Kevin Kiernan, Director
Solid Waste Division
King County Department of Natural Resources and Parks
201 South Jackson Street, Suite 701
Seattle, WA 98104

Dear Mr. Kiernan:

Thank you for the opportunity to comment on the 2009 Draft Comprehensive Solid Waste Management Plan. We believe that the Draft Plan is well structured, comprehensive in scope, and that the policy direction set forth is clear and concise.

We would offer the following comments as friendly amendments, which the County may want to consider in preparation of the final plan.

General Comments – We would like to offer a few general comments that do not pertain to particular sections of the plan, but which highlight areas where the staff may want to focus more energy in drafting the final version of the plan.

1. The plan should place more emphasis on establishing uniform recycling standards across the County. Increasingly Material Recovery Facilities (MRF) have the capacity to process a broad array of materials. The County should, as a matter of policy, be a catalyst for communities to expand their recycling programs to capture the maximum amount of recyclable materials, and the materials collected should be as uniform as possible across jurisdictions and between sectors (i.e., residential and commercial).

2. While the Plan addresses Construction and Demolition (C&D) materials in several sections, we believe that greater emphasis needs to be placed in the plan on the recovery of C&D materials. In particular the County should set a goal for C&D recovery. Also, we have concerns about how residuals from C&D processing will be viewed in the final plan (discussed later under Chapter 4-27).

3. We believe that there needs to be a more elaborate discussion under both Chapters Five and Seven about entrepreneurial ways in which the County transfer facilities could be used to consolidate loads of both recycling and organics. We appreciate the interest expressed in Chapter Five in taking loads of commercial organics at the Shoreline Transfer Station, but we believe that the plan should point to the environmental benefits of reducing truck trips by

consolidating loads of organics and potentially recyclables, and that Chapter Seven should address the potential financial benefits of the tipping fees associated with this policy change. We also believe that the County would significantly increase diversion rates by allowing fully co-mingled recycle to be accepted for transfer at all facilities.

4. The plan contains repeated discussions regarding public outreach and education with respect to the solid waste system, collection, and recycling. In almost all of these discussions the tone of the plan is that this is primarily the responsibility of the County and municipal governments. We believe that collection and processing companies have a strong interest in educating our customers, and CleanScapes is an industry leader in creating educational and incentive programs to encourage our customers to reduce the amount of material they dispose of, including recycling and yardwaste. We believe the plan should more explicitly recognize the significant role that contractors, such as CleanScapes, play in public outreach and education. CleanScapes' goal is to help our customers (jurisdictions, individuals and businesses) achieve their waste reduction and recycling goals. As such, we believe that education and outreach is a partnership between the hauler, the City, the County and the individual customers.

Chapter Specific Comments – Following are comments that address specific elements of the detailed chapters in the plan.

Chapter 1 – Introduction – No Comments

Chapter 2 – Solid Waste System Planning

1. Tonnage and Transaction Data (2-11). The plan discusses how the County tracks C&D data from private haulers. The County may want to consider including language recommending a more comprehensive reporting system that requires C&D haulers to provide data on diversion rates, proportions of single-source vs. comingled loads, and the amount of Industrial Waste Stabilizer (IWS) and Alternative Daily Cover (ADC) generated by the processors.

Chapter 3 – Waste Prevention and Recycling

1. Waste Prevention and Recycling: Summary of Recommendations. This table lists recommended actions and responsibilities for the cities and County but "collection companies" are only mentioned in the context of data reporting. We believe collection companies can take an active role in achieving waste prevention and recycling goals. Measure that CleanScapes has taken include:
   - Annual Neighborhood Reduction Rewards competition with a financial incentive for the winning area
   - School programs including workshops and scholarships

- Waste audits and assistance meeting LEED requirements
- Weekly waste reduction tips by email
- Visit and/or call all commercial and multifamily customers to discuss recycling opportunities, to identify barriers and implement solutions
- Truck graphics that educate and inform customers about program opportunities
- Endorse and support product steward approaches for all relevant products

Given these and other actions, "collection companies" could be listed in the "responsibilities" column for items 1, 3, 4, 5, 10, 12 and 14 in the table.

2. Waste Prevention and Recycling Goals (3-3). The text box provides an excellent explanation of the difference between waste prevention and recycling and notes that reaching waste prevention goals can result in falling short of recycling goals. To reinforce the hierarchy we suggest that in future years, Table 4-1 which currently shows per capita "garbage disposal" also show the per capita figure for "material disposed + recycled tons + yard waste tons."

