



August 13, 2026

Solid Waste Management Program Rule Coordinator
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Proposed Amendments to Chapter 173-350 WAC – Organic Materials Management

The RNG COALITION appreciates the opportunity to comment on the Washington Department of Ecology's proposed amendments to Chapter 173-350 WAC.

RNG COALITION represents the renewable natural gas industry across North America, including hundreds of organizations throughout the renewable gas supply and value chain. Our members support the development and deployment of renewable natural gas for practical decarbonization solutions across multiple sectors.

Anaerobic digestion plays an important role in Washington's organic waste management system by providing a pathway to divert food and other organic wastes from landfills while producing renewable energy and beneficial soil products. We support Ecology's efforts to reduce contamination in organic feedstocks and finished products. However, the final rule should recognize that different organic waste management technologies have different feedstock capabilities and should not establish requirements based primarily on what material can be accepted directly by a composting facility.

The RNG COALITION supports Ecology's recognition of organic materials pre-processing as a distinct part of the organics management system. We urge Ecology to preserve this pathway, restore the previously proposed 2 percent contamination standard following pre-processing, clarify how that standard applies when pre-processing is used in conjunction with anaerobic digestion, and avoid requirements that would effectively require food waste generators to manually depackage food before it can be recovered.

Restore the 2 Percent Contamination Standard Following Pre-Processing

RNG COALITION recommends that Ecology restore the previously proposed 2 percent physical contamination standard for feedstocks entering anaerobic digestion, composting, or another organic materials management process. The current 5 percent threshold is unnecessarily permissive and does not reflect the level of feedstock quality that organic materials management facilities should ultimately strive to achieve.



Importantly, the 2 percent standard should apply only after any necessary pre-processing has occurred. It should not establish an upper contamination limit for source-separated organic material received by a permitted pre-processing facility, including a pre-processing facility collocated with an anaerobic digester.

Ecology should clearly distinguish between material received for pre-processing and feedstock entering the downstream organic materials management process. Pre-processing facilities exist specifically to receive material containing packaging and physical contaminants, remove those materials, and prepare cleaner feedstock for anaerobic digestion, composting, or other organic materials management.

Applying the 2 percent threshold at the facility gate would defeat the purpose of the pre-processing pathway and could significantly limit the recovery of packaged commercial food waste. A permitted pre-processing facility should therefore be allowed to receive source-separated organic material exceeding 2 percent physical contamination so long as the material is reduced to the applicable standard before entering the organic materials management process.

Avoid a One-Size-Fits-All Feedstock Standard Based on Direct Composting

RNG COALITION supports restoring the 2 percent contamination standard following pre-processing, while also encouraging Ecology to provide a practical and consistent methodology for demonstrating compliance. Measuring contamination solely by volume can present challenges, particularly for plastics and film packaging that can be compressed significantly depending on how material is collected, handled, and measured.

The capabilities and needs of composting and anaerobic digestion are not identical. Material suitable for direct composting may need to arrive relatively clean and free of packaging. Anaerobic digestion paired with modern pre-processing can recover organic material from more complex commercial food waste streams before that material ever enters the digester.

Ecology should not use the characteristics of material suitable for direct composting as the default design assumption for every organics management pathway.

Commercial food waste can include expired, damaged, recalled, off-specification, or otherwise unusable food that remains in its original packaging. Requiring this material to arrive in a form suitable for direct composting would overlook the purpose and capabilities of dedicated pre-processing systems.

The Clean Soil Coalition, a coalition of farmers, scientists, and clean-energy innovators focused on smarter food waste policy, has emphasized that composting and anaerobic digestion can serve as complementary components of an effective organics management system. Clean source-separated



organics may be well suited for direct composting, while packaged and more complex commercial food waste streams can be processed through depackaging and anaerobic digestion.

Washington should preserve both pathways rather than structure statewide requirements around one processing model.

