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Public Health
Seattle & King County

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King County DNRP
Solid Waste Division
Planning & Communications

February 3, 2010

2009 Draft Solid Waste Plan Comments
King County Solid Waste Division
201 S Jackson St, Suite 701
Seattle, WA 98104-3855

Re: King County Draft 2009 Comprehensive Solid Waste Management Plan Comments

Thank you for providing us with the opportunity to review and comment on the *Draft 2009 Comprehensive Solid Waste Management Plan (The Plan)*. We have completed our review of *The Plan*.

We would like to suggest that *The Plan* provide more information on solid waste system infrastructure gaps and limitations. What are the significant gaps and limitations, how will they be addressed? For example:

- Is there a shortage of yard waste transfer/consolidation facilities in the county, if so where? Based on the current proposed legislation to adjust yard waste fees, it appears that the KCSWD is already working to address this issue in the north part of the county. Is this an issue in other areas of the county? Will other new transfer stations include yard waste transfer/consolidation facilities?
- Is there a shortage of single stream recyclable waste transfer/consolidation facilities in the county? If so, will the new transfer stations include single stream transfer/consolidation facilities?
- For those portions of the waste stream that are currently handled privately, should the solid waste management plan address future capacity needs where there are significant limitations or gaps? For example, should the draft 2009 King County Comprehensive Solid Waste Management Plan look at the advocacy of having additionally compost facilities even if it is privately owned?

We would also like to see information that demonstrates that KCSWD waste prevention and recycling plans align with the infrastructure limitations in the system such as:

- There is only one compost facility in King County and only a few in our region, all of which are at capacity. What impact does this have on KCSWD waste diversion plans?
- The *2006 Material Recovery Facility Assessment* prepared by Cascadia Consulting Group, Inc. concludes: *"Glass, shredded paper, and increasing amounts of non-recyclable plastics in the incoming commingled stream pose challenges for Puget Sound MRF's and The anticipated supply of comingled recyclables in 2010 exceeds the current processing capacity."* Are these issues being monitored or have they been addressed?

Additionally:
The "Common Terms" definitions on pages xii-xiv should be the same as in the Code of the King County Board of Health Title 10 and WAC 173-350.

The regulatory agency for solid waste handling in King County is Public Health – Seattle & King County (PHSKC) (as authorized by the King County Board of Health). This should be reflected in the text on page 2-4. Since both PHSKC and KCSWD are divisions of King County, it is confusing when the entity that handles solid waste is referred to as King County as it is in the document (example page 2-5, collection & processing chart in Chapter 4, etc.).

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Chapter 1 - Managing Illegal Dumping and Litter on page 1-10 although the first sentence makes reference to safety hazard, we recommend inclusion of the "risk to public health". A more inclusive statement could read as follows: *Illegal dumping and litter can cause environmental contamination and pose both safety hazards and risks to public health.*

The role of PHSKC in enforcing illegal dumping is not acknowledged on page 2-4.

The graphic on page 2-17 may be clearer if Seattle and cities not part of this planning area or that may be annexed out of the planning area were a different color than those cities that may be annexed into the planning area.

Is Ecology involved in dialog with the King County Solid Waste Division about what constitutes beneficial use as stated on page 3-23?

What are the criteria for certification of C&D processing facilities? How is it determined if facilities are meeting target diversion rates and is compliance with regulatory requirements required for certification?

Chapter 4 – Collection & Processing chart, #22 states the responsibility is the county for encouraging contractors & homeowners to use at least two containers on construction, demolition, or remodeling sites. Should this be the KCSWD and the Cities?

Page 4-8 states: *"Facilities that process mixed recyclables require solid waste permits and are regulated by Public Health – Seattle & King County."* While these facilities are regulated by PHSKC, some are permit exempt.

On page 6-16, the last sentence of the 1st paragraph is not entirely true. Six of the nine closed landfills are listed on the Integrated Site Information System (ISIS) list which is part of the MTCA process. It would be more factual to say the following:
"*...None has been placed on the Hazardous Sites List under the state Model Toxics Control Act,...*"

On page 6-16 in the 4th paragraph, the 3rd sentence regarding Hobart Landfill is not entirely true. There have been water quality exceedances in monitoring wells beyond the boundary of the slurry wall. Please revise this sentence to state its current status.

The solid waste regulation in King County is *The Code of the King County Board of Health Title 10.*

Please contact Teri Barclay at 206-263-8428 or myself at 206-263-8495 if you have any questions.

Sincerely,

Bill Lasby

Bill Lasby, Supervisor
Solid Waste Program

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