3. Product Stewardship (3-9). We support the County's work with the Northwest Product Stewardship Council (NWPSC) on framework legislation and on take-back programs for fluorescent tubes/bulbs, pharmaceuticals, mercury thermostats, paint and other products. However, based on our experience in the City of Shoreline, a curbside collection program for fluorescents is also an effective option for handling this particular product.

4. What is Beneficial Use? (3-23). This sidebar within the Plan alludes to a larger debate within the King County Solid Waste Division, regarding the reclassification of Industrial Waste Stabilizer (IWS) from a beneficial use to disposal. Please find a copy of the January 25, 2010 letter from Craig Vierling, General Manager at CDL Recycle, to Kevin Kiernan, which serves as our comment on this issue.

5. Priority Materials for Curbside Collection (3-25). We support the County's emphasis on waste prevention, but recognize that a strong recycling program is also key to a "Zero Waste" strategy (p 3-25). To the extent that the County continues to assist with the design and implementation of effective recycling programs, we believe that one area of emphasis should be achieving consistency with respect to the types of materials accepted in various jurisdictions and between residential and commercial sectors. The fact that a County resident is potentially confronted with a different list of recyclables at work, at home, when visiting the regional shopping mall and social events or households in other parts of the County makes education difficult and likely affects the recycling rate and contamination levels.

Chapter 4 – Waste Collection

1. Electronic Products and Fluorescent Bulbs and Tubes (4-12). This section only addresses the curb-side collection of fluorescent bulbs by saying "Collecting these products at the curb is complicated by the fact that some of the products tend to break easily and contain potentially hazardous materials that must be safely disposed." As you may know, CleanScapes currently has a curb-side collection program in the City of Shoreline, which has been successful to date. Based on our experience with this program, concerns regarding the breakage of bulbs and release of mercury into the environment are easily addressed through proper material preparation and collection procedures. We would hope that the plan would at least reference the Shoreline curb-side collection program for fluorescent bulbs. Also, please find attached a January 12, 2010 memo from CleanScapes to the Washington Department of Ecology regarding our curb-side collection program in Shoreline.

2. Frequency of Collection (4-16). David Allaway, Oregon Department of Environmental Quality has conducted extensive research showing that weekly residential recycling collection captures more material than every-other-week collection programs and that the additional tons collected more than offsets impacts related to additional truck trips.

3. Multi-Family Residential Collection (4-20). We appreciate the recognition in the plan of the recycling challenges presented by multi-family complexes, and strongly endorse the plan's recommendation that the County invest resources into recycling education and outreach to property managers and maintenance staff. In addition, the County serves a very important role in pilot testing and sharing results of effective multifamily recycling programs.

4. Management of Residuals from C&D Processing (4-27). Please see comments under Chapter 3 – number 3 above, relative to C&D residuals and IWS.

Chapter 5 –Solid Waste Transfer Station

1. Future Plans For Urban Transfer Stations – Organics (5-22). We appreciate the County's interest in using the transfer stations as consolidation points for commercial organics collection, prior to hauling them to Cedar Grove. We know that the County is in the process of developing a special rate for commercial haulers to dump organics at County transfer facilities. This policy change benefits everyone by reducing the miles and time that large trucks are on the road. Benefits include less wear and tear on the roads, decreased fuel use and therefore lower greenhouse gas emissions, and longer truck life-cycles. We strongly encourage this policy initiative, and we suggest that it be referenced in the final plan.

2. Future Plans for Urban Transfer Stations – Recycling. We would strongly encourage that the County also consider using transfer stations as points for haulers to consolidate loads of recyclable materials, before hauling to regional MRFs. For haulers, travel times to/from the transfer station, and time spent at the transfer station, directly affect truck hours and miles on the road and significantly impact the sustainability of operations. Consolidating

municipal waste collections at nearby stations before hauling them to more distant locations, is a more sustainable option.

3. We strongly believe that the Shoreline Transfer Station is currently severely underutilized. We believe the County should work with Seattle Public Utilities to allow transfer of City of Seattle MSW at the Shoreline facility instead of the City building a new North Transfer Station.

Chapter 6 – Landfill Management and Solid Waste Disposal

1. General Comment - Extending the Life of Cedar Hills Landfill. As a general comment we are supportive of the County's efforts to extend the life of Cedar Hills Landfill, and would encourage you to emphasize your third area of focus – Diversion of Waste and consider a fourth area of focus, total waste reduction. While achieving operational efficiencies and developing new areas of the landfill will clearly help expand capacity and extend the life of the landfill, reducing the gross amount of waste hauled to the landfill for disposal has the greatest potential to extend the life of the facility and yield concurrent environmental benefits. One of CleanScapes' overarching goals is to reduce the total waste generated in the communities we serve, which is why we have developed incentive programs to encourage our customers to reduce all waste. While increasing diversion as a percentage of the total waste will extend the life of the landfill, so too will reducing in the aggregate the amount of waste that customers generate.

