

WA Refuse & Recycling Association (Brad Lovaas)

Please see the attached four (4) documents for WRRRA's submission in this matter. Thank you.



WASHINGTON REFUSE & RECYCLING ASSOCIATION

August 1, 2025

Mr. Chris Fredley
Rules Coordinator, Department of Ecology
300 Desmond Drive Southeast
Lacey, WA 98503

RE: WRRA Comments on Organic Management Concepts

Mr. Chris Fredley:

The Washington Refuse and Recycling Association (WRRA) is the longest serving Solid Waste Trade Association operating on the West Coast of the United States, as we have been advocating since 1947. The WRRA represents the private sector solid waste, recycling and composting industry in all its aspects in Washington State, including initial curbside residential and commercial collection & transportation to state-of-the-art recycling, compost and landfill facilities. WRRA member companies serve a vital role in public health, safety, and environmental protection.

The WRRA Members thank you for the opportunity to comment in the Organics Rulemaking process on the agency's proposed "concepts" prior to the issuance of proposed rules. WRRA has encouraged individual members that provide organics collection services and operate compost facilities to also comment on the draft concepts. We would ask that the department give specific attention to the comments submitted by Waste Connections and Cedar Grove as they operate collection services in addition to some of the largest compost facilities in our state.

Regarding this matter, we refer to WRRA's letter to the Department of Ecology dated June 12, 2024, concerning depackaging, as well as our informal comments submitted in March 2025. We would also make you aware of our discussion with the Solid Waste Management Program's Leadership and meeting with agency leadership regarding source separation earlier this year. WRRA's Source Separation Whitepaper is provided for your reference. It was updated following feedback from the Department this past Spring. I have also attached the above referenced June 2024 letter on depackaging and our informal comments from March 2025.

Lacking specific rule language we will offer these high-level comments on the department's proposed "concepts" at this juncture this in this rulemaking.

Conceptual Feedback:

- We ask: Should the department use this rulemaking to implement the three Organic Management Laws that have been enacted in 2022, 2024 & 2025? There are many aspects of these three laws that rulemaking could clarify, particularly on implementation. It would be appropriate to address this question early in the rulemaking process, when an amended CR-101 could be issued to address any potential changes that may be warranted to WAC Chapter 173-304, or other WAC chapters that are not specifically referenced in the Department's CR-101 filed on December 9, 2024. It may be necessary to consider amendments or new sections in WAC Chapter 173-304, for example, to provide sufficient guidance for "depackaging" facilities emerging in the industry.
- The three recent Organic Management Laws (OML's) are state mandates for local collection – both residential and commercial services- and the regulation of organic management facilities statewide. The department should be cognizant of the fact that these "state mandates" came with no associated state funds for local governments to implement these requirements. This will not only impact local government but also the generators of organics materials and the service providers whether it be a regulated residential or open-market commercial service.
- Source-separation should be emphasized throughout this rulemaking, both with respect to organics collection and the processing of those materials, regardless of whether the facility is a compost facility or a "depackaging" facility. Source separated organic materials must be clearly defined due to current inconsistent interpretations of state law, specifically related to packaged food.
- Source-separation by the generator should be a priority for the Department in this rulemaking and in the implementation of the OML's. A return to the "throw it all in one container, and we will separate it and recycle or compost it" will undermine the thirty years' of effort and investment in facilities and specific collection equipment and the regulatory direction that have already achieved high diversion rates throughout Washington State. In other words, generators should still be required to source separate easily separable items and processing facilities (both composting and pre-processing) should be prohibited from knowingly accepting recyclable items that will be landfilled. High-contamination recycling in the "front end" collection from the customer will lead to increased landfilling of residuals and compostable organics, undermining longstanding public policy goals and defeating renewed legislative objectives.
- Similarly, there should be standards and limits as to how much garbage is allowed in the "organics" bin for pre-processing
- As do others, we believe that the Department analogously should look to Vermont for experience with, and examples of, recently drafted rules on "Mechanical Depackaging" for guidance on how to regulate this activity.

