

This section is the “core” of the Plan. It discusses the planning issues introduced in Section 1 in greater depth, and describes what we intend to see accomplished to address these issues between 1999 and 2005, the first six years of this Twenty-Year Plan. (The entire Twenty-Year Plan, which served as the exclusive “menu” for this Six-Year Action Plan, is presented in Section 3.)

This section presents the central planning issues. It details the relationship between the planning issues and the specific activities which this Plan calls for. It explains the rationale for those activities, and discusses the range of activities which may be chosen to resolve a problem where a definitive solution can not currently be selected. Finally, it presents the considerations which will likely be central to choosing the preferred solution when that solution can eventually be selected.

Following the presentation of each planning issue is a list and description of the activities which will be taken over the next six years to deal with each of these issues. This is the “action plan” to address each issue. The activities and tasks shown are numbered in accordance with the goals breakdown shown in Section 3.

In several instances, activities have been shown which will not be implemented until after 2005. These activities are contingent upon the results of activities which will be implemented between 1999 and 2005. The activities will be implemented after 2005 depend upon actions prior to that time, and therefore they are included here so that the importance of implementing these prior activities is fully recognized.

This Six-Year Action Plan was developed by analyzing the activities from this Twenty-Year Plan, and selecting those considered to be most effective in resolving the planning issues established earlier in the planning process. While activities shown under a particular issue are meant to address primarily that issue, it is important to remember that in many cases the activities will also help resolve additional planning issues. These additional issues are listed after the activities are described.

The system will continue to refine its plans, and develop new ways to accomplish the mission, goals, and sub-goals of this Plan. Some of these efforts will be incremental and ongoing as programs are assessed. While we presently intend for all activities within the Six-Year Plan to be undertaken, future developments may prevent or argue against this. In addition, at any time during the first six-year period covered by this action plan, activities listed in the Twenty-Year Plan may be undertaken upon a majority vote of the system Council instead of the ones listed here. However, if the system desires to undertake activities not listed in the

Twenty-Year Plan during the initial six-year planning period, a major plan amendment process would be required. This process would include the involvement of all plan signatory cities and towns as well as Department of Ecology approval.

Other plan modification efforts will be more comprehensive in nature. For instance, the Recycling Potential Assessment (RPA) recognizes that within the next several years solid waste prevention and recycling programs need a comprehensive review. Accordingly, in light of the many changes in solid waste in the next 5-10 years, RPA project number 25 calls for the system to comprehensively assess and review waste prevention and recycling activities sometime around the year 2000. Similarly, in the year 2004, this Plan will be updated.

Planning Issues and Considerations

Early in the planning process, the following issues were identified as needing relatively quick resolution:

- financial integrity of the solid waste management system
- ongoing planning/public policy decision-making mechanism
- moderate risk wastes
- waste prevention
- recycling
- solid waste system capacity
- identifying the need for and siting of disposal/recycling facilities
- special wastes
- illegal dumping/ other enforcement issues
- content of disposed material
- waste import/ regional implications of decisions

As a result, this Six-Year Plan includes those activities which help resolve these issues.

In some cases activities shown fall neatly into a single planning issue. For instance, activity II.A.1. calls for definition of the Division's and other agencies' roles in dealing with illegal dumping. This activity is only intended to help address the illegal dumping issues.

In other cases activities are intended to address a number of planning issues, but

will have a primary and direct impact upon a single issue. For instance, activity I.A.1.a., the School Program, will have a primary and direct impact on recycling, but will also help address other issues, including waste prevention, moderate risk waste, and illegal dumping. In such cases, the activity is listed under the issue it will primarily address, but mention is also made of the other affected issues. For some planning issues all of the requisite activities are described elsewhere.

Similarly, certain activities, such as III.B.2.a., Effective Communications with Relevant Parties, will help resolve all of the planning issues. These activities are listed separately below, at the beginning of the issue and program descriptions.

When an activity is implemented to resolve more than one planning issue it is important for program managers to note that fact. The number of issues to be resolved may affect how the program is implemented, and will affect the results expected from the program. As a result, the program's design needs to be carefully considered. In these cases the programs must be designed and implemented to resolve all of their associated planning issues in order to be successful.

Finally, certain activities are basic to the mission of the solid waste management system, but do not directly address any of the planning issues. As a result, these activities must be undertaken immediately, and are in this Six-Year Action Plan, but are not listed under any of the planning issues. These activities follow immediately.

I.C.1.b. Environmental Safety and Compliance

- Solid Waste Facility Operations
- Leachate and Landfill Gas Operations
- Ground and Surface Water Monitoring
- Moderate Risk Waste Enforcement
- Garbage Accumulation and Illegal Dumping Investigation

Protecting public health, safety, and the environment is the reason that government undertakes solid waste management. The Snohomish Health District develops and enforces regulations to ensure this protection, while the system develops and implements plans and handles solid waste. One of the system's most basic solid and moderate risk waste related obligations is to ensure that its facilities, both operating and closed, pose as little environmental danger as is possible. The system commits to fulfilling this obligation, and if private facilities should become part of the system, further commits to ensuring that such private facilities also pose as little environmental danger as is possible.

Compliance Background

Several federal, state, and local regulations establish requirements for operating, maintaining and monitoring solid waste and moderate risk waste facilities, as well as addressing other solid waste issues such as illegal dumping and garbage accumulation problems at residences. These regulations are:

Federal:

- Subtitle D, Resource Conservation and Recovery Act (RCRA)
- National Pollution Discharge Elimination System (NPDES)

State:

- Revised Code of Washington (RCW)
 - Chapter 36.58, County Solid Waste Disposal
 - Chapter 70.95, Solid Waste Management, Reduction and Recycling
 - Chapter 70.95C, Waste Reduction
 - Chapter 70.95I, Used oil Recycling
 - Chapter 70.105, Hazardous Waste Management
- Washington Administrative Code (WAC)
 - Chapter 173-303 WAC, Dangerous Waste Regulations
 - Chapter 173-304 WAC, Solid Waste Handling
 - Chapter 173-351 WAC, Municipal Solid Waste Landfills
 - Chapter 246-203 WAC, General Sanitation

Local:

- Snohomish Health District Sanitary Code
 - Chapter 3.1, Regulations Governing Solid Waste Handling
 - Chapter 3.5, Regulations Governing Moderate Risk Waste Handling
- Snohomish County Code
 - Chapter 7.35, Solid Waste Disposal
 - Chapter 7.41, Operating Rules and Disposal Fees for Disposal Sites

- Puget Sound Air Pollution Control Authority Regulations
- Pretreatment Ordinances, including Everett City Code No. 2034-95

These regulations establish requirements that govern solid waste storage, handling and facility operating policies, facility closure requirements, ground and surface water protection and monitoring requirements, sanitary sewer, leachate and landfill gas treatment and disposal practices. They also establish requirements which prohibit illegal dumping of solid and moderate risk wastes, the accumulation of garbage on property, and improper handling of moderate risk waste.