2. General Comment - Disposal Options Once Cedar Hills Closes. We appreciate the thoughtful discussion provided in this section of the plan, and would strongly encourage the County to adopt a final plan that would allow for the broadest possible array of alternatives to be considered in future public policy discussions with respect to alternative disposal of waste. As the draft plan notes, the possibilities open to the County will "evolve over time as technologies emerge and are tested."

Chapter 7 – Solid Waste System Finance

1. General Comment. The King County Solid Waste Division is currently experiencing a significant budget shortfall, resulting from a fall-off in tonnage related to the recession. While this section addresses potential policy changes to current financial structures, including fees, it does not address any potential areas that the County may want to explore in the short-term or long-term to enhance revenues or expand the revenue base of the Solid Waste Division. Some examples of these types of activities would be innovative use of system assets to generate new revenue (e.g. allowing haulers to consolidate or transload at Transfer Stations for a fee).

Thank you for the opportunity to offer input during the development of the Comprehensive Plan. If you have questions or would like additional information on any of our comments, please contact John Taylor, Government Relations Manager for CleanScapes, at (206) 658-4075 or john.taylor@cleanscapes.com.

Sincerely,

Chris Martin
President

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Memorandum

To: Jay Shepard, Washington Department of Ecology

From: John Taylor, Government Relations Manager, CleanScapes

Date: January 12, 2010

Re: Curb Side Collection of Mercury Containing Lamps

During CleanScapes' testimony to the Environmental Health Committee on December 4, 2009, several committee members raised questions regarding the cost and mechanics of curbside collection of fluorescent bulbs. Folllowing is a brief overview of our collection program in Shoreline and estimated costs.

Program Operations

CleanScapes has provided curb-side collection of fluorescent tubes and CFL bulbs since we started Shoreline operations in spring 2008. We ask that our Shoreline customers comply with the following instructions in preparing their fluorescent bulbs for collection:

- Place bulbs in original packaging or wrap in newspaper and secure with tape.
- CFL bulbs should be placed in a plastic bag tied closed (or a zip-lock bag).
- Set on top or to the side of recycling cart (not inside) on recycle day.
- Tubes must be less than 4 feet long.
- Limit of 2 tubes/bulbs per collection and 10 per year.

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CleanScapes residential collection trucks are outfitted with special boxes to collect fluorescent bulbs, and drivers place them in the boxes as they run their routes. We direct customers to put bulbs out with their recycling, but if they inadvertently put them out on a garbage or yard waste collection day drivers will still collect the bulbs.

For commercial customers, fluorescent tubes and bulbs can be collected from businesses and apartment complexes when requested by the bill payer or account contact. The cost is $20.00 for the first tube/bulb and $2.00 for each additional. We ask commercial customers to follow the guidelines listed above for safe handling.

Once we have the fluorescent bulbs in our yard we aggregate them into larger hard cardboard containers or plastic bins for shipping to the contractor who processes all of our fluorescent lights – Ecolights Northwest. CFL bulbs are packed in the white plastic bins seen in the right hand photo below.

A question that several committee members had was the occurrence of broken bulbs curbside, during collection, and during transport to the recycling facility. We collect approximately 240 bulbs curbside annually in the City of Shoreline. For the 2009 collection year our drivers reported two (2) broken bulbs curbside.

With respect to bulbs broken on our collection routes once they are placed in the trucks, we had no reports of broken bulbs in 2009. This is primarily attributable to customers complying carefully with our packing instructions, and the effectiveness of the design of the transport containers on our trucks. There is some occurrence of bulbs breaking in transport from our yard to the recycling contractor – we have breakage of approximately one in fifty bulbs.

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Program Costs

The collection costs for this program are negligible, because fluorescent bulb collection is done in conjunction with the regular collection of other commodities.

The disposal of the bulbs is the only real costs we incur, and is comprised of transportation associated with getting the bulbs from our yard to Ecolights Northwest and the disposal fees we pay to them. Overall, our total 2009 costs were approximately $2,000, although this includes disposal cost from bulbs collected from non-curbside commercial customers.

Conclusion

To date our experience in Shoreline has been very successful. While there are a limited number of customers who utilize the service, we have heard anecdotally that it is a service customers appreciate having access to, and one which the City of Shoreline strongly supports. As customers become more aware of the program, we anticipate that the volume of material will increase. We are confident in the efficacy and longevity of this program, and believe that any associated increase in program cost would be negligible, because our collection costs are minimal and disposal costs could benefit from a volume discount.