- WRRRA Members have long dealt with contamination in all diversion activities whether residential or commercial municipal solid waste recycling, organic waste recycling or construction waste recycling. Consumer education, bin and container labeling, as well as accept and do-not-accept lists are critical components to reducing overall contamination. A list of municipal solid waste or organic “recyclables” should not contain garbage or specific items that will contaminate the specific stream of materials that is being collected for recovery.
- We would like more clarification on “pre-processing” facilities, and whether this new class of facilities will be fully permitted or allowed to only accept source-separated organic materials. The Department should seek to prevent pre-processing facilities from circumventing current collection, transportation and facility requirements.
- The Department should also look to the 2005 Transporter Law (RCW 70A.205.300-70A.205.340) and reconsider its policy of not implementing that statute. This law prohibits the delivery of recyclable materials for landfill disposal and should not be ignored as part of this rulemaking. Intent—2005 c 394: "It is the intent of the legislature to improve recycling, eliminate illegal disposal of recyclable materials, protect consumers from sham recycling, and to further the purposes of RCW 70.95.020 and the goal of consistency in jurisdictional treatment of the statewide solid waste management plan adopted by the department of ecology." [2005 c 394 s 1.]
- With respect to the transportation of residuals: WRRRA believes that the transportation of solid waste is not subject to regulation by the Commission once it is delivered to a post-collection facility, whether that be a transfer station, a material recovery facility or a compost facility. We do not believe that the transportation of residuals is a regulated UTC service, nor do we believe that Ecology has authority over this activity. This transportation element has not been treated as a regulated activity since 1961, when the collection and transportation of solid waste was initially regulated by the state. Instead, solid waste handling facilities have had the operational flexibility, when desired, to contract with motor carriers for the appropriate hauling of residuals from post-collection facilities. These motor carriers have been subject to regulation by FMCSA and other authorities, but they are not otherwise authorized to act as solid waste collection companies. *See* RCW 81.80.470(2) (“nothing in this chapter changes RCW 81.77.010(8), to allow any entity, other than a solid waste collection company authorized by the commission or an entity collecting solid waste from a city or town under chapter 35.21 or 35A.21 RCW, to collect solid waste that may incidentally contain recyclable materials.”). Thus, when considering the operations of regulated industry, such as WRRRA members, the motor carrier’s ability to haul residuals is secondary to, and follows from, the solid waste collection company’s authority to collect solid waste directly from customers. It is not necessary to require public tariffs or rate review for residuals hauling, as there

are many other laws that the state may enforce to assure safe, environmentally sound operations when a regulated company contracts with a motor carrier for residuals hauling. To the extent that other, unregulated companies may seek to haul excessive amounts of residuals, these companies may be properly “classified” and brought into compliance based on the nature of their “front end” services provided to customers, which likely involve high amounts of contamination and solid waste in their containers and bins. It is not necessary to change the regulation of residuals hauling throughout the state for all solid waste companies, when more direct means may be used to address specific companies who are not operating in compliance with Department or Commission rules.

Conclusion

Thank you for the opportunity to comment in this important rulemaking. We look forward to providing more specific comments when specific rule language is proposed. Please direct any questions to India Brine at india@wrra.org or me.

Sincerely,

A handwritten signature in black ink, reading "Brad Lovaas". The signature is written in a cursive, flowing style.

Brad Lovaas

WRRRA Executive Director



WASHINGTON REFUSE & RECYCLING ASSOCIATION

June 12, 2024

Peter Lyon
Department of Ecology
Solid Waste Management Program Manager
Olympia, WA

RE: Depackaging Facilities and the State's Solid Waste System – Fall 2024 Organics Rulemaking

Dear Mr. Lyon:

The Washington Refuse and Recycling Association (WRRA), writes today regarding the development of organics depackaging facilities in Washington State. WRRA members represent a large fraction of the State's solid waste and organics management infrastructure, from education and collection programs, to hauling, processing and end markets. With regard to organics management, we serve our communities, protect the environment, and increase the diversion of recyclable and organic materials from landfills. Source separation is key to our success in achieving these results.

The Department's waste facility regulations, and their enforcement, play a key role in ensuring the success and long-term environmental and economic sustainability of Washington's regulated solid waste collection system. There is growing evidence that depackaging facilities that do not have responsible regulatory standards will move Washington backwards on recycling packaging and organics, thus threatening the environmental and climate goals set by the State. Our State has ambitious but achievable goals for increasing the diversion of recoverable resources from landfills and returning them to beneficial use.

We believe depackaging operations within Washington may be accepting non-source separated solid waste (i.e., commingled organics, recyclables, and garbage or "municipal solid waste") and utilizing depackaging machines to recover only a portion of the organics and recyclable content. The residual waste, estimated at upwards of 40% of the total inbound material, is contaminated and must be sent for landfill disposal. If true, materials that previously were being recycled and composted are now being landfilled, in clear disregard of the State's established goals for environmental and climate outcomes.

