

Annotation of 1992 Draft Plan Comments

The following is an annotation of all comments received on the Draft 1992 King County Comprehensive Solid Waste Management Plan, issued in August of 1992. The annotation summarizes the comments received, identifies the concerned party, and references the action taken within this Plan to address the comment.

Key to Codes for Concerned Parties

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| Cities | Industry | Regulatory Agencies |
| C1 Bellevue | I1 UNOCAL | RA-1 Seattle-King County Health Department |
| C2 Lake Forest Park | I2 Texaco | RA-2 Washington Utilities and Transportation Commission |
| C3 Bothell | I3 Shell | RA-3 State Department of Ecology |
| C4 Redmond | I4 Remtech | |
| C5 Tukwila | I5 Exxon | Citizens |
| C6 Mercer Island | I6 Aippersbach and Ryan | CIT-V Vashon Island Citizens |
| C7 Federal Way | | CIT-CH Cedar Hills Area Citizens |
| C8 Auburn | Advocates | CIT-SE Southeast King County Citizens |
| C9 Seattle | A1 Washington Citizens for Recycling | CIT-NE NE Lake Washington Citizens |
| | A2 West Seattle Recycling | CIT-MS Mid-Snoqualmie Citizens |

For parties' suggested revisions, *added text is indicated by bold italic*, ~~deleted text by strikeout~~.

| Comment | Concerned Parties | Reference in Plan |
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| Chapter I | | |
| Be more explicit in identifying Cedar Hills as a resource. | SWAC | Change made; see I.A.1 |
| Implementation timelines should be updated. | C7, C9, RA-1 | Updates made; See Executive Summary Table 4, Figure I.2, Tables III.3, III.4, III.17 and III.18, IV.16, IV.17, IV.21, IV.23 and IV.24. |
| Provide discussion on the plan amendment process. | C8 | See I.E.3. |

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION | Annotation of Draft Plan Comments |
| No. TG-940411 | 9v |

| Comment | Concerned Parties | Reference in Plan |
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| Include in plan development section, a discussion of penalties for non-compliance with the 1989 CSWMP, according to terms of interlocal agreements. | SWAC | No change; not within the scope of the plan. |
| The description of RCW 36.58 should read: " County authority to regulate solid waste collection districts ." | RA-2 | Revision made; see Table I.2. |
| Add the following statutes to Table I.2: RCW 36.58 Solid Waste Disposal WAC 480-12 Motor Carriers WAC 480-70 Solid Waste Collection Companies | RA-2 | Additions made; see Table I.2. |
| Revise: "WUTC authority does not necessarily extend to city collection utilities or contracts." | RA-2 | Revision made; see I.C.1.a. |
| Revise: "King County cannot provide solid waste collection unless a solid waste collection district is formed (RCW 36.58A.010) and the Washington Utilities and Transportation Commission determines that no certified hauler is available to perform collection services . However, RCW 36.58.04000(1) gives counties the authority to contract directly for residential recyclable collection or to allow private solid waste haulers franchised certificated by the WUTC to collect recyclables. The County has chosen to have commercial-certificated haulers set up recyclable collection programs in unincorporated areas." | RA-2 | Revision made; see I.C.1.b. |
| Add that projected tonnage figures for materials do not include Seattle. | C9 | Addition made, see I.B.1.a. |
| Prior to final approval of the plan the County needs to conclude interlocal agreements with Woodinville and Burien. | RA-3 | Interlocal agreements concluded. See Table I.1. |
| Is energy resource recovery being considered as a means of refuse disposal? | CIT-MS | See I.D.2.a. |
| Chapter II | | |
| Discuss draft legislation being considered which would impose fines on recyclers who are not in compliance with DOE survey requirements. | C9 | No change made; not within the scope of the plan. |
| Add the population density of each area serviced by a city or franchised operation. Required per RCW 70.95.090 (5)(c). | RA-3 | Change made; see Figure II.6. |
| Need additional discussion of the relationship of tonnage projections and the 1992 decline in tonnage. | SWAC | Addition made; see II.B.1.e. |
| Explain how waste reduction and recycling are measured and address errors in the forecast methodology and the generation forecast. | C9 | Discussion added; see II.B.1.d. |
| Differentiate waste reduced from waste recycled in Table II.1 | RA-3 | See II.B.1.d. |
| Revise Table II.1 to make figures consistent from year to year. | RA-3 | Change made; see Table II.1. |
| Data is missing in the "2010" column of Table II.3 for rows labeled "rural landfills" and "Cedar Hills." | RA-2 | Revision made; see Table II.3. |

