Thomas Halford



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To the Washington State Department of Ecology, Good morning,

My name is Thomas Halford, and I've spent my career managing excavation and utility operations across Western Washington. I want to share a practical, field-level perspective on the importance of disposal sites like the Looker Properties Canyon Road Pit and NW Cascade in Puyallup—both of which play a vital role in keeping infrastructure projects and emergency response work moving safely and efficiently.

Hydro-excavation has become the industry standard for working around buried utilities. My teams use high-pressure water and vacuum systems to expose or install lines for power, sewer, storm, water, and gas. The water used to perform this work and fill our trucks is potable water, drawn from approved municipal sources. It's the same clean water that runs through household taps, which means the resulting material is simply native soil mixed with clean, drinkable water.

If you compared a soil sample from a hydro-excavation truck to one from a traditional excavation on the same jobsite, you'd find no difference other than moisture. It's safe, reusable earth—not contaminated waste.

Facilities such as Looker Pit and NW Cascade are essential for this reason. They are properly managed, centrally located, and permitted to handle clean soil material generated by hydro-excavation work. Requiring contractors to send this material to processing plants designed for oily or contaminated waste would immediately overwhelm those systems and bring critical projects to a halt.

At Liquid Environmental Solutions, we move hundreds of cubic yards of material each year and rely on these facilities to maintain safe, compliant operations. During severe weather events—like the November 2024 storm—having nearby, approved sites allowed us to make emergency repairs quickly, protecting public infrastructure and restoring essential services.

We take environmental compliance seriously and fully support oversight that ensures all material is handled appropriately. At the same time, there must be practical options for



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disposing of clean, non-hazardous soil in an efficient, sustainable way. Sites like Looker Pit and NW Cascade meet that need, allowing clean material to be dewatered, reused, and kept out of facilities that were never designed to handle it.

Thank you for taking the time to consider this perspective from those of us who perform this work every day.

Respectfully, Thomas Halford Liquid Environmental Solutions