

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of Determining the Proper  
Carrier Classification of and Complaint  
for Penalties Against:

NORTHWEST JUNK HAULERS LLC

DOCKET TG-240599

DECLARATION OF  
STEVIN PETERS

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Stevin Peters, under penalty of perjury under the laws of the state of Washington, declares as follows:

1. I am employed by the Washington Utilities and Transportation Commission (Commission) as an investigator in the Solid Waste Enforcement program within the Transportation Safety Division. As an investigator, my responsibilities include conducting investigations regarding the business practices of regulated transportation companies. As part of those duties, I investigate transportation companies that may be operating without the required Commission-issued certificate.
2. On January 18, 2023, staff received a complaint from Brock Gudgeon, of Brock's Junk Removal, LLC.<sup>1</sup> The complainant submitted advertisements that Northwest Junk Haulers LLC (referred to as Northwest Junk or Company) offered services that require a solid waste certificate or a common carrier permit.
3. On January 18, 2023, Staff researched the Company's licensing. Staff discovered the Company was registered with the Washington Department of Revenue and has a unified business number of 604-995-275.<sup>2</sup> Staff reviewed Commission records to determine if Northwest Junk had authority to operate as a solid waste carrier in the state of Washington. Staff learned that the Commission has no record of the Company.
4. On January 18, 2023, Staff researched Company advertising on Facebook and discovered an advertisement for a dumpster bag.<sup>3</sup>
5. On January 18, 2023, Staff researched Company advertising on their website and discovered another advertisement for a dumpster bag.<sup>4</sup>

<sup>1</sup> See Attachment A for initial complaint.

<sup>2</sup> See Attachment B for copy of Department of Revenue record.

<sup>3</sup> See Attachment C for copy of Facebook advertisement.

<sup>4</sup> See Attachment D for copy of Company website advertisement.

6. On January 25, 2023, Staff sent a letter to Northwest Junk at 9023 Merchant Way, Everett, WA, 98208, stating that staff believed the business was in violation of Commission rules by operating as a solid waste carrier without the required certificate.<sup>5</sup> The letter outlined allowable activities for a company operating without a certificate.
7. On December 7, 2023, Staff spoke with Justin Larreau, owner, via telephone. The Company stated they did not receive the compliance letter sent January 25, 2023. Staff explained the rules regarding solid waste. The Company stated they were willing to remove the advertisement for the dumpster bags and apply for a common carrier permit. Staff told Company they would send via email.
8. Staff emailed the initial compliance letter to [northwestjunkhaulers@gmail.com](mailto:northwestjunkhaulers@gmail.com), as the Company stated they did not receive it.<sup>6</sup> The email included a link to apply for a common carrier permit.
9. On January 9, 2024, using a fictitious name, Staff messaged the Company via Facebook Messenger. The message requested a quote for the Company to perform curbside garbage collection at a residential location. The message also included a picture of garbage bags on the curb of a residential house. The Company responded via Messenger with a price for the service and offering to collect as soon as that afternoon.<sup>7</sup>
10. On January 9, 2024, staff researched the Company website and found they continued to advertise dumpster bag service.<sup>8</sup>
11. On August 13, 2024, using a fictitious name, I used the company's online website to request their dumpster bag pick up service to an address within their service area. The request was approved, and a pickup was scheduled for August 23, 2024.<sup>9</sup>
12. On August 13, 2024, I researched advertisements on social media. I found advertisements offering garbage removal services on Yelp.<sup>10</sup>

DATED October 8, 2024, at Lacey, Washington.

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Stevin Peters

<sup>5</sup> See Attachment E for a copy of the compliance letter dated January 25, 2023.

<sup>6</sup> See Attachment F for a copy of the follow up email sent December 7, 2023.

<sup>7</sup> See Attachment G for a copy of the offer of service for garbage collection from the Company.

<sup>8</sup> See Attachment H for a copy of the continued advertisement of dumpster bag service.

<sup>9</sup> See Attachment I for a copy of the offer of service for dumpster bag pick up service.

<sup>10</sup> See Attachment J for a copy of the Company advertisements on Yelp.

## Attachment A

### McPherson, Kathryn (UTC)

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**From:** McPherson, Kathryn (UTC)  
**Sent:** Wednesday, January 18, 2023 3:44 PM  
**To:** Brock Gudgeon  
**Subject:** Ad review

Dear Mr. Gudgeon,

Thank you for your submission to the Washington Utilities and Transportation Commission (UTC). Your complaint indicates that Northwest Junk Haulers LLC may be in regulatory non-compliance. The UTC appreciates you notifying us about your concerns regarding the operations of this company.