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| Are there any PSAPCA regulations regarding air emissions which apply to the siting of transfer stations? | C9 | Not specifically. PSAPCA regulations require that the County be cognizant of odor and dust from the operation of transfer stations and landfills. |
| Add to transfer station siting constraints, fragile or sensitive slope areas. | C9 | Addition made; see II.C.3.f. |
| How do you notify the public that the County is in the process of siting a new facility? | CIT-SE | See II.C.5. |
| Why is waste generation per person increasing? | CIT-V, CH | See II.B.1.e. |
| What are the reasons for the recent decline in disposal tonnage? | CIT-SE | See II.B.1.e. |
| Chapter III | | |
| Implementation plans in the WR/R and facilities sections are too vague. Add a waste reduction goal and a discussion of what the County and cities can do to affect waste generation. | SWAC | Clarification made; see III.A.1.a and A.3.b.(5). |
| Add to the waste reduction analysis and strategy section per capita waste generation goals and a program/methods for monitoring waste generation rates. | SWAC | Clarification made; see III.A.1.a, A.2.e, and A.3.b.(7). |
| The County should continue to accept all materials at transfer stations which the cities are required to collect including yard waste, bulky yard waste, appliances and textiles. | C1 | Clarification made; see III.B.3.b.(3) and IV.B.2.a. |
| Expand 1989 plan summary to include the County's and cities' compliance with the 1989 plan recommendations. | SWAC | See Table III.5. |
| Define "on-call" collection with regard to bulky yard waste and white goods. | C4 | Program change made; see III.B.3.b.(1) and (5). |
| The County needs to devote greater study and analysis to the yard waste ban. If a ban is enacted the County needs to provide new collection sites for yard waste and indicate this commitment in the plan. | C1, C4, C8 | Program change made; see III.B.3.b.(4). |
| Assess the industry's ability to manage an increase in supply before implementing a full or partial ban on yard waste. | RA-3 | Program change made; see III.B.3.b.(4). |
| Reword requirements for urban yard waste collection to allow for greater flexibility in service options. | C7 | Clarification made; see III.B.3.b.(4). |
| Is the county planning to document the need for public sector provision of multifamily yard waste collection? Clarify whether collection would be required for multifamily or if the requirement is for the establishment of collection sites at each complex. Collection should not be mandatory. | C1, C3, C4, C6, C7 | Clarification made; see III.B.3.b.(1). |
| The plan should allow cities to meet the need for bulky yard waste collection in ways other than on-call collection. | C1, C2, C4, C6, C7, C8 | Program change made; see III.B.3.b.(1). |

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| Clarify whether the 21 percent of urban single-family households which do not currently receive recycling service reside in incorporated or unincorporated areas. | RA-2 | Clarification made; see III.B.3.a.(1). |
| Does the County intend to define a minimum number of months for the provision of yard waste collection services? | RA-3 | Not at this time. Collection service standards will be developed by the County and cities during implementation. See III.B.3.b.(4). |
| Clarify the recommended frequency of textiles collection from households. Is it the County's intent to distribute the costs of textiles collection across the entire residential customer base? | C1, RA-2 | Program change made; see III.B.3.b.(1). |
| The cities should not duplicate textiles collection services which are already available through the private sector. Textiles should not be added to the list of secondary recyclables. | C1, C2, C3, C4, C6, C7, C8 | Program change made; see III.B.3.b.(1). |
| Acknowledge the modest return of collecting textiles, polycoated materials and other items which constitute a small percentage of the waste stream. | C5, C8, RA-2 | Program change made; see III.B.3.b.(1). |
| Has the County considered less expensive means of diverting textiles? | RA-3 | Program change made; see III.B.3.b.(1). |
| Cities and haulers should not be responsible for on-call collection of white goods. | C2, C4, C8 | Program change made; see III.B.3.b.(1). |
| The County should support the local collection of white goods by re-instituting the collection option at transfer stations. | C1, C4, C5 | Program change made; see III.B.3.b.(1). |
| County coordination of white goods recycling should supplement, not replace, other appliance recycling efforts. The issue of CFCs should be addressed more thoroughly. | C7 | Program change made; see III.B.3.b.(1). |
| The plan needs to place greater emphasis on waste reduction and provide more opportunity for optional programs, flexibility, and innovation in this area. | C1, C5, C6, C7, C8 | Emphasis expanded; see III.A.3.b and III.B.3.b.(1). |
| The plan should include a more aggressive role for the County in seeking legislation which supports waste reduction and recycling. | C1, C5, C6, C7 | Emphasis expanded. See III.B.3.b.(2) and (4), and III.A.3.b.(5) and (6). |
| Add a discussion of the County's position on the "ban on bans." | C9, A1 | See III.A.2.d and III.A.3.b.(6). |
| Address need for more interaction with manufacturers on packaging issues. | C2, C7, SWAC | See III.A.2.d and III.A.3.b.(6). |
| Cities and counties should be required to use differential rate incentives and to educate customers about collection services and rate incentives. Discuss which cities already have rate incentives and the education methods in use. | SWAC | Detail added; see III.B.1.c.(2). |
| Add to the existing conditions section of the waste reduction chapter a discussion of the effectiveness of collection rate incentives (mini-cans, universal recycling fees, substantial can rate differentials). | SWAC | No change made; not within the scope of the plan. See III.B.1.c.(2). |

