

# 2015 State Solid and Hazardous Waste Plan Update

## Background

The Washington Department of Ecology is updating the State Solid and Hazardous Waste Plan. Ecology distributed the second draft for public comment from January 8 to February 20, 2015. This focus sheet summarizes the comments we received on the second draft and explains how we incorporated them into the final plan. The second draft included an executive summary, new section introductions, and a glossary that were not available for review in the first draft. In addition, the second draft included the new plan name “The State Solid and Hazardous Waste Plan: Moving Washington Beyond Waste and Toxics.”

## Who We Heard From

Ecology received comments from 29 individuals representing a variety of stakeholders, including: two local government health departments, six local government public works departments, two solid waste and recycling collection company representatives, one Washington state agency, one Oregon state agency, six non-governmental organizations (NGOs), six Ecology staff, and four citizens (one not from Washington). All four citizens and three of the NGOs commented primarily or solely on biosolids.

Of these 29 individuals, seven had commented on the first draft. In addition, three organizations, using different representatives, also submitted comments on both drafts.

## Summary

Overall, comments on the second draft were favorable. A number of commenters expressed appreciation for the changes we made in response to comments on the first draft. Support for the new plan structure and emphasis on the sustainable materials management approach continued. We also had numerous and helpful suggestions to improve wording and clarity. We were advised to use consistent terminology for product stewardship, extended producer responsibility, and environmental justice issues throughout the document. No comments were received on the new plan name.

## Comment Summary by Plan Section

### • Executive Summary, and Framework and Foundations Introduction

The second draft was the first time stakeholders had seen the executive summary. There were a few editorial comments for improving the writing.

Stakeholders suggested additional edits to the Framework and Foundations introduction. We addressed the following areas as suggested:

- Emphasizing health impacts of waste and toxics
- Including the connection of materials management to jobs
- Clarifying language about environmental justice in this section and throughout the plan
- Clarifying graphs and sources in the “current trends in solid and hazardous waste” section
- Clarifying that the Governor’s proposed direction on toxics is representative of general evolution in thought and action on this issue

- **Managing Hazardous Waste and Materials**

This section includes four subsections: Pollution Prevention, Compliance and Compliance Assistance, Permitting and Corrective Action, and Small Volume Hazardous Materials and Wastes (also known as the Moderate Risk Waste or MRW section).

As with the first draft, the majority of comments on this section were requests to clarify terminology, roles, and a few 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. Changes to the moderate risk waste subsection, which was new to the second draft, included reducing contamination in MRW so that more MRW can be recycled. We also added that technical assistance could be provided to take-back locations as well as to MRW facilities. In addition, the importance of local hazardous waste plans was added to the introduction of this section.

- **Managing Solid Wastes and Materials**

This section includes three subsections: Solid Waste System Issues, Solid Waste Materials and Infrastructure, and Organics Materials and Infrastructure. There were numerous comments requesting clarification and some additions to the background and authorities in the introduction to this section. There were very few proposed changes to the Solid Waste System Issues subsection.

We made many changes to the Solid Waste Materials and Infrastructure subsection as a result of comments on the first draft. There were few additional substantial comments on the second draft. There was a request for clarification that recycling work includes improvements for all recycling, not just curbside. Another comment emphasized that we want legitimate recycling. A few comments called for strengthening enforcement work, while others wanted less enforcement in some areas. We left enforcement language unchanged. We also did not add product stewardship work to this section. We are focusing stewardship work on toxic or hard-to-handle products that are addressed in other sections.

For the Organics Materials and Infrastructure subsection, we again declined to add an action on increasing food waste composting collection at the curb, as current composting infrastructure appears to be near capacity. We believe diversifying processing infrastructure and increasing end-use markets for recycled organics are the priorities at this time.

There were few other changes proposed to this subsection other than wording clarifications, with one exception. We received many comments regarding biosolids, which are the topic of one goal and five actions in the plan. Based on comments on the first draft, we made changes to the second draft to support more research on biosolids. Commenters on the second draft requested we stop promoting land application of biosolids, which contradicts both state and federal policy. Therefore, the goal and actions continue to support the beneficial use of biosolids.

- **Reducing Impacts of Materials and Products**

We continued to receive favorable comments about this new section. Based on comments, we made wording improvements to the introduction and added a connection to climate change. There were also helpful clarifications and suggested additions for goals and actions, including adding government purchasing opportunities, and better clarifying the product stewardship related actions for toxic and hard-to-handle materials.

- **Measuring Progress**

Significant changes were made in the Measuring Progress section from the first to second draft. There were few additional changes proposed from those who reviewed the second draft, other than clarifications.

- **Providing Outreach and Information**

There was support for the goals and actions in this section and few suggested changes. Based on comments, we clarified our intent that the agency's work on outreach and information would be done in coordination with others.

## **Next Steps**

Ecology incorporated suggestions from comments on the second draft into the final plan update. The final state plan update will be complete and available in June 2015. 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.

## **For More Information**

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

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