Washington's waste, recycling and compost laws recognize that all diversion of waste from landfills begins with one fundamental concept: source separation. "Source separation" means the separation of different kinds of solid waste at the location where the waste originates. RCW 70A.205.015(26). The Washington legislature identifies source separation as a fundamental strategy of solid waste management. RCW 70A.205.005(5). "Collection and handling strategies should have, as an ultimate goal, the source separation of all materials with resource value or environmental hazard." RCW 70A.205.005(5). Furthermore, it is the responsibility of "state, county, and city governments to provide for a waste management infrastructure to fully implement" source separation strategies. RCW 70A.205.005(5)(b).

Considerable investment of time and taxpayer funds have gone into the development of these source-separation programs in Washington. This critical work over previous decades has led to increased organics diversion, lower contamination levels in feedstocks sent to compost facilities, and consequently higher quality recycled products. Depackaging facilities jeopardize these advances.

From our collective experience, we would like to emphasize the following key points of concern:

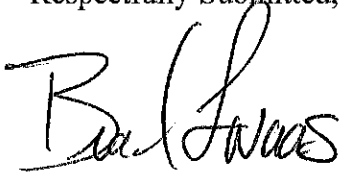
1. More material is going to landfill disposal. Enabling depackaging facilities to accept non-source separated municipal solid waste with a "take it all" model just discourages source separation and equates to more landfilling. Recyclables and organics that were previously recovered are now being disposed of as garbage. This is a giant, and avoidable, step backwards. More landfilling undermines the methane reduction/climate goals of ESSHB 2301, passed in 2024, and HB 1799, passed in 2022.
2. Threat to Washington's source-separated system. The emphasis on source separation at the point of generation cannot be overstated, and the State's intent on this subject is clear. In HB 1799, the legislature determined that source separation was not just a goal or a fundamental strategy, but a statutory requirement for businesses sending material to organic management facilities. Businesses that are subject to the organics management requirements of HB 1799 and that comply by contracting with an organic waste collection and management service **must** source separate "organic material from other waste." See RCW 70A.205.545. Thus, the legislature has determined that for those businesses source separation is not optional. Food waste must be separated from non-organic packaging at the location where the waste originates. This concept must serve as the foundation for the new rules Ecology plans to develop.
3. Lack of standards for depackaging. There are no current regulatory standards for inbound contamination allowances for depackaging facilities. The default permitted allowance for compost facilities by regulation is 5% inbound contamination. No compost facilities in Washington willingly accept garbage or recyclables as per their acceptance list.
4. Enforcement is critical for transparency. Building a strategic framework for depackaging should include a component that identifies both the role and funding for enforcement. This will enhance accountability in daily operations, aiming to improve environmental outcomes and create a fair and equitable business environment in Washington.

WRRRA and its members do not oppose anaerobic digestion (AD) for organics management; in fact, at least one signatory is pursuing an AD project and intends to comply with state source-separation laws.

While it is possible depackaging may be a helpful tool in the future towards achieving shared goals, WRRRA strongly encourages narrowly tailored regulation and standards, including how those apply to solid waste handling permits for entities using depackaging equipment to ensure compliance with the source separation mandate of HB 1799 and an ongoing commitment to our shared environmental and climate goals.

We look forward to engaging with Ecology during future rulemaking. Thank you for considering our perspective on these important issues.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Brad Lovaas". The signature is fluid and cursive, with the first name "Brad" and last name "Lovaas" clearly distinguishable.

Brad Lovaas, Executive Director



WASHINGTON REFUSE & RECYCLING ASSOCIATION

Organic Materials Management Rulemaking Questions

with WRRA Comments

Contamination Threshold Limits

- What options at solid waste facilities should Ecology consider for preventing physical contaminants in food waste/other organic feedstocks and finished compost?
- Currently, a facility must reject feedstock loads that appear to have 5% or more by volume or else have a plan for removing contaminants prior to composting. Finished compost must have less than or equal to 1% by weight and not to exceed 0.25% by weight of film plastics.
 - How should the amount of physical contaminant be measured?
 - What is an appropriate threshold for contamination in incoming feedstocks?
 - What is an appropriate contamination limit in finished compost products?