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| Identify the city which has yet to implement a variable rate structure and describe their plans. | RA-3 | See III.B.1.c.(2). |
| State law does not grant the counties authority to require differential rate incentives nor change rate structure. All recommendations which seek to implement programs which fall, by statute, within the WUTC jurisdiction should be reconsidered. | RA-2 | Clarification made; see III.B.1.a.(5), III.B.1.c.(2), III.B.2.b.(2), III.B.2.f, and III.B.3.b.(2). |
| Revise: <i>'The County and cities would all implement and maintain a variable rate structure for solid waste collection, with cost differentials that offer substantial incentives to reduce waste. The County can work with the Washington Utilities and Transportation Commission to implement rates that make waste reduction and recycling more attractive waste management alternatives.'</i> | RA-2 | Revision made; see III.A.3.b. |
| Add to the existing conditions section of the waste reduction chapter greater description of the baby diaper project, the food waste composting study, the 'dollars for data' program and other projects. Include current funding levels, benefits of the programs, and an evaluation of the effectiveness of the programs. | SWAC | Some detail added. Not all information is within the scope of the plan. See III.A.1.a, III.A.2.e, and III.A.3.(7). |
| Consolidate information provided on Table III.6 onto one page. | SWAC | No change made. Not technically feasible. |
| Clarify the units of measurement used in Table III.8 with regard to batteries and tires. | SWAC | No change made. See footnotes to III.B.1, Table III.8. |
| Reference Table III.13 in the waste reduction chapter. | SWAC | Change made; see III.A.1.a. |
| Does the County plan to monitor the effect of waste reduction efforts? | RA-3 | Yes. See III.A.1.a, III.A.2.e, and III.A.3.b.(7). |
| Reconsider the requirement that all secondary materials be accepted at special collection events funded by the County. | C1, C2, C3, C6, C7 | Change made; see III.B.3.b.(7). |
| It is not clear whether household collection of #3-7 plastics would be required or optional. | C1 | Clarification made; see III.B.3.b.(7). |
| Clarify the "voluntary" component of recycling collection programs. | RA-2 | Clarification made; see III.B.3.b.(1). |
| Create a provision for the periodic review of recyclables markets. Develop a mechanism for changing the recyclables lists, based on market viability for the materials. Collection of a material should not be required until markets are in place. | C2, C7, 17, SWAC | See III.B.3.b.(1). |
| Should King County work to promote higher value markets in coordination with the Clean Washington Center and/or Tetrapak? Should the County avoid collection of these materials unless the market covers additional costs? | C9 | No change made; not within the scope of the plan. |
| Expand the existing conditions section of the recycling chapter to include a discussion of green glass market conditions and reasons for including this material in the list of designated recyclable materials. | SWAC | See III.B.3.b.(1). |

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| Goals for materials diversion should be accompanied by goals to procure recycled products. | SWAC | See III.B.3.a.(5). |
| Is King County planning to strengthen its procurement ordinance? | C9 | See III.B.3.a.(5). |
| Wait until the next plan update to add polycoated paper and additional plastics to the list of mandatory recyclables. | C7 | See III.B.3, Table III.15. |
| Neither food waste nor #3-7 plastics should be classified as recyclable materials. | C7 | See III.B.3, Table III.15. |
| Mixed waste paper, #1 and #2 plastic bottles and yard waste should no longer be classified as primary recyclables. | C7 | See III.B.3, Table III.15. |
| Clarify and standardize the use of terms describing the different recyclable plastics. | SWAC | Standardization made throughout the plan as follows: #1 and #2 Plastics (PET and HDPE) and #3-7 Plastics (vinyl, LDPE, polypropylene, and polystyrene)* |
| Does King County discourage the recycling of PVC and mixed resins? | C9 | No. King County doesn't discourage the safe recycling of any reusable material. See III.B.1.a.(3). |
| Polycoated paperboard should not be included in recycling programs. | C2 | See Table III.15. |
| Add that the Clean Washington Center is researching the production of cellulose insulation and mulch/bedding from MWP. | C9 | No change made. This level of detail does not fit within the scope of the plan. |
| Establish and enforce recycled content standards for cellulose insulation. | C9 | No change made. Recycled content standards are established by legislative process. |
| Consider requiring that lead-acid batteries generated in King County be reclaimed in the U.S. and not shipped overseas. | C9 | No change made. Trade policy does not fall within the jurisdiction of King County. |
| Add glass collection to Table III.6 for Auburn. | C8 | Addition made; see III.B.1, Table III.6. |
| Add an explanation of regulatory structure to Table III.6 . | RA-2 | See Table IV.4. |
| Identify the two urban cities who have not implemented a household recyclable collection or equivalent program and describe their plans. | RA-3 | Change made; see III.B.1.a.(1). |
| Establish minimum educational guidelines for entities (cities, counties and haulers/recyclers) responsible for recycling collection programs. | SWAC | No change; not within the scope of the plan. |

