

**Whatcom County Response to Comments
Preliminary Draft Revision Dated July 16, 2015
Comprehensive Solid and Hazardous Waste Management Plan
Whatcom County, Washington**

**Ed Nikula, Whatcom County Solid Waste Advisory Committee
Received July 20, 2015**

1. I have reviewed the plan and only one question. In Appendix E, table 4.1.1 Recomps tons are shown as about 11,000. Is this county tons only and excludes City of Bellingham?
Response: The 11,663.25 tons presented in the Cost Assessment Questionnaire Table 4.1.1 is the total quantity of solid waste handled, as reported by RDC as per WAC 173-350-310(d), Intermediate solid waste handling facilities, at their permitted solid waste handling facility.

**Amber Jones, Whatcom County Solid Waste Advisory Committee
Received July 22, 2015**

1. Sections 1.2.4 and 6.1. Remove ‘with the exception of Bellingham’ as we do offer a 32 gallon service to those customers as well.
Response: “...with the exception of Bellingham” will be removed from the text in both sections.
2. Section 1.8.1. Date should be changed to July 2015.
Response: Based on the uncertainty at this time as to when local adoption will occur, the end date of the plan update process will be removed from the section.
3. Table 8-1, Goal 2.A. Sham recycling is still not defined correctly. The issue isn’t recyclables being hauled to a landfill, the issue, which costs the county \$8.50 per ton, is sham recyclers (companies that can only legally haul recyclables) illegally hauling garbage and calling it recycling.
Response: Action 2.A will be revised to state “Investigate service provider compliance with applicable requirements to determine if there is an issue of illegally hauling solid waste under the guise of recycling, and enforce requirements as applicable.”
4. Table 4-2, Goal 3.B. SSC offers free waste audits; additional assistance with follow up on more properties is likely to increase participation and diversion.
Response: While SSC may be providing this service, it may not be provided system-wide. Goal and associated actions developed by the SWAC Subcommittee and previously approved by SWAC remain valid. Action 3.A will be revised to state “Create or expand programs to provide...”
5. Table 4-2, Goal 3.C. SSC now uses photo labels on multi-family recycling containers, and offers Spanish & Russian decals by request.
Response: While SSC may provide this service, it may not be provided system-wide. Goal and associated actions developed by the SWAC Subcommittee and previously approved by SWAC remain valid.
6. Table 4-2, Goal 3.D. The current schedule is EOW across the system, and customers who want weekly pick-up can request it at additional cost.
Response: The SWAC Subcommittee developed Action 3.D as a means of ensuring that the focus remains on means of improving multi-family recycling; action remains valid.

7. Section 5.1.1. Some areas in the east county don't have a F+ option either.
Response: Text will be added to the section indicating that curbside collection is not available in some portions of eastern Whatcom County.
8. Glossary – The source for legally or legislatively defined terms in this glossary are:
Response: The source of glossary terms is Appendix A (Glossary of Terms and List of Acronyms) of the Department of Ecology's Guidelines for Development of Local Comprehensive Solid Waste Management Plans and Plan Revisions, Publication No. 10-07-005. A footnote to the glossary will be included that states the source.
9. Section 2.3.1. The source(s) for the following definitions is/are: [they can supply citation(s)]
Response: The source of definitions is Appendix A (Glossary of Terms and List of Acronyms) of the Department of Ecology's Guidelines for Development of Local Comprehensive Solid Waste Management Plans and Plan Revisions, Publication No. 10-07-005.
10. Section 3.2. It should be noted that with contamination losses at <1%, Whatcom County's effective recycling diversion per capita is actually significantly higher than the state average, where contamination and processing losses from single stream recycling approach 25% by weight.
Response: Comment will be incorporated into Section 3.2.
11. Section 4.2.2. While additional outreach will be helpful, it should be noted that the local multi-family program is now, and has been very successful since 1992. Over 95% of all multi-family complexes participate, with an average 30% recycling rate, and a contamination rate below 5%. These numbers are better than virtually all states in the nation achieve for single family curbside.
Response: Comment will be incorporated into Section 4.2.2.
12. Section 8.1.5. The Washington Refuse & Recycling Association did, and can in the future cooperate through equipment and manpower sharing during manmade and natural disasters, to provide safe and effective handling of larger quantities of solid waste than normal.
Response: Comment will be incorporated into Section 8.1.5.
13. Table 8-1, Goal 2.A. Sham recycling is the act of hauling material for disposal, when the service has been represented to the original customer as being recycling. This includes the hauler allowing the customer to place non-recyclable material in the supposed recycling container.
Response: See response to Amber Jones Comment No. 3.
14. Section 9.1.3. Each ton of contaminated CDL or sham recycling bypassing Whatcom County transfer stations results in the loss of \$8.50/ton in County solid waste tax revenues.
Response: Noted. Comment is fairly specific relative to a section that provides a general discussion on waste management system financing.

Polly McNeill, Attorney representing Sanitary Service Company, Inc.
Received July 23, 2015

1. Section 9.1.2: This section should state, “The Flow Control Ordinance’s designation of specific facilities has no legal significance, because it was determined to be unconstitutional by a federal magistrate.” Simply taking out the inaccurate statement that the FCO does not designate specific facilities is simply not enough, given the fact that the code language is still on the books. This situation is alluded to in the Financing discussion, and should be explicitly stated here in the section about the FCO itself because otherwise the entities operating under the current system appear to be in violation of County code.
Response: Noted. An additional action 1.D will included stating that the county flow control ordinance will be reviewed and updated.
2. Section 8.2.1: Even though the flow control ordinance exempts C/D waste, state law still requires that it be hauled by the certified/contract company. According to the numbers in the Plan, C/D waste contains 11 percent residual waste and is not recyclable material. Following, “This amendment allows disposal of C/D waste at undesignated disposal sites, including site outside the county,” the section should state, “Collection of such waste by unauthorized haulers results in illegal diversion of C/D waste and loss of excise tax funds to the County.”
Response: Noted. As stated above, potential flow control and sham recycling issues will be investigated, reviewed and responded to in the planning period.
3. Section 9.2 should include the following: “Under current conditions, the County is losing excise tax funds through loopholes in the system. One is that C/D waste is being delivered to out of county facilities following collection by unauthorized waste haulers. Another is that services being misrepresented to customers as recycling result in C/D waste being hauled for disposal without collecting or remitting the excise taxes due.”
Response: Noted. As stated above, potential flow control and sham recycling issues will be investigated, reviewed and responded to in the planning period.
4. Table 9-1 should include a Goal to “Reduce the diversion of excise funds from the system” and the related actions should include, “Monitor hauling C/D waste out of the county” and “Police construction job sites to ensure proper C/D waste handling practices.”
Response: As stated above, flow control and sham recycling issues will be reviewed and investigated.
5. In Table 6-1, the Goal is to, “Ensure that collectors are providing the required minimum service to all providers,” by taking action to, “Investigate complaints regarding collection services and correct deficiencies.” Yet there is nothing about current conditions suggesting any concern that minimum service levels are not being provided, and we are not aware of complaints regarding legal solid waste collection services. A more meaningful way to state this is, “Ensure that collection of waste is being provided by authorized haulers.”
Response: All goals, including Goal 1.A, were developed through the SWAC Subcommittee and vetted through the SWAC. Goal from a system-wide perspective remains valid.
6. In Section 9.1.1: A new sentence was added in the description of Cities, saying, “The City of Bellingham has a municipal contract with SSC for collection, and an independent disposal contract.” The description should note that the contract is for residential customers, and commercial are still governed by WUTC regulations.
Response: Comment will be incorporated into Section 9.1.1.

Larry McCarter, Recycling & Disposal Service Inc.

Received July 23, 2015

1. What SSC says about FCO is and isn't true.

What is true is we need NEW disposal agreements between ALL disposal sites.

Within the scope of those agreements we can agree to any level of recycling WE agree to be the right amount.

We can agree to accept and recycle c/d waste too.

And we can agree to pay a county tax for self haulers.

Response: Comment noted.

Diana Wadley, Washington State Department of Ecology

Received November 25, 2015

Procedural Items that Must be Addressed Prior to Plan Approval

1. Resolutions of Adoption: Whatcom County and the cities with interlocal agreements need to approve the updated comprehensive solid and hazardous waste management plan prior to Ecology's approval of the final draft. Please include a statement assuring that the plan acceptance process outlined in the interlocal agreement has been fulfilled.

Response: Text will be added to Section 1.3 indicating that "Each participating jurisdiction, as represented by the Solid Waste Executive Committee through interlocal agreement, adopted this revision to the Plan prior to its approval by Ecology."

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:

Thank you. It also appears you'll have the traditional appendix with the actual resolution of adoptions (Append. C.), which is great.

Response: No response necessary.

Items that Must be Addressed Prior to Plan Approval

1. Required: In various places in the plan, such as in section 1.3, section 6.1, in the WUTC Cost Assessment, and on the map on page 17, it is stated that the planning area of this plan does not include the eastern portion of the county, and that that portion of the county is included in the Skagit County plan. That is incorrect, and Whatcom County needs to plan for its entire county. Please revise your draft accordingly to include the full county, including the populace, haulers, needs, etc. therein.

Response: Because the Newhalem area is isolated from Whatcom County service provision by geographical and transportation infrastructure constraints, solid waste management services are provided by Skagit County service providers. To provide clarity and compliance with solid waste planning requirements, an action 1.E will be added to Table 9.-1 stating that "Pursue an interlocal agreement with Skagit County that defines and establishes solid waste planning and service provision responsibilities in the Newhalem/Diablo area."