This information may be used for enforcement purposes. You may be contacted to provide additional information and documentation or if the UTC decides to initiate enforcement action against the company.

If your allegations are found to be valid, we will investigate and inform you of our findings and actions taken. Your time reporting is appreciated. Thank you.

Sincerely,

Kathryn McPherson  
Investigator, Solid Waste Enforcement  
(360) 522-6121

This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

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**From:** Brock Gudgeon <brocksjunkremoval@gmail.com>  
**Sent:** Saturday, January 14, 2023 11:05 AM  
**To:** McPherson, Kathryn (UTC) <kathryn.mcpherson@utc.wa.gov>  
**Subject:** Re: Ad review

External Email



## Brock's Junk Removal, LLC

425-772-6260

Mukilteo, WA & Lake Stevens, WA

Licensed-Bonded-Insured

I'm on Angie's list, Home Advisor, Yelp, Facebook & [Brocksjunkremoval.com](http://Brocksjunkremoval.com)

Compliance Depot - Vendor ID 850567

RMIS - Vendor ID 1256491

NetVendor ID (NVID): 58734

Contractors License Number - BROCKJR842RZ

## Attachment B

1/18/23, 3:05 PM

Washington State Department of Revenue



Washington State Department of Revenue



### < Business Lookup

#### License Information:

[New search](#) [Back to results](#)

**Entity name:** NORTHWEST JUNK HAULERS LLC

**Business  
name:**

**Entity type:** [Limited Liability Company](#)

**UBI #:** 604-995-275

**Business ID:**

**Location ID:**

**Location:** None

**Excise tax and reseller permit status:** [Click here](#)

**Secretary of State status:** [Click here](#)

#### Governing People May include governing people not registered with Secretary of State

| Governing people | Title |
|------------------|-------|
| LARREAU, JUSTIN  |       |

The Business Lookup information is updated nightly. Search date and time: 1/18/2023 3:05:11 PM

## Attachment C

1/18/23, 3:07 PM

(3) Facebook



This photo is from a post.

View post



**Northwest Junk Haulers**

December 15, 2022 · 🌐

...

Like

Comment

Share



Write a comment...



## Attachment D

1/18/23, 3:05 PM

Dumpster bags – Snohomish County Junk Removal



# SNOHOMISH COUNTY DUMPSTER BAGS



ORDER NOW

SCHEDULE PICKUP

## ALL-INCLUSIVE PRICING INCLUDES DUMPSTER BAG & DISPOSAL

When a full size dumpster rental or a roll-off dumpster is just too much for your project or your residential HOA – Dumpster Bags are an excellent alternative that offers affordability and convenience that's backed by top rated local junk haulers. We are locally owned, family operated and ready to be of service!



Step 1: Buy-A-Bag for just \$249 one-time and we will hand deliver or express mail you a DumpsterBagz today. Same-Day or Next Day delivery available for all locations in Snohomish county



Step 2: Fill up your DumpsterBagz with any non-hazardous materials which can include household junk, construction debris, commercial junk and lots more! \*No heavy materials such as dirt, rock, concrete, etc.



Step 3: When your DumpsterBagz full just schedule a pick up online and we will come pick up the Bagz within 24-48 hours. Your one-time purchase of just \$249 includes pick up and disposal up to 2000 pounds!

**INCLUDES BAG • PICKUP • DISPOSAL**



**ORDER NOW**

**DUMPSTERBAGZ**

\*Price includes pick up with direct access for loading. Ensure the full Dumpster Bag is curbside, in the driveway or just inside your garage so we can pull up to it with our truck or trailer. We have to charge additional fees to remove a full Bag without direct access for loading.

\*75 DOLLAR ADDITIONAL TONNAGE SURCHARGE

\*3500 POUND MAX CAPACITY

\*NO HEAVY MATERIALS SUCH AS ROCK, DIRT CONCRETE ETC.

## FREQUENTLY ASKED QUESTIONS

HOW MUCH DO DUMPSTER BAGS HOLD?

-Dumpster bags hold a total of 81 cubic feet, or three cubic yards and its dimensions are 96"x48"x30"

WHAT DO I DO WHEN MY BAG IS FULL?

-EASY! Just give us a call or use one of our book/schedule buttons to book an appointment at your convenience

### SHOULD I RENT A ROLL OFF DUMPSTER?

-If your jobsite has a large amount of heavy debris then yes, you need a full size dumpster for cleaning up all that demolition debris, but if you're just doing some spring cleaning and need to get rid of a couple pickup truck loads of junk, that's when you need a dumpster bag!