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| Revise: "Businesses could select their service provider, but if recyclers or cities were unable to provide recycling services, a business' garbage hauler would provide the minimum level of service a business could subscribe to services provided by any common, contract or private carrier offering recycling services in their area." | RA-2 | Revision made; see III.B.3.b.(2). |
| State law constrains the Commission from placing minimum service level requirements for nonresidential recycling on motor carriers regulated under chapter 81.80 RCW. | RA-2 | Clarification made; see III.B.3.b.(2). |
| Greater emphasis on nonresidential recycling programs is needed. | C1, C4, C5, C6 | Emphasis expanded; see III.B.3.b.(2). |
| Collection service plans for nonresidential recyclables should maximize freedom of choice. | C7 | See III.B.3.b.(2). |
| The County should be more specific about its role in identifying and addressing barriers to nonresidential recycling. | C7 | Clarification made; see III.B.3.b.(2). |
| Note the appliance recycling resource list as an on-going program in Table III-18 [formerly III.17]. The list should be updated regularly. | SWAC | Revision made; see Table III.18. |
| Include a key to symbols on each page of Table III.18 [formerly III.17]. Also indicate that the table is divided into the quarters of the year. | SWAC | Change made; see III.B.3, Table III.18. |
| Cost estimates for the new on-call programs should be revised to account for an expected participation rate of less than 100 percent. A cost/benefit analysis should be done for each program to ensure its necessity and economic feasibility. | C1, RA-2 | Changes made to programs. See III.B.3. |
| Expand the cost assessment element of the plan to include information on the sufficiency of revenues to fund associated programs and how surplus revenues would be used. | RA-2 | Program changes made; see III.B.3 and Appendix K. |
| Include complete estimates of the cost of providing bulky yard waste collection, appliance collection, and textile collection as well as yard waste collection services to multifamily residential structures. | RA-2 | Programs revised; see III.B.3. |
| Consider providing financial incentives to buy-back centers for #2 HDPE plastic, ferrous materials, green glass, and mixed waste paper. | A2 | No change. Program currently only focuses on primary recyclables. See III.B.1. |
| The County may wish to protect the confidentiality of those surveyed for recycling data by entering into interlocal agreements with those who wish to have access to this data. | RA-3 | No change made in the plan. Comment noted. |
| There should be greater incentives for citizens to recycle. | CIT-CH | See III.B.3.b.(7). |
| Why is there a decline in mixed waste paper collection? | CIT-CH | See III.B.2.c.(2). |
| Why isn't recycling mandatory? | CIT-V | See III.B.3. |
| Provide additional recycling collection bins in more available and convenient areas. | CIT-CH | See III.B.3.b.(1). |

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| Is King County working on the markets for recycled materials? | CIT-SE | Yes. See III.2.c.(1), (2), and (3). |
| Who uses recycled paper? | CIT-NE | See III.2.c.(1). |
| Where do people take refrigerators since they are not being accepted at the facilities? | CIT-NE | See III.3.b.(1). |
| Chapter IV | | |
| What are the standards for new and upgraded transfer stations? What new systems will be incorporated? Will there be segregation of commercial from self-haul unloading? | SWAC | See IV.B.2.a, e, and g. |
| Reconcile references to Factoria expansion. | SWAC | Changes made throughout Chapter IV. |
| Are there any plans to site a transfer facility in the S.E. area? | C9 | See IV.B.3.a.(3) and B.3.b.(3). |
| Enumclaw landfill variance has already been granted. | RA-1 | Change made throughout Chapter IV. |
| Hobart implementation schedule should be adjusted. | RA-1 | Adjustment made throughout. See IV.C.3.b.(1) and Table IV.24. |
| Typo: "Algon... Scheduled Scheduled to close. | RA-1 | Correction made; see Chapter IV, Table IV.8. |
| Will the Waste Management Northwest-Woodinville Recycling Transfer Station (formerly Snohomish Eastmont) open by 12/31/92? | C9, RA-1 | No. Change made throughout. See IV.B.3.b.(1). |
| Is the existing transfer station system cost-effective and is the County looking at ways to make it more so? Would an expanded system of smaller stations be more effective? | C9 | See IV.B.2.a, IV.B.3.a, b, and d. |
| List the types of recyclables that each transfer station accepts. | C9 | No change made; information is subject to change. See IV.B.2.e. |
| Change: "Under the Solid Waste Management and Recovery Act, local governments are given primary responsibility for solid waste handling planning. " | C9 | No change made as handling is correct. See Related Legislation RCW 70.95.020(1). |
| Add: "Cities may require mandatory collection, in which all residents and businesses subscribe to designated refuse collection services or mandatory payment for collection services. " | C9 | Revision made; see IV.A.1.a.(6). |
| Change: "Contracts usually are awarded on a competitive basis to the lowest bidder through an RFP or bid process. Occasionally, contracts are awarded through direct negotiations. " | C9 | Revision made; see IV.A.1.a.(6). |