WRRA Comments:

- Permitted compost facilities must have procedures and criteria to ensure that facilities accept only source separated feedstocks. State regulations include a default limit of 5% inbound contamination and compost facilities across the state therefore are typically held to this 5% contamination standard. WAC 173-350-220(f)(iii)(C). No compost facilities in WA willingly accept garbage or recyclables as per their acceptance list
- Facility acceptance lists should include only items that can be processed and should not knowingly accept materials that will be landfilled. Because of our standards, Washington achieves impressive recovery rates at compost facilities with some recycling over 95% of all inbound materials.
- Packaged food and source separated food cannot be commingled.
- 90% recovery requirement on the backend for non-source separated streams. This is achievable with the right equipment and protocols.

Slaughter Waste

- Slaughter waste generators have found it increasingly difficult to find processing options for their material, prompting more generators to consider onsite management. This waste stream can cause significant impacts if managed incorrectly.
 - As Ecology reviews permit structures and existing permit exemptions, what factors would you like us to consider regarding slaughter waste?
 - How should on-farm slaughter fit in with agricultural practices?

WRRRA Comments:

- The decision to accept slaughter waste should be determined by market forces, involving both generators and processors. Proposed regulations should not mandate organic management facilities, such as composting sites, must accept specific materials.

Pre-processing Operations

- There are currently no specific standards for depackagers. As a result, depackagers are currently operating under the material recovery facility standards. Ecology proposes creating pre-processing standards for such operations and other organic pre-processing. One way to address such types of operations could be a minimum recovery rate that gets recycled.
 - What should Ecology consider as we develop standards for these facilities?

WRRRA Comments:

- New regulations must protect and maintain our state's source separated system at a minimum.
- New regulations must be consistent with existing state law requiring businesses to source separated (RCW 70A.205.545(3)(a)).
- With few exceptions to be identified via the rulemaking, the generator must remain responsible for source separating all non-compostable and recyclable materials from organics at the point of generation.
- Easily and readily recyclable items that cannot be recovered on the back end should not be allowed on a depackaging facility's acceptance list. These depackaging operations can result, as a byproduct, with large volumes of residuals containing other recyclable materials such as recyclable plastics. The legislature has established a hierarchy for waste management that recyclable materials to be landfilled (RCW 70A.205.310(a)). In order to further this important goal and maintain this standard, pre-processing facilities should be required to meet a quarterly recovery rate of 90%, effectively an industry standard requirement. This ensures the facility is only accepting the correct materials and recycling to a reasonable standard.
- Pre-processing operations, including depackaging, are intended to handle mixed materials, which will likely require transportation by state-certified or municipally contracted haulers. Proposed regulations should establish standards to ensure compliance with and oversight of the laws and contracts that govern solid waste hauling in the state.
- The proposed rules should require pre-processing facilities to have documented back-up agreements in place with permitted facilities with available capacity.

Recordkeeping and Reporting

- What level of recordkeeping and reporting should be required for various facility types, including exempt facilities if they export finished organics off site?

WRRRA Comments:

- Building a strategic framework for depackaging should include a component that identifies both the role, performance standards, and funding for enforcement. This will enhance accountability in daily operations, aiming to improve environmental outcomes and create a fair and equitable business environment in WA.
- Currently, there is no express allowance for deducting certain materials that are scavenged or removed

out of mixed waste inbound feedstocks. Due to this lack of guidance, these deductions are vulnerable to abuse and can result in inaccurate diversion reports. Accounting deductions need to be better understood in order to be consistently applied and regulated across jurisdictions.

- Transparency in accounting and reporting will be critical to assess facility contamination, recovery and disposal rates. This should be monthly by material class.
- Monthly and annual reports should include basic information on the jurisdiction of origin due to city/county flow control requirements.

Training at Facilities

- Currently, facility supervisors responsible for daily operation at compost facilities must have specific training, and a trained supervisor may provide training for other employees.
 - What level of training, such as additional/on-going training, should be required, and what would be the desired outcome from such training?
 - What level of training should be required at different organic management facility types, including some under permit exemption exporting finished materials offsite?
 - If no certification or training for managing organic wastes via vermiculture or other organic management technologies exists, what would you recommend?

WRRRA Comments:

- Tracking training and educational hours should be straightforward and documented for JHD review. There are various training and education opportunities beyond Compost Facility Operator Training (CFOT), such as Ecology presentations, Washington Organic Recycling Council (WORC) meetings/webinars, U.S. Composting Council (USCC) presentations/webinars, and Washington State Recycling Association (WSRA) educational events. The JHD can assess and adjust training requirements if facility-related issues arise.