### HOW LONG DO I HAVE TO LOAD UP THE BAG?

-Take as long as you need! there is no rental period, it can be a day, week or a year that's up to you, just let us know when you want it gone

### ARE THERE ANY ITEMS THAT CANNOT BE PUT IN THE DUMPSTER BAGS?

- Yes just like any dumpster, you can't put hazardous materials in bags. This includes oils, chemicals and paint.

**SEND MESSAGE**

NORTHWEST JUNK HAULERS (425) 535-0247

SNOHOMISH COUNTY JUNK REMOVAL

## Attachment E



STATE OF WASHINGTON

### UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

January 25, 2023

Justin Larreau  
Northwest Junk Haulers LLC  
9023 Merchant Way  
Everette, WA 98208

Re: Non-Permitted Solid Waste Transportation

Dear Justin Larreau:

The Washington Utilities and Transportation Commission believes Northwest Junk Haulers LLC (Northwest or Company) is engaged in solid waste transportation services without a required certificate from the Commission. It is illegal to operate or advertise as a solid waste collection Company in Washington without the required solid waste certificate from the Commission. You can receive a penalty of \$1,000 for each violation of this law.

This letter is to help you understand solid waste transportation requirements and what actions you need to take to avoid these penalties.

#### **What you need to do**

To avoid enforcement action by the Commission, your Company must:

- Immediately remove any advertisement offering to collect solid waste;
- Stop providing solid waste collection services; and
- Submit a complete solid waste application (enclosed) or **by February 8, 2023**, respond in writing explaining your Company's operations and why they do not require operating authority from the Commission.

#### **Solid waste collection regulations**

Solid waste collection includes residential and commercial garbage, residential recycling, yard and drop box service.

Respect. Professionalism. Integrity. Accountability.

Justin Larreau  
January 25, 2023  
Page 2

By law, advertising as a solid waste collection Company is considered evidence of operating as a solid waste collection Company as noted in Revised Code of Washington (RCW) 81.04.380). So, even if you are not operating, your Company is still required to remove all advertisements.

**Compliance investigation**

Staff received information that Northwest is advertising for solid waste services online via social media and on the Company webpage. Staff reviewed attached advertisements. Northwest has advertising for solid waste services that include the rental of garbage drop bags for sale and disposal, requiring a solid waste certificate or a common carrier permit. Advertisements discovered are included in this letter.

**Solid Waste Certificate application**

To provide solid waste collection services, including advertising, your Company must first submit a solid waste application. Your Company cannot operate until the Commission grants a solid waste certificate.

All applications are subject to public protest and your application must demonstrate that the current solid waste collection Company in your proposed service area is not providing the service your Company will offer. The Commission only grants new certificates if the current Company is unfit, unwilling, or unable to provide the service.

**Common Carrier permit application**

A certificate of convenience is not required for companies transporting waste derived from residential or commercial projects considered private carriage. Junk removal, where the company's employees load and transport the waste using company-owned equipment is considered incidental to the job performed.

A company transporting property, including general commodities, does require a common carrier permit per Revised Code of Washington (RCW) 81.80.070. Your company may need to apply for a common carrier permit with the commission. Information on how to apply for and obtain a common carrier permit is included in this letter.

Send your response to [kathryn.mcpherson@utc.wa.gov](mailto:kathryn.mcpherson@utc.wa.gov) or mail P.O. Box 47250, Olympia, WA 98504. Please call investigator, Kathy McPherson at (360) 522-6121, if you have any questions.

Sincerely,



Digitally signed by  
Perkinson, Mathew (UTC)  
Date: 2023.01.19  
07:47:30 -08'00'

**MATHEW PERKINSON**  
Assistant Director, Transportation Safety

Enclosures



## Attachment F

### McPherson, Kathryn (UTC)

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**From:** McPherson, Kathryn (UTC)  
**Sent:** Thursday, December 7, 2023 2:28 PM  
**To:** northwestjunkhaulers@gmail.com  
**Subject:** Compliance investigation documents  
**Attachments:** Solid Waste Application New.pdf; SW and CC RCWs.pdf; Common Carrier Application - Fillable.pdf; Motor carrier overview - Transportation and Insurance requirements.pdf; NonCompSWLet Northwest Junk Haulers LLC 01 25 2023.pdf

**Importance:** High

Thank you for speaking with me again. I apologize for the delay in following up with your company regarding this information. Please find attached the documents sent to you January 25, 2023. My goal is to provide you with education on the rules for solid waste certificates and common carrier permits. Please complete a common carrier permit to ensure compliance with Washington state laws. I will follow up with you in a couple of weeks to ensure you have completed the common carrier permit. It also may be found at [common carrier permit](#).

