

Elizabeth Davis

Before proceeding with the official comment, here is my personal statement. I want to thank all involved with the Waste management operations in the Washington Ecology Department. You are unsung heroes that endeavor to keep our state healthy and clean. I want you to know that there are more than a few normie citizens out here who are rooting for you to keep up the fight to maintain and improve our high standards waste management! We are counting on you!

Subject: Public Comment – Strong Inspection, Enforcement, and Environmental Safeguards for Chapters 173-350 and 173-351 WAC Rulemaking

To the Washington Department of Ecology:

I am writing to submit comments on the proposed updates to Chapters 173-350 and 173-351 WAC regarding Solid Waste Handling Standards and Municipal Solid Waste Landfills. As a Washington resident, I request that Ecology establish clear, enforceable, and rigorous regulatory requirements that prioritize environmental health, groundwater protection, and community safety over operational exemptions.

Specifically, I urge the Department of Ecology and Jurisdictional Health Departments (JHDs) to incorporate and strengthen the following safeguards in the final rule language:

- * Mandatory Minimum Inspection Frequencies:

- * Require mandatory, unannounced routine physical inspections of permitted solid waste facilities and landfills by local health jurisdictions and Ecology inspectors at least quarterly.

- * Do not allow self-reporting or facility-managed compliance audits to replace independent agency verification.

- * Rigorous Groundwater and Leachate Monitoring:

- * Strengthen groundwater monitoring protocols around landfill boundaries (WAC 173-351-400 series) to mandate immediate public notification and corrective action triggers upon any detection of hazardous constituents, PFAS, or heavy metals.

- * Ensure that leachate collection and storage systems (including surface impoundments and tanks) undergo mandatory, verified tightness and leak testing on a strict schedule.

- * Strict Limits on Exemption Categories:

- * Ensure that any permit exemptions provided under WAC 173-350-210 or 173-350-320 (e.g., for waste piles, material recovery, or organic processing) are tightly restricted, clear, and conditional upon strict operational performance standards.

- * Prevent facilities from misclassifying solid waste as "fill" or "exempt materials" without rigorous, verified contamination testing.

- * Transparent, Enforceable Penalty Structures:

- * Establish clear enforcement escalation pathways and mandatory penalties for repeat violations, unpermitted waste storage, or improper discharge to land or water.

- * Ensure that Jurisdictional Health Departments are fully supported with clear regulatory backstops from Ecology when enforcing corrective actions against non-compliant operators.

Washington's land and water resources require firm, proactive regulatory oversight. I ask Ecology to ensure that the final rule reflects a strong commitment to public health protection, environmental justice, and non-partisan enforcement. Thank you for considering these comments.