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:

Thank you. Please pay attention to all areas of the plan pertaining to this. For example, looking at section 2.1 of the Track Changes version, it appears the sentence, "This portion of the county constitutes the solid waste management planning area and encompasses 755 square miles, including the incorporated municipalities of Bellingham, Blaine..." needs changed, since your planning area is the whole county (minus about 25 square miles of reservation land). There is also a sentence in 2.1.1 that says, "The eastern portion of the county, not included in the study area, is typically mountainous." which will need the middle piece deleted. It would also be good to remove the "both the western and central portion of" from this

sentence in section 1.3, “The Plan encompasses both the incorporated and unincorporated areas of the western and central portion of the county, with the exception of the Lummi and Nooksack reservations.”

Response: Comment will be incorporated as suggested.

2. Required: Please correct Figure 2, the map of the planning area to encompass the eastern portion of the county, and highlight to show the Nooksack and Lummi reservations.

Response: Figure 2-1 will be revised to indicate the locations of the Nooksack and Lummi reservations.

Please refer to the response to Diana Wadley Comment No. 1 (Items that Must be Addressed) regarding inclusion of the eastern portion of Whatcom County into the planning area. A Figure 2-2 will be added that shows the western portion of Whatcom County, including city limits, urban growth areas and rural areas, and tribal lands in greater detail.

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016: Great start, but I don't see a purple line that correlates with the "Planning Area" given in the legend. Please add it, and when you do so, please draw it such that it includes all county lands (including federal), but does not include tribal lands.

Response: The purple "Planning Area" line is embedded in the "County Boundary" line. The figure will be revised to make more discernible, and to make clear that tribal lands are not part of the Planning Area.

3. Required: While it is understood that the solid waste system in Whatcom County is almost fully privatized, the county must still look ahead and ensure adequate facilities are in place. Additionally, the County is still responsible for its closed solid waste handling facilities (landfills). Please discuss with greater specificity the projected waste in relation to facility capacities and capabilities, as well as post-closure needs, with an eye on the six- and twenty-year planning horizons. For example, this could be expounded upon in section 2.3.8 and/or section 7.2. This will help you meet the requirements for:

- A six-year construction and capital acquisition program for solid waste handling facilities. (Note: The date of the first year referenced in the six -year capital and acquisition projection will also mark the beginning of the new five-year planning window. Looks like from the rest of the plan that you'd want the first year to be 2016.)
- The estimated long-range needs for solid waste handling facilities projected twenty years into the future.

Response: Discussion will be included in Section 2.3.8 and Section 7.2, and an action added to Table 7-3 indicating that the County will work with the private solid waste service providers to ensure that each is completing planning to maintain service capacity over the planning horizon.

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016: Adding the sentence, "The County will continue to work with the private solid waste service providers to ensure that facility capacity is constructed in advance of need." in section 2.3.8 is not specific enough. Please show you have already discussed the waste disposal and recycling projections with each of the major facility operators and that they have analyzed that information alongside their facility capabilities and given you feedback to either assure their ability to meet demand over the six-year horizon (2016-2021), or show their plans for (via capital or other major acquisitions they'll need) meeting demand, or if you'll need to explore other options. Please also show such analysis related to the longer 20-year timeline. We are not asking you to do a detailed analysis, but rather to use the waste projection data you already have in

section 2.3.8 to inform a discussion around upcoming facility or capital needs over the six- and twenty-year horizons.

Response: The following will be added as the second to the last sentence of Section 2.3.8 “Solid waste service providers were apprised of these waste projections throughout development of this revision of the Plan and have ensured the County that they will continue to plan for and construct sufficient system capacity in advance of need.”

4. Required: Please distinguish how you designate an area “rural” or “urban” for the purposes of RCW 70.95.090 (7) (b). The 2008 plan included a map for this. This information could come more into play as the eastern portion of the county comes into the fold. Looks like the Kendall-Maple Valley area and/or Limited Areas of More Intense Rural Development mentioned in 9.2.1 could be unique, too.

Response: Figure 2-2 will be added to the Plan (refer to response to Diana Wadley Comment No. 2 – Items that Must be Addressed) that will show city limits, urban growth areas (including the Kendall-Maple Falls LAMRD), and rural areas consistent with the County’s current zoning map.

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:
The proposed Figure 2-2 is a great start. Please show distinctly which of the Comprehensive Plan Designations given in the legend will be considered “rural” and which will be “urban” for the purposes of RCW 70.95.090(7)(b). All components of the map should be so specified, with the exception of tribal lands. Also please discuss how the updated map will correlate with the table and text given in Section 2.1.2.

Does Newhalem/Diablo have the minimum program for collection of source separated recyclable materials as defined for rural areas in RCW 70.95.090(7)(b)(i)? The final sentence in section 2.1.3 mentions "community services" as part of what's discussed in the [Whatcom Co. Comp Plan](#) updated in 2014. I would consider programs for the collection of source separated recyclables to be a kind of community service. However, looking at that plan, I see in Chapter 5 that it is pulling information from the 1999 SWMP (though they should've been utilizing the 2008 plan at that time). Please ensure that future Comp Plans pull from this updated plan, especially since the Whatcom Co. Comp Plan notes that Newhalem is excluded, but in reality it must be included. In the meantime, please discuss in this Solid Waste Management Plan update how the minimum programs for the collection of source separated materials from residences in urban and rural areas are being met.

Response: Figure 2-2 will be revised to more clearly designate “rural” and “urban” designations. Section 2.1.2 is specific to a description of the planning area – not services provided in that area; discussion related to source separation requirements in both incorporated and unincorporated portions of the county are presented in Section 4.1.1 (related to recycling) and Section 5.1.1 (related to organics collection).

Diana Wadley Comment on January 15, 2016 Revision, Received March 21, 2016:
Section 4.1.1, is lacking a description of recycling in the unique Newhalem/Diablo area. Since the Newhalem/Diablo area is not required to have curbside recycling service per Whatcom County’s Solid Waste Collection District exclusion described in [WCC 8.11.010](#), please show readers that the area is meeting the minimum program for collection of source separated recyclables materials as defined for rural areas in RCW 70.95.090(7)(b)(i). My research concludes this area does meet the program requirements, as residents and businesses have the option to self-haul to local

recycling depots. Thus, you could insert the following into section 4.1.1 to satisfy this requirement, if you concur. It could fit at the end of the second paragraph under the “Residential Curbside Recyclable Collection” section.

“The unincorporated Newhalem/Diablo area is serviced by Waste Management and has an exclusion from mandatory curbside recycling service per [WCC 8.11.010](#). However, this area meets the minimum program requirements for collection of source separated materials as described in RCW 70.95.090(7)(b)(i) through recycling depots to which residents may self-haul their recyclables.”

Response: Comment will be incorporated as suggested.

5. Required: Please include at least one example of each SWAC and SWEC minutes showing discussion of this plan.

Response: Copies of SWAC and SWEC meeting minutes discussing the Plan revision will be included in Appendix C.

6. Required: WUTC Comments: The WUTC conducted a formal review of the Plan and forwarded their comments to Ecology and to the County in a letter dated September 10, 2015. The WUTC comment letter, assigned as an attachment to Ecology’s comments, showed no actionable items, but still must be attached to your Final Plan.

Response: Text will be added to Section 1.8.4 indicating that the WUTC issued a letter dated September 10, 2015 indicating that it had no comments on the draft revision of the Plan; the letter will be included in Appendix E.

Other General Comments

1. Mention of any contracts or agreements between the County and the private facilities that manage the county’s solid waste would be helpful.

Response: Reference to any associated contracts/agreements will be included in Sections 7.1.1 and 7.1.2.

2. Note that the State Plan has been published as of June 2015. Preferred names are the full name of The State Solid and Hazardous Waste Plan; Moving Washington Beyond Waste and Toxics or “the State Solid and Hazardous Waste Plan”

The 2015 state waste plan update contains 53 goals with 177 supporting actions. It looks like the column “Connecting to Beyond Waste” in the table at the end of most chapters is ready to be updated to match the now-published plan. For example, here’s a goal from the State Plan that seems very applicable to table 3-1 of your plan: “Goal SW 4: Waste generation will be reduced throughout the system by both businesses and residents.” Other goals/actions from the state plan may also apply. Thank you for drawing connections between your plan and the State Plan!

Response: Document will be revised to reflect 2015 adoption of the State Solid and Hazardous Waste Plan. Connections to the Beyond Waste Plan in the goals and actions tables at the end of each applicable chapter will be revised to accurately reflect the Priorities and Key Principles presented in the Beyond Waste Plan; identification of each specific goal in the Beyond Waste Plan would make the goals and actions tables unwieldy and may generate confusion in trying to tie each Whatcom County goal to all applicable Beyond Waste Plan goals.

3. Figure 2-3 shows the Whatcom County Waste Stream Composition, but I had trouble finding the matching graph or data in the 2009 Waste Characterization Study (<https://fortress.wa.gov/ecy/publications/summarypages/1007023.html>). Please cite the page and source of data. Additionally, as I looked at the 2009 Waste Characterization Study data for Whatcom County (fortunately for you the only sample area for the Northwest Waste Generation Area!), I became unsure that Whatcom is as similar to the rest of the state as said in this draft plan. On page two of the study is Figure 1: Overall Statewide Disposed. Figure 29 on page 69 of 2009 study shows overall NW and reveals that of all the areas, this study area has the highest organics, and that organics seems to be the largest difference between Whatcom and the other study areas. Table 38 on page 85 shows NW's residential data. It shows residential organics at 49.2%! And of that, vegetative food was the highest portion, followed by animal manure. I just wonder if this reveals an opportunity you might want to address in the plan.

