BEFORE THE WASHINGTON UTILITIES

AND TRANSPORTATION COMMISSION

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| In the Matter of the Petition of  STERICYCLE OF WASHINGTON, INC.,  For an Order Suspending Tariff Filing and Initiating an Adjudicatory Proceeding concerning the Abandonment of Authority Under G-237 and Proposed Biomedical Waste Collection and Transportation Services of Waste Management of Washington, Inc., dba WM Healthcare Solutions (G-237) |  | Docket No. TG-110553  DECLARATION OF Jeff Norton IN SUPPORT OF waste management of washington, inc.’s opposition to stericycle’s motion for summary determination |

I, Jeff Norton, declare as follows:

1. I am an Account Development Manager for Waste Management of Washington, Inc. and I make declaration on personal knowledge.
2. My role at Waste Management is to develop solutions for Healthcare Facilities and the different waste they generate. I work with facilities to help maintain compliance and safe handling procedures for their wastes while increasing their sustainability and reducing their environmental impact. Biomedical Waste is one of the waste streams that I work with the most because of my knowledge and background with this particular waste stream and because of the complexities around this waste stream. Over the past 10 months, I have also been working with our operations team to set up a biomedical waste program that is in line with the generators expectations.
3. In the twelve-month period prior to Stericycle’s Complaint, Waste Management has been holding itself out to provide biomedical waste collection services. I myself, as well as other Waste Management employees, have been soliciting customers and negotiating contracts.
4. To prepare for collecting biomedical waste, Waste Management addressed the operational prerequisite of having processing capacity first. In June, 2010, the company pursued and ultimately obtained approval from the jurisdictional health department to treat biomedical waste at the Seattle autoclave facility.
5. Waste Management made arrangements with the Covanta Waste to Entergy incinerator in Brooks, Oregon, to process residual chemotherapy waste and pathological waste that are not allowed to be autoclaved, and that are segregated by customers in specially marked containers. In late 2010, Waste Management set up a partnership with a major medical device company to reuse plastics derived from recycling plastics from sharps containers and medical devices generated at medical facilities.
6. For processing, Waste Management also has two directly owned backup facilities for autoclaving the medical waste - Vernon, California and Reno, Nevada. The company also owns an incinerator in Texas as a backup for waste that is not permitted to be autoclaved.
7. As part of the permitting for Waste Management’s new Seattle facility, the company prepared an Operations Plan that was the subject of review and comment by both the King County Health Department and the Department of Ecology. Attached is a true and correct copy of the Operations Plan at Exhibit 1. The Operations Plan comports with the regulations administered by the WUTC as well.
8. In March 2010, Waste Management obtained licenses for the collection vehicles from the King County Department of Public Health.
9. In terms of collection, Waste Management has for some time been collecting medical waste from cruise ships that dock in Seattle, along with other international waste that must be treated. It also has been operating a sharps recycling program which encompasses a fully recycled option for medical sharps and the sharps containers. The process is a combination of treating the medical waste, grinding, reclaiming the plastics and metals, supplying the metals to a metal recycler and the plastic is pelletized and goes directly to a manufacturer to be made back into sharps containers. The program currently reclaims about 70-80% . This program is available as a part of an overall recycling program designed for healthcare facilities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 26th day of May, 2011, at \_\_\_\_\_\_\_\_\_\_\_\_, California.

Jeff Norton

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method as indicated below, pursuant to WAC 480-07-150.

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| Steven B. Johnson  Donald B. Scaramastra  Garvey Schubert Barer  1191 Second Ave., Suite 1800  Seattle, WA 98101  (206) 464-3939  sjohnson@gsblaw.com | 🞎 Via Legal Messenger  🞎 Via Facsimile  🗹 Via U.S. Mail  🗹 Via Email |
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DATED at Seattle, Washington, this 26th day of May, 2011.

Kathy Moll