RNG COALITION also encourages Ecology to consider the practical limitations of measuring incoming contamination solely as a percentage by volume. Packaging materials, particularly plastics and films, can be highly compressible, which can make volumetric determinations difficult to apply consistently in the field. An apparently precise numerical threshold may therefore produce inconsistent results depending on material composition, handling, and compaction.

The better regulatory focus is whether facilities appropriately manage the materials they receive, remove contaminants before downstream processing when necessary, and consistently meet environmental and finished-product requirements.

Source Separation Should Not Become a Manual Depackaging Requirement

RNG COALITION strongly supports source separation of organic waste from municipal solid waste and other unacceptable materials. However, source separation should not be interpreted to require that every food product be manually removed from its packaging at the point of generation.

A grocery store, food manufacturer, restaurant, or other commercial generator should be able to separate packaged food waste from its general waste stream and send that material to a facility specifically designed and permitted to separate the food from its packaging.

Requiring workers at individual businesses to open containers, bags, cups, and other food packaging by hand would shift waste processing functions away from specialized facilities and back onto generators that may not have the equipment, labor, space, or operational systems to perform that work efficiently.

More importantly, imposing such a requirement could reduce rather than increase diversion. Where commercial quantities of packaged food cannot practically be separated by hand, making mechanical pre-processing unavailable or unnecessarily difficult may leave landfill disposal as the easier option.

That would work directly against Washington's organic waste diversion and climate objectives.

The state should distinguish between **source separation from the municipal solid waste stream** and **pre-processing of source-separated food waste to remove packaging and other physical contaminants**. They are different functions, and the final rule should preserve both.

Maintain Strong Finished-Product Standards

Preserving pre-processing and anaerobic digestion does not mean accepting greater contamination in finished organic products. RNG COALITION supports strong, enforceable finished-product



standards that protect Washington soils and maintain public confidence in compost, digestate, and other beneficial products.

The Clean Soil Coalition's 2025 independent third-party testing of commercially available Washington compost illustrates why finished-product standards matter. Testing found significant differences in contamination performance among products, including one sample that exceeded Washington's existing physical contaminant and plastic standards.ⁱ

The appropriate response to these concerns is not to restrict technologies capable of removing contamination. It requires processors to demonstrate that the material ultimately produced meets protective environmental standards.

Ecology's proposed standards for processed material, including digestate, requiring no more than 0.5 percent physical contaminants by dry weight and 0.1 percent film plastic by dry weight provide a strong performance-based backstop. RNG COALITION supports retaining these requirements along with appropriate sampling, testing, reporting, and enforcement.

These standards also reinforce why Ecology should preserve flexibility on the front end. If a facility can safely accept a challenging source-separated food waste stream, remove packaging and contaminants through pre-processing, and consistently produce material meeting stringent finished-product requirements, the rule should allow that facility to do so.

Preserve Technology-Neutral Organic Waste Management

Washington will need a range of technologies to successfully manage the increasing quantity and complexity of organic material diverted from landfills.

Composting plays a role in that system, particularly for already clean organic and yard waste. Anaerobic digestion has an equally important role, particularly where food waste can avoid being sent a landfill and be recovered for renewable energy production.

These pathways should complement one another.

Ecology should therefore avoid provisions that pick winners and losers among organics management technologies. The final rule should establish protective environmental outcomes and allow regulated facilities to determine how best to achieve them.

A facility should be judged on its ability to responsibly manage incoming material, remove contamination, protect public health and the environment, and produce compliant finished products, not on whether its operating model resembles the processing pathway historically used for organic waste in Washington.

Conclusion

RNG COALITION appreciates Ecology's work to modernize Chapter 173-350 WAC and its recognition that organic materials pre-processing is an important part of Washington's evolving organics



management system. We appreciate the Department's leadership and commitment to stakeholder engagement throughout this process. Please do not hesitate to contact us with any questions. Thank you for your consideration of these comments.

Sincerely,

Yanni Psareas

Manager of State Government Affairs

RNG Coalition

505 SE 184th Ave

Vancouver, WA, 98683

(916) 588-3033

yanni@rngcoalition.com

ⁱ <https://cleansoilnow.org/wa-compost-test>