Response: Figure 2-3 was created using the data for all four quarters/seasons specific to Whatcom County provided in the 2009 Study.

4. Due to the online nature of most Solid and Hazardous Waste Management Plans today, please include links to items discussed when possible. Examples include studies and Whatcom County Code referenced, and online databases/directories discussed.

Response: Hyperlinks to on-line resources (e.g., Revised Code of Washington, Washington Administrative Code, Whatcom County Code, etc.) will be embedded in the document.

5. Please use “multifamily” instead of “multi-family,” as that is how it is spelled in both County Code (8.10.060) and the Washington State Recycling Association study.

Response: All references to “multi-family” will be revised to “multifamily.”

6. Counties are encouraged to plan for disaster debris, whether within their solid waste management plans or via their emergency management teams. There is also a growing focus on this within the solid waste world as we are faced with increased severe weather events and seek solutions to mitigate climate change. An example of this is in the EPA’s Sustainable Materials Management Program (SMM) Strategic Plan for FY 2017 – 2022 (see the built environment section): http://nrcrecycles.org/mobius/nrcwp-content/uploads/2015/02/SMM-Strategic-Plan_October-2015.pdf Ecology is aware and supportive of the current disaster debris planning efforts by Wallace Kost of the Whatcom County Sheriff’s Office. I would encourage inclusion of participation in that effort as a goal or action within this plan. Section 8.1.5 seems primed to discuss it.

Response: Discussion will be added to Section 8.1.5 and goal/action associated with integration of waste handling and disposal efforts with the Division of Emergency Management’s emergency response documents will be added to Table 8.3.

**Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:
Thank you for the improvements to section 8.1.5. I ran this section by our specialist on disaster debris, who had some useful suggestions, including the below:**

- **You might expand language to include the Health Department as having a role in approval of suitable alternative staging areas. The Sheriff and Health Department will need to work together for approval. This is important because**

FEMA will likely be asking if storage and management meets regulatory requirements. Federal reimbursement is usually tied to this.

- Because the work of “designating certain locations and facilities for accumulating large volumes of disaster debris...” will occur later, I suggest leaving the door open to unusual, temporary sites. A text edit that could accomplish this may be, “Disaster debris will be managed through the appropriate existing facilities, including transfer facilities, permitted inert waste landfills, building materials recovery centers, and composting facilities as feasible. The County may also need to designate certain locations and facilities for accumulating large volumes of disaster debris.”
- It is true that the Sheriff’s Office is responsible for coordinating continuity of services (though local emergency management) but it is as a coordinating entity. The role of the Health Department should be identified this plan, including being at the table during response and recovery.
- The certificated haulers have the right to the waste in their territories. Emergency situations don’t negate that and most franchise agreements include contingencies. Additionally, not all certificated haulers are WRRRA members, including a couple of the larger ones. I would suggest editing your text to remove this mention of the WRRRA, unless you’re aware of services that I am not.

Response: The Department of Emergency Management is actively completing the disaster management plan, using the Snobomish County plan as a template. An update of this effort, and how it ties with solid waste, was presented to the SWAC during its January 28, 2016 meeting. Citation of the Health Department’s involvement in emergency response planning, as well as designation of locations for large volumes of disaster debris, will be included in the text. Reference to WRRRA will be removed (note this was included per Amber Jones Comment No. 12).

7. The County’s Flow Control Ordinance (codified within County Code 8.15) requires that solid waste generated in the county be processed or disposed of at a designated waste facility. It appears to me that the code gives a mechanism by which new facilities may be designated as part of the system (County Code 8.15.080). Would it be helpful to include the agreements executed per County Code sections 8.15.080 (D) and 8.15.060(B) to show which facilities are designated and their responsibilities?

Response: Whatcom County Code 8.15.030 currently designates disposal at the Recomp and Olivine facilities, both of which are no longer current. Table 9-1 will be revised to include update to WCC 8.15.030.E.

8. **Diana Wadley Comment on January 15, 2016 Revision, Received March 21, 2016: We concur with the Polly McNeill Comment No. 1, in regard to the private solid waste facilities. Because the Point Roberts facility is on County property, however, it has the potential for flow control. Suggested text for the end of section 9.1.2 follows: “The Flow Control Ordinance’s designation of specific private facilities has no legal significance, because it was determined to be unconstitutional by a federal magistrate.”**

Response: Comment will be incorporated as suggested.

Updated Response: June 14, 2016. Upon further consideration and discussion with Diana Wadley, the comment will not be incorporated. An additional action 1.D will be included stating that the county flow control ordinance will be reviewed and updated.

Other Specific Comments by Section

1. In the Acronyms and Abbreviations section, for MFS, I would suggest saying, “Minimal Functional Standards, such as those found in Chapters 173-304 and 173-350 WAC.”
Response: Comment will be incorporated as suggested.
2. In 1.1 and 1.4, it appears this is only a solid waste management plan. However, this is a joint solid and hazardous waste management plan. Please make that clear, even if by simply pointing the reader to Chapter 11.

Response: Sections 1.1 and 1.4 will be revised to specify that planning associated with hazardous waste management has been in accordance with RCW 70.105 and is presented in Chapter 11.

3. In 1.2.5, are the five closed landfills the county landfills that are later referenced? Is so, you might clarify by adding the word “county.” Also, “status” was spelled “statues.” This section also says, “...in addition to several others regulated as MTCA sites.” In Section 7.1.3, it says the two Y-Road closed county landfills are MTCA sites. Are there other landfills that are MTCA sites, and if so, should they be named as well? Or perhaps in this section you could limit to naming just the landfills accepting MSW and the closed landfills, and then provide greater detail in section 7.1.3 and point readers that way?

Response: Comments will be incorporated as requested.

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016: Please further clarify the text in section 1.2.5. Specifically, if the two Y-road, county-owned landfills are the only closed landfills in the county currently under MTCA process, you might consider the following text: “...While there are no active landfills, there are five closed county landfills maintained under permit in post closure status. Two of these landfills are regulated as MTCA sites (see Section 7.1.3.)”

Response: Text will be revised to read “Other closed landfills, such as the Y Road landfills, are regulated as MTCA sites (see Section 7.1.3).”

4. In section 1.3, the eastern portion of the county needs included, please. And regarding exclusion of the Nooksack and Lummi reservations, please show them (at least the Lummi) on the maps accordingly.

Response: Please refer to the response to Diana Wadley Comment No. 1 (Comments that Must be Addressed Prior to Plan Approval).

5. In section 1.5, please update to show that the State Solid and Hazardous Waste Plan has been completed as of June 2015 (<http://www.ecy.wa.gov/wasteplan/index.html>).

Response: Comment will be incorporated as requested.

6. In section 1.6, it would be nice to have the names of the SWAC members by their positions (at the very least the subcommittee members).

Response: Do not concur. Section 1.6 describes the roles and make-up of the SWAC and SWEC and is meant to be applicable throughout the life of the Plan. Given the limited nature of committee service (less than the life of the Plan), listing specific individuals in Section 1.6 is not appropriate. Please note that specific SWAC members that participated in revision to the Plan are listed on the Acknowledgements page of the Plan.

7. Suggested rewording of last paragraph of 1.8.4, mostly to avoid the word “amendment”:
"The County Health Department revised the Plan to address comments received from all parties. The revised preliminary draft was submitted to Ecology for its 120 day review and comment. Once the County incorporated Ecology's comments, the County carried out the local adoption process, including revisiting existing interlocal agreements (etc.)"

Response: Comment will be incorporated as suggested.

8. In section 2.1.2, you say, “The U.S. Census defines rural areas as... ” did you mean to say "urban" here?

Response: Concur; text will be revised to indicate “urban” rather than “rural.”

9. In section 2.1, are there any larger waste-generating industries to note in Whatcom County, such as food processors, oil refineries, or pulp and paper mills?

Response: There are no industries operating that generate waste at quantities requiring specific planning relative to the countywide planning effort.

10. In section 2.2, please note when the incinerators closed.

Response: Year the last incinerator ceased operation will be included in the text.

11. In section 2.3.1, could note that waste reduction is sometimes called waste prevention.

Response: Comment will be incorporated as suggested.

**Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:
Thank you. A similar edit to the glossary’s definition of “waste reduction” would be appreciated.**

Response: Comment will be incorporated as suggested.

12. In section 2.3.2, it would be helpful to clarify what kinds of waste you are talking about. For example, the total 311,842 tons is inclusive of tons recycled, diverted, MSW AND industrial and inert wastes. It's everything. The percentages given are again of everything. It also would be helpful to include the type of waste disposed at BP, Cemex, and Greater Wenatchee. Only MSW is mentioned in this paragraph, but these facilities take other types of waste. Note also that the Cowlitz County landfill mentioned in section 7.1.1 is missing here.

Also missing is Graham Road Recycling and Disposal (from your list of where the 8% (of non-MSW) goes.

Thank you for including a complete list of facilities accepting various items, though. Such information may help inform people like Wally Kost working on the Disaster Debris Management Plan.

Response: Comment will be incorporated as requested.