The Snohomish Health District is the regulating and enforcement agency for all solid and moderate risk waste facilities, whether operating or closed. The Health District also investigates and resolves a large number of garbage accumulation, illegal dumping, and moderate risk waste related complaints. Solid waste transfer stations, rural drop box sites, open or altered landfills, petroleum contaminated soil treatment facilities, certain recycling facilities, and moderate risk waste collection facilities are required to have a permit issued by the Health District. The Health District periodically inspects each facility to verify that the Solid Waste Management Division and other solid waste facility owners are operating their facilities in accordance with applicable regulations.

Moderate risk wastes are, legally, one form of solid waste. Therefore, some regulations which cover solid waste facilities also govern the operation of moderate risk waste facilities. However, facilities for handling moderate risk wastes are also covered by additional regulations. As is the case with solid waste regulations, federal, state and local jurisdictions all play roles in developing and implementing controlling regulations. Also, as in the case of solid waste, the Snohomish Health District is the organization with the bulk of the regulatory duties, and the Solid Waste Management Division is the primary planning jurisdiction. The two agencies cooperatively implement the Plan. The regulations controlling moderate risk waste facilities, and the organizations which participate in moderate risk waste management, are discussed in detail in chapter 5 of the 1993 Moderate Risk Waste Management Plan.

System Compliance Activities

To ensure compliance with groundwater and surface water regulations the Division's Environmental Services Section (ESS) performs ground and surface water monitoring at four closed landfills (Bryant, Lake Goodwin, Lake Stevens and Cathcart), the unused Regional Landfill and McCollum Park, formerly known as Emander Landfill.

Following is a brief synopsis of each of the closed landfills:

- Cathcart Landfill - This 52 acre landfill opened in 1980 and was considered state-of-the-art because of its advanced liner system. This landfill was closed in 1992 after receiving 3.2 million tons of refuse. Final closure included a flexible membrane liner that was keyed near the existing bottom liner for total encapsulation. The facility is being monitored per WAC 173-304 regulations. Moderate contamination has been detected downgradient from the facility, presumably from holes in the bottom liner system. The facility has an active landfill gas extraction system that has successfully controlled landfill gas migration and odors.
- Bryant Landfill - This unlined landfill opened in the 1950's as an unregulated disposal site. The 30 acre landfill underwent final closure with a clay cap in 1987 after receiving approximately 847,000 tons of refuse. The facility is being monitored per WAC 173-304 regulations. Light contamination has been detected downgradient from the facility. The facility has a passive gas extraction system that has successfully controlled odors and lateral gas migration.
- Lake Goodwin Landfill - This unlined landfill opened in the 1950's as an unregulated disposal site. The 11.5 acre landfill underwent final closure in 1983 after receiving approximately 185,000 tons of refuse. Light contamination has been detected downgradient from the facility. The facility has no landfill gas control system.
- Lake Stevens Landfill - This unlined landfill opened in 1947 as an unregulated disposal site. The 27 acre landfill underwent final closure in 1984 with a bentonite dike around its perimeter and a bentonite cap. The facility has moderately contaminated local aquifers and was determined to pose an imminent threat to drinking water supplies. Snohomish County Solid Waste installed public water to several nearby residents to ensure a safe drinking water supply. The facility has a passive gas extraction system that has successfully controlled landfill gas migration and odors.
- McCollum Park Landfill (Emander Landfill) - This 27 acre facility opened in 1947 as an unlined, unregulated disposal site. The facility underwent final closure in 1996 after receiving 238,000 tons of MSW and sludge. Final closure included sludge stabilization with portland cement and a flexible membrane liner over the top of the landfill. The facility is being monitored per MTCA regulations. Moderate contamination has been detected downgradient from this facility. The facility has an active/passive gas extraction system that has successfully controlled landfill gas migration and odors.

Samples are collected and sent to a licensed laboratory for analysis for a variety of constituents that would indicate potential problems in both ground and surface

water. The results of these tests are provided to the Health District each quarter. Annually, ESS prepares a statistical analysis for each landfill using a computer program (Dump STAT or MTCA STAT) which depicts trends in groundwater quality which is forwarded to the Health District and Department of Ecology for their review.

Landfills generate leachate and methane gas during the decomposition of the waste. The Cathcart and Lake Stevens Landfills, as well as the Regional Landfill, have leachate collection systems.

Leachate generated at the Lake Stevens Landfill is collected in the landfill through perforated pipes extending into the landfill. Periodically, the leachate is pumped into a tank truck from the landfill through a series of leachate sumps. The leachate is transported to the Regional Landfill Leachate Pretreatment Plant for treatment prior to discharge via a pipeline through the Silver Lake Water District sewer system for final treatment and disposal at the publicly owned treatment plant in Everett.

Leachate generated at the Cathcart Landfill is disposed of in the same manner except that the leachate is pumped via a pipeline directly to the pretreatment plant on a continuous basis. A leachate pipeline from the Regional Landfill to the pretreatment plant has been installed, but not used. There are no leachate collection systems at the Bryant or Lake Goodwin Landfills nor at McCollum Park. Capping these landfills has thus far significantly reduced leachate generation at these facilities.

Landfill gas is collected in perforated pipes under the cap or gas collection wells drilled into the landfill and burned in a flare at the Cathcart, Lake Stevens and Bryant Landfills and at McCollum Park in compliance with operating permits issued by the Puget Sound Air Pollution Control Authority. Landfill gas generated at the Lake Goodwin and Oso Landfills is dispersed passively through the soil cap.

Funding for operation and maintenance of all solid waste facilities is included in the annual Solid Waste Management Division budget. A landfill closure/post closure fund was created for the Cathcart Landfill in 1988 as a result of changes in the State Minimum Functional Standards for landfills. Sufficient funds were allocated to a reserve account within the Solid Waste fund balance to provide funds for the landfill capping (closure) and to maintain the landfill and perform groundwater monitoring for a minimum of twenty years, or until there is no landfill settlement and leachate and landfill gas production has ceased. At the end of each fiscal year, the post closure reserve account is decreased by the amount of funds expended the previous year. If the Regional Landfill were to be opened, a similar closure/post

closure fund would be established. There are no closure funds for the other closed landfills since they were closed prior to the requirement to establish such reserve accounts.

The Division is also responsible for four additional closed landfills: Sultan, Old Bryant, Gold Bar, and Lake Roesiger. These landfills, closed some years ago, were relatively small and have neither leachate nor gas management systems.