Permit Exemptions

- The current rule has conditional permit exemptions for several organic material management facilities. Some permit exemptions are in state law while others are instances where Ecology determined an exemption provides sufficient oversight. Only low risk operations should qualify for exemption. It is important that the rule creates a fair and equitable business landscape and neither overburdens exempt facilities, nor allows exempt facilities to excessively undercut standards required for permitted operations.
 - What new exemptions, if any, are desired?
 - What exemptions, if any, need revisions?
- Ecology sees a need for a permit exemption for yard debris drop off locations where yard debris is transferred to an organic management facility within a reasonable time. One type of drop-off location is a retail landscaping material yard where landscapers may bring full loads throughout the day for consolidation into a larger load. We are considering time and volume limits for this permit exemption to ensure materials move regularly to a compost or other type of processing facility.
 - What time limitation would be appropriate for this exemption?

- What volume limit would be appropriate?

WRRRA Comments:

- It would be very helpful if hauling non-source separated packaged material for depackaging is rightly characterized as what it is: hauling garbage. Permits should acknowledge this and require UTC compliance for inbound loads.
- Permit exempt recycling facilities can only accept wastes source separated into individual material streams and have a 5% annual capacity limit on the amount of residual waste sent for disposal. WAC 173-350-2120(2).
- Yard debris drop-off locations and wood waste recycling facilities (however permitted) should be subject to monthly inspection and enforcement. These facilities should have signage depicting what materials they can and cannot accept in order to comply with solid waste collection and transportation regulation. Inspections should include review of the signage and accepted materials.

Other

- What requirements should be placed on digestate to be beneficially used (liquid and solids, combined or separated)?
- Ecology must update the definitions section of chapter 173-350 WAC with certain organic- related terms in statute.
 - What organic related terms would you like to see clarified or added to the rule?

WRRRA Comments:

- Digestate: WRRRA understands that solid digestate from a food waste anerobic digester is still considered solid waste under state regulations. Solid digestate should meet the same standards as compost of biosolids if it is land applied.

Thank you for the opportunity to provide comments on this important and impactful rulemaking. WRRRA is excited to continue the process. If you have any questions, please contact Legislative and Regulatory Policy Analyst, India Brine at india@wrra.org or (360)742-2609.

Sincerely,

A handwritten signature in blue ink that reads "Brad R. Lovaas". The signature is written in a cursive, flowing style.

Brad Lovaas
Executive Director



Source Separation: The First Step Toward Recycling, Composting, and All Diversion

- Washington's waste and recycling laws recognize that all diversion of waste from landfills begins with one fundamental concept: source separation.
- What is Source Separation? "Source separation" simply means the separation of different kinds of solid waste at the location where the waste originates. RCW 70A.205.015(26). When you put all of your recyclables in one bin and all of your organics in another, that's source separation!
- Source separation is the key first step in separating materials for recovery (like recycling and compost/organics) from materials for disposal (garbage or waste container).
- Recycling and organics diversion both begin with source separation for good reasons, and Washington's laws reflect this essential first step toward diverting waste from landfills.

The Importance of Source Separation

- **The First Step:** Source separation plays a key role in recycling and organics diversion efforts by separating material for recovery from material for disposal. This helps recover valuable resources which reduces overall environmental impact. Washington's waste industry is 4.1x Net Zero on greenhouse gas emissions due to all of the recycling and composting we accomplish.
- **End Products & Markets:** Source separation ensures that materials are kept clean and uncontaminated. The end markets for both recyclable commodities and compost have specific requirements for the quality and purity of materials they accept.
- **Contamination Prevention:** Contamination reduces the quality and value of both recyclables and organics for compost, making them more difficult and costly to process. Clean, separated materials can be processed more efficiently, leading to lower processing costs, reduced energy consumption, and fewer greenhouse emissions.
- **Public Health, Odor and Pest Control:** Source separation of organic waste also helps control odors and eliminate pests from organic waste. Source separation reduces the likelihood of these issues arising, making composting more manageable in residential and commercial settings, particularly in urban areas. Companies that collect and transport mixed, non-source separated wastes are highly regulated with high safety, consumer protection, and solid waste handling standards.
- **Better Environmental Outcomes:** Source separation contributes to the conservation of natural resources. Recycling and recovering materials such as paper, plastic, glass, and metal diminishes the need for v raw materials, which helps to preserve forests, conserve energy, and reduce greenhouse gas emissions. Compost produced from organics waste can be used in place of other dirt or fertilizer with higher environmental footprints.
- **Education and Awareness:** Source separation promotes education and awareness about composting and recycling. By encouraging individuals and communities to separate organic waste for composting, it fosters a culture of environmental stewardship and sustainable waste management practices.

