



King County

Solid Waste Division

Department of Natural Resources and Parks

King Street Center

201 South Jackson Street, Suite 6400

Seattle, WA 98104-3855

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711 TTY Relay

kingcounty.gov/solid-waste

August 13, 2026

SENT VIA ELECTRONIC MAIL

Dawn Marie Maurer

Dmau461@ECY.WA.GOV

Washington State Department of Ecology

300 Desmond Drive SE

Lacey, WA 98503

Dear Dawn Marie Maurer;

King County appreciates the Washington State Department of Ecology's leadership and efforts to improve compost quality, reduce waste, and strengthen Washington's composting infrastructure. We support the overall direction of this rulemaking and share Ecology's goal of building an organics management system that maximizes edible food recovery and organic waste diversion while protecting public and environmental health.

As Ecology finalizes the rule, King County encourages a framework that provides clear, enforceable standards while maintaining sufficient flexibility to accommodate differences in facility design, processing technologies, and evolving markets.

King County's detailed comments and recommendations are attached for Ecology's consideration and are summarized below.

Facility plans of operation. King County recommends that Ecology require each facility to identify in its plan of operation the categories of materials it intends to accept. The jurisdictional health department would then approve those materials based on the facility's specific design, processing technology, contamination controls, and permitted downstream outlets. This facility-specific approach would create a clear and enforceable standard while allowing facilities to adapt as technologies, processing methods, and markets evolve.

Clean wood waste. King County recommends defining "clean wood waste" based on the characteristics of the material rather than how the material is ultimately used. The rule should separately clarify which activities involving clean wood waste are subject to its requirements, including organics processing, reuse, recycling, and forestry or land-



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management activities. This approach would provide regulatory clarity without limiting future recycling technologies or beneficial uses.

Sampling and compliance. King County supports Ecology's proposed contamination standards but recommends greater clarity on how facilities will demonstrate compliance. The final rule should specify how samples must be collected, how the five-percent contamination limit will be measured, and what laboratory and testing methods must be used. It should also clearly define what happens when a facility exceeds the limit, including whether material may be reprocessed and retested and what actions are required when exceedances occur repeatedly.

Residuals and destinations. King County supports requiring facilities to report how much residual waste is generated and where it is sent. This information will improve transparency and help jurisdictions understand how effectively organics are being diverted from disposal. The requirement should ensure that residuals are managed at lawful, appropriately permitted facilities, while allowing facilities to determine whether those destinations are located within or outside the county.

King County appreciates Ecology's work to advance a stronger and more resilient organics management system. We believe these refinements will improve regulatory clarity and accountability while preserving the flexibility necessary for innovation and continued investment in organics recovery infrastructure.

Thank you for the opportunity to provide comments and for your continued partnership.

Sincerely,

DocuSigned by:

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Rebecca Singer
Division Director
King County Solid Waste Division

CC: Chris Stubbs, Deputy Director, SWD
Christine Kim, Strategic Planning Manager, SWD
Amy Ockerlander, Government Relations Manager, SWD