I.B.2.a. Hauler Coordination

The system will continue to coordinate its actions with haulers and SQG vendors, through ongoing informal contact as well as more formalized contact where appropriate.

I.B.2.b. WUTC Coordination

The system monitors and comments on WUTC actions which pertain to or impact services and rates in Snohomish county, including incorporated areas that utilize the WUTC franchise system. The system interacts with the WUTC on issues such as contract authority, trucking deregulation, flow control, rate structure, rate review, public notification, etc. The system will continue to undertake these activities.

I.C.8.a. Anticipate and React in a Timely Manner to Health District Inspection Reports Detailing Environmental-related Problems at System Solid Waste Facilities or Concerning Waste Transport.

The system and the Snohomish Health District have a long history of working together cooperatively. As a result, many of the agencies' interactions are informal. The system is regularly informed of Health District concerns before any official report is issued. The system will attempt to anticipate Health District reports, and will always react to significant concerns in a timely manner.

II.B.2.a. Facility Monitoring and Remediation

Monitoring closed system landfills is a necessary system responsibility. If monitoring shows cause for concern with environmental quality, remediation of the facility is also an unavoidable system responsibility. As a result, the Solid Waste Management Division will continue to undertake and place the highest priority on these activities. Any organizational or financial changes which the system undertakes in regards to the Division will take into account the vital nature of these activities and their high priority.

III.B.2.a. Effective Communications with Other Relevant Parties

Solid waste management has moved from being primarily a local activity to increasingly becoming a regional, statewide, and even national and occasionally international activity. Furthermore, the integration between public and private actors has also increased, and is likely to continue to do so in the future. As a result of these trends, the system must maintain effective communications with those parties and bodies, such as our own cities and towns, other counties, state SWAC, and the National Association of County Officials (NACO) and the Solid Waste Association of North America (SWANA), whose actions will significantly affect the accomplishment of the mission of this Plan. One aspect of this communication effort will be RPA project number 12, Assist Cities and Towns. In addition, RPA project number 1, Optimize Private Sector Efforts, presented earlier in I.A.2.a., will be implemented in conjunction with this activity.

III.B.2.b. Coordination with Other Relevant Parties

In some instances communication will lead to the decision to coordinate activities with others. The system should keep alert for opportunities when coordination will yield more efficient use of resources.

In particular, RPA project number 1, Optimize Private Sector Efforts, presented earlier in I.A.2.a., will be implemented in conjunction with this activity. In addition, RPA project number 12, Assisting Cities and Towns, calls for the system to work with cities to develop funding mechanisms for staffing and projects related to waste prevention, recycling, and implementation of moderate risk waste plan elements. Furthermore, the system will work with other parties toward the development of a comprehensive and coordinated local hazardous waste management program.

III.B.3.a. Monitor Relevant Developments in the State Legislature, Congress, Federal and State Courts, and Administrative Law Panels, and as Appropriate Interact with these Groups and/or Adjust System Policies and Procedures Accordingly

System activities are controlled and impacted by legal forums and political decisionmakers far removed from the geographic boundaries of Snohomish county. Accordingly, the system will monitor legal and political developments which may

be expected to impact system activities. Where appropriate, the system may participate in these forums and attempt to affect resulting decisions. In instances where such participation is not appropriate or not practical, the system will monitor developments in order to adjust its policies and/or procedures.

III.D.5.a. Evaluation Strategy

Wherever feasible, all programs and plans will include an evaluation element. If not feasible, the program will be reviewed annually to determine if it is accomplishing what it was designed to, whether it can accomplish more or accomplish it more efficiently, and whether an evaluation mechanism can be added. Where the activity is being implemented by the system, we will attempt to implement changes suggested by the evaluation process. Where the activity is being implemented by others, the system will work with those parties to seek implementation of the suggested modifications.

Furthermore, there will be occasions when the overall direction of activities will be evaluated. For instance, RPA project number 25 calls for the RPA to be thoroughly evaluated and modified sometime around the year 2000 to reflect the many changes in solid waste in the next 5-10 years. Furthermore this Plan will be thoroughly evaluated in preparation for the 2005-2011 planning horizon.

III.D.5.b. Data Collection

The collection and analysis of data is necessary for planning and project evaluation. Therefore, the system will undertake extensive data collection and evaluation, including the following activities:

- The system will maintain and analyze data on system and hauler collected materials, including materials destined for disposal, recycling, and composting.
- Haulers will be required to submit monthly data reports to the system detailing recycling tonnage, participation, and other information.
- The system will produce quarterly and annual tonnage reports, including source and type of waste.
- The system will produce periodic program reports on specific programs.
- The system will cooperate with DOE on the DOE State-wide Survey and will encourage private companies within Snohomish county to do the same.
- The system will conduct Recycling Potential Assessment (RPA) project number 21, Curbside Efficiency Study. The purpose of this study is to work with the private sector to identify operational and economic problems within the current curbside recycling system and propose solutions, specifically to lower the costs of curbside recycling and increase diversion in the system. Recent WUTC rate

reductions have accomplished part of the work included in this study, but much remains to be studied.

- RPA project number 22, the Transfer Station Study, will determine what changes can be made at existing and planned facilities in order to allow for more effective recycling on-site.

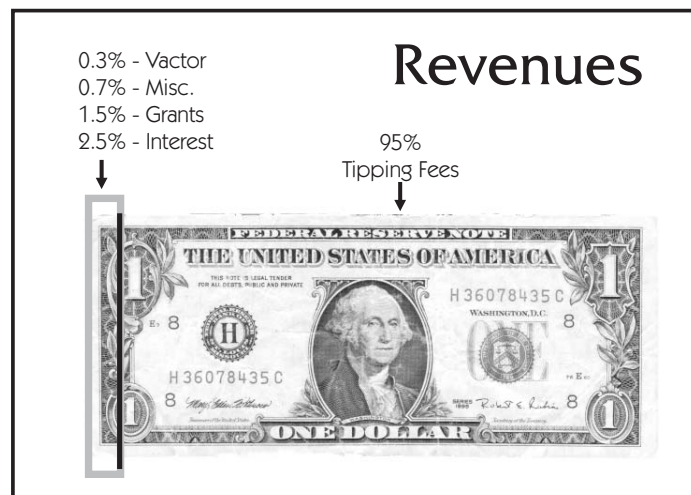
In addition, in an effort to better plan and manage system solid and moderate facilities, data on facility usage, revenues, operation, and costs will be collected and analyzed.

The RPA's Non-residential Program Analysis calls for a consultant to be hired to evaluate the success of the existing business recycling program and recommend next steps. A database will be developed, businesses will be surveyed, and the consultant will recommend businesses to target by type, location, etc.

