

Rebecca Francik (Rebecca Francik)



August 1, 2025

Mr. Chris Fredley

Rules Coordinator, Department of Ecology

300 Desmond Drive Southeast

Lacey, WA 98503

**RE: Basin Disposal Comments on Organic Management Concepts**

Dear Mr. Fredley,

Basin Disposal is the G-certified hauler for Franklin County and also serves parts of Walla Walla, Columbia, Benton, and Yakima Counties. We act as the waste and recycling utility for many cities across Eastern Washington. Providing accurate, transparent information to our customers—especially regarding recycling and composting—is a core value of our company.

Garbage collection is a highly regulated industry. The process is straightforward and verifiable, with tons collected and delivered to landfills easily tracked. In Eastern Washington, landfill disposal remains both accessible and affordable. Over the past decade, many of our partner cities have expressed interest in recycling and green waste services. However, when presented with the costs of curbside collection for organics or recycling, city councils have consistently opted against implementation due to financial concerns.

With the passage of HB 1799, curbside collection will now be mandated. This shift will result in significant price increases for our communities—particularly challenging given the current lack of composting infrastructure in our region.

To meet the state's organic diversion goals, maintain system integrity, and ensure the production of high-quality compost it is essential that consumers have confidence in the process. This means being able to verify that their organic waste is being delivered to reputable facilities that utilize at least 95% of the collected materials to produce high-quality outputs.

To support this goal, we respectfully request the following measures be included in your rulemaking:



- **Enforcement mechanisms** to prevent sham organics collection. In the face of rising costs, disreputable operators may appeal to price-sensitive city councils and industrial producers.
- **Strict source separation requirements** for all organics.
- **Mandatory reporting** from depackaging facilities, including:
  - Total tons of material received
  - Tons of organic matter separated from packaging
  - Tons of residuals
- **Clear classification of residuals** as solid waste
- **Mandatory collection of residuals** by certified waste haulers for proper landfill disposal
- **Verification protocols** for all depackaging and organics collection operations, ensuring:
  - Total organics + total residuals = total incoming tonnage
  - Total organics separated = organics diversion from landfill
  - Total residuals = MSW
  - Only certified haulers are permitted to transport residuals to landfills

Basin Disposal believes that these checks and balances are essential to achieving the state's organic diversion objectives while safeguarding the integrity of the system and preventing exploitation of the new laws for profit.

Thank you for your consideration.

Sincerely,

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