Please call or email if you have any questions regarding the information provide. If you have questions regarding the common carrier permit, licensing staff can assist you at 360-664-1222 or [transportation@utc.wa.gov](mailto:transportation@utc.wa.gov).

Thank you,

**Kathryn McPherson**  
Investigator, Solid Waste Enforcement  
Transportation Safety Division  
(360) 522-6121  
[Kathryn.Mcpherson@utc.wa.gov](mailto:Kathryn.Mcpherson@utc.wa.gov)  
[www.utc.wa.gov](http://www.utc.wa.gov)










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## Attachment G

1/9/24, 1:50 PM


(20+) Messenger | Facebook











Search





Northwest Junk Haulers








Inbox


























Northwest Junk Haulers

Waste Management Company

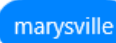
1:38 PM

Can you pick up my xmas clean up? I have about a half a trailer size of boxes, garbage and a tree that need to be taken to the dump. I got em all on my driveway for pick up?


And how much would that cost

Hi Kelley! Thanks for reaching out. What city are you in?

Could you send a picture of the pile?







and a 6 footish tree





Perfect. Should be 280 for all of this. We could actually swing by as soon as this afternoon if you'd like?

okay... i have another person offering a bid... can i get back to you?



Aa



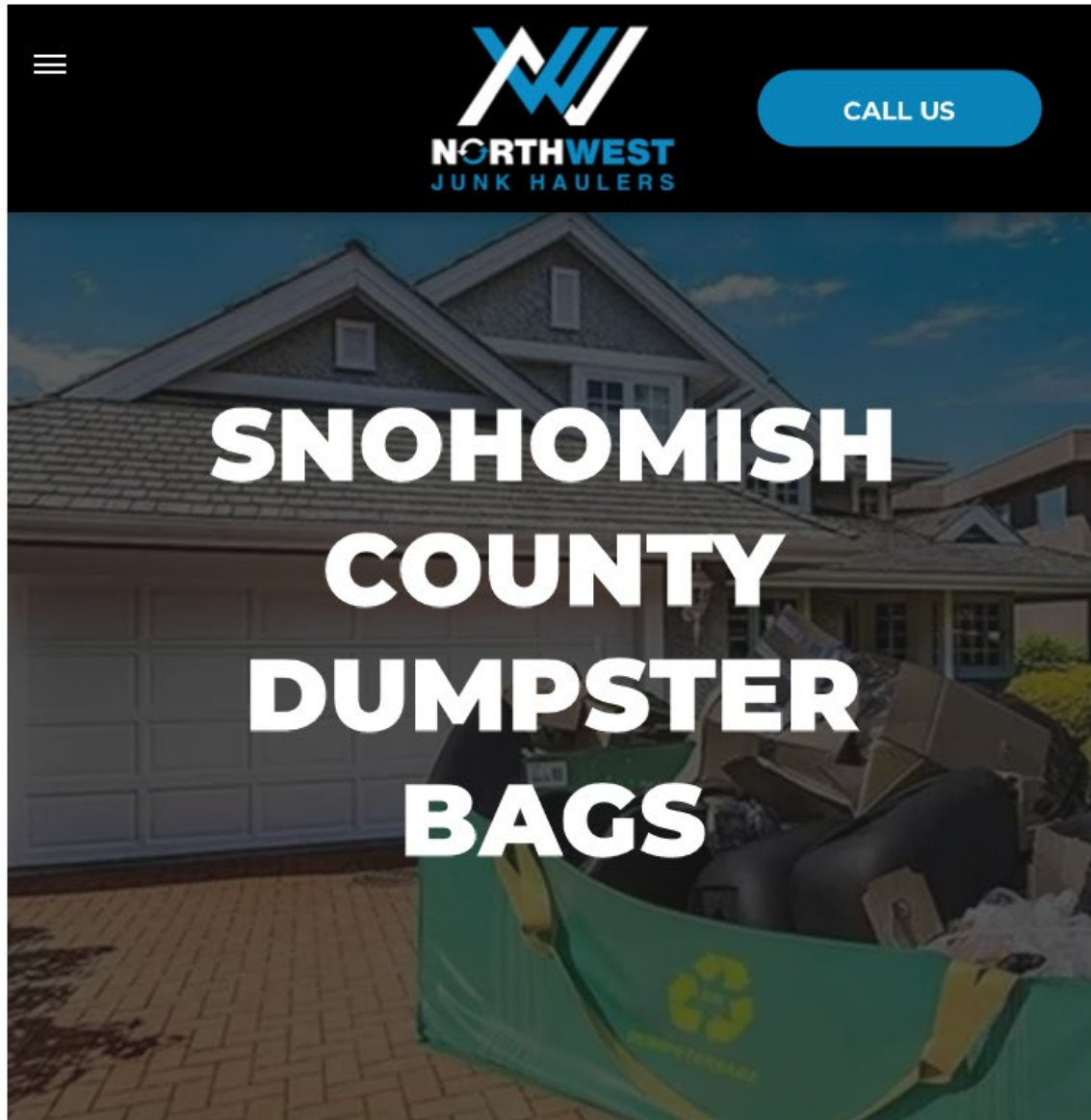
https://www.facebook.com/messages/t/101633499476570

