

Health Department response to public comment for 4/9/2024 -

- 1. If as the Solid Waste Plan says we already have a 90% recycling participation rate, how much higher can this new system increase that?**

The participation rate alone doesn't provide the complete analysis and only references customers on service. There is a significant number of county residents that do not have curbside service. In fact, according to the Solid Waste Plan, recycling rates have stagnated since 2011. This is in part due to the changing mix of packaging, more plastic and less paper and glass. While we can't predict how many additional people will recycle, or how much more material will be recycled giving the convenience of a cart, based on experience in other jurisdictions both are likely to increase.

- 2. If there is real evidence from the SSC pilot projects and from other communities that such a switch will lead to higher amounts of material being collected at the curbside? How much higher if as the Solid Waste Plan says we already have a higher rate than most of the rest of the state?**

Yes, the Recycling Partnership is a nonprofit organization focused on increasing the amount of material entering the recycling supply chain. They have found in multiple locations that the ease of recycling and the size of container has led to both an increase in participation rate and volume of material. The amount of increase varies but has been more than 15% in many locations.

Unincorporated Whatcom County does not have a higher participation rate or overall recycling rate than other parts of the state that have curbside recycling collection. For many customers convenience is extremely important. The ease of the rolling cart is likely to add customers that are not currently on service.

- 3. What contamination rate is to be expected under this new system? Can we get data from the MRF's about how much of each commodity is marketable once separated? If our current contamination rate is 1% as the recent study found how much more material will need to be collected to make up for the higher contamination?**

Since our material will be going to a regional Material Recovery Facility (MRF), we will not be able to obtain contamination rates specific to our collection area. However, it would be reasonable to anticipate given the level of education and experience our customers have gained over the past several decades that the contamination rate in Whatcom County would be much lower than the average 10-15%.

Given the anticipated increase in contamination, on average, customers would need to recycle an additional 40 lbs. of material per year, or 1.5 lbs per set out. However, it is quite likely we would see several thousand new customers given the convenience of the carts, bringing that number way down.

- 4. Glass in such systems, especially with truck compaction, is a problem and some have discussed the need for separate collection of glass, or perhaps not collecting glass at all. How will this problem be handled and tracked? Is there a market for glass? How much are we being paid for the various commodities once they are separated at the MRF, or how much are we paying to get rid of them?**

Glass has indeed been a topic of discussion with single-stream collection. Most jurisdictions keep the glass in the bin because it leads to a much higher recycling rate for glass which otherwise is more likely to go to the landfill. However, nothing would preclude a jurisdiction from deciding they wanted to pull glass out of the single stream mix in the future and recycle it through other means such as community drop boxes.

All of the single-stream MRF's available in Snohomish and King Counties accept glass as nearly all of the jurisdictions in those counties collect glass in their single-stream curbside programs.

As is the case with all recycling commodities, the value of glass varies with the market. MRF's charge a processing fee to run material through their facility, the amount of credit or charge for materials depends on the market.

- 5. SSC currently picks up a variety of materials that are set next to the 3 bins, such as motor oil, car batteries, scrap metal, etc. How will these items be handed with single bin system?**

No change. Materials previously set next to the 3 bins are set beside the single-stream bin.

- 6. If the new single bin system is so much more efficient and will lead to fewer trucks on the roads how many jobs will be lost**

SSC does not anticipate eliminating any jobs. The transition to single-stream will take several years, as fewer residential recycling curbside trucks are needed drivers will transition to other areas of the company. SSC has been in communication with the labor union throughout this process and the union is fully aware of the proposed switch to automated trucks.

- 7. Currently, our recyclables are taken to a local MRF on Slater Road for separation, and this local processing is supported in various documents. I have been told that the local MRF is not able to sort the types of mixed loads this new system would deliver so our recyclables will be hauled to a MRF in King County. Is that true? Will our recyclables be tracked separately (tonnage, contamination, etc.) from other communities that use the regional MRF?**

Since the closure of Northwest Recycling's sorting facility in January of 2021, curbside material is not being sorted in Whatcom County. The plastic, tin, aluminum, and glass mix is being transloaded in Ferndale and trucked to a single-stream MRF in Snohomish or King County for sorting. SSC is collecting the material in a very inefficient, labor and truck intensive method but the material is being handled the same as material collected in a single-stream bin.

Tonnage is tracked separately, contamination rates cannot be. However, there is certainly reason to believe contamination rates from Whatcom County will be far lower than those of other jurisdictions. Whatcom County is an outlier, having had the direct feedback through the curb sort system for so much longer than other jurisdictions, so our customers have a better understanding of what can go in the bin than most.

- 8. The City of Bellingham is currently considering mandatory curbside collection of organic waste. Will the County go down this path also? For 30+ years the County has promoted home composting of such waste, so if collection becomes mandatory will exemptions be given for those who have embraced home composting, or will they be paying for a system they don't need?**

It is not just the City that is implementing mandatory curbside organics collection. The state has passed legislation in the past two sessions requiring curbside organics collection in qualifying jurisdictions. The legislation does recognize home composting and requires jurisdictions to have a process for exemptions.