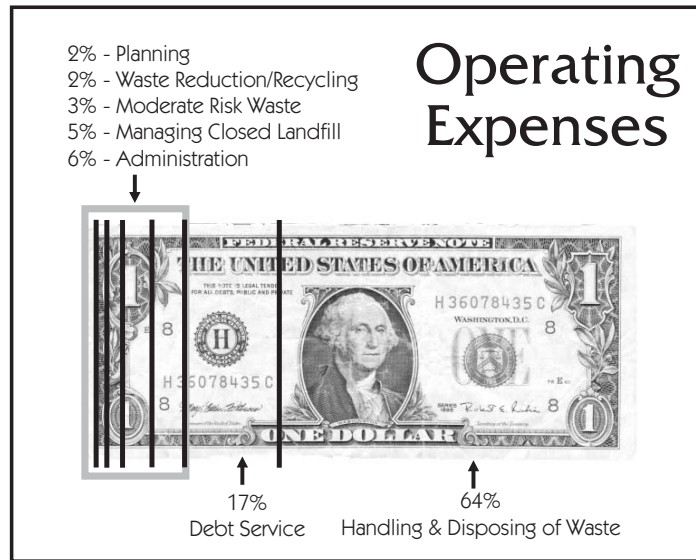
RPA project number 24, the Self-Haul Study, will determine who the self haulers are, what materials they haul, why they self-haul, and identify the barriers to recycling that they encounter or perceive.

Financial Integrity of the System

One of the most significant long-term issues facing solid waste management in Snohomish County is the financial integrity of the existing system. In brief, it is unlikely that the Division will be able to continue to finance the operation of the existing system indefinitely, so long as we continue to rely exclusively upon existing financing mechanisms and make decisions using existing operational philosophies.



Until the 1970's counties tended to use general funds for solid waste management. During that decade the costs of disposal increased, and most Washington jurisdictions switched over to user fees, also called tip fees. Today within the system, and within Washington in general, solid waste management activities are paid for almost exclusively through tip fees. General tax revenues are only rarely used for solid waste management activities. The total quantity of tip fees collected varies directly with the amount of solid waste processed by the system. Unfortunately, system costs rarely vary directly with that quantity of waste.



figures may not total 100% due to rounding.

Certain costs, such as monitoring and remediating of old landfills and fulfilling NPDES permit requirements, remain even if no waste enters the system. As a result, tip fee financing can only be relied upon where the quantity of incoming waste is predictable, and high enough to pay both those costs which vary with tonnage and those costs which remain the same regardless of tonnage. During the 1970's disposal costs accounted for almost all solid waste expenditures. Since then non-disposal costs have increased, to the point where moneys paid by the system to its solid waste disposal contractor are approximately only 50% of total solid waste management expenditures. However, tip fees still pay for virtually all of these activities, and even when incoming tonnage decreases, these other costs must be paid.

Flow control is the legal authority of a jurisdiction to provide that solid waste generated within that jurisdiction go to one or more designated facilities. This authority has traditionally been used by local governments across the country to accomplish a variety of governmental purposes, including ensuring that solid waste went to environmentally sound landfills, ensuring that solid waste was handled in an economically efficient manner, and to maintain sufficient tonnages to support solid waste related expenditures. Flow control has traditionally been accomplished by a variety of methods- by ordinance, by contract, by municipal operation, and by other means. However, in 1994 the United States Supreme Court found that a flow control ordinance in Clarkstown, New York violated the Commerce Clause of the United States Constitution, and was unenforceable. Since that time there has been much controversy concerning the methods by which flow control can be accomplished, including court cases and Congressional debate.

Financing the solid waste system primarily with tip fees has relied in large part upon the authority of local governments to use flow control. As methods of flow control become the subject of challenge in lawsuits and by other means, local governments may face increased challenges in their efforts to direct the flow of solid waste, to predict the volumes of waste that will be processed through their systems, and to finance system costs with tip fees.

In addition, financing primarily through tip fees works at cross purposes with waste prevention and recycling. These environmentally beneficial activities are the top two solid waste management strategies mandated by the state. However, waste prevention and recycling may also reduce tip fee revenues necessary to cover expenses such as monitoring and maintaining old landfills, as well as operating waste prevention and recycling programs.

Although the system has so far been able to finance most solid waste operations through tip fees, this situation probably cannot be sustained over time. The region, and the nation, are probably moving toward a less regulated, free market oriented environment. Therefore it will be necessary to address the issue of long term financing.

While the system has already experienced competitive economic pressures on its solid waste operations, such pressures are likely to increase within the next several years. Accordingly, the system will have to decide whether it desires to stay in the business of providing solid waste services, and if so, to decide which services it should provide. Regardless of which decision the system makes, a reexamination of the system's solid waste financing mechanism is necessary. If the system continues to provide all of the services it currently provides, competitive pressures may force it to pay an increasing portion of its non-disposal related costs through a

mechanism other than the tip fee. Conversely, if the system drops certain services, the costs of monitoring and possibly remediating old landfills will remain along with certain other non-disposal programs, and these will also likely have to be paid through a non-disposal related mechanism.

However, there is another reason why it is crucial to design and have a new financing mechanism available prior to deciding which activities the system will undertake. Such decisions should be based on what is in the best long-term interests of Snohomish county residents. The only question before the system should be how to ensure that human health and environmental quality are protected while delivering solid waste management services in the most economical and convenient manner to system residents. The question of how to pay for monitoring and remediating closed landfills, or for other solid waste related services, should not play a role in answering this question. However, so long as the financial status quo remains in effect, decision makers will find it impossible to avoid these conflicting issues when making pivotal decisions. As a result, this Plan anticipates that alternative funding mechanisms will be sought, and if they become available, they will be evaluated by staff and SWAC, and possibly implemented by the system.

Designing and implementing an alternative funding mechanism is vital, but the process will be complex and will require considerable effort on the part of Solid Waste Management Division staff. This may include working with other local officials, and on the state level, to ensure that state law permits the option of enacting a range of alternative financing methods.

In addition to having an alternative funding mechanism available, if the system decides to continue to provide all or many of the services it now provides its solid waste management operations must also be evaluated to ensure that they are delivered in an economically competitive manner. Simply put, the system must continually provide better service at less cost than what is available to waste generators elsewhere. In this way generators will use system services for their disposal needs- not because there is some law requiring them to do so, but because it is in their own best interests, and they do so voluntarily.

Over the last several years the system has improved its competitive position. There has been increased emphasis on customer service, and waste processing, handling, and transport operations have been streamlined.