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016: Thank you for adding in the Graham Road Recycling and Disposal facility. To add in the Cowlitz Co. Headquarters Landfill, we offer this text edit suggestion for section 2.3.2: "...Most of the total solid waste generated in the county is MSW, with roughly 56 percent of total county wastes disposed of at Columbia Ridge landfill in Arlington, Oregon (RDS), roughly 36 percent disposed of at the Roosevelt Landfill in Roosevelt, Washington (RDC), and a very small amount disposed of at the Headquarters Landfill in Cowlitz County, Washington."

Response: Comment will be incorporated as suggested.

13. Table 2-8 reflects data from the Ecology Recycling Survey, which includes construction and demolition debris. Because construction and demolition tends to be a large and weighty portion of the waste stream, it is reasoned that much of the decline in tonnages during the recession was due to a slowdown in housing construction.

Response: Concur as text in accompanying Section 2.3.8 acknowledges the recession that began in 2008 as being a factor in the temporary decline.

14. The second paragraph of Chapter 3 gives two primary reasons for promoting waste reduction (reduce toxicity and reduce quantity of discarded materials). It does mention this "conserves natural resources," but I would encourage stronger language focused on this conservation piece, and a nod to the full life cycle of materials. We are seeing shift away from the traditional end-of-life focus, as seen in the new State Solid and Hazardous Waste Management Plan, which uses a "sustainable material management" lens. A key reason for promoting waste reduction/prevention is the avoidance of resource use and pollution associated with creating the materials in the first place (the "upstream" environmental costs.) From the new state plan:

"To represent the current system and focus on reducing waste and toxics, we used a sustainable materials management approach, which is also used by the U.S. Environmental Protection Agency (EPA). The sustainable materials management approach is illustrated in the materials life cycle graphic [visible if you follow the link below] that Ecology adapted from Oregon's Department of Environmental Quality. Materials management looks at the full life cycle of materials from the design and manufacturing phase, through the use phase, to the end-of-life phase when the material is either disposed or recycled.

Materials management still focuses on recycling and disposal issues. However, looking at production and use phases can help identify more sustainable ways to design products that use less energy, water, and toxics. This is important because the adverse environmental impacts of extraction, production, and use can be far greater than those associated with disposal when a material becomes a waste. According to EPA, a sustainable materials management approach is essential to conserving our natural resources to meet both today's needs and those of future generations."

Source: <https://fortress.wa.gov/ecy/publications/documents/1504019.pdf> page 4 (Executive Summary). And while I see your point that waste prevention is a tough sell (because there's no object to sell and usually no money to be made), I suggest you can also use Washington's, Oregon's, and EPA's recent plans to show that there is a trend for more "political support" of waste prevention and pollution prevention via the promotion of whole systems thinking.

Response: Chapter 3 will be revised to reflect increased support for waste and pollution prevention.

15. In Section 3.1.1, you could put in a graphic of the EnviroStars logo to enhance brand recognition by readers. A link to the online EnviroStars directory would also be great.
- On a related note, have you heard about the effort going on in the King County area to utilize the EnviroStars brand to recognize "green" businesses beyond just toxics/hazardous waste-related work? I would encourage you to touch base with Jessica Branom-Zwick at Cascadia Consulting about this effort to build on the brand, and see if you think it would be something your county would want to consider: jessica@cascadiaconsulting.com.

Response: Hyperlink to EnviroStars website and EnviroStars logo will be added to Section 3.1.1. Note: As an EnviroStar participating jurisdiction, Whatcom County is indeed participating in the EnviroStars rebranding discussions.

16. In Section 3.1.2, you need to add the word "Materials" between "Industrial" and "Waste," and I suggest also including the acronym "IMEX."

Response: Comment will be incorporated as requested.

17. In Section 3.1.3, is this Green Classroom Certification program associated with Washington Green Schools? If not, I would suggest putting exploration of potential synergies with Washington Green Schools as a goal or strategy of this SWMP. See www.wagreenschools.org.

Response: RE Sources' Green Classroom certification is independent of the Washington Green Schools program; however, per Washington Green Schools program website, there are a handful of Whatcom County schools also participating in that program. Text will be added to Section 3.1.3 regarding the Washington Green Schools program, as well.

18. In section 3.1.4, please note County residents may also utilize a recycling hotline operated by the State of Washington that is both online (<http://1800recycle.wa.gov> and <https://www.facebook.com/1800recycle.wa.gov>) and via live phone assistance during the week (9:00-3:00 at 1-800-RECYCLE (1-800-732-9253)).

Please also expand upon the "Permanent Information Centers," so the reader can imagine what they look like/how they function. Are they brochure racks? How are they maintained?

For Event Recycling, You could note that this is required by law:

<http://www.ecy.wa.gov/PROGRAMS/SWFA/eventrecycling/> Also, Skagit County is currently doing a lot in this area, FYI: <http://www.skagitcounty.net/Departments/Sustainability/zerowaste.htm>

The Electronics Recycling area could mention many electronic items are now able to be recycled for free via a product stewardship program that launched in 2009 called E-cycle Washington: www.ecyclewashington.org.

Response: Comments will be incorporated as requested.

19. In Section 3.2, it notes how critical it is to raise public awareness of County-funded waste programs, but I believe we want to raise awareness of both County-funded and non-County funded programs.

Response: Text will be revised to indicate "...awareness of County- and non-County-funded waste programs..."

20. Table 3-1 notes support for Master Gardeners, but on page 31, this is called a "Master Recycling & Composting Program," which seems to be a better fit. Same comment for section 5.1.1.

Response: Both Table 3-1 and Section 5.1.1 will be revised to reflect the Master Composting and Recycling program rather than Master Gardener program.

21. **Required** Chapter 4, Recycling, only touches on commercial recycling to say it is unregulated. While this is true, commercial waste is a large portion of what's out there (43.7% of all MSW, according to the 2009 Washington Statewide Waste Characterization Study (page 9).) It is also required to include programs to monitor the collection of source separated waste at nonresidential sites as part of your waste reduction and recycling element (RCW 70.95.090 (7) (b) (ii).) Please expand upon commercial recycling. For example, are the materials collected typically sorted in a similar way as the residential bins (paper separate from containers)? Does there seem to be high participation? Is it costly for businesses? Any creative rate structures to incentivize it?

Response: Commercial Recyclable Collection discussion in Section 4.1.1 will be expanded, including addressing the questions presented in this comment.

22. Section 4.1.1 is not actually what Ecology and the Utilities and Transportation Commission would consider the "list of designated recyclables," as that is found in Whatcom County Code Section 8.10.050, Section C, as noted in section 4.1.3. However, the list shows foil. I don't see foil listed in WCC 8.10.050, Section C, and I actually would advise against collection of foil, unless Whatcom Co has a special end market for it. During the presentation from an aluminum recycler at the NW Commingled Workgroup, it came to light that foil basically just gets burnt up in the recycling stream with no recovery of metal. While it is possible to recover it, you'd need a recycler whose system is set up specifically for foil. You might double-check your end market.

And within Section 4.1.3, a process for proposed changes to the designated recyclables list is given. Note that WCC 8.10.050, section L outlines a method by which an item may be removed from the list. Please ensure the protocol for changes to this list outlined here in the plan does not conflict with the protocol outlined in the County Code. Additionally, please have list updates sent to both Ecology and the Utilities and Transportation Commission.

Response: Reference to foil as an accepted recyclable material will be removed from Section 4.1.1. Section 4.1.3 will be revised to indicate that the SWAC will make a recommendation to the County executive rather than the County council to be consistent with WCC 8.10.050(L).

23. Section 4.2.1 on residential recycling starts off with some data on recycling participation and diversion. If by recycling participation you mean the number of residents setting out recyclables compared to those not source-separating out recyclables, it would seem to me that 40 to 50 percent would be a low number, especially for a county with a collection district. The diversion number given also seems a bit odd in a section devoted to residential

recycling, as I believe that rate is from our data that includes commercial and some industrial waste, as well. Please cite your data source?

Response: Use of the word "participation" was incorrect and will be removed from the text.

24. Section 4.2.1 begins the discussion of three-bin collection in comparison to single-stream collection. You may wish to note the regional effort to which you are invited and which is currently underway, the Northwest Commingled Workgroup: <http://www.ecy.wa.gov/programs/swfa/commingled/>. And although Ecology does support the collection of source-separated materials through RCW 70.95.090 (7)(b) as stated in the plan, source-separation simply means sorting recyclables from garbage at the source of generation. It does not necessarily mean the three-bin method.

Response: Comment noted.

25. In Section 4.2.1, education is given as the answer to overflowing bins, but I wonder if there are other solutions? How do the haulers mitigate issues associated with the three-bin system such as limited bin size and weather-related issues (blown away or wet materials)?

Response: Text will be added indicating that haulers will accept appropriately separated materials in alternative containers.

26. At the end of section 4.2.2, I suggest expanding upon the "targeted focus" with wording such as: "...relatively low multifamily recycling rates, and that an approach with three prongs can help boost rates. The three components are: 1) Collection logistics, 2) Policies and regulations, and 3) Education and outreach." (Those focus areas are from the Washington State Recycling Association study.) I suggest playing up options beyond education in Table 4-2, as well.

Response: Comment will be incorporated as requested.

27. The first sentence in Chapter 5 is technically incorrect. If there is waste to compost, that waste has already been generated. I suggest "Significant diversion of waste is commonly accomplished..."

Response: Comment will be incorporated as suggested.

