Dirt Hugger

July 24, 2025

Dear Ecology,

Thanks for requesting input on the rulemaking process. We appreciate your desire to engage various stakeholders in the process. We have two main comments in regards to the new language. Otherwise, we are in support of the proposed new language.

1. **2% contamination limit on inbound feedstock**

    a. We are big fans of this and think it is a key to the long-term viability of the composting industry. Cleaner feedstock reduces operating costs and helps ensure the compost we produce is marketable. Consistent and reliable outbound flow of compost is essential to the health of every facility and clean feedstock is a top driver of that flow. If we can't sell compost then it piles up at our facilities, limiting our processing capacity. Worse yet, it negatively affects the environmental benefit of compost application to our soils. On aggregate **17% of our operating cost is in contamination removal.**

    We do want to clarify that ***we support the 2% threshold for residentially collected material.*** A 2% limit might be more challenging for commercial food waste feedstocks.

    b. This spring we studied 400 loads of incoming material from four different regions in both Oregon and Washington for contamination levels. On aggregate **84% of the loads were under the proposed 2% threshold**. Of the failing loads 14% were at 3% contamination, 1% at 4% contamination, and 1% at 5%+ contamination.

    c. We spoke with our four largest hauling partners. They were in support of the concept of having 2% or less contamination in their feedstocks for the long-term viability of the organics stream.

    Two haulers said it would be 'no problem', and indeed 99% of their material is below this threshold. Another hauler recommended a phase-in period lowering the contamination threshold over time, which will give them time to improve material without rejecting loads wholesale. A fourth hauler was concerned about the ability to meet that threshold.

    d. The haulers that said it would not be an issue mentioned that they get out ahead of contamination through routine cart audits and education. They said it would **only take one**

rejected load by us to clearly send the message that material needs to be cleaned up. They often do the same at the curb by auditing and removing contaminants and leaving 'Oops Tags'. Based on this, we don't see a Herculean effort required to get all of these loads below the 2% threshold, especially, when compared to the long-term industry benefit.

e. Haulers also cited the number of actual roll carts in the loads as a driver of contamination levels. If haulers keep their roll carts out of the loads at the transfer station it would lower their contamination numbers and save them on capital expenses.

f. Given our load statistics from this spring, Dirt Hugger would potentially lose 16% of our feedstock since it would be above the threshold. Based on 2024 numbers that would be roughly 10,000 tons. Since we are on the Oregon/Washington border that material could get redirected to Oregon if a hauler wasn't willing or able to clean up the feedstock. While that would have a negative business impact, **we are willing to lose tonnage in the short-term for the longer-term benefit of clean feedstock.**

2. Language around residuals hauled by a UTC licensed hauler

   a. Our local UTC hauler is a monopoly and is not interested in hauling our residuals locally at our scale (30 ton loads). Instead, we self haul to the closest landfill. This language change would be untenable for us since we wouldn't be able to get the volume of residuals off our site given our UTC haulers capacity and interest to haul.

      We need to maintain the ability to haul our composting process residuals to the landfill internally. Furthermore, our local UTC hauler's landfill is 48 miles farther away than our closest option. Both from a cost and logistics perspective this rule change is not viable for us.

Please feel free to reach out with any questions or clarifications on these two points.

Regards,

Pierce Louis | Co-Founder/CEO
Dirt Hugger