Being competitive has been and will continue to be challenging. Governmental entities such as the system's Solid Waste Management Division are concerned with public policy and economic issues. As such, both public policy and economic considerations receive significant weight when decisions are made. Since the

Division may in the future be competing with private entities, we will need to cultivate a system that has a strong orientation towards customer service and cost-sensitivity, and which is highly responsive to changes in the field. This must occur while functioning within a political system, if we are to be competitive.

This change in focus involves many different factors. Government hiring, transfer, promotion, and disciplinary practices tend to be more cumbersome and regimented than those in the private sector. There are extra controls over the managing of public funds, such as purchasing requirements. And government employees, including managers, often tend to make decisions in a more deliberate and cautious manner than those in the private sector, partly because they deal with increased scrutiny but also because there are few rewards in the public sector for taking chances.

These characteristics are understandable within the governmental context, but may tend to work against competitiveness. Changing them would be very difficult, in some cases impossible, and in some cases even undesirable in light of countervailing benefits. However, all aspects of the Division's operations, including the underlying mindset these characteristics represent, must be systematically and thoroughly scrutinized for their impact on competitiveness. A zero based management approach, where all policies and procedures are analyzed to see if they justify themselves, is necessary. Where changes are necessary, they must be made if the Division is to compete.

In this context the term "competitive" needs to be explained. If the system Council determines that a system-run transfer station is in the public interest, then the Division will design, build, and operate that facility with the intent that its prices and services will be "competitive". This approach does not imply that the system is trying to take business away from the private sector. It simply recognizes that a customer-centered focus is required or the facility may not be able to pay for itself.

Finally, all other aspects of system solid waste operations will need similar scrutiny. In particular, such scrutiny must include an analysis of real properties the Division controls to ensure their optimal usage. In certain instances it may be desirable to sell real properties owned by the Division where the sale is likely to outweigh the advantages of maintaining ownership for possible future use. The scrutiny must also include business arrangements with contractors and other system suppliers of goods and services. Finally, a review of those activities currently funded primarily by tip fees, but which benefit other units of government, such as MRW activities which benefit water quality, needs to be undertaken. In such situations different approaches to funding these activities needs exploration.

The following programs are designed to address this planning issue. The first two deal with making more efficient use of the system's employees by minimizing bureaucratic requirements, while the latter two projects call for the system to develop a long term plan to deal with funding issues.

III.E.1. Ongoing Review of Administrative, Financial Management and Legal Burdens

On an ongoing basis, project managers will review the administrative, financial management and legal burdens associated with their projects. If the function of those burdens is unclear, or the associated workload seems excessive, managers will discuss that issue with relevant system and other staff.

III.E.2. Minimize Undesirable Burdens

Relevant system staff will work with others to remove or alter those burdens with minimal purpose or whose burden is excessive.

III.E.4.a. Assess Long Term Financial Needs

As a prerequisite to ensuring the system's financial ability to accomplish mandated and desired activities the system must first determine what those activities are. Long term budgets then have to be developed for these activities. Both elements of this activity will take considerable staff time and will be accorded highest priority. This priority is the result of the changing legal and organizational framework within which the system will have to operate in the future.

III.E.4.b. Assess Long Term Financial Options

Concurrently with or subsequent to the activity immediately above, Assess Long Term Financial Needs, the options for meeting those needs must be developed. These options' implications will be both statewide and local. Before implementation, they will need to be presented to system decision-makers, the cities and towns, and other stakeholders in the public and private sectors.

Ongoing Planning/Public Policy Decision-Making Mechanism

All plans, no matter how well prepared, become outdated. Sometimes plan goals change with time. Circumstances which affect the means by which goals will be attained may also change. If plans are to remain current they must either be rewritten and reapproved constantly, or some means of updating them must be built into the Plan itself.

This issue is particularly relevant for this Plan. As stated previously, many of the basic underpinnings of solid waste management are in flux, and it is not possible to accurately predict their future status. As a result, this Plan is sometimes less definitive than would otherwise be desirable. While the goals of the Plan are generally clear, the means by which the goals will be attained are in some cases less so.

Accordingly, this Plan attempts to resolve this problem in two ways. First, where the means for resolving a planning issue can not presently be decided, the Plan instead attempts to show how that decision will be made. The Plan discusses the probable sources of data and other information, the options which currently appear feasible, and the factors which will seemingly have the greatest impact on which solution is chosen. Finally, the Plan discusses who will make the decision.

The second way in which this Plan is designed to stay up to date is that it includes a formal procedure for modifying the plan. In essence, it permits dropping activities shown in the Plan, or undertaking an activity sooner than shown, after notifying DOE and the cities and towns, and having the County Council formally approve the action.

The following programs are designed to address this planning issue and are further described elsewhere in this section.

- III.B.2. Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Snohomish County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.
- III.D.5. Monitor, evaluate, and improve all programs and plans.
- III.E.4. Ensure the long-term financial ability of the system to accomplish mandated and desired activities and to fulfill financial obligations which the system has assumed as a result of its solid waste management, recycling, or moderate risk waste activities.

Moderate Risk Wastes

As discussed in Section 1, the Snohomish Health District is, and has historically been, the lead agency for the enforcement of solid waste and moderate risk waste (MRW) management issues in Snohomish county. The Health District works cooperatively with the system in implementing various programs, including many dealing with MRW.

Following adoption of the 1993 MRW Plan by Snohomish County and its cities and towns, the Health District created a grant funded program to accomplish specific objectives outlined in the 1993 MRW Plan. Among these objectives was the drafting and adoption of countywide MRW regulations and the implementation of other activities intended to reduce the amount of MRW generated, address problems associated with the improper handling and disposal of MRW by both households and small businesses, create standards for the safe operation of MRW collection facilities, and provide other services related to the proper management of this waste stream.

In regard to household hazardous waste (HHW) activities, the Snohomish Health District investigated and resolved approximately 250 complaints concerning the improper management of HHW from 1993 to 1996. Most of these complaints involved improper storage and disposal of waste such as oil, gasoline or paint and paint related products. The Health District has also provided education to homeowners through exhibits at annual public events such as the Evergreen State Fair and Public Health Week. In addition, phone consultation on household hazardous waste has been provided to the public during business hours.

The Health District has also implemented small quantity generator (SQG) activities. (Small quantity generators, SQG's, are businesses which generate and accumulate relatively small amounts of hazardous wastes.) The District investigated and resolved approximately 530 complaints concerning the mismanagement of small business hazardous waste from 1993 to 1996. Most of these complaints involved improper storage and disposal of waste, as did the HHW complaints; however the SQG complaints generally involved larger quantities of waste. Health District staff also participated on the Vector Grit Task Force and wrote/adopted a countywide street waste solids policy; formed a task force known as IRAC to draw local regulatory agencies together and develop a contact and information directory for SQG's; participated on the SQG Advisory Panel; participated in SQG workshops coordinated by SWMD and in the Envirostars forums; attended and staffed a booth at annual Waste Information Conferences.