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| Add: <i>"In unincorporated King County, individuals may choose to haul their own waste..."</i> | C9 | No change made. Residents throughout the County may choose to haul their own waste in addition to receiving regular collection services. See IV.A.1.b.(1). |
| Add greater specificity about County and private sector roles in monitoring and addressing self-haul waste. | C7 | See IV.B.2.a. |
| Add: <i>"Cities can also establish the collection rates, bill residents for the service, collect revenue and pay the contractor for the services provided."</i> | C9 | No change made. This level of detail does not fit within the scope of the plan. See IV.A.2.c.(1). |
| What issues are to be covered in the waste export position paper? Add discussion of the waste export option to plan. Need further discussion on disposal options after Cedar Hills is closed. | SWAC | Discussion added; see IV.C.1.a.(5), IV.C.2.a.(5), and IV.C.3.b.(3). |
| How will the closed landfills be used? | SWAC | See IV.B.4.a.(2). |
| Investigate alternatives to using increased levels of soil and earth material cover at Cedar Hills. | C9 | No change made. Landfill cover is an operations issue and is not within the scope of the plan. |
| Discuss the need for a groundwater study and the problem with periodic migration of landfill gas at the Vashon Island landfill. | RA-1 | See IV.C Table IV.19 and associated footnotes. |
| Include an implementation schedule for the installation of new wells at Cedar Falls and Duvall landfills. | RA-3 | No change made. That is an operational detail not within the scope of the plan. |
| Revise: <i>"RCW 81.77 also directs if a county legislative authority comments to the Commission per RCW 81.77.120, the WUTC to will monitor those comments concerning the adequacy of garbage and refuse collection in unincorporated portions of a county or unregulated areas in cities or towns."</i> | RA-2 | Revision made; see IV.A.1.a.(2). |
| Clarify "exceptions" granted to solid waste collection companies by WUTC. | RA-2 | Revision made; see IV.A.1.a.(3). |
| Revise: <i>"RCW 36.58A authorizes counties to establish a system of solid waste disposal. Under certain conditions, as allowed by chapter 36.58A RCW, counties may establish collection districts..."</i> | RA-2 | Revision made; see IV.A.1.a.(4). |
| Revise the "license" column of Table IV.3 to reflect that cities have three regulatory choices not four. | RA-2 | Revision made; see IV.A.1, Table IV.3. |
| Revise: <i>"In a licensed system, WUTC certificates are augmented by city licenses, which grant the municipality additional regulatory control over collections and revenue through fees."</i> | RA-2 | Revision made; see IV.A.1.a.(6). |
| Define the abbreviation "FA" in Table IV-5. | RA-2 | Revision made; see Table IV.4. |
| In Table IV.4 distinguish local government options for the collection of garbage from the options for collection of recyclables. | RA-2 | Distinction made; see Table IV.4. |

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| Correct regulatory authorities in Table IV.4 for Des Moines (cert), Federal Way (contract) and Mercer Island (contract). | RA-2 | Revisions made; see Table IV.4. |
| Table IV.4 does not reflect the fact that Lake Forest Park's residential rates include the cost of yard waste collection. | C2 | No change made. That level of detail is not within the scope of the plan. |
| Clarify mandatory collection in Table IV.4 Does this include recycling? Correct can rates for Auburn. | C8 | Clarification and changes made, see Table IV.4. |
| Add a statement of which agency was responsible for the moderate risk waste surcharge. | RA-2 | Addition made; see IV.A.1.c.(1). |
| Revise wording to reflect the fact that the WUTC cannot promote cross-subsidization between solid waste collection companies and motor carriers. | RA-2 | Revision made; see IV.A.2.c and Table IV.7. |
| It is untrue that the cost of service methodology used by WUTC "does not allow for incentive rates to encourage WR/R behavior." | RA-2 | Revision made, see IV.A.2.d. |
| Clarify whether the County is or is not asking the WUTC to increase rates through shorter amortization periods? | RA-2 | No change made. The County is not recommending specific alternatives to the current rate review process. See IV.A.3.b. |
| Investigate alternatives to current leachate disposal method for the Duvall landfill. | C9 | No change made; see IV.D.3. |
| Expand section B.2.g.(3) of Chapter IV. Does "materials recovery" include the idea of salvaging materials from the MSW stream? | C9 | No. Clarification made; see IV.B.2.g.(3). |
| What information is there about the types of additional transfer station services the public wants? | C9 | See IV.B.2.a. |
| Table IV.22 lists two alternatives and the text discusses three. | SWAC | Correction made; see Table IV.22. |
| Add a discussion of actions which could be taken in response to the results of the queuing study. | I7 | Change made; see IV.B.2.c. |
| How do waste management problems specific to Vashon Island fit into the discussion of the County waste system? | CIT-V | See IV.C.1.a.(4) and IV.C.4.b.(4). |
| When will transfer station siting begin in the Northeast (formerly Mid-Snoqualmie) area? How long does the process take? | CIT-MS | See IV.B Table IV.17. |
| Is the County considering mandatory garbage collection for the Snoqualmie valley? | CIT-MS | Not at this time. See IV.A.3.c. |
| Is a new transfer station going to be sited at Hobart or anywhere else in SE King County? | CIT-SE | Yes. See IV.B.3.b. and IV.C.4. |
| Why is Houghton transfer station being closed and where is the new NE Lake Washington transfer station site? | CIT-NE | See IV.B.1.a.(1) and Figure IV.6. |

