

August 18, 2026

Clark County Solid Waste and Recycling and the City of Vancouver Solid Waste Services would like to offer our comments on the Washington Department of Ecology's (hereafter, Ecology's) preliminary statewide collection lists. Our comments are organized as follows:

1. Material categorization
2. Residential recycling list
3. Alternative collection list
4. Residential composting list
5. General feedback

Material Categorization

1. Wet-strength material

Wet-strength material is included in three categories: Other Molded Pulp Packaging; Polycoated Fiber Food Packaging; Other Coated Fiber. In the Full Evaluation Matrix, all three categories have the following note in the DESIGN Key Notes column: "Wet-strength resins were rated as a challenge by 33% or more paper mill respondents."

Wet-strength material is currently not recyclable in Clark County. In Oregon, wet-strength materials are not currently accepted for recycling.

Comment: Please make wet-strength material its own category and include that category on the initial residential collection list so that it may be evaluated in the needs assessment. We would have concerns if it were added to the final statewide lists because we have historically been unable to take this material.

2. Plastic bag and film packaging

Please reach out to plastic bag and film recyclers to review which materials they currently can and cannot accept. Only PE Bag and Film Non-food Packaging has been proposed for alternative collection, but there are materials outside this category that some recyclers are already collecting.

For example, in Clark County, residents may drop off plastic film at any of the three transfer stations or at participating retail locations. The plastic film and bags are then recycled by Trex. In the current system, residents may drop off clean and empty bread bags and non-biofilm produce bags. However, these materials are in the PE Bag and

Film *Food Packaging* category, and therefore not listed for collection. Similarly, a film plastic food storage bag with a zipper could be dropped off, but “zipper-closure bag” is categorized as Other Film & Flexible Packaging, which is not listed for collection.

Comment: Please connect with plastic film recyclers to review what materials they currently can and cannot accept, adjust the material categories accordingly, and include those on the initial alternative collection list so that they may be evaluated.

3. Separate nursery pots from #1 - #7 Black Pigmented Rigid Plastic Packaging

The category #1 - #7 Black Pigmented Rigid Plastic Packaging is currently not on any collection list. However, many jurisdictions will accept nursery pots in their recycling programs. For example, in Clark County, clean and dry rigid plastic nursery pots 4 inches in diameter or larger may be recycled, but not brittle, crinkly, or easily broken nursery pots.

Comment: Please move nursery pots from #1 - #7 Black Pigmented Rigid Plastic Packaging into their own category and include that category on the residential recycling list so that it may be evaluated in the needs assessment.

4. Split out #5 PP bottles, jugs, and jars from #5 PP Bottles and Containers

#5 PP Bottles and Containers is on the draft preliminary recycling list. This category “includes #5 beverage bottles, #5 other product bottles, #5 other containers, #5 tray/thermoform, #5 tubs.”

Comment: Please split “#5 PP Bottles and Containers” into “#5 PP Bottles, Jugs, and Jars” and “#5 PP Other Containers.” Trays and thermoforms can be harder for a resident to identify than a bottle, jug, or jar. We recommend trays, thermoforms, and similar be evaluated separately from bottles, jugs, and jars.

5. No size specifications

For the following material categories, minimum and maximum sizes are not specified:

- #1 PET Clear/Natural Other Containers,
- #2 HDPE Natural & Pigmented Other Containers,
- #5 PP Other Bottles & Containers,
- Aluminum & Bi-metal Food Packaging,

- Most paper categories

Some MRFs may only be able to sort certain sizes of these materials. For example, Aluminum & Bi-metal Food Packaging includes “food service container base[s].” A food service container base could be recycled in our current curbside system as scrap metal, and we can only collect scrap metal that is longer than 2 inches but shorter than 24 inches in any dimension and not heavier than 35 pounds. Similarly, paper products in Clark County must be larger than a postcard to be accurately sorted and recycled through our system.

Comment: Please review material categories to determine if minimum and/or maximum size must be specified to ensure the material could be properly sorted at a MRF.

6. Mixed-material paper packaging and products

Comment: How do mixed-material paper packaging and products fit into the proposed categories?

For example, envelopes and mailers appear in four categories, all of which are on the draft preliminary recycling list: Kraft Paper; Other Uncoated Paper; High-grade Paper Products; Low-grade Paper Products. However, what category would a mixed-material package, like a paper envelope with bubble wrap embedded, fit into? Other than Paper with Metal Composite Packaging, which has not been proposed for any statewide list, it was not clear to us how products that are a mix of paper and other materials fit into the categories.

