City of Tacoma Solid Waste (Dan Corum)

The following comments are respectfully submitted in response to the ECY proposed updates to Chapter 173-350 WAC. We encourage Ecology to reconsider the draft language and requirements regarding organic materials pre-processing for three main concerns.

Concern: Organic materials pre-processing will increase costs for Tacoma ratepayers without providing meaningful benefits while undermining source-separation messaging.

Rationale: Tacoma already has a low contamination rate (Pre-processing is an expensive blanket solution and holds the potential to undermine the success of source-separation messaging. "Recycling right" becomes less of a concern upon learning that "contamination gets sorted out before it is made into compost"

Recommendation: Make no changes in the rules. Continue to support source separation as the primary method for reducing contamination.

Concern: There is no identified test method for determining two percent contamination by volume in the draft i.e. "use of method XYZ (or as updated)" and, more importantly, there is no accepted method for even determining a two percent contamination rate by volume.

Rationale: The proposed change to two percent is a continuation of the shortcoming with the current five percent standard. The standard is largely applied through visual observation. It's difficult to enforce. Utilizing methodology that measures contamination by wight may be more accepted and objective but for contaminates like plastic bags, two percent by weight may not achieve the intended goals of contamination reduction.
Additionally, the two-percent contamination rate rule is insufficient and unneeded. It is insufficient because even two percent contamination by volume or weight is too high for some composters producing compost for agricultural markets. It is unneeded, because compost facilities already have agency to set their own standards for what they will accept or reject. This is based on their business model and projected markets for buyers, which should remain their purview.

Recommendation: Make no changes in the rules.

Concern: The draft needs to include a standard for the rate of acceptable contamination levels of inbound organic materials for pre-processing to avoid unintended consequences.

Rationale: If pre-processing is required for organic feedstocks, those feedstocks need to be predominately composed of organic materials and not recyclable materials or solid waste. Construction of expensive pre-processing facilities will generate demand for materials to process. Tacoma has an open market for commercial recycling and organics collection but not for garbage. Private haulers would be incentivized to collect mixed materials for organics pre-processing calling it "recycling" even if the materials are mostly garbage with minimal organic materials. The lack of a contamination standard for inbound materials holds the potential of undermining local flow control of commercial waste without achieving the goal of significant organics recovery.

Recommendation: Set standards for maximum contamination rates by weight for inbound

feedstocks for organic pre-processing.

Thank you for reviewing these comments,
Dan Corum
Sustainability Analysist
Environmental Services
City of Tacoma