28. Please define green waste in your glossary so we know what we're discussing in Chapter 5. Additionally, please specifically cite the "seasonal waste sort" mentioned at the start of Chapter 5. The 2009 Statewide Waste Characterization Study was conducted over all four seasons, so if that's the study you're citing, I'm not sure what you mean by seasonal. However, the data from that study is pretty interesting when looking at Whatcom and its organics: The Northwest WGA chart shown as Figure 29 on page 69 shows organics at almost 30%. Table 37 shows Organics from Commercial as only 24.7%. (Food-Vegetative 14.7% is largest, followed by Food non-vegetative at 8.2%)(Animal manure only 0.6%). Table 38 shows Organics from Res. as 49.2%. (Food-Vegetative 17.9%, followed by Animal Manure 12.6%).

Response: A definition of green waste will be included in the glossary. The second paragraph of Chapter 5 will be revised to indicate "In 2009-2010, Ecology conducted a four-season MSW characterization study in select counties across the state, one of which was Whatcom County. The study found that organic material..."

29. In Section 5.1.2, are any of the digesters accepting waste from offsite? If so, what kind of waste and who is hauling it? Similarly, in section 5.2.2, please discuss any issues or

opportunities related to the digesters. How do you think the various organics facilities will handle the waste stream projected 6 and 20 years into the future?

Response: Digesters operating in Whatcom County accept waste from off-site that are self-transported to each digester by the generator, as regulated under WAC 173.350.250.

30. In the first sentence of 5.2.1, do you mean to say "... drop-off facilities, and onsite composting"?

Response: Text will be revised to clarify "on-site composting."

31. In Table 5-1, there's a suggested action to require compostable service containers at commercial locations. Just as a word of caution, we have seen a lot of contamination issues related to acceptance of such compostable items at other compost facilities in the state. One has even reversed its policy and now accepts no compostable service ware.

Response: Comment noted.

32. As with other tables, the final column may now be updated. State Plan goals that may fit well include SWM 17 and SWM 22, as well as others.

Response: Please refer to response to Diana Wadley Other General Comments Comment No. 2.

33. First sentence of 6.1 should technically say "certificated" instead of "certified." Also in 6.1, "biweekly" can have two meanings... one is "every other week" and the other is "twice a week." I suggest clarifying by saying "every other week." Furthermore, it says Bellingham is an exception regarding the containers listed. What do Bellingham citizens use?

Response: Text will be revised to indicate "certificated" rather than "certified;" to reflect "every other week" rather than "biweekly;" and the exception to Bellingham will be removed (see response to Amber Jones Comment No. 1).

34. In the first column of table 6-1, I suggest adding clarifying source language such as "...required minimum service to all subscribers as outlined in [the ILAs, County Code...etc.]"

Response: Comment will be incorporated as suggested.

35. Section 7.1.3 starts out by saying the MSW generated in the county ultimately goes to one of the following landfills. However, of the list of six facilities, it seems to me that only three actually receive traditional Whatcom MSW (Columbia Ridge, Roosevelt, and Headquarters). This is based on the table of Solid Waste Disposal Data by County for 2013 found on Ecology's data page here: <http://www.ecy.wa.gov/programs/swfa/solidwastedata/> (and the addition of Headquarters, which would be a very small amount and may have been overlooked on our table). What is the source of data/MSW for the remaining landfills listed? The bullet for the Graham Road facility even notes it does not accept MSW. As you clarify this section (including adding in where waste from the eastern portion of the county goes), you might note on the Cemex Inert Waste Landfill that the petroleum contaminated soils are not inert until they are treated. Suggest adding "The contaminated soils are treated with a thermal desorption process before they are landfilled." Additionally, you might reference how this data is presented in the table on page two of Appendix A (and within that table, it may be good to have "MSW" listed in the "materials accepted" column where applicable, or clarify that traditional MSW is what is meant by the "Waste" column).

Response: Text will be revised to indicate that Columbia Ridge, Roosevelt, and Headquarters facilities receives most of the MSW generated in the county, and that the other three facilities receive other waste. Cemex contaminated soil treatment process will also be added.

36. In 7.1.3 on the Cedarville Landfill, I suggest adding, "The leachate collected is treated and discharged under an NPDES permit issued by Department of Ecology."

Response: Comment will be incorporated as suggested.

37. In Section 9.1.1, please explain the contracts with certain tribal businesses more. The contract is between whom? The County and the tribal business? For what service(s)? Additionally, for the cities that have municipal contracts for both residential and commercial solid waste collection, is recycling a part of the contract, or does the contract only refer to trash destined for landfill? If recycling collection is part of the contract, is it for residential or commercial or both? (Commercial recycling is unregulated, but sometimes a city will "embed" commercial recycling within a solid waste collection contract.) Furthermore, since you point out Bellingham has a separate disposal contract, should it be clarified here that for the cities of Everson, etc. that the solid waste collection contract includes disposal?

Response: Tribal contracts for solid waste services are directly between the tribes and solid waste service providers.

Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:

Thank you. A suggestion to add clarity to section 9.1.1 is to remove the sentence under the header "Cities" that reads, "Solid waste collection in the county is regulated under municipal contracts and through contracts with certain tribal businesses on the Lummi Reservation, in addition to regulation under the WUTC," and instead create a header for "Native American Tribes." Under that header, you could insert this language from the 2008 plan, if it still holds true:

"Lummi and Nooksack tribal lands are not subject to this Plan.

However, non-tribe residents living within reservation boundaries are subject to provisions of County solid waste ordinances. Both the Lummi and Nooksack Tribes contract with private WUTC certified haulers for garbage pickup."

Response: Comment will be incorporated as suggested.

38. In section 9.1.1 related to Ecology's roles, please say "including RCW 70.95," as we are governed by additional portions of RCW. Also please note we approve both local solid and hazardous waste management plans.

Response: Comment will be incorporated as requested.

39. In section 9.1.1 related to the Northwest Clean Air Agency, please note how they dovetail with asbestos.

Response: Section will be revised to add "NWCAA is also responsible for regulation of any construction that may result in handling and/or disposal of asbestos containing materials."

40. In section 9.1.2, please cite how it's now codified, so a reader can more easily locate the current regulatory text. Something like "...1991... and codified as WCC 8.15.030" (or perhaps the whole chapter of 8.15?)

Response: Comment will be incorporated as requested.

41. In section 9.2, landfill leases are mentioned. What leases would this be referring to?
Response: Text will be revised to indicate that revenues include lease payments by private solid waste service providers for lease of County-owned land (SSC leases land upon which Cedarville and Birch Bay-Lyndon drop box facilities are located, and Cando leases the land at which its transfer station facility is located).
42. In the organics portion of the implementation table found in chapter 10, it seems to me that 2B and 2D would better be done concurrently.
Response: Concur, comment noted.
43. On page two of Appendix A, the data for Ryzex is missing.
Response: Ryzex was inadvertently left in the table and will be deleted.
44. On the next-to-last page of the draft plan, a portion of the budget is shown as a payment to the Health Department. What does this cover? Is it staff for inspections/permitting and solid waste enforcement like illegal dumping work?
Response: To supplement Ecology grant revenue for solid waste compliance enforcement activities, an allocation of \$25,000 per quarter of solid waste excise tax revenue is utilized to finance staff-conducted solid waste enforcement activities.

Specific Comments by Section-Hazardous Waste

1. The last paragraph of 11.1.1 has an incorrect statement. The 2008 plan updated the Haz Waste Plan as well, as stated on page 9 of Section Two of that plan.
Response: Text will be revised to indicate “Since then, updates to the Plan (most recently completed in 2008) have included reference to the 1991 Hazardous Waste Management Plan...”
2. Sections 11.1.2.3 and 11.1.7.3 both mention technical assistance to businesses. It is advised to mention the EnviroStars program, which could be done by referring the reader to section 3.1.1 of the solid waste portion of this plan.
Response: Comment will be incorporated as requested.
3. In section 11.1.4, they’re technically “certificated” haulers, instead of “certified.”
Response: Comment will be incorporated as requested, and elsewhere in the document, where appropriate.
4. Are the interlocal agreements referred to in section 11.1.5 the same ones as found in Appendix C? If so, please cite accordingly.
Response: Reference to Appendix C will be added to the text.
5. In section 11.1.7.4, is there any kind of fee associated with either program? How is the fee structured?
Response: CESQGs are required to pay for hazardous waste disposal at the MRW facility in accordance with the established and approved fee structure defined in the Disposal of Toxics Program operations plan.
Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:
To help readers understand that CESQGs must pay a fee, please note as much in the text, such as by adding “and must pay for hazardous waste disposal in accordance with the fee structure defined in the Disposal of Toxics program operations plan.” to the end of the final sentence.
Response: Comment will be incorporated as suggested.

6. In section 11.2 and throughout, the hazardous waste planning period is given as 2015-2020. I suggest shifting it to match the solid waste management plan's period of 2016-2021.
Response: Comment will be incorporated as suggested.

7. In areas where you plan for the future and say the County will be contracting with Stericycle, you might loosen your wording to allow for other contractors. (For example, "... County (through contractor such as Stericycle Environmental Solutions)")
Response: Applicable goals defined in Section 11.2.2.1 will be revised as suggested.

