

Thomas Howell

**To Whom It May Concern,**  
**Department of Ecology**

Good morning,

Pro-Vac has extensive experience in hydro-excavation operations throughout the energy and utility industries. With this knowledge, we would like to highlight the critical importance of facilities such as the Looker Properties Canyon Road pit in Puyallup, WA, and provide context on the types of material transported to that site and similar facilities.

Hydro-excavation has become a required method by many municipalities across Washington State. Over the last 30 years, as more facilities have been installed underground, the risks to infrastructure and worker safety necessitate this method. Hydro-excavation ensures the safe installation and maintenance of critical systems—including power, water, sewer, gas, and storm utilities—that serve millions of businesses, customers, and citizens across Western Washington. Without this method, the ability to maintain and expand essential infrastructure would be significantly impaired.

It is important to distinguish between materials displaced by hydro-excavation:

- **Contaminated material** such as debris from storm or catch basins, oil/water separators, or material that displays a sheen must be delivered to specialized processing plants. These facilities are designed to treat and clean such material for safe reuse.
- **Clean soil** generated by hydro-excavation, however, is fundamentally different. Processing plants are not designed to handle massive volumes of clean soil. Requiring contractors to bring uncontaminated material to these facilities would overwhelm their capacity many times over, effectively halting critical public improvement and infrastructure projects.

As a contractor that moves hundreds of thousands of yards of hydro-excavated material annually, Pro-Vac relies on safe and compliant disposal solutions for reusable material. The availability of facilities like the Looker Pit is vital not only for municipalities and counties, but also for utilities, schools, hospitals, and energy providers. These sites enable emergency repairs and rapid response during storm events, which would not have been possible without access to compliant, central disposal options.

Pro-Vac is committed to full compliance in all excavation and disposal practices. We work in close partnership with our clients, including Potelco and other utility providers, to ensure that

material is properly characterized and transported to appropriate facilities. The Looker Pit is uniquely valuable because of its central location along the I-5 corridor and its demonstrated compliance measures to dewater and responsibly repurpose clean material.

Thank you for your consideration of this matter. Pro-Vac remains committed to supporting safe, efficient, and environmentally responsible solutions for infrastructure projects across Washington State.

Respectfully,

**Tom Howell**

***Vice President of Operations - Pro-Vac West***

