

Swanson Bark & Wood Products  
240 Tennant Way  
Longview, WA 98632

## Solid Waste Definitions Rulemaking, WAC 480-70

Docket Number: TG-080591  
Commenting Party: John Leber  
Date: March 31, 2009

1. ***Solid waste collection requires certificate.*** Swanson Bark & Wood Products has been in the business of collecting wood waste since 1928, which is defined as solid waste once it lands on our property. We have never had a certificate, nor should we be required to have a certificate. Either you would need to give Swanson and other similar type recyclers certificates, or change the wording.

Your proposal has two words that would seem to eliminate the problem. You say “for disposal” in 1)a)i, but in 1)a)ii you say “source separated.” In the case of a deconstruction project, it’s already source-separated, we’re already taking the material, we are transporting it, we do use a motor vehicle, we are over the highways of the state of Washington, and we do need to get paid. So – you’re taking a company that’s been in business since 1928, has 100 employees, and effectively putting us out of business. I don’t think that’s the intent of the legislature.

2. ***Private carriage of solid waste collection or solid waste collection under a local government contract does not require a solid waste collection certificate.*** We have no contracts with cities, towns or counties. We are a function of the free enterprise system.
3. ***Commercial recycling collection requires a motor carrier permit.*** Regarding 3)b), we are a motor carrier, we have collected and transported recyclable materials, primarily wood products and wood residuals which is classed a solid waste once it lands on our property, same as above. In 3)b), it says we can’t do that. Again, I don’t think that is the Legislature’s intent.

Regarding 3)e), we own and are responsible for virtually everything that we transport. Given that, does this still mean we have to register as a transporter? Is this a change? I thought we were exempt.

4. ***Uses that are not “for disposal.”*** Regarding 4)a), are you saying we need to look at every county’s local comprehensive solid waste plan? We have drop boxes scattered from just south of the Canadian border into a good part of Western Oregon. Is it your intent that we must check with every affected county? If so, that should be changed.

Regarding 4)f), we clearly understand the issues and see both sides of the argument and have no opinion, except to note we are able to recycle virtually any wood-based material that we find in some type of a burnable or soil situation.

5. **Uses that are “for disposal.”** I suggest rewording 5)b) because there are definition problems around “*incineration*,” “*disposal facility*,” and “*energy*.” If you mean wood gets burned to generate steam and that’s producing energy, then we’re good with that. If you define *energy* as creating electricity, then we have a serious problem. The *incineration* word is also an issue in that if we mean *burn*, that’s one thing, but if we mean *to destroy*, that’s something separate.
  
6. **Transporting recyclable materials to a sorting facility.** I would appreciate it if members of the commission would either visit our facility in Longview or similar facilities I know of in Seattle and Tacoma to see what we wind up with as residuals. For instance, regarding 6)a), if we wind up with mixed steel and aluminum (the solids out of our wood products), this is saying we can’t haul it over to Waste Control ourselves. We would have to hire Waste Control, the local G-Hauler, to do it for us even though they want the recyclables. It also says that the things that are totally trash cannot be hauled to the landfill by us, even though we hauled it onto our property. Is that really what you mean to do? Our relationship with Waste Control is good enough that we trade trucks and trade boxes occasionally, and you’re going to make enemies out of us.

In 6)b) you’ve got the word “solid waste” back in there again. Since we hold ourselves out as a transporter of recyclables and reusable materials (wood), which also is a solid waste once it touches our property, you’ve got mixed messages here.

I apologize if my attitude shows when I read this type of stuff, but if you would come and look at our facility, or if you like I would come and work with you to try to eliminate contrary meanings, I think it will keep all of us from getting mad at one another at some later date. I appreciate your help.

Sincerely,

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