Jeffrey Gage

Under 173-350-025(2)(b)(vii)it states "Equal to or less than 32 gallons where manual handling is practiced." Most reusable containers for Organic waste range from 60 to 90 gallons with wheeled carts. these have been proven to be manageable by all accounts unless overloaded by user. I request this be changed to allow or include the 60 and 90 gallon capacity wheeled versions of reusable containers.

Under WAC 173-350-215(6)(a)(iv) it states we need to provide a representative sample collection method but it does not describe what test method is needed to be used to measure or determine the amount of the level of physical contaminates by volume, making this section a futile requirement. Sampling methods must consider the testing procedure to be used. As a facility permitting consultant, I do not know how I can or any others can address this section with any level of professional competence without a test method being determined.

Under WAC 173-350-215(6)(a)(ix) it states that "Operator training to include required reading of the approved plan of operation for employees with responsibilities for compliance with this section" So the only training or competency requirement in this new section for the persons responsible for the operation of these facilities and compliance with all the engineering stipulations you are requiring is to be able to read? There are training courses and certification programs for transfer station operators, managers of composting operations, and certification programs from several associations that will provide the context, knowledge base and skill set training to accomplish these tasks in a safe manner. You cannot expect compliance without understanding what you read. Please require the person responsible for these operations to be certified under SWANA or USCC programs for operations of these types.

Under WAC-173-350-220(2)(j)it states "Limit physical contaminants in incoming feedstocks to no more than five percent by volume" Please identify an accepted test method for accomplishing this section's requirement.

Under WAC-173-350-220(6)(a)(iii) states..."and must contain no more than 5 percent physical contaminants by volume" How is this supposed to be described, what method of evaluation do you propose to be used to allow for precise screening, do you mean of the yearly tonnage, or of the single bag you find full of garbage? What percentage is that and what is the assumed basis amount of waste is this by load or by customer or by material category? What test methods are used to measure for 5% by volume?

Under WAC-173-350-220(6)(a)(iv)(D)(III) states "during the period when the compost is maintained at 55 degrees Celsius 131 degrees Fahrenheit or higher, there must be a minimum of five turnings of the windrow..." Please be specific what you mean by "is maintained" in light of the fact that when you do the turnings, there will be a period of loss of temperature in the pile and it will slowly rebuild in temperature above 55 degrees Celsius or 131 degrees Fahrenheit. How often does this need to be measured and documented, once between turnings? continuously?

Under WAC-173-350-220(6)(a)(iv)(G) states the testing for Table 220-B must be done by an accredited laboratory, what about the 5% contaminates by volume for feedstock testing, what labs do that testing? What is the test method?