Residential Recycling List

For the following materials, unless otherwise noted we support the inclusion of the materials on the preliminary recycling list so that they may be evaluated in the needs assessment. However, we have concerns about our ability to recycle them with our current system and infrastructure, as explained below.

7. Plastic “Other containers”

The proposed residential recycling list includes “other containers” for #1 PET (clear/natural only), #2 HDPE, and #5 PP.

“Other containers” includes tubs, clamshells, trays, and thermoforms. We are concerned that if we were to tell a resident that they could put bottles, jugs, jars,

clamshells, trays, thermoforms, and tubs in their recycling cart, they would end up putting any packaging of that resin in their cart. It would become too difficult to distinguish which shapes are acceptable and which are not. If bottles, jugs, jars, tubs, clamshells, trays, and thermoforms could all be recycled, what shapes or packaging types of that resin could *not* be recycled? Furthermore, the notes in the Full Evaluation Matrix for #1 PET Clear/Natural Other Containers (including clamshells and trays) are not promising: they are not accepted by 70% of Washington, difficult to force into a thermoforms line, may be a contaminant, have no local markets, and are not on any of the collection lists in Oregon. Finally, it would be challenging to teach residents to only recycle certain resins and pigments of clamshells.

Currently, plastic bottles, jugs, tubs, and jars, regardless of resin, are recyclable in Clark County. Collecting additional shapes/package types would require additional infrastructure investments.

8. #5 PP Other Packaging & Food Serviceware

This category includes #5 plates and cups. Once you tell a resident they can recycle plastic cups, they will put all types of plastic cups in their cart. It would be difficult to get residents to put only #5 cups in their carts. This would be particularly challenging in a jurisdiction like ours, where our composter cannot accept compostable cups (“plastic cups go in the recycling, compostable cups go in the trash”). Food contamination would also be an issue with this category.

Finally, what is the market access for plastic plates and cups, and how in-demand is this material for plastic recyclers?

9. #1 PET Lids >2"; #2 HDPE Lids and Handles >2"; #5 PP Lids >2"

Currently, plastic lids can only be recycled in Clark County if they are screwed onto an empty, clean, and dry container. Loose lids are a top contaminant in our paper bales. Our current MRF uses a star screen, which cannot distinguish flattened plastic from flattened paper. Since our region relies on Oregon’s system (which does not currently allow loose plastic lids in curbside recycling) it’s likely that our facilities will be unable to effectively sort these out as contaminants. The Full Evaluation Matrix stated “Lids may contaminate fiber on occasion but in small quantities. Otherwise [#1 and #2] lids are likely sortable appropriately.” We would like the Needs Assessment to further analyze what percentage of MRFs in Washington can currently accept detached

lids and handles, what sorting equipment allows them to do this, and what the cost and timeline would be to implement that equipment in MRFs around the state.

10. Uncoated Food Service Corrugated Cardboard

This category includes pizza boxes. Our current message to residents is that only the parts of the pizza box that are not greasy or food-soiled are recyclable. In the needs assessment, please assess the extent to which food and grease contamination on pizza boxes is a problem for MRFs and end markets: how much grease/food contamination is too much, how many MRFs report it as a problem, etc.

11. Uncoated Food Service Paper and Molded Pulp Packaging

Of all the materials in this category, the only thing currently recyclable in Clark County is molded pulp packaging. We are concerned that most of the rest of the materials (e.g., uncoated paper sandwich wrappers, uncoated pulp food service clamshells, uncoated plates, etc.) would be too food-soiled to have value to bale and sell. Aside from food contamination, it would be difficult for the average resident to consistently identify whether a paper plate or bowl is coated or uncoated.

12. Polycoated Fiber Food Packaging

Would this category include to-go coffee cups? Clark County does not currently accept coffee cups. Food contamination and the cup coating are both issues. We have the same concerns for Polycoated Fiber Food Packaging that we have for Uncoated Food Service Paper and Molded Pulp Packaging. Coffee cups are not recyclable in Oregon. Finally, as a jurisdiction that cannot accept compostable coffee cups for composting, it would be a confusing message for residents that paper coffee cups can be recycled but compostable coffee cups are garbage.