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| Chapter V | | |
| Do not require soil waste generators to use the Cedar Hills landfill for disposal of petroleum-contaminated soil wastes even temporarily. | I1, I2, I3, I5, I6 | Detail added. See V.A.3.(2) and V.A.4. |
| Add a discussion of tracking mechanisms for the removal of hydrocarbon-contaminated soils. | I6 | No change made. Not within the scope of the plan. |
| Add: "Airborne asbestos <i>can</i> present a considerable risk..." | C9 | Change made, see V.B.1. |
| Add: "Home generated sharps are exempt from KCBOHC regulation if they are...(3) placed into a needle clipper or a sealed and labeled PET <i>pop</i> bottle." | C9 | Addition made; see V.C.1.a. |
| Discuss the alternatives to home sharps disposal which could be offered by making changes in state law. | C9 | No change made. Not within the scope of the plan. |
| Are there any exceptions to the flow control ordinance, such as recyclables and untreated biomedical wastes? | C9 | Yes. See V.C.3.a. |
| Add a section on IMEX and list IMEX in Appendix E. | RA-1 | Addition made to plan; see V.D.3.b.(2). |
| Add information on the new KCBOHC 'solid waste treatment site' category and the accompanying standards. | RA-1 | No change in plan. See Related Legislation, Solid Waste Handling Code, Title 10, KCBOHC Section 10.24. |
| Revise to reflect that KCBOHC Title 10 regulations on CDL landfills are now significantly more strict than State WAC 173-304. | RA-1 | No change. This level of detail does not fit within the scope of the plan. See V.D.1.f.(1). |
| Update the CDL section to reflect the most current information. | SWAC | Change made; see V.D. |
| Add: " CDL collection will be accomplished per chapter 81.77 RCW. " | RA-2 | Addition made; see V.D.1.f. |
| Are some self-haulers also allowed to dump at Cedar Hills, such as self-haulers with special wastes? | C9 | Residential haulers may bring in some special wastes in limited amounts. See Related Legislation, King County Public Rules 7-1-2 and 7-2-1. |
| Where do people go with inert CDL and small quantities of non-inert CDL waste? | C9 | For a description of waste acceptance and waste clearance policies see Related Legislation, King County Public Rules 7-1-2 and 7-2-1. |
| What is the role of the new CDL screening employees? Where will they be stationed and are they necessary? | SWAC | Clarification made; see V.D.1.e. |
| Has the Mt. Olivet landfill closed yet? | C9 | Yes. See V.D.1. |
| Hogfuel and painted wood should not be considered woodwastes. | C9 | Clarification made; see Table V.9. |

| Comment | Concerned Parties | Reference in Plan |
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| Acknowledge the Health Dept. support for a rewrite of Ecology's minimum functional standards for woodwaste landfills. | C9 | No change made; not within the scope of the plan. |
| Provide an implementation schedule and cost summary for recommendations in Chapter V. | RA-3 | Scheduling clarification made throughout; see Chapter V. See Chapter VII and Appendix K for cost summaries. |
| Add: "...King County Surface Water Management, and the Environmental Health Division of the Seattle-King County Department of Public Health..." | RA-1 | Addition made; see V.E.1. |
| The County should accept used tires at the landfill. | C5 | See V.G |
| Add that large amounts of tires could be used as lightweight fill, landfill cover, or fill in road construction. | C9 | No change made. Landfill cover is an operations issue. |
| Add discussion of tires, sludge, and septage and dredge spoils to your plan as required by RCW 70.95.090. | RA-3 | Change made; see V.G. |
| Does King County use tire-derived fuel in small-scale boilers? | | No. No change made in the plan as the procurement of boiler fuel is an operations issue. |
| Chapter VI | | |
| Isn't it a King County public rule which requires generators of contaminated soil and industrial wastes to obtain a clearance, not the Health Dept.? | C9 | The Health Department and/or the County require clearance forms. See VI.C.1.b. and c.(1). |
| Doesn't all asbestos waste have to have a PSAPCA Notice of Intent <u>and</u> a Waste Clearance Form? | C9 | No. In cases where a PSAPCA Notice of Intent form is not required, the County requires a Waste Clearance Form. For a discussion of waste clearance authority. See VI.C.1.b and c. |
| Table VI-7 does not reflect that violation of the litter ordinance is a misdemeanor, punishable by a maximum \$500 fine or six months in jail. | C2 | Correction made; see VI.D, Table VI.7. |
| Develop a revolving fund to abate illegally dumped waste. | C7 | Change made; see VI.D.3.b. |
| The plan should place more emphasis on dealing with the problem of illegal dumping and County responsibility for clean-up in view of additional banning of landfill disposal for various materials. | C1, C4, C6, C7, C8, C9 | Change made; see VI.D. |
| Consider providing information for the public on the disposal of acceptable and unacceptable wastes. | C9 | No change made. That information is provided at the transfer stations. |
| Typo: "...in a receptacle paid they paid for." | RA-2 | Change made; see VI.D.2.c. |

