

2014 State Solid and Hazardous Waste Plan Update

Background

The Washington Department of Ecology is updating the State Solid and Hazardous Waste Plan (the Beyond Waste Plan). Ecology distributed a first draft of the update for public comment from August 18 to September 17, 2014. This document summarizes the comments we received and explains how we are incorporating them into the second draft.

Who We Heard From

Ecology received public comments from 27 individuals representing a variety of stakeholder roles, including: three local government health departments; nine local government public works departments; four solid waste collection companies; one state agency, one federal agency, four non-governmental organizations, four Ecology staff, and one recycling business.

Overall Comments

Overall plan comments were favorable, with support for the new plan structure and the emphasis on the sustainable materials management approach. Some commenters expressed appreciation that we are including more focus on all parts of the materials management cycle – upstream, use, reuse, recycling and end of life, including proper disposal. One commenter also voiced support for the inclusion of Governor Inslee’s focus on toxics in his water quality initiative.

Some comments directed us to increase focus on certain plan elements, such as adding more emphasis on recycling and construction and demolition debris (C&D). In response to comments, we have added a few additional elements to the plan. We also accepted many of the numerous and helpful suggestions to improve wording and clarity.

A few comments asked that Ecology prioritize the work in the plan and expressed concerns about whether resources are available to accomplish this work. In response to these concerns, we are adding a section on priorities. While all actions are important, work will remain resource dependent.

In some instances, there were calls for Ecology to take on stronger roles, including proposals for bans or changes to laws. In most cases, we chose not to accept these ideas, instead focusing on working with our stakeholders for agreed upon solutions. Some suggestions were too detailed or specific for the more general approach of the plan, and so we generally did not use them. However, we will likely consider and address many of these specific ideas as we begin implementing the plan actions. Other suggestions were more appropriate for the solid waste handling standards rule update (WAC 173-350), which is currently underway, and these suggestions will be addressed in that venue.

An increased focus on environmental justice throughout the plan was requested, and we have integrated these concepts in many areas.

Of course, not all comments were in agreement. In these instances, we leaned toward incorporating those that were most consistent with the solid waste hierarchy and the vision of the plan.

Comment Summary by Plan Section

1) Introduction

Stakeholders requested we add additional information to the introduction and provide clearer language. We addressed the following areas as suggested:

- Emphasizing health impacts of waste and toxics
- Increasing the connection of waste to climate change
- Emphasizing environmental justice, including addressing this in the “What will Washington be Like in 2035” section
- Clarifying some terms, either in text or in the glossary
- Adding more information under “Current Trends in Solid and Hazardous Waste”
- Putting greater emphasis on the strength of existing solid waste infrastructure

2) Managing Hazardous Waste and Materials

The majority of comments on this section were requests to clarify terminology, roles, and other details. There were also comments asking that the local source control program work more cooperatively with local health departments and their small hazardous waste generator programs. A separate moderate risk waste section was created in response to comments.

3) Managing Solid Wastes and Materials

► Solid Waste System Issues

This small section grew larger in response to comments, with the addition of a new goal and actions on local planning and grants. Other changes included clarifying terminology and highlighting stakeholder involvement.

► Solid Waste Materials & Infrastructure

Ecology received many requests for changes to this section.

- In the first draft, moderate risk waste had been integrated into the solid waste section. Based on comments, Ecology moved MRW into a separate section under Hazardous Waste. This led to revisions to some goals and actions.
- As suggested, Ecology separated a large, multi-faceted goal on collection and access to services into two goals. However, even more separation into specific types of recycling locations (public space, multifamily, commercial) was requested. We chose not to further divide the goals, given limited resources over the next five years to accomplish more detailed work in these areas.
- We added additional actions under the recycling markets goal and the litter goal.
- Several comments called for more enforcement of facility requirements and the transporter law. We have strengthened these sections.
- In response to many comments and questions, Ecology made wording improvements to the goal on landfills, in order to clarify the intent.

► Organic Materials & Infrastructure

There were few proposed changes to this section beyond clarifying wording. We did not take the suggestions to add more focus on collecting compostable materials at the curb, as current composting infrastructure appears to be near capacity. Instead, our focus in this plan is on increasing infrastructure (including diversification) and in finding end use markets for compost and other end-products. Additionally, we are increasing focus on preventing food waste to begin with.

Some commenters expressed concerns about land application of biosolids. We added an action to support additional research on biosolids, but we will otherwise continue to support the beneficial use of this material.

4) Reducing Impacts of Materials and Products

This new section was well-received. There were numerous comments on the product stewardship goal and actions, expressing support and requesting that we include additional requirements for stewardship programs. We incorporated some of these elements into the actions. We also added a new action to reduce toxics in packaging in order to increase recyclability. In addition, we moved a goal and the associated actions from the Measuring Progress section into this section, as it was a better fit.

5) Measuring Progress

Ecology received many positive comments on the importance of the work in this section. We added measurements to assess environmental justice concerns. To address comments regarding how we were looking at a limited flow of materials, we added more explanation of how we would work with partners to gather sales data and information. We also added an action about tracking successes of manufacturers doing their own environmental footprint projects¹. We moved one goal and the associated actions from this section to the Reducing Impacts section, as the goal was more about gathering information than measuring progress. We also shortened and reorganized the remaining goals to tighten this section,

6) Providing Outreach and Information

Based on comments, this new section on outreach and information appeared to be needed and supported. Ecology accepted new content and actions proposed by commenters. We added more focus on outreach to audiences with limited English proficiency and on safely managing household hazardous waste. There were suggestions to include incentives, coordinate our outreach with others, and use behavior change strategies which we incorporated to a small degree. We also added two more actions to outreach work on waste reduction and recycling as suggested by commenters.

Next Steps

Ecology has incorporated responses to comments into the second draft plan update. This will be available for public review and comment later in 2014. Please join the [listserv](http://listserv.wa.gov/cgi-bin/wa?SUBED1=WA-STATE-WASTE-PLAN&A=1) to be kept informed about the state plan update. <http://listserv.wa.gov/cgi-bin/wa?SUBED1=WA-STATE-WASTE-PLAN&A=1>

For More Information

State Plan Update Website: <http://www.ecy.wa.gov/wasteplan/>

Janine Bogar, Waste 2 Resources Program (solid waste)

Janine.bogar@ecy.wa.gov

360-407-6654

Chris Chapman, Hazardous Waste and Toxics Reduction Program

Chris.chapman@ecy.wa.gov

360-407-7160

WA State Department of Ecology

P.O Box 47600

Olympia WA 98504-7600

Special accommodations

If you need this document in a format for the visually impaired, call the Waste 2 Resources Program at (360) 407-6900.

Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

¹ An environmental footprint is the resources used and pollutants released over the life of the product, including supply chain, production, use, and management at end-of-life. Brand owners are increasingly turning to product footprints as a way to better understand and manage environmental impacts, to uncover opportunities to reduce costs and risk, and to increase market share. Oregon Department of Environmental Quality has initiated a study of the benefits and challenges of foot-printing efforts. <http://www.oregon.gov/deq/LQ/Pages/SW/productecofootprint.aspx>