The state law requires that curbside organics pickup be made available in certain areas, but participation isn't mandatory. The County is not considering imposing mandatory curbside organic collection.

- 9. To implement a single bin system will new trucks and bins need to be purchased, and if so won't those costs be passed along to rate payers? Is there a financial analysis that shows these increased new infrastructure costs, (compared to the old trucks and bins which I assume have already been amortized), and how those costs will be offset by greater efficiency to avoid rate increases to households?**

Yes, collecting single-stream carts requires a different type of truck than those currently used to collect the 3 bins. However, regardless of the collection method all vehicles reach the end of their useful life and need to be replaced. The current fleet used for County curbside recycling collection is aging and in need of replacement. Historically, many jurisdictions transitioned to single-stream during a time of major capital investment either for their fleets or processing facilities. In addition, replacements for the current style of collection vehicle are not readily available since virtually the entire country now uses single-stream collection.

The trucks currently used average 1.5 tons per load, very low for their gross vehicle weight. They are relatively small capacity and without any compaction fill up quickly requiring two or three trips to the recycling facility per day. Single-stream trucks are larger and provide light compaction allowing 4.5 tons per load. This will reduce the number of trucks needed, miles driven, emissions, traffic on local roads and noise.

SSC rates are reviewed and must be approved by the Washington Utilities and Transportation Commission (WUTC). The WUTC requires any regulated hauler to submit a request for a rate case if the hauler is seeking rate increases. The WUTC reviews all of the company's financial information, including operating and capital expenses when considering any rate request.

10. Where is the financial analysis that shows the costs/benefits to actual recycling compared to employee injuries, litter, truck fuel usage, etc.

The use of automated trucks reduces employee injuries and Labor and Industry related expenses. Residential recyclers, that climb in and out of the vehicle 300-400 times per day and manually lift 600-900 bins per day, are three times more likely to be injured on the job than SSC employees in automated trucks. Automation also extends the career of employees and makes it much easier to recruit and retain quality experienced drivers.

Even with maintaining an every other week collection schedule, the reduction in the number of vehicles required and associated miles driven will significantly reduce fuel usage, truck traffic on local roads, and Greenhouse Gas impacts.

While we have not completed an economic analysis on the cost/benefit of litter reduction, wind blow from open recycling bins is a common complaint that we hear. Customers in the areas that have already transitioned to single-stream have been pleased with the reduction in windblown materials on collection day.

11. Why is so little information available about what materials are actually being recycled, and at what costs, and where?

Material Recovery Facilities (MRF's) are generally private. Unlike haulers, they are not subject to the WUTC regulations and do not generally make their information public.

12. Studies suggest changes to single bin systems work better (less contamination) if accompanied by significant educational efforts to ensure people know what can and cannot be put in the bins. Will SSC undertake these increased educational efforts? Who will oversee it? Who will pay for it? Will these efforts include tagging or rejecting loads that contain improper materials?

Yes, ongoing education and outreach will be extremely important. SSC will continue to provide education to our customers in partnership with contract cities, Whatcom County, and other community partners. Drivers are continuing the practice of tagging single stream accounts when they see contamination.

The county has recently hired a Public Health Educator, whose work focuses greatly on Solid Waste management, including promoting waste reduction, recycling, and organics management. The county will continue to work with haulers to provide education about proper management of recyclables.

13. Since the new toter for single bin collection is so much larger than the current capacity of the 3-bins (about 5 times larger) will residents be allowed to move to less frequent collection for a

reduced costs? Has less frequent collection been considered to further reduce fuel usage, wear and tear, and climate impacts?

The single stream cart is larger, about 2.5 times the capacity of the 3 bins. The additional capacity allows customers to more easily recycle additional material while also allowing cardboard to be placed in the cart which helps with collection efficiency. SSC has not considered less frequent collection than every other week.

Regarding data that shows that recycling will increase:

There is a lot of data to show that volumes will increase. Seattle, Ann Arbor, Albuquerque, Minneapolis, Tampa, Columbus, Philadelphia all had increases in volume. We are not aware of a jurisdiction that saw a reduction. It is not possible to know exactly how much increased volume we would see in Whatcom County. What we know for certain is the recycling tonnage is going down currently, per the Solid Waste Plan data.

Regarding the CSHWMP's focus on three-bin source separated recycling:

The plan does not reference a consideration to move toward single stream recycling. The pilot program that was run in Bellingham occurred while the plan was well into its lengthy revision. Stopping the plan revision process would have caused an undue delay to the process, and the plan has an allowance for amendments to address changes that arise during its 5-year span. The process for amending the plan would occur after any changes are made, as it would not make sense to amend the plan prior to county approval of proposed changes.

The City of Bellingham has more control over its collection system, as it contracts directly with the hauler. In the unincorporated area, the hauler is regulated by the plan, county code, and the Utilities and Transportation Commission. The hauler does not gain its franchise from the county, that is granted by the UTC.

Regarding code language and definitions:

The language will be amended to maintain consistency throughout the code (Material Recovery Facilities vs collectors and processors). Material Recovery Facility can be defined, and is already defined in WAC 173-350, as is "source-separated", which was called out in the letter to have a specific definition. The removal of the term "source-separated" will be reversed.