

Snohomish Health District

350 Comments from Snohomish Health District (SHD)

SECTIONS:

-021 (2)(g) This supports SHD in discussing stockpiled material.

-021 (3) The entire section is helpful in giving a process for businesses to establish through criteria what is no longer solid waste. Our experience with the matrix, such as Table 220A for compost exemptions really helped businesses and regulators alike by having parameters for determining and defining what fits the criteria and/or what they need to do to fit the criteria.

-021 (3)(c) positive market value is a reasonable, common-sense indicator—It will help SHD determine follow up as the business should know its receiving vendors. "Established markets" may need more definition.

-021 (3) (d) again is helpful for SHD, as a business should handle a product or commodity as valuable, protected, not left as a waste. This should help with waste piles.

-040 SHD likes the changes to the performance measures as they are inclusive without giving one regulation more weight.

-100 "agricultural waste". The change from "on" to "from" allows persons with wastes generated at a farm to transport anywhere. We see this with farms advertising "compost", manure, or topsoil that has not been through any pathogen reduction process.

-100 "asphaltic material". Extremely helpful that shingles are spelled out as not asphaltic material.

-100 "comingled recyclable materials". This is a helpful definition along with the already existing "source separated" to help businesses identify and define materials.

-100 "commodity". Creating a robust definition is very helpful.

-100 "indoor storage". This is a great help. It would be more helpful if stated thus; a structure where roof and walls exclude precipitation to protect solid waste. Many sites have roofs or hoop houses attached to ecology blocks that don't meet the roof.

-100 "limited MRW facility". Add to the end -- "take-back centers that abide by performance standards in section-040." This would help with oil collectors, fluorescent tube collectors etc.

-100 "manufactured topsoil". Change wording on third sentence to – "Manufactured topsoils may not contain solid waste such as but not limited to laminate, plastic, or asphalt shingles. Material containing such waste are not manufactured topsoil and are subject to management under this chapter."

-100 "point of compliance". The last sentence makes this especially helpful in establishing and reinforcing that there are points in a process that have to meet compliance, like PFRP, an air standard, etc.

General changes in the facility sections, 210 -360

SHD appreciates the creation of the "Table 000-A" for exemptions. We have used Table 220-A since 2013 for compost exemptions, and we find it helpful for the facilities as well as for us to explain. It is easy to use and follow; we pick the box that works for the business and it is much easier for them to follow.

SHD appreciates that Ecology has added the new section, "documentation" and the restructuring so that the section "operating", follows within the facility sections 210-360. This is a logical progression and the delineation of numbers and letters is good because the sections detail what we need for operating plans. This also mirrors what and how most operators already document and spell

out in their operations plans. SHD appreciates that it is written in a manner that most can just follow the numbers and letters to know what to include in their plan. This helps us to review and offer technical assistance to a clear vision provided by the facility operators.

-310

-320(4)(b)(i) last sentence—The jurisdictional health department may: remove "at the time of permitting". We want to look at the design requirements as facilities change with processes and practices.

-320(6)(a)(v) last sentence-- ...unless an alternate schedule is approved by the jurisdictional health department. Remove "as part of the permitting process;" as there may be times or events which would cause an alternate schedule that is not connected to permitting process, such as flooding, changing their process flow, etc.

-360(6)(a)(v)(A) Routine inspections must be conducted.....approved by the jurisdictional health department. Remove "as part of the permitting process". This allows a facility more flexibility.

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