



WASTE CONNECTIONS
Connect with the Future®

December 12, 2025

Mr. Chris Fredley
Rule Coordinator, Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

RE: Waste Connections Comments on Proposed Rule Language under WAC 173-350

We appreciate the opportunity to provide comments on this first draft rule language for WAC 173-350. Waste Connections has a long history of operating composting facilities in Thurston and Pierce Counties, where we proudly divert organic materials from landfills and turn them into valuable products. Strong partnerships with our customers and end-users help us process +150,000 yards of compost each year.

In addition to composting, Waste Connections provides collection services, recycling processing, and landfill operations across the region, giving us a unique, comprehensive perspective on the entire waste management system. While we support the intent of the proposed organics rulemaking to advance environmental goals, we are concerned that certain provisions could significantly increase operational complexity and costs for facilities.

Inbound Contamination Limits

The proposed reduction of inbound contamination limits from 5% to 2% presents significant challenges for composting facilities like ours. Waste Connections has made measurable progress in managing contamination because our finished compost must meet strict market specifications (i.e. DOT, Organics Certification), and our Local Health Department inspections have consistently found us in compliance. We invest heavily in customer outreach and education, and we maintain open communication with haulers to address contamination concerns. While we strive for continuous improvement, perfection is unrealistic in real-world collection systems. Imposing a 2% threshold would force us to reject loads that we can currently process successfully, creating unnecessary burdens for the communities we serve and increasing landfill disposal.

We are in a period of transition as newly enacted legislation expands food waste collection for commercial, multi-family, and residential customers. This shift will require time and significant outreach to help customers comply. As these programs roll out and participation grows, some

increase in contamination is inevitable. Our priority should be education and outreach before imposing stricter requirements on receiving facilities. We urge a balanced approach at this time.

Our facility has demonstrated the ability to manage contamination effectively under current limits, and we believe that collaboration and education—not overly restrictive thresholds—are the most effective path forward.

Depackaging and Source Separation

While preprocessing solutions such as depackaging facilities can play a role in managing contamination, they must be held to equivalent standards for contamination control, residual management, and reporting. Allowing lighter requirements for pre-processing facilities creates an uneven playing field and risks undermining decades of investment in source separation and composting infrastructure.

The state of Washington recently enacted the Recycling Reform Act, which prioritizes transparency and consistency through the creation of a statewide recycling acceptance list. Depackaging practices must align with these principles to ensure recyclable materials remain in recycling streams—not diverted to landfill. As a service provider committed to recycling for residents, we understand that integrity matters: we must recycle what we promise to recycle. Allowing recyclable packaging to enter depackaging systems only to be landfilled as residual undermines that integrity and erodes public trust. Preserving source separation is essential to maintain the credibility and effectiveness of all programs designed to improve environmental outcomes.

To maintain program integrity and environmental outcomes, Ecology should:

- Reaffirm source separation at the point of generation (as required by RCW 70A.205.545).
- Limit depackaging to source-separated feedstocks (lessons learned from Vermont’s strategy)
- Establish enforceable residual limits to prevent depackaging from becoming a disposal pathway.

The regulatory framework must advance Washington’s environmental objectives without imposing disproportionate burdens on proven, high-performing composting operations. Composting facilities are the backbone of organics recovery—transforming food and yard waste into valuable soil products, reducing landfill dependency, and supporting climate and sustainability goals. These operations have invested heavily in contamination control, customer education, and infrastructure to meet stringent market standards. Rules that create uneven playing fields or introduce impractical thresholds risk undermining these investments and reversing decades of progress.

This challenge is amplified by timing. Washington is in the midst of two major system transitions: the Organics Collection mandate and the Recycling Reform Act. Both require extensive outreach, infrastructure adjustments, and customer education to succeed. Introducing sweeping changes to inbound contamination limits and depackaging standards during this critical implementation period risks confusion, higher costs, and setbacks in participation.

We urge Ecology to adopt a balanced approach—one that promotes innovation and accountability while preserving the integrity of source separation and the viability of composting. By reaffirming statutory requirements, applying consistent standards across all processing pathways, and prioritizing education over punitive measures, Washington can achieve its diversion goals without sacrificing the programs and partnerships that make those goals possible.

Sincerely,

Rick Vahl
Government Affairs Manager
Silver Springs Organics/LRI/Waste Connections