8. Regarding used oil, Ecology has seen a recent rash of Polychlorinated biphenyls (PCBs) from public used oil collection sites. If this contamination spreads to larger loads as the contents of the tanks are collected for recycling, local governments can incur large expenses. If Whatcom County has safeguards in place to watch for PCBs, such as staffing used oil collection sites or other means, please include them in the plan. If no such safeguards are in place, please recognize the potential for contamination of PCBs within the plan and consider recommending creation of safeguards against them.
Furthermore, to more fully comply with Chapter 70.951 RCW, the Used Oil Recycling Act, please include a description of how used motor oil from watercraft is addressed, how signage is monitored/assisted, and what public education, if any, is focused on motor oil.
Response: The contracted waste motor oil collection company uses Chlor-detect for detection of PCB contamination prior to pumping out each used oil tank at each pick-up; no PCBs have recently been detected. The Disposal of Toxics program accepts motor oil from watercraft. Staff provide technical assistance on handling and disposal. Additionally, staff have worked with Port of Bellingham to achieve EnviroStars status and educate the public on proper watercraft motor oil disposal through signage.

Additional Items to Address Before Submission of the Final Draft

1. **Required** Please show how each of these comments from Ecology has been addressed in your final draft plan, citing the specific section(s) and/or page(s) within the final draft.
Response: Revisions to the draft Plan will be maintained in track changes mode in a file separate from the final revision that is submitted for Ecology approval.
**Diana Wadley Comment on January 15, 2016 Revision Received February 17, 2016:
This document and the accompanying track changes document have been very helpful. Thank you!**
Response: You are welcome!

Lisa Friend, Citizen

Received December 7, 2015

General Observations

1. Attention should be paid to issues of Extended Producer Responsibility (EPR, also known as “Product Stewardship”) and the management of marijuana residuals, both of which could face the county in future years. Opportunities for producer management of paint, in particular, are likely to come before SWAC again in future.

Response: Comment noted.

Acronyms and Abbreviations

1. The term “CDL” is referenced on Page 56. Perhaps it should be added to this list, as a variation of C/D.

Response: Reference to CDL in Table 7-1 will be revised to “C/D Waste.”

Introduction

1. Page 4, figure 1-1: Please include the Cedarville Drop-Box site.

Response: Cedarville Drop-Box site will be added to Figure 1-1.

Planning Area

1. Table 2-3, Whatcom County Employment Sectors: Consider including the Materials Management sector in this data, as a baseline for tracking the economic impact of the local solid waste and recycling industries in future years. Many communities are having success with demonstrating the positive economics associated with employment in the recycling, composting and related materials management sectors.

Response: Materials Management sector-specific data for Whatcom County is not available (2013 U.S. Census American Community Survey).

2. Section 2.3.1, Solid Waste Definitions: Please include a definition of “Organics Management” and/or “Composting.” Also, under “diversion,” perhaps clarify whether “alternative daily cover” is viewed by the County as a “beneficial use.”

Response: Please refer to the Glossary at the end of the document. The source of glossary terms is Appendix A (Glossary of Terms and List of Acronyms) of the Department of Ecology’s Guidelines for Development of Local Comprehensive Solid Waste Management Plans and Plan Revisions, Publication No. 10-07-005 and should be maintained consistent with the definitions presented in that publication.

3. Section 2.3.7, Diversion and Recycling Rates: Please note that incineration and, if appropriate, alternative daily cover, are prevented, in addition to landfill diversion. In the second paragraph, are “organics” appropriately listed under both diversion and as a recycled stream? The repetition confused me.

Response: Comment Noted. Recycling is considered a component of landfill diversion, so it is appropriate to list organics under both. As shown in Figure 2-4, Organics (at 19%) are third highest component of the recycled stream (with metals and paper, at 39% and 31%, respectively, being the only larger components).

Waste Reduction and Public Education

1. Could “Extended Producer Responsibility” (Product Stewardship) be appropriately listed in this chapter?

Response: Do not concur.

2. 3.1.1., Public Sector Activities: Program evaluation/assessment is a primary County role that could appropriately be listed with “public outreach and education.” The purchase of recycled-content goods, recycled-asphalt pavement, and finished compost are also functions of County government that could be listed here.

This is an ideal place to note the role of County government in the financial management of the materials management sector and opportunities for the county to apply for and administer state and federal grants.

The final sentence of this section, could we reference data that prove the plastic bag ordinance “is a big step forward in reducing litter and unnecessary waste,” etc.? While this is intuitively true, information about how much litter has been reduced and money saved since 2012 should be incorporated or referenced.

Response: Reference to the County’s role as overall solid waste management program assessment will be added to Section 3.1.1. However, citing the listed operational functions are not considered relative the public education functions the County leads. No data is available relative to the City of Bellingham’s plastic bag ordinance.

3. Table 3-1, Goals and Actions: Please add items 2F and 3 E, each reading “Evaluate effectiveness of outreach efforts and use data to fine-tune program elements,” which would support “Beyond Waste” principle of “Strive for Continuous Improvement.”

Response: Goals and associated actions provided in the Goals and Actions table were the outcome of significant deliberation of the SWAC subcommittee relative to tangible results and careful consideration of available County resources for action implementation.

Recycling

1. Section 4.1.1, Programs. In the second paragraph, address the issue of enforcement of the garbage collection exemption and provide data on how widely this exemption is used. Address the provision of recycling series to multifamily units, including trailer parks, homeowners association and condominiums.

Response: The purpose of Section 4.1.1 is to provide an overview of the collection program; action 1.A in Table 9-1 addresses the need to evaluate the exemption program. Multifamily residential recycling is discussed in Section 4.2.2.

2. Table 4-1, Accepted Curbside Materials by Bin: Please add “phone books” under “Scrap Paper,” perhaps in the “Mail, magazines, catalogs” Bullet. Consider adding “steel” cans to the “Tin cans” bullet and perhaps specifying that empty aerosol cans are included.

Response: “Phone books” are already listed under the second bullet associated with Scrap Paper; fourth bullet associated with Containers will be revised to indicate “Tin/steel cans.”

3. In the Point Roberts paragraph, please clarify how “seasonal vacation” and “weekend homes” are serviced (one assumes through drop-off service).

Response: Curbside recycling pick-up is not required of residences meeting these definitions; therefore, recycling participation is left to the discretion of the resident.

4. Under “in-house recycling,” please indicate the level of diversion the County is achieving through this program, as a baseline. This is an excellent place to record the County’s efforts to procure recycled-content products and compost as well as any waste-prevention measures such as banning of single-use water bottles at County events.

Response: The County has not conducted an assessment of the diversion level associated with in-house recycling. Any efforts that County may be pursuing associated with recycled-content and compost procurement is not applicable to discussion specific to “in-house recycling”.

5. Electronics Recycling: Opportunities for diversion of small electronics that do not fall under the E-Cycle Washington definition should be clarified here. “Consumer Products” represent 10% of the County’s discarded waste: Is there need for more diversion of small electronics?
Response: A hyperlink to the specified RCW sections, in addition to the E-Cycle webpage will be provided for the reader to access more specific information relative to small electronics diversion opportunities.

6. Along those same lines lie opportunities to divert additional hard-to-recycle materials for which markets are developed or developing. These include Christmas lights, film plastic, rigid plastics, paint and, perhaps, carpet.
Response: Comment noted.

7. Diversion of Construction and Demolition materials should be addressed in this section.
Response: Construction and demolition waste is considered a special waste; therefore it is discussed in Section 8, Special Waste.

8. 4.1.2, Facilities: These should be mapped in this section in a more specific fashion than in Figure 1-1.
Response: Comment noted.

9. I would be interested in knowing the number of hours these facilities are open each week, the number and type of users (residents vs. businesses vs. apartment/trailer park dwellers) and any change in use over time.
Response: This information is not available.

10. More information in this section could appropriately include details about the markets for Whatcom-County-generated recyclables and compost (domestic or international? Washington or west coast?), contracts, responsibilities and residuals.
Response: Comment noted.

11. I would be interested in knowing the number of hours these facilities are open each week, the number and type of users (residents vs. businesses vs. apartment/trailer park dwellers) and any change in use over time.
Response: This information is not available.

12. I suggest sections 4.2.3 “Commercial Recycling” with a similar level of detail and 4.2.4 “Construction and Demolition Recycling.”
Response: Please refer to response to Diana Wadley Comment No. 21 (Other Specific Comments by Section); construction and demolition debris is discussed in Section 8.

13. Table 4-2, Goals and Actions: Incorporate section on Commercial diversion and C/D. Explain how local government will improve efforts towards “Beyond Waste” Strategy 4: “Lead by example in government, especially through...purchasing power...”

Response: Goals and associated actions provided in the Goals and Actions table were the outcome of significant deliberation of the SWAC subcommittee relative to tangible results and careful consideration of available County resources for action implementation.

Organics Material Management

1. This section should address health and environmental concerns about micro-plastics in compost and steps to keep these materials out of the Whatcom County organics stream. Currently, materials are collected that do not meet the “Biodegradable Products Institute” standards for compostability nor equivalent ASTM standards.

Response: Comment noted.

2. In addition, the residents of Lummi Island are interested in regular residential compost collection service: this need should be addressed in this section.

Response: The collection service provider will be notified of this perceived need.

3. In the first paragraph, the parenthetical definition of “organic materials” could include compostable paper.

Response: Comment will be incorporated as suggested.

4. 5.1.1, Programs: How are food scraps handled in Point Roberts? Are they accepted in the “green waste” drop box at Cando?

Response: Food scraps are managed as municipal solid waste in this area.

5. Under “Educational Programming,” provide data about the effectiveness of existing outreach programs and how continuous improvement can be gained.

Response: Requested data is not available.

6. 5.1.2, Facilities: Indicate the costs to the consumer for use of these programs and usage trends over time, particularly given recent increases in charges at the City of Bellingham Clean Green facility.

Under “Digesters,” please indicate the percentage of County waste currently directed to these facilities, vs. other organic management options.