Following the adoption of the MRW regulations, the Health District also established a program to permit and inspect MRW collection facilities to ensure that there is no threat to public health created through the operation of these facilities. Since the time the regulations were adopted in 1994, seven MRW collection facilities have been reviewed and permitted, and are currently being monitored. These facilities include both the Ports of Everett and Edmonds, various auto parts stores around the county, and the system's drop boxes and transfer stations, all of which are considered "MRW" Limited Facilities. The system's permanent, or "fixed" MRW facility is also permitted by the Health District.

The Health District has also implemented a number of miscellaneous MRW activities since the adoption of the 1993 MRW Plan. These include the following: creating an inventory checklist for school chemical stockrooms with information on how to dispose of wastes; doing waste designation for materials that are not suitable for disposal through a solid waste transfer station; and overseeing the proper cleanup of illegal methamphetamine drug labs.

The Solid Waste Management Division, prior to the passage of the Moderate Risk Waste Management Plan, had developed a residential MRW program. Included were educational programs and some means of regular collection, initially collection events. Since that Plan was adopted in 1993, the system has also begun the development of a small quantity generator program.

While most activities the MRW Plan called for were intended to resolve problems of a relatively immediate nature, the Plan also called for the resolution of a number of longer term problems. In order to address these long term issues the Plan set up two panels to study and discuss the problems and propose suggested solutions.

The first of these panels was the Small Quantity Generator Advisory Panel. This group had a general charge of completing the small quantity generator elements of the MRW Plan. As a component of this charge, the group had a specific responsibility for determining the desirability and feasibility of organized year round hazardous waste disposal opportunities for small quantity generators. If the Panel found such organized disposal to be advantageous, it was to propose options.

The Small Quantity Generator Advisory Panel began meeting in 1994. It investigated and participated in the development of technical assistance and educational programs, year round disposal options, and the implementation within the county of EnviroStars, an incentive program whereby small businesses would be encouraged to handle their hazardous wastes responsibly. Additional activities which were recommended and have been implemented include the production and distribution of a newsletter and technical assistance brochures, and technical assistance by telephone to local businesses.

The SQG Panel developed a list of proposed programs and priorities which can be found in the appendix of this Plan. The Panel also formally recommended that the system establish a fixed facility for year round collection of moderate risk wastes from both residents and small quantity generators. Such a facility was opened in Everett in early 1999.

The second panel which the MRW Plan set up was an Interagency Governmental Coordination Panel. Many different units of government are involved and concerned with the control and management of hazardous wastes. These include the Solid Waste Management Division, the Surface Water Management Division, the Snohomish Health District, and local water and sewage treatment districts. The Plan called for a panel representative of these types of agencies to develop a coordinated approach to regulating and managing moderate risk wastes, and to financing this regulation and management.

The Interagency Coordination Panel began to meet in 1996. It initially concentrated its efforts on identifying the roles of each agency, and publicizing these roles so the public knows which agency to contact when assistance is needed.

The work of the Interagency Coordination Panel must be completed to fully implement the 1993 MRW Management Plan. In addition, the SQG Panel findings must be translated into action. A prerequisite to accomplishing this is to decide which agencies should undertake the recommended programs, and how those programs should be paid for. An ad hoc group, meeting under the auspices of the EnviroStars program, the Solid Waste Management Division, and the Snohomish Health District, undertook a short series of meetings to address those issues. There is a continuing need for stakeholders and decision-makers dealing with all environmental media (ground, surface, storm, and waste water, air, soils, solid waste) to cooperatively develop and implement solutions to MRW related problems.

Wherever possible this Comprehensive Solid Waste Management Plan update has attempted to include the progress made to date in implementing the MRW Plan. This Plan also includes other updates to the MRW Plan, such as decisions made and changes in priorities. Nevertheless, it must be noted that much of the work of the SQG Panel has not been implemented. Thus, this Comprehensive Plan can not be as complete or definitive in relation to MRW issues as would otherwise be desirable. The 1993 MRW Plan should be seen as the Plan for the system's MRW efforts except where it is in conflict with this Plan.

The 1993 MRW Plan anticipated that an update to that Plan would be prepared in 1997. Since this Comprehensive Plan update coordinates both the system's solid waste and moderate risk waste activities, this Plan should be considered an update to both system Plans. This Plan will be updated no later than 2006, and will continue to include both solid waste and moderate risk waste management. Any prior plans or plan updates remain valid except as they may conflict with this or future updates.

The following programs are designed to address the moderate risk waste planning issue.

I.A.2.j. Latex/Oil Base Paint and Solvent Program

Self-haul, drop-off, and exchange programs are needed for residents, contractors, and other businesses to recycle usable paint and paint related materials and recover or dispose of other materials at a reasonable cost. The system will work with other public entities and the private sector to encourage the provision of these services.

I.A.4.i. Household Moderate Risk Waste Recycling/Disposal Opportunities

One significant difference between household moderate risk wastes on one hand, and recyclables and solid wastes on the other, is that a single collector of MRW generally decides whether the waste will ultimately be recycled or disposed of. In the case of solid wastes, the household generator generally separates what is considered to be recyclable from what the generator considers to be solid waste. After separation, the generator may then self-haul the wastes to a recycling facility, a disposal facility, or a combined facility such as one of the system recycling and transfer stations or drop boxes.

However, in most cases of household moderate risk wastes, the household disposes of all wastes, and the disposal facility decides whether the material will be disposed of or recycled. The significance of this difference is that the generator of solid wastes must be supplied opportunities for both recycling and disposal, while the generator of household MRW need only be supplied opportunities for “disposal” since the “disposal” facility can be expected to recycle the wastes where it is economically feasible to do so.

The Snohomish County Moderate Risk Waste Management Plan currently assumes that residents should have “free,” or low cost opportunities to dispose of their moderate risk wastes. Accordingly, disposal opportunities have been provided to residents, initially through a number of collection events held around the county, and now at the fixed facility in Everett. Residents are not charged for this service, the underlying policy being that residents are more likely to remove toxics from their home if they are not charged. However, surveys of residents who use County provided disposal services indicate that there would be little disagreement with a small charge. Accordingly, charging a modest fee for use of the permanent facility will be considered to help offset associated costs.

Findings from a study of year round disposal options suggested that a fixed, centrally located, permanent facility be developed to increase customer service and decrease program costs. The SQG Advisory Panel and SWAC concurred with this, and the system Council approved construction. Construction was completed in January 1999.

