

November 21, 2025

Department of Ecology

Attn. Solid Waste Department, Rule Making

**Re: Rule Amendment Changes- Chapter 173-350 WAC**

Dear Ecology Rule Making coordinator:

Thank you for the opportunity to comment on the Organic Materials Management Rulemaking. We appreciate the Department of Ecology's efforts to strengthen the state's organics management framework and offer the following comments and suggestions.

#### Physical Contamination Reduction

- Reducing the regulatory physical contaminant level in incoming feedstocks to no more than two percent by volume is unfortunately unrealistic at this time and could significantly affect the feedstock operations chain and existing conditions that have been put in place by composters and other organic processors. This aspect of organics management is out of the control of everyone (except the generators) in the process. Lenz supports any and all efforts to reduce contamination; however, we do not think this change is prudent at this time and think composting facilities should retain the discretion to determine whether to accept and process materials based on their operational capabilities.
- Measuring contamination should be performed on a wet-weight basis. Volumetric analyses are problematic and more reliant on interpretation. Weight based measurement have less ambiguity and allow for better representative sampling to occur.

#### Source Separation

- One of the examples given in the definition for "Source Separation" reads as follows: "a grocery store that **places packaged or unpackaged food** for purposes of recovery of the organic materials **within in one container** and other solid wastes the store generates in separate containers". Ecology should not allow the co-collection of packaged and

unpackaged food waste. This, and all like references, should be changed to align with the goals of source-separation.

#### Training

- Lenz supports additional training for compost operators. However, operators of anaerobic digestors should be required to have the same level of training, and on-going education, as wastewater treatment operators. These systems have complex, and sometimes dangerous processes that require a trained operator to deal with effectively and safely. This section should be updated with additional training requirements.

Please let me know if you have any questions. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wheeler', written in a cursive style.

**Edward Wheeler**

Program Director/Environmental Scientist | **Lenz Enterprises, Inc.**

P.O. Box 868 | 5210 SR 532 | Stanwood, WA 98292

(m) | 360.333.0516