Response: Most recent annual tonnage processed (and percentage of which was manure) by anaerobic digesters located in the county will be added to Section 5.1.2.

7. 5.2.1, Programs: The adjective “backyard” should be added to “composting,” to differentiate that term other organics management options listed in the first sentence.

Response: The word “on-site” has been added prior to “composting” to provide the differentiation (see response to Diana Wadley Comment No. 30 – Other Specific Comments by Section).

8. Purchase and use of finished compost should be addressed in this section.

Response: Policy associated with purchase and use of finished compost should be considered by the County department using compost operationally, not as a policy defined the solid waste management plan.

9. Table 5-1, Goals and Actions: Perhaps add 1B – “Evaluate effectiveness of current backyard composting programs and seek continuous improvement.”

In element 2 C, clarify that only BPI- or ASTM-certified compostable containers should be required. In addition to requiring the use of these materials, purchase of organics receptacles and collection service should likewise be mandated.

Add a third goal to encourage government/institutional purchase of use of finished compost

Response: Comment noted. Goals and associated actions provided in the Goals and Actions table were the outcome of significant deliberation of the SWAC subcommittee relative to tangible results and careful consideration of available County resources for action implementation.

Solid Waste Collection

1. In this section, it would be appropriate to address litter data over the past decade (how much is collected, from what regions, etc.) and the exemption of solid waste collection, how many exemptions exist, estimate of gaps, and the enforcement of the exemption.

Response: Action 1.A in Table 9-1 addresses the need to evaluate the exemption program.

2. The management of industrial quantities of solid waste, though not MSW, should be addressed in some portion of the plan: What is done with wastes from Alcoa, refineries, etc.?

Response: Industrial generators utilize existing services of the county solid waste management system.

Although Alcoa and BP additionally operate permitted landfills for certain approved wastes generated only from on-site operations, they are not within the scope of the plan.

3. Enforcement of the collection exemption and mapping of its use can be included under “Goals and Actions.” Funding is likely available to the county for this type of analysis, and it should not be overlooked simply because of fears that analysis is not within the budget.

Response: Action 1.A in Table 9-1 addresses the need to evaluate the exemption program.

Transfer and Disposal

1. Section 7.1.1, Transfer Stations: Separate the third and fourth bullets in the paragraph beginning “These transfer stations are open to the public,” as the Bellingham Vactor Waste Facility is closed to the public.

Response: Text will be revised to read “These transfer stations, with exception to the Bellingham Vactor Waste Facility, are open to the public.”

2. Section 7.1.1, Transfer Stations: Separate the third and fourth bullets in the paragraph beginning “These transfer stations are open to the public,” as the Bellingham Vactor Waste Facility is closed to the public.

Also in the final paragraph, add a reference to Section 8.1.8.

Response: Text will be revised to read “These transfer stations, with exception to the Bellingham Vactor Waste Facility, are open to the public.” Reference to Section 8.1.8, Vactor Waste, is already provided in the bullet associated with the Bellingham Vactor Waste Facility.

3. Table 7-1: For clarity, be sure the footnote “*Gate fee, regardless of weight or materials,” appears on the same page as the “RDC” section.

Response: The subject footnote is applicable to anywhere in the table an asterisk () is presented, regardless of what page of the table the notation is presented.*

4. Section 7.1.3, Landfills: Please reference the closed “County Construction Recycling/Muenschler Landfill” site, which was operations at the time of the previous Plan

update: It's closure should be documented in this plan, along with the fate of the "Foothills Recycling Landfill," referenced in Section 8.1.9.

The fate of the Olivine incinerator, which at one time accepted materials from the public and local haulers, should also be addressed in this section.

Response: There are many closed private landfills in the county that are no longer a component of the solid waste system, and not within the scope of the plan. Landfills that are operational and part of the system, or publicly owned and maintained in post-closure status utilizing solid waste excise tax revenues, are within the scope of the plan.

5. Section 7.2, Needs and Opportunities: In light of continuing litter issues on county roadsides, the potential for siting of another drop box in the County should be addressed here. This topic is more fully addressed in section 9 but also deserves mention in this section.

Response: Do not concur. Access and capacity are merely one component of the litter and illegal dumping issue, which is a compliance management task appropriately and adequately discussed only in Section 9.

Special Waste

1. The inclusion of plant and soil residuals from marijuana-growing operations should be addressed in this section, including pertinent state regulations that affect this new industry.

Response: Text will be added to Section 8.1.1 to indicate that handling and disposal of marijuana industry crop residues will be completed in accordance with the most current state regulations.

2. Section 8.1.5, Disaster Debris: A separate disaster management plan should be developed by the County and referenced in this section. Include "woody debris" under both "flood" and "earthquakes" and include "vehicles" under "fire."

Make note of FEMA guidance on the development of such plans and note that federal funding might be available for plan creation. Contingency contractors with debris management companies and site should be in place in advance of any disaster.

Response: The Health Department is currently supporting the Whatcom County Sheriff's Office Division of Emergency Management in the development of a separate disaster debris management plan, which will be referenced in this section. Suggested materials will be added to the applicable events.

3. Section 8.1.7, Biomedical Waste and Pharmaceuticals: In the bulleted section listing "Participating pharmacies," consider the fate of the Haggen chain. Also, clarify whether the MRW facility accepts controlled substances from households, though not from businesses: I found the acceptance of controlled substances from households surprising. Additional detail is not clear on the phone line nor the County Hazardous web site.

Response: Agree that the future of pharmacy acceptance unused medications at the current Haggen pharmacies remains uncertain; however, all are currently still operating. The plan is accurate as stated that the MRW facility "accepts unused pharmaceuticals from households (including controlled substances), and from small-quantity generator businesses (not including controlled substances)."

4. Section 8.1.9: Tires: Please provide data and trends for used tire diversion in the county, including the number/weight of tires found as litter or in cleanup piles: The Ecology website indicates that tons of tires cleaned up are going down statewide; does the same hold true in Whatcom County?

Response: The County has not tracked tire diversion data.

5. Section 8.2.1, Construction and Demolition Debris Recycling: Because C&D materials represent such a significant portion of the local waste stream, any data on the tonnage of these materials being diverted from Whatcom County should be reported in this section. Data about the success of marketing sorted materials from in-county processors and, if possible, out-of-county processors, would be appropriate before proposing any flow control changes.
Also in this section, the “Goals and Actions” recommend controlling “sham recycling.” This topic is not addressed in the narrative; this section seems the appropriate place for clear introduction of the “sham recycling” topic and its place in the state “Beyond Waste” plan.
Response: As stated above, potential flow control and sham recycling issues will be investigated, reviewed and responded to in the planning period.
6. Section 8.3, Goals and Actions: Under goal number 1, include bullet “D” to encourage pilot program for use of recycled asphalt shingles in County parking lot paving or road applications.
Response: The Health Department is currently providing support to a private sector paving company to implement permitted asphalt shingle recycling operations.
7. Under “Priorities of Plan,” is the wording “Enforce compliance, technical assistance and enforcement”? This terminology seems self-reflective and can be, therefore, confusing to the lay reader.
Response: The correct terminology, per the Beyond Waste Plan, is “Focus on facility compliance, technical assistance, and enforcement.” Text will be revised accordingly.

Administration and Enforcement

1. Section 9.1.1, Agency Roles and Responsibilities: Perhaps introduce the “Solid Waste Division” of the Whatcom County Health Department in the first sentence, for clarity.
Response: Clarity specifying the Solid Waste Division of the Health Department will be added.
2. Insert information about the county’s management of the annual Solid Waste budget into this section with a reference to Section 10.3.
Response: Comment will be incorporated as suggested.
3. Under “Cities,” please address the absence of a municipal contract for commercial solid waste collection in the City of Bellingham and the reason the City does not contract for this service.
Response: Text will be added specifying that commercial collection in the City of Bellingham is governed by WUTC regulations.
4. Under “Washington State Department of Ecology,” please address the availability of grant funding from the state for local solid waste programs.
Response: Comment will be incorporated as suggested.
5. Under “Washington Utilities and Transportation Commission,” please clarify whether the certificated areas are for residential collection only and, if so, the legal structure(s) under which commercial garbage, recycling and organics collection take place.
Clarify whether Whatcom County Ordinance No. 90-95 was restricted to residential services or whether commercial collection was also addressed.

Response: Do not concur. Sufficient level of detail relative to the WUTC's role as it pertains to a solid waste management plan is provided.

6. Section 9.1.3, Financing: The history of the Maple Falls drop-box site should be addressed here or in Chapter 7.

Response: Do not concur. Maple Falls drop-box facility is no longer active and, therefore, not relative to the current plan update.

7. At the end of this section, indicate how often payments are made to the County and whether there has ever been any issue regarding the amount/timeliness of such payments. A 10-year summary of payments might be helpful.

Response: Do not concur. Request is not relevant to the level of detail of a solid waste management plan.

8. This is also a good place to indicate the county's plans for continued financial support of essential solid waste services, education, and program evaluation if waste reduction and recycling result in a decline in fee payments/smaller budget. It would not be appropriate for readers of this plan to come away with the idea that waste reduction and recycling would be given reduced priority if – by their success – the solid waste budget could suffer.

Response: Comment noted.

9. Section 9.1.4, Administration: The County's role in procuring state and local grants for solid waste operations should be mentioned here, as should the role of the health department in facilitating the SWAC and SWEC meetings.

Response: Comment will be incorporated as suggested.