I.A.4.j. Small Quantity Generator Moderate Risk Waste Recycling/Disposal Opportunities

While the system provides residential MRW generators “free” or low cost disposal, system policy has generally been that business generators are expected to pay for disposing the MRW they generate. The theory has been that waste disposal is a cost of doing business, and as the system would not subsidize a solid waste generator, so it should not subsidize a moderate risk waste generator. Moreover, Department of Ecology grants which subsidize household MRW disposal may not be used for SQG waste disposal. Nevertheless, small quantity generators may bring their MRW to the MRW Facility, where they are able to dispose of this waste for a charge prorated to cover their share of expenses.

The system will also explore expanding the latex paint collection program to cover SQGs on a fee for service basis. In addition, the system will evaluate the potential of making household hazardous waste disposal options available to SQGs, again on a fee for service basis, when developing disposal options for specific waste streams. Finally, the system intends to expand efforts to increase participants in MRW programs.

I.A.4.k. Moderate Risk Waste Activities Conducted by Snohomish Health District

The Snohomish Health District is the lead solid waste enforcement agency in Snohomish county, and therefore has the ultimate responsibility for ensuring that moderate risk waste is handled and disposed of in a safe manner. The Health District currently provides, and will continue to provide, the following services to accomplish this objective:

1. Writes, adopts and enforces countywide MRW regulations (Snohomish Health District Sanitary Code, Chapter 3.5, “Regulations Governing Moderate Risk Waste Handling”).
2. Investigates and resolves moderate risk waste complaints related to businesses and households.
3. Ensures the cleanup of illegal drug labs.
4. Ensures the safe operation of the system’s household hazardous waste collec-

tion events and its waste oil and antifreeze drop off stations. These sites are reviewed, permitted and inspected.

5. Ensures the safe operation of all other fixed (permanent), temporary, and limited MRW collection facilities. These sites are also reviewed, permitted, and inspected.
6. Provides technical assistance and education to businesses and households regarding hazardous waste prevention, recycling, and proper storage and disposal.
7. Provides technical assistance to public school laboratories regarding appropriate use, storage, and disposal of hazardous chemicals.
8. Provides technical assistance to Snohomish county citizens and public agencies by participating on various committees and providing education at public events. For example, the Health District has been active on the Snohomish County Vector Waste Task Force, the Stillaguamish Clean Water District Committee (preventing non-point pollution from MRW), the Snohomish County Groundwater Committee, and the Snohomish County Small Quantity Generator Advisory Panel. The Health District's Moderate Risk Waste program has also helped to staff the public information booth at the Evergreen State Fair and other events.
9. Initiated an Interagency Regulatory Assessment Committee (IRAC) to assist small businesses in understanding how different regulatory agencies rules affect their MRW handling practices.

Furthermore, in accordance with the Draft Snohomish County Groundwater Management Plan (1998), the Health District is considering initiating a small quantity generator inspection program. The program would be designed to protect sensitive groundwater supplies, and under it the District would inspect small quantity generators operating within Critical Recharge Areas (CRA's). CRA's are geographical areas which are particularly important in recharging aquifers which lie below them. Since water must move through the Critical Recharge Area to reach the underlying aquifer, any pollution of the CRA, such as from a small quantity generator, results in pollution of the aquifer. Prior to implementing this program, the Board of Health must identify a funding source for, and officially approve it.

I.A.5.c. MRW Rate Incentives

The system will work with the business community and hazardous waste related vendors to encourage the availability of service level options for moderate risk waste disposal which encourage use by smaller businesses.

I.B.4. Ensure the Availability of Self-Haul MRW Disposal Opportunities for Residents and SQG's.

System moderate risk waste activities are designed to minimize the quantity of MRW generated. Nevertheless, some quantity of these wastes will continue to exist, and thus need safe disposal. In contrast to solid wastes, which are generated regularly and by most businesses and households, moderate risk wastes tend to be generated in a scattered and sporadic manner. As a result, regular route collection of these wastes is unlikely to be economically feasible. Instead, the system has opened a fixed MRW Facility, where safe handling and ultimate disposal of these wastes can be certain. SQG businesses are able to dispose of their MRW at this facility, and are charged for processing and disposal/recycling of this waste.

I.B.5. Consider the Desirability of MRW Route Collection Opportunities, and Implement as Appropriate.

In specific instances, such as certain industrial neighborhoods, route collection of MRW could be feasible. The system will work with the private sector and other agencies to determine whether such an activity would be feasible, and if so, encourage and cooperate in its implementation.

I.D.2. Utilize the MRW Facility to Provide Year Round Disposal of Household and SQG Wastes, and to Maximize Opportunities for Reuse, Recycling, Pollution Prevention, and Education.

The system currently contracts with a private company to handle, transport, and dispose of moderate risk waste brought to the MRW Facility in Everett. The operation of this facility allows the system to provide year-round collection services more economically, and also to present opportunities for ongoing educational programs.

Moderate risk waste activities will also help address the waste prevention, content of disposed material, and illegal dumping/other enforcement issues.

Waste Prevention

Waste and pollution prevention are the most environmentally beneficial waste management strategies. Nevertheless, they have not engendered the political support or public enthusiasm associated with recycling. While individual companies can achieve considerable economic benefits through waste and pollution prevention, no other company, such as a hauler or processor of recyclables, will gain from another party reducing their generation of waste. This is contrary to the situation of recyclables, where certain companies earn money by helping others to recycle. Since no such profits exist in the case of waste or pollution prevention, the marketing of these strategies will be left largely to the public sector. If the system believes that these strategies are desirable, it must actively and aggressively encourage them.

This Plan assumes that there is, and will continue to be, public support for waste and pollution prevention programs. Therefore it calls for pollution prevention and waste prevention programs for both solid and moderate risk wastes.

The following programs are designed to address this planning issue and are further described elsewhere in this section.

- I.A.1. Assess needs and educate children, the general public, businesses and institutions, including governmental entities, concerning waste and pollution prevention and recycling.
- I.A.2. Develop and implement programs that will make waste and pollution prevention and recycling easier and more convenient for the general public and businesses and institutions, including governmental entities.
- I.A.3. Assess the desirability and feasibility of legal mandates and public incentives designed to encourage or require waste and pollution prevention and recycling, and implement as appropriate.
- I.A.5. Develop, and where feasible implement, or recommend to the WUTC or other appropriate party, garbage and recycling rate incentives, or other financial incentives, which will encourage waste and pollution prevention and recycling.
- I.B.2. Maintain effective working relationships with haulers and WUTC staff, and comment on proposed WUTC regulatory actions, or otherwise interact with the WUTC where appropriate.
- III.B.2. Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Snohomish County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.