13. Low-grade Paper Products

This material covers many types of products. In the Full Evaluation Matrix, under COMPATIBILITY Key Notes, the consultant referred to large cat scratching pads. We would be unlikely to accept scratching pads in our current system. They could come in various three-dimensional shapes that would be difficult to sort and they can be composed of multiple materials, which would be difficult for a resident to distinguish.

They would also likely be damaged by the time a resident disposes of them. We thought this category may also encompass cardboard air filters, which would also likely not be accepted in our current system due to their hard-to-sort shape, potential to be composed of various materials, and potential poor quality at time of disposal.

14. Glass bottles & containers

“Glass containers” is a very broad category. We currently do not accept non-food-grade glass like cosmetics containers, candles, etc., which would be encompassed by “glass containers.” We also do not accept canning jars (e.g., Ball jars), drinking glasses, Pyrex baking dishes, and measuring cups due to their different melting points and characteristics from glass jars and bottles. Glass is a challenging end market and, while we support a broad category on the list for evaluation purposes, we would be concerned with a category as broad as “glass containers” being on a final list.

We recommend the following resources be consulted when evaluating whether glass should be collected commingled or separately:

- [Northwest Region Report: Optimizing the Commingled Residential Curbside Recycling Systems in Northwest Washington \(October 2016\)](#): “Glass in commingled collection bins breaks into fine pieces. Broken glass contaminates other materials, damages equipment, and is a safety hazard for MRF workers. Glass is particularly affected. Recommendations include: Collect glass separately if possible. Communities that do not take glass in their commingled programs should continue to keep it separate. Jurisdictions changing to collect glass as a non-comingled item will need to build in time for the adjustment. Residents will not change their habits when a commodity collected in the curbside cart for a long period [sic]. In this case, glass will remain in the feedstock as a contaminant” (PDF p. 11).
- Glass Recycles Foundation, [Collection Models Best Practices](#): Acknowledges that quality of glass can suffer when collected single stream. A separate bin for glass “enables residents to have curbside access while keeping single-stream items free of potential contamination from broken glass. This also allows glass to be recoverable at a higher rate.”
- [Improving Oregon Recycling Systems Infrastructure Collection Alternatives Research \(Phase 2 Task 1\): Single-Family, Dual-Stream Collection Research Summary \(April 10, 2020\)](#).
- [Institute for Local Self-Reliance: Dual Stream vs. Single Stream Recycling \(August 22, 2019\)](#).

Alternative Collection List

15. Aerosol cans

We support the inclusion of Aluminum Aerosol Cans and Ferrous Aerosol Containers on the alternative collection list. Currently, aerosol cans are accepted in Clark County's curbside recycling system. If there were an alternative collection program for aerosol cans, we would advocate to continue to collect them curbside countywide. Discontinuing curbside collection of this material in favor of depot collection could confuse residents.

16. Compressed Gas Cylinders

We support the inclusion of Compressed Gas Cylinders on the initial alternative collection list so that they may be evaluated in the Needs Assessment. However, if these were to end up on the final alternative collection list, they would need to be drop-off only in Clark County due to safety concerns with hauling.

17. Small Format Metal Packaging

Small Format Metal Packaging includes "can lids" and "pull tab[s] from food can[s]." Due to worker safety concerns at the MRF, we currently instruct Clark County residents that a can lid can only be recycled if it is attached and "crimped" into the can. A fully detached lid is currently garbage in Clark County. Would inclusion of Small Format Metal Packaging on the final list require us to accept can lids in any form, or could we keep our messaging the same to support worker safety?

Residential Composting List

We support that compostable packaging products have not been added to the residential composting list. We would be unable to accept these in our organics system because our composter produces a certified organic compost.

General Comments

It would have been helpful when reviewing these lists to see how these material categories translated into baled end-market products (i.e., which materials would be sorted and sold together).

Southwest Washington, and Clark County in particular, relies on processing infrastructure in both Washington and Oregon. Clark County will continue to rely on processing infrastructure in Oregon in the future. For that reason, our regional position is that the more harmonized our statewide list is with the RMA in Oregon, the easier education and outreach would be for residents and the higher likelihood that our facilities would be equipped to sort those materials. If materials that are currently not on the RMA list end up designated for recycling in Washington, we would prefer they be designated for alternative collection, rather than curbside collection, to not make recycling more confusing for residents and difficult for processors.

Please let us know if you have any questions.

Sincerely,

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