10. Section 9.1.5, Enforcement and Compliance: Data about the county's garbage collection exemption structure should be included here. Also, the duplicate labeling of Section 9.2.1 as "Enforcement and Compliance" is confusing. Perhaps consider additional distinction between the two section and their titles.

Response: Specific data requested are not available and, as stated above, the exemption program will be reviewed during the planning period as a recommended action item. Section 9.1.5 describes the existing conditions associated enforcement and compliance, while Section 9.2.1 identifies corresponding needs and opportunities.

11. Section 9.2, Needs and Opportunities: The opportunity for the County to apply for and benefit from USDA Rural Development Solid Waste grants should be detailed here, especially as these grants could provide additional solid waste services to the Kendall-Maple Valley and Point Roberts areas listed here..

Response: Do not concur. The solid waste budget includes significant revenue from numerous grant sources, and it is not within the scope of the plan to call out each grant opportunity separately as an action item.

Implementation Schedule

1. Section 10.1, Implementation Responsibility: Under "Waste Reduction and Recycling," consider adding: "The County should lead by example by buying recycled products and finished compost and by promoting a model in-house diversion program."

Response: Comment noted.

2. Section 10.1, Implementation Responsibility: Under “Solid Waste Management Planning,” the provision of data on diversion successes should be emphasized, as should financing for effective programs.

Response: Comment noted.

3. Table 10-1, Implementation Schedule: The phrase “Track efficacy and fine-tune” would be appropriate in nearly every section, including: “Education and Community Outreach” elements 1, 2, and 3; Multifamily Recycling elements 2 and 3; and the initial occurrence of “Compliance Management and Enforcement” 2.a (Provide programming support...)

The Education and Community Outreach element could use a bullet 4.C to consider use of the Re-TRAC software. 4.A should include litter reduction measures.

The “Residuals Recycling” section needs a second element that would read: “Monitor residuals and markets” to insure that locally generate materials are sent to end-use markets with a 12% or lower residual rate (to combat or define “sham recycling”).

New sections need to be created for Commercial Recycling and C&D Diversion.

The Multi-Family Recycling section would benefit from “Track efficacy and fine-tune” phrases for elements 2 and 3.

Under “Organics Management,” please include the term “data-based” before “impact.” Include the “Food, Too Good to Waste” program and also use the term “BPI-Certified compostables” in section C.

If both the “Compliance Management and Enforcement” and “Administration and Enforcement” sections are maintained, the checkmarks in both timelines should match.

Bullets “A” should include “Track efficacy and fine-tune.”

In the “Special Waste Programs” section, address data-based evaluation of current diversion programs and goals for the future in element 1, “Increase C/D waste material recycling.”

Under sub-topic “C,” add the use of recycled-asphalt-shingle paving material.

If data will not soon be available for adequate comparisons between in-county and out-of-county C/D processing options, considered delaying element 2.B, “Evaluate changes in the Flow Control exemption...” to 2017 or later.

Under element 4, regarding pharmaceuticals, incorporate an action that reads: “Develop extended producer management policy at the state level.”

Consider an element 5: Investigate extended producer management options for paint.

Response: The implementation schedule reflects the timeline for completing goals and associated actions identified associated with each plan element. Those goals and associated actions were the outcome of significant deliberation of the SWAC subcommittee relative to tangible results and careful consideration of available County resources for action implementation.

4. Section 10.3, Budget: Provide detail on the Disposal of Toxics budget, which represents a quarter of the annual solid waste budget: How has this budget changed in the past decade.

What percentage is dedicated to the management of paint?

Provide additional data on the success of community education and outreach programs and the amount of money spent on litter control programs year over year / ton by ton.

Detail a budgetary goal: Lower expenditures and increase the effectiveness of outreach / program spending.

Response: The purpose of Section 10.3 is to provide an overview of the solid waste budget, not specific detail relative to program components or budgetary goals.

Local Hazardous Waste Management Plan

1. Section 11.1.2.1, Hazardous Waste Inventory: Please provide detail on the hours per week the MRW site is open and also the hours per week the drop-off sites are open. Detail the percentage of collected material that comes from the MRW site vs. the drop-offs and, if possible, the amount collected at each drop-off site per year. Include the volumes of oil collected in the residential recycling collection program and the volumes of oil and antifreeze collected by the CESQG service.
 If possible, make a note on Figure 11-2 explaining the jump in customers in 2007.
 Provide a break and new title after the bullet that begins “Twenty-four...” to indicate a change in subject to contaminated sites.
 A similar break and new title should precede the final paragraph in this section, which again changes subjects to address service providers.
Response: Operational hours of each facility will be added. The detailed data requested is not within the scope of the plan. Section titles will be added to delineate discussion relative to Dangerous Waste Generators, Remedial Action Sites, and Hazardous Waste Services.
2. Section 11.1.2.2, Public Education: Please add wording that will direct the County to track efficacy of these outreach programs and fine-tune services for greater impact.
Response: Comment noted. Due to resource constraints, measurement of program efficacy is not a prioritized goal.
3. Section 11.1.2.3, Technical Assistance: Include data about the number of calls received, the topics that represent the most common inquiries, and the number of individuals and businesses served each year.
Response: The number of businesses and households served each year is depicted graphically in Figure 11-2. Technical assistance inquiries by type are not tracked.
4. Section 11.1.2.4, Service Improvement...: Provide data on cost savings and public service improvements realized through the state’s fluorescent lighting take-back program and extrapolate to the potential for service improvements through a paint take-back program for Whatcom County.
Response: Do not concur. Although the DOT program supports/participates in established stewardship programs, such programs are not managed at the local level.
5. Section 11.1.4, Financing the Program: Discuss options for manufacturer funding of paint and pharmaceuticals management through Extended Producer Responsibility programs. Similar programs are already helping fund the take-back of electronics and fluorescent lights in Whatcom County, and those financial contributions/savings should be acknowledged in this section.
Response: Do not concur. Although the DOT program participates in established stewardship programs, such programs are not managed at the local level.
6. Section 11.7.1, Household Collection: Please provide data on the amount of each of these materials managed by the county on an annual basis over the past decade; perhaps in an appendix.
 Under “Annual Collection Events,” indicate the geographic location of these collections over the past decade.

Under “Household Waste Pharmaceuticals Collection,” indicate the volumes of these materials collected through the MRW each year. If possible, incorporate data from local pharmacy and law enforcement take-back programs, as well.

Response: Figure 11-1 graphically depicts the total annual quantities of MRW collected by source. It is not within the scope of this plan to provide detail on quantities by waste type.

7. Section 11.1.7.2 and 11.1.7.3: Provide data on the effectiveness of each program either here or in Section 11.1.2.2.

Response: Comment noted. Due to resource constraints, measurement of program efficacy is not a prioritized goal.

8. Section 11.1.7.6, Used-Oil Education and Collection: Provide data on the percent of used oil re-processed for re-use as an oil-product versus the percent that is used for fuel. Substitute the phrase “taken to” (the MRW facility) for “disposed of at.”

Indicate the amount of used oil that comes to the facility from residents vs. through the CESQG program.

Response: All of the used oil is delivered to the refiner for reprocessing, with different fractions being used for different purposes (light ends become fuel product): it is not within the scope of this plan to analyze this product ratio. “Disposed of at” will be replaced with “delivered to.”

9. Section 11.2.1, Guiding Principles: Incorporate a new bullet early in the strategies that allows for Extended Producer Responsibility for management of materials. This will be congruent with item #8 in this section: “...foster an ethic of responsibility among those who produce, sell, and use hazardous products.” And with item #10.a.

Response: The DOT program currently does participate in established stewardship programs, as applicable.

10. Section 11.2.2.1, Household Collection: Under “Action,” specify the hours per week the MRW facility and satellite collection sites are to be open.

Under HC Goal 2, Collection Event, “Action,” include the phrase “in addition to every-other-year collections in Point Roberts.” Under “Funding Source(s)” include the potential for USDA rural development funding for rural collection events.

Incorporate a new HC Goal: “Explore Extended Producer Responsibility for painting, pharmaceuticals and other priority materials, as determined by the county or state.” This can also be the text of “Action,” with the timeframe to begin in 2016 and the implementing agency to be the County. Appropriate funding source(s) would be the excise tax on solid waste hauled by certified haulers and, possibly, affected manufacturers.

Response: Do not concur.

11. Section 11.2.2.2, Household and Public Education: Incorporate “Test efficacy and fine-tune” under each action.

Response: Comment noted. Due to resource constraints, measurement of program efficacy is not prioritized goal.

12. Section 11.2.2.3, Small Business Technical Assistance: Incorporate “Test efficacy and fine-tune” under each action.

Response: Comment noted. Due to resource constraints, measurement of program efficacy is not prioritized goal.

13. Section 11.2.2.4, Small business Collection Assistance: Add “fees” to the Funding Sources under SBCA Goal 1.

Response: Comment will be incorporated as suggested.

14. Section 11.2.2.5, Enforcement: Incorporate “Test efficacy and fine-tune” under E Goal 1.

Response: Comment noted. Due to resource constraints, measurement of program efficacy is not prioritized goal.

15. Section 11.2.2.6, Used-Oil Education and Collection: Incorporate “Test efficacy and fine-tune” under each action. Add “fees” to the Funding Sources under USEC Goal 2.

As appropriate, add another element for the collection of used oil by curbside recycling service providers.

Response: Comment noted. Due to resource constraints, measurement of program efficacy is not prioritized goal. Whatcom County solid waste collection providers currently accept used oil via curbside pick-up.