Recycling

While the Recycling Potential Assessment (RPA) calls for the system to retain the 50 % solid waste recycling goal, it calls for the goal year to be flexible, with 2008 being the approximate target year. As this Plan was developed, the Solid Waste Advisory Committee (SWAC) expressed concerns with the idea of a flexible goal year, believing a flexible goal reflected a lack of resolve to actually accomplish the goal. In addition, some members expressed concerns with how recycling goals are set, particularly in that a goal may ignore economic considerations, or fail to account for the possibility that the purpose of recycling programs may change with time.

In light of these concerns, this Plan calls a 50 % recycling goal, to be achieved in approximately 2008, but it also calls for this goal to be re-examined within the next several years. During that year system staff and SWAC will decide whether the goal should be changed, and if so, in what way. Such a change would be considered a minor plan amendment, and in accordance with the Plan modification and revision mechanism presented in Section 1, would be presented to the County Council for their consideration. Similarly, and at the same time, any change in programs necessary to meet the new goal will be derived from Section 3 of this Plan, and also presented to the County Council.

The RPA is the basis for the programs presented in this Plan. The RPA process began with interested parties proposing possible future solid waste recycling programs, and an examination of the materials left in the garbage from each of the generator sectors. Working with the cities, SWMD staff and consultants developed a list of over 300 possible programs. Using criteria developed by the cities and towns, SWMD staff and consultants, this list was eventually reduced to 50 programs. These programs were clustered into six alternate packages of activities. One package was selected based on staff, city and SWAC input. This package was reviewed by interested parties and then reworked to reflect new conditions to minimize system spending and to maximize flexibility. Computer modeling was used and, in addition, a cost analysis was done of existing programs.

The RPA process was intentionally designed to include the input of a number of interests, particularly cities and towns. While consultants were hired to do the RPA, city and town recycling coordinators were involved throughout the process in updates, criteria development, brainstorming potential programs, program and package review, and selection of a package for recommendation. SWAC was also given frequent updates and a SWAC subcommittee assisted in refining the RPA work and selecting a recommended package to present to the entire SWAC. SWAC endorsed the initial recommended package in 1994 and reconfirmed its support of the revised recommended package in 1995.

Other stakeholders gave initial input through a series of stakeholder meetings on the RPA. Separate meetings were held with haulers, processors (CDL and traditional recyclables), drop-off recycling centers, other businesses and trade organizations, agencies, and Master Recycler Composters and dome sponsors. After a single package was selected, one meeting was held inviting all stakeholders to comment.

The RPA examined three main approaches to 50 % recycling: a regulatory approach, an education/programmatic approach, and an approach combining the two. With a regulatory approach, the public sector establishes the services to be provided and the private sector implements most of the programs and services. This approach could cost the system the least if the regulations were inexpensive to develop and enforce, but significant reliance on regulations could be unpopular with the public. In some instances, there could be difficulty coordinating the enactment of regulations with the development of the necessary service infrastructure. As a result, this approach is not recommended.

With an educational/programmatic approach, the system would provide numerous educational opportunities for citizens and would also provide some services directly. This approach is much more expensive for the system, though it provides high customer service levels. Due to cost, this approach is also not recommended.

This Plan recommends combining the two approaches. A blend of education/programs and regulations provides both relatively high cost efficiencies and relatively high customer service. In this package, most programs are implemented by the private sector, resulting in savings to the system. A major strategy of the recommended approach is for the system to prioritize work which assists the private sector in successfully implementing services and establishing facilities. If circumstances change, programs can be implemented more aggressively so that the goal year is earlier than 2008.

This Plan defines “recyclable materials” as those solid wastes that are separated for composting, recycling, or reuse into the usable or marketable materials. Materials which are separated, and then used for energy production, such as hogged fuel, would be considered recyclables. Materials disposed of in a landfill or through incineration are not considered recyclable materials, nor are residual material remaining after recyclables have been removed.

The following programs will address recycling issues:

I.A.1.a. School Program

The system will provide assistance in the area of waste/waste and pollution prevention/recycling/MRW education to schools and other agencies involved with the education of children and older students. The system provides phone referrals for speakers, volunteers and service providers; maintains a “lending library” of educational materials and “hands-on” tools, provides educational materials directly to teachers when possible, and cooperates with other youth agencies such as the YMCA Youth Earth Service Corps.

The RPA, project number 13, calls for the system to work with other agencies, such as the Snohomish PUD, to fund two resource conservation education specialists to work with public schools in the county to reduce waste.

The Small Quantity Generator (SQG) Advisory Panel suggested the development and implementation of programs to educate students concerning MRW. In particular, the Panel suggested materials cover alternative handling and disposal methods to minimize and prevent pollution, and the role consumers may play in reducing the use of hazardous materials and in encouraging the appropriate methods for disposing of MRW by businesses.

In discussing the system’s responsibilities concerning school programs, the word “school” should be understood broadly. In addition to traditional secondary schools, the system should also be prepared to provide materials to, and if possible more actively assist, vocational schools and colleges.

I.A.1.b. Information Phone Line

The system currently provides, and will continue to provide and promote, a central phone number which the public may call for information on solid and moderate risk waste issues. Callers are served by recorded message, office personnel, or specialists depending upon need. In addition, the system will work with other entities, such as the Health District, to ensure that appropriate information is readily available by phone.

I.A.1.c. Educational/Referral Materials

In response to customer needs, the system will continue to maintain, distribute and publish information on private and public solid and moderate risk waste prevention and recyclable management options, including guides, brochures, and reference lists. Constituent tasks include:

- RPA project number 15 calls for the creation of a series of Waste Prevention Guides, to be used initially in a campaign promoting prevention. Subjects include an overall waste prevention guide and individual guides on food waste, yard debris and grasscycling, and repair shops and charities.
- RPA project number 16 will establish a system to efficiently distribute publications to the public.
- The SQG Panel called for the production and distribution of educational materials associated with the appropriate management of MRW for both the business community and the general public.

I.A.1.d. Customer Outreach and Advertising

The system will continue to ensure that current recycling, waste prevention, and MRW handling/disposal instructions are distributed or published to customers annually. Instructions may be distributed by the system, other governmental entities, organizations, cities, private haulers, or a combination of these. Instructions may be distributed through direct mail, billing inserts, newspaper ads, city, system, and other organizational newsletters, or, in emptied recycling containers. Constituent tasks include:

- RPA project number 3 calls for increasing residential recycling by 10% for each residential unit through a major educational and promotional campaign for one year.
- RPA project number 14 calls for the system to contract with a consultant to develop and implement an education/outreach campaign to reduce the generation of mixed waste paper from commercial and residential