| Comment | Concerned Parties | Reference in Plan |
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| Amend current laws to require drop-box owners to also include an identification number on all bins. | SWAC | Discussion added; see VI.D.3.b. |
| Include in enforcement section a discussion of King County law pertaining to the labeling and maintenance of recycling drop-boxes. | SWAC | Discussion added; see VI.D.3.b. |
| The problems with illegal dumping are well-documented and further study is not needed. The County needs to follow-up on reports, impose higher fines, and enact more stringent laws. | CIT-CH, NE, MS | See VI.D. |
| Chapter VII | | |
| Include plans for future financing of SWD activities. | SWAC | See VII.A.1. |
| When, what, and how will rural recycling programs be funded and carried out? | SWAC | See VII.A.1 and Appendix K. |
| Is there a difference between "user fees" and "disposal fees"? | SWAC | No. Change made throughout to standardize as "disposal fees." |
| Does the Solid Waste Division have the ability to charge fees other than disposal fees? | SWAC | No. Clarification made; see VII.A.1. |
| Is the minimum fee for regional direct and charitable customers \$5.73 or \$5.93? | SWAC | It is \$5.73. See VII.A.1. |
| It would be useful to see the budget broken down by "fixed" and "variable" costs. | SWAC | No change; not within the scope of the plan. |
| Are closure costs for Cedar Hills financed with bond sales or only through surcharges? | C9 | Closure costs are financed through the landfill reserve fund with transfers from the operating fund. See VII.A.3.b. |
| What are the plans/contingencies if state grant funds end? What are the plans for avoiding the elimination or reduction of these grant funds? | SWAC | See VII.A.1. |
| Can we assume that all CPG funds coming to the Solid Waste Division are spent on and in unincorporated King County? | SWAC | Clarification made; see VII.B.1. |
| Include an analysis of the sensitivity of variable and fixed costs to decreasing tonnage. The implications for each of reaching our WR/R goals should be examined. | SWAC | See VII.A.1. |
| How much of the budget is determined by computer models? What are the plans for ongoing review and revisions of the models? | SWAC | No change; not within the scope of the plan. |
| Explain clearly the rationale for the forecasted timing of capital expenditures. | C9 | See VII.A.3.e. |
| How will computer models be affected by major changes in disposed tonnage? Will they and the transfer system as a whole be affected by Growth Management Act issues? | SWAC | No change; not within the scope of the plan. |

| Comment | Concerned Parties | Reference in Plan |
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| Identify alternatives to disposal fees for covering costs of Solid Waste Division operations and activities. Discuss the decoupling of solid waste management from disposal services. | SWAC | See VII.A.1. |
| What would be the effect of immediate closure of the Vashon Landfill on the Landfill Reserve Fund and other accounts? What are the contingency plans if this occurs? | SWAC | No change; not within the scope of the plan. |
| When will tipping fees be expected to increase, why is such an increase necessary and how will the additional revenue be allocated? | C1, C6 | Detail added; see VII.A.1. |
| The plan should avoid actions which lead to rate increases. | C6 | See VII.A.1. |
| Expand Chapter VII and Appendix K to include discussion of the revenues which come from hauler surcharges to customers. | RA-2 | Clarification made; see VII.A.1.a. |
| Expand the cost assessment element of the plan to include information on plans to increase, decrease or terminate surcharges. | RA-2 | Clarification made; see VII.A.1. |
| How does the County collect fees from all populations to insure that ratepayers of certificated haulers are not unduly burdened? | RA-2 | See VII.A.1 for a discussion on financing. |
| Clarify that residential and commercial customers of solid waste collection companies pay a different surcharge for recycling programs. | RA-2 | Clarification made; see VII.A.1. |
| Revisit and revise the 22-cent fee which goes to the Health Department as necessary. | RA-2 | Detail added; see VII.A.1.a. |
| Is the Solid Waste Division funded fully with its own revenues? | CIT-SE | Yes. See VII.A.1. |
| Add an explanation of the rate setting process. | CIT-SE | See VII.A.1. |
| Related Legislation | | |
| Chapter 70.95 RCW has been revised and needs to be corrected in your related legislation section. | RA-2 | Code revised. See Related Legislation, Solid Waste Management Act, Chapter 70.95 RCW. |
| Add additional pages and amendments for KCBOHC Title 10. | RA-1 | Code revised. See Related Legislation, Solid Waste Handling Code, Title 10 of the King County Board of Health Code. |
| The \$10.00 fee for each additional acre in K.2 should be in K.1 under the \$150.00 fee for the first acre. | RA-1 | Code revised. See Related Legislation, Solid Waste Handling Code, Title 10 of the King County Board of Health Code. |