Source Separation in Washington Law

- The Washington legislature finds that “Source separation of waste must become a fundamental strategy of solid waste management. Collection and handling strategies should have, as an ultimate goal, the source separation of all materials with resource value or environmental hazard.” RCW 70A.205.005(4). To protect public health and safety, the collection and transportation of solid waste is a highly regulated industry in Washington.
- To protect public health and safety, the collection and transportation of solid waste is a highly regulated industry in Washington. Collection and transportation of mixed solid wastes that are not source separated are generally regulated as solid waste under RCW 81.77 and may only be collected and transported pursuant to a Certificate of Public Convenience and Necessity issued by the Washington Utilities & Transportation Commission, under contract with a city, or by a city itself within the city limits. Transporting solid waste for disposal without authority on “more than an occasional basis” violates Washington law, WAC 480-70-016.
- More specifically, Collection of mixed solid wastes (garbage bin) from residential and commercial customers requires authority to collect and transport under Washington law, as discussed above. Collection of source separated re source separated recyclables (recycling / organics) from residential sources also requires authority. Source separated recyclable materials from commercial sources are considered solid waste by Ecology, but their transportation is not regulated by the UTC. Transporters of recyclable materials must register with the Ecology and must obtain a common carrier permit from the UTC.
- Washington’s laws reflect the importance of source separation at both the state, local, and individual level:
 - Local government plans must include strategies for the “Source separation of recyclable materials and products, organic materials, and wastes by generators” and the “collection of source separated materials” RCW 70A.205.040(1)
 - “It is the responsibility of state government to ensure that local governments are providing adequate source reduction and separation opportunities and incentives to all.” 70A.205.005(6)(d)
 - “It should be the goal of every person and business to minimize their production of wastes and to separate recyclable... materials from mixed waste.” 70A.205.005 (6)(a)
 - Many businesses in Washington must arrange for organic materials collection, as required by the [2022 Organics Management Law](#) expanding organics service in the state. The law expressly requires businesses subject to this law to source-separate their organic material from other waste. 70A.205.545.
 - Courts have viewed source separation as a key legal concept for distinguishing unregulated hauling of commercial recyclables from regulated transportation of mixed solid wastes. *AGG Enters. v. Washington County*, 281 F.3d 1324, 1328 (9th Cir. 2002)).
- Many Washington cities contract with third parties for solid waste collection services. Contracts regularly require solid waste generators to source separate their waste streams to a high standard to maximize recovery while minimizing cross-contamination and residual waste down the line. In some jurisdictions, waste collectors “tag” contaminated containers with an explanation of what must be removed before the container can be emptied by the collector.
- For recyclables, contamination reduces the end value of commodities. For organics, contaminants can remain in compost. Contaminants like plastics, glass, and metals are not biodegradable and can take a long time to break down, if indeed they indeed break down at all.
- Recycling and Composting facilities both need to manage inbound contamination, which is accomplished through source separation:

- Permitted compost facilities must have procedures and criteria to ensure that facilities accept only source separated feedstocks. State regulations include a default limit of 5% inbound contamination and compost facilities across the state therefore are typically held to this 5% contamination standard. WAC 173-350-220(f)(iii)(C). Facility acceptance lists include only items that can actually be processed and do not knowingly accept materials that will be landfilled. Because of our standards, Washington achieves impressive recovery rates at compost facilities with some recycling over 95% of all inbound materials. There are no current state standards for facilities that prepare materials for anerobic digestion, but these facilities will be subject to future rulemaking (such as de-packaging facilities that accept large volumes of non-source separated municipal solid waste).
- Permit Exempt recycling facilities can only accept wastes source separated into individual material streams, and have a 5% annual capacity limit on the amount of residual waste sent for disposal. WAC 173-350-210(2).

In summary, source separation is extremely important to protect local solid waste programs. It is crucial for recycling and composting under Washington State laws because it supports waste reduction goals, maintains quality standards for recyclables and compost, protects the environment, and fosters community engagement and education in diversion. By emphasizing and encouraging source separation in its laws and regulatory policies, Washington State can effectively manage its waste streams, conserve resources, and promote environmentally and economically sustainable waste management practices.