

King County Solid Waste Division (Hannah Scholes)

Memo

December 11, 2025

TO: Dawn Marie Maurer, Facilities Specialist, Northwest Region, WA Dept of Ecology

FM: Rebecca Singer, Director, King County Solid Waste Division

RE: King County Solid Waste Division comments – WA Department of Ecology Organic Materials Management Rulemaking, Third Informal Comment Period

As mentioned in our previous comments, King County is supportive of Ecology’s vision to improve compost quality, reduce waste, strengthen composting infrastructure, and build a truly sustainable circular economy for organic materials. However, King County wants to ensure that these systems facilitate both maximum diversion of waste, and food waste reduction following the [EPA’s wasted food scale](#) (prioritizing first donations to feed humans, then animals, and then composting or anaerobic digestion).

We respectfully ask you to reconsider the 2% by volume incoming contamination limit. The primary reason to limit incoming contamination should be to limit contamination in the final product, therefore, we support the proposed end product contamination standards. However, some compost facilities have already invested in post-processing technology to remove contamination. If a facility is able to produce an end-product that meets the quality standards outlined in the draft rule, that facility should be able to determine the level of incoming contamination accepted up to the current 5% limit, or an equivalent limit, measured by weight. This approach allows flexibility for existing and future facilities to navigate the final product requirements in a way that controls cost and works with their space and operations plan. There is not and should not be any requirement that a facility accept any level of contamination beyond what they are able to process into a quality product.

We are also concerned that without guardrails for pre-processors around the type of material accepted and diversion levels, food donations from large businesses may decline, and easily recyclable packaging like cans and bottles may end up in the landfill after being ground through depackaging equipment. Pre-processing facilities that accept packaged food should be required to demonstrate and report on their ability to recycle the packaging they accept such as metal, paper, cardboard, Polyethylene Terephthalate (PET), and High-Density Polyethylene (HDPE) plastics, in addition to producing a de-contaminated organics

stream and reporting yield of organic material. There should be a standard for the amount of residual generated at preprocessing facilities to ensure and incentivize maximum diversion of commodities. Additionally, generators should be encouraged to donate edible food rather than comingle it with all other organic waste for ease.

Please see our additional comments in the attached document.