| Comment | Concerned Parties | Reference in Plan |
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| Section 10.28.087 Human Excrement, is now included in our Regulations and is not "Reserved." | RA-1 | Code revised. See Related Legislation, Solid Waste Handling Code, Title 10 of the King County Board of Health Code. |
| Section 10.68.010: B.7 has been repealed and replaced with C. | RA-1 | Code revised. See Related Legislation, Solid Waste Handling Code, Title 10 of the King County Board of Health Code. |
| Change 10.72.020.C: "All facilities shall also...testing parameters listed in Section 10.68.72.020(c)(2) per WAC 173-200." | RA-1 | Code revised. See Related Legislation, Solid Waste Handling Code, Title 10 of the King County Board of Health Code. |
| Appendices | | |
| Change PSCOG to the Puget Sound Regional Council. | C9 | Change made. See Appendix A.C. |
| What percentage by weight or volume of the MMSW stream is woodwaste? | C9 | See Appendix B, Table 3.3. |
| Add: "Preference should be given to those sites where gas control requirements are minimized <i>and/or where gas recovery can be minimized.</i> " | C9 | No change made; see C.C.2.b.(2) |
| Has King County surveyed local wineries to verify that they only want virgin green glass and why this is so? | C9 | A survey has not been necessary. Color standards for light green ("deadleaf green") wine bottles preclude the use of recycled glass cullet. Dark green wine bottles can be made with from 40-80% recycled cullet. Both types of bottles are used by local wineries. See D.1.E.2.c. |
| Correct Appendix E with regard to Auburn's collection program and school programs. | C8 | No change made as this level of detail is not required. See E.E.2. |
| Bassett Western facility no longer accepts yard waste, tree trimmings and prunings. | RA-1 | Change made; see Appendix F. |
| Add Lloyd Enterprises to Appendix F. | RA-1 | Change made; see Appendix F. |
| Cedar Grove should be included in Appendix F | RA-1 | Change made; see Appendix F. |
| Nurseryman Products is no longer in business. | RA-1 | Change made; see Appendix F. |
| Carpinito Bros. no longer accepts yard waste. | RA-1 | Change made; see Appendix G. |

| Comment | Concerned Parties | Reference in Plan |
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| Redmoor Resource Recovery is closing down its Issaquah yard in January '93. | RA-1 | Change made; see Appendix G. |
| Appendix K | | |
| If the County cannot provide separate customer counts and tonnages for state-regulated and city-regulated collection programs, add a footnote to that effect. | RA-2 | No change. To provide a city-by-city accounting would require an amendment to current reporting requirements. |
| What are the matching dollars for the Waste-Not-Washington grants and where are they? | SWAC | See Appendix K. |
| What are the \$1.5 million for the King County WR/R grant program and where are they? | SWAC | See Appendix K. |
| Does the forecast of future CIP expenditures reflect the most recent revisions to the forecast of waste disposal. | C9 | Yes. See Appendix K. |
| How has the County responded to WUTC assertions that the plan understates required revenues despite increases in tipping fees? Explain the discrepancy between WUTC's analysis of tipping fee increases and the County's calculations. | C1 | Correction made; see Appendix K Table 4.1.2. |
| Provide a more thorough definition of cost estimates and detail the link between program expenditures and rate components. | C7, RA-2, C9 | See Table 4.6.1, Appendix K. |
| The plan does not adequately detail the costs of all required programs. | RA-2 | See revised Table 3.1, Appendix K. |
| The plan does not estimate the cost impacts of a yard waste ban. | RA-2 | Clarification made; see discussion in III.B.3 and Appendix K, Table 3.1. |
| Describe short-term program costs and financing needs for the transfer system in a more accessible and complete manner. | RA-3 | Updates made; see Appendix K, Table 4.3.1. |
| What are the \$2.8 million matching funds for the State CPG and where are they? | SWAC | See Appendix K. |
| Add detail on the 22-cent administrative surcharge and the moderate risk waste surcharge to Appendix K. | RA-2 | See revised Table 4.6.1 in Appendix K. |
| Address discrepancies between WUTC and County projections for MRW, administrative and hazardous waste items. | RA-2 | Correction made. See Table 3.3 in Appendix K. |