

Josh Helm

HCON Inc has submitted a letter for consideration in lieu of making a full statement in this comment box. Thank you.



Joshuah Helm

E-mail: Jhelm@HCONinc.com

October 9, 2025

Dear Sir/Ma'am,

It has been brought to our attention that the DOE may be considering the stoppage of hydro-excavated material waste disposal at multiple sites throughout Pierce County. If enforced, it would be not only costly to our customers, but detrimental to our business.

Let me start my simply stating what Hydro-Excavation is regarding our scope of work.

Hydro Excavation is a process of breaking up earth with clean, high-pressure water, and collecting both the material and the water into a tank/bin with a high-powered vacuum unit.

As a contractor, HCON uses this process for trenching, fence post holes, daylighting existing facilities, or installing vaults or other underground facilities. The material collected into the bin/tank is no different than any other material excavated by any method minus the clean water. Further, the soil we are excavating from within the R.O.W of our public works projects is tested for contaminants prior to and during our construction efforts. The soil tested from a dump truck coming from a given site would display the same results of a vac truck coming from the same site with the addition of clean water.

Currently we pick up our clean water for hydro excavation at a public Aqualoader Fill Station provided by Firgrove Mutual Water. This public station is metered and tapped directly into their water main that provides service to the entirety of the South Hill of Puyallup. Also, when we need water from other sources, typically, this is gathered from a public, metered and controlled source. We won't even pull from a lake, river or pond even with appropriate permitting for fear of contamination in the pond bottom and/or rocks and debris damaging the very costly pump systems on the trucks themselves. The water is simply never dirty and always potable water.

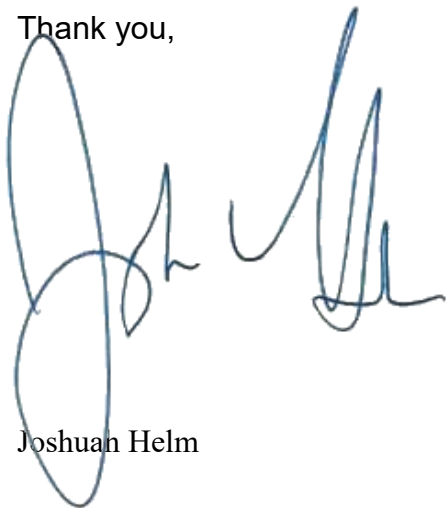
There may be some misunderstanding with the various agencies on what is Hydro-excavation spoils vs. what is storm system maintenance spoils. This is entirely different and to my knowledge is highly regulated as to where they can dump given the material coming from storm basins, oil water separators and other mechanisms where storm runoff may contain sheen or contaminants. This is a completely different market segment. The equipment may look similar, but the job and result is not the same.

Given the state of underground infrastructure throughout our region. Hydro-excavation has become a priority and requirement as opposed to an expensive option. Municipalities require hydro ex across the state. Currently, in Pierce County, I am unaware of any official decant facilities that are open to the public. The only official decant facilities are typically publicly owned and not open to the public for general use.

To limit or expel the current dump site providers in our local area the ability to take our spoils, the DOE would be causing unjust turbulence throughout our industry. I would like to ask that before a sweeping declaration is made that could harm business rate payers and service providers, a formal public discussion is had to help those at the Department understand the difference between Storm/Sewer maintenance spoils vs. Hydro-Excavation discharge. They are not the same nor should an entire industry suffer over a misunderstanding of definition and/or scope.

Thank you for your time and consideration of this matter,

Thank you,

A handwritten signature in blue ink, appearing to read "Joshuan Helm". The signature is stylized with a large loop on the left and a series of vertical strokes on the right.

Joshuan Helm