Sanitary Service Company (Ted Carlson)

Sanitary Service Company, Inc. (SSC) would like to submit our comments via the uploaded file. Thank you for the opportunity to be part of the process. Ted Carlson, Sanitary Service Company

Sanitary Service Company

Recycling & Garbage Collection Services
Jobsite & Event Services
Storage Container Rentals
Shredding
Commercial • Residential

November 20, 2025

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

RE: Sanitary Service Company, Inc. Comments on Proposed Rule Language

Mr. Fredley,

Sanitary Service Company, Inc. (SSC) appreciates the opportunity to comment on the Department of Ecology's draft rule language under WAC 173-350. SSC is a family owned solid waste collection company serving Bellingham and Whatcom County since 1929. SSC currently provides organics collection to residential and commercial customers throughout our service area.

SSC supports diversion of organic waste away from landfills in an effort to reduce impacts from harmful greenhouse gasses. We are fortunate to have access to a compost facility located just outside our service area who we have had a great working relationship with for decades. All of the final compost material is sold locally and put to beneficial use in Whatcom County.

SSC is also a member of the Washington Refuse & Recycling Association (WRRA) and we support and agree with WRRA's comments on this organic rulemaking. In particular, there are two issues that SSC would like to highlight that will have negative impacts on local solid waste collection companies and in our opinion will be counterproductive in efforts to meet our shared goal of diverting 75% of organic material away from the landfill.

Compost Facilities (WAC 173-350-220)

SSC agrees that contamination of inbound material should be a continued source of focus and we are committed to reducing contamination through education and outreach programs to our customers. However, lowering the inbound contamination levels to 2% will result in more organic material going to the landfill dramatically reducing our ability to meet our goals. Compost facilities already have the ability to reject contaminated loads and do so when it is necessary. They have also been successfully processing inbound materials with less than 5% contamination, keeping all of that organic material out of the landfill and putting it to beneficial use.

Rejecting additional loads with less than 5% contamination will not only send good (clean) organic material to the landfill, it will raise program costs resulting in rate increases to customers. At the same time we are mandating organic collection throughout many areas of the state, we do not want to unnecessarily increase rates. We also don't want customers to lose faith in our programs, especially if

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we are requiring customers to have curbside organics collection. If best efforts to source separate at the curb prove futile, because even with 97% clean material it will be diverted to the landfill, customers will become discouraged.

Organic Materials Pre-Processing (WAC 173-350-215)

We understand the potential value of anaerobic digestion to supplement compost facilities, providing more statewide capacity for handling organic material. However, the depackaging facilities and pre-processing language are concerning. Without inbound contamination limits for the pre-processing facilities, they can essentially take in mixed solid waste. Without question this will result in recyclables and organic material ending up in the landfill, totally undermining the state goals for diverting organic material away from landfills.

Moving away from source separation at the generator level is extremely problematic. Unfortunately, we are already seeing this happen and it will only continue without inbound contamination limits on all facilities. Throughout the state, grocery stores that previously source separated clean recyclables and clean compost material are now using single mixed waste bins. This results is recyclables and organic material ending up in the landfill. Material that was previously being recycled and composted. A huge step in the wrong direction.

The lack of a level playing field between compost facilities and depackaging facilities is concerning. With no inbound contamination limits, or limits on residuals, this has the potential of enabling sham recyclers and composters. If commercial customers are no longer required to source separate, they can use mixed waste containers, avoid state and local solid waste taxes, and undermine solid waste collection and processing infrastructure. We have seen this with construction and demolition sorting facilities claiming to recycle material only to landfill large percentages while avoiding taxes and undercutting investments in actual recycling.

We know from a recent listening session on this rulemaking process that Ecology is aware of Vermont's experiences with depackaging facilities and mixed-organic waste. It is not working in Vermont. Hopefully, we can learn from what happened in Vermont and avoid similar mistakes here in Washington.

SSC appreciates the opportunity comment, as well as, Ecology's engagement with stakeholders throughout the rulemaking process. In addition to our comments, we fully support WRRA's more detailed comments on behalf of our industry.

Thank you for your consideration.

Sincerely,

Ted Carlson

Ted Carlson
General Manager
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