1/1

## Attachment H

1/9/24, 1:34 PM

Reliable Dumpster Bag Services in In Snohomish, WA | Northwest Junk



**ALL-INCLUSIVE PRICING  
INCLUDES DUMPSTER BAG &  
DISPOSAL**





### STEP 1:

Buy-A-Bag for just **\$249** one-time and we will hand deliver or express mail you a DumpsterBagz.

**Same-Day or Next Day delivery available** for all locations in Snohomish county



### STEP 2:

Fill up your DumpsterBagz with any non-hazardous materials which can include household junk, construction debris, commercial junk and lots more! \*No heavy materials such as dirt, rock, concrete, etc.



### STEP 3:

When your DumpsterBagz get full, just schedule a pick up online and we will come to pick up the Bagz within **24-48** hours. Your one-time purchase of just **\$249** includes pick up and disposal up to 2000 pounds!

[Order Now](#)

[Schedule A Pickup](#)

*\*Price includes pick up with direct access for loading. Ensure the full Dumpster Bag is curbside, in the driveway or just inside your garage so we can pull up to it with our truck or trailer. We have to charge additional fees to remove a full Bag without direct access for loading.*



## DUMPSTER BAGS FAQs

**HOW MUCH DO DUMPSTER BAGS HOLD?**



**WHAT DO I DO WHEN MY BAG IS FULL?**



**SHOULD I RENT A ROLL OFF DUMPSTER?**





**HOW LONG DO I HAVE TO LOAD UP THE BAG?**



**ARE THERE ANY ITEMS THAT CANNOT BE PUT IN THE DUMPSTER BAGS?**





CALL US

## CONTACT US TODAY!

Full Name:


Email

Phone:






Message:

Let's Get Started





**NORTHWEST**  
JUNK HAULERS





### GET IN TOUCH

(425) 535-0247  
[northwestjunkhaulers@gmail.com](mailto:northwestjunkhaulers@gmail.com)  
[www.northwestjunkhaulers.com](http://www.northwestjunkhaulers.com)

[Book An Appointment](#)

### BUSINESS HOURS

Mon - Sun      7:00 am - 7:00 pm



## Attachment I

8/13/24, 10:54 AM

Gmail - Northwest Junk Haulers has accepted your appointment



Jason Bishop <jason.thebishop@gmail.com>

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### Northwest Junk Haulers has accepted your appointment

1 message

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**Northwest Junk Haulers** <noreply@messaging.squareup.com>  
Reply-To: Justin Larreau <northwestjunkhaulers@gmail.com>  
To: Jason Bishop <jason.thebishop@gmail.com>

Tue, Aug 13, 2024 at 10:50 AM



## Your appointment has been accepted.

**Friday, August 23, 2024**

**1:00 PM - 1:30 PM PDT**

Dumpster bag pickup

Your Location

314 N. Kelsey Street

Monroe, WA 98272

[View details](#)

[Reschedule or cancel](#)

[Our Cancellation Policy](#)

8/13/24, 10:54 AM

Gmail - Northwest Junk Haulers has accepted your appointment

# Square Go


Download our iOS app to manage, reschedule, and cancel hassle-free



**Northwest Junk Haulers**  
(425) 535-0247



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 **appointment.ics**  
1K

Attachment J

# Northwest Junk Haulers

Claimed • Junk Removal & Hauling

Open Open 24 hours See hours

Write a review

Add photo

Share

Save

Photos & videos

See all 4 photos →



Services Offered Verified by Business

- Appliance Removal
- Electronic Waste Removal
- Garbage Removal
- Mattress Removal
- Post Construction Cleaning
- Storm Debris Removal
- Commercial Services
- Furniture Removal
- Cleanouts
- Hot tub pickup and removal
- Residential Services
- Yard Debris Removal

Get pricing

Response time  
50 minutes

Response rate  
100%

Get pricing

2 locals recently requested a quote

northwestjunkhaulers.com

(425) 535-0247

Get Directions  
9023 Merchant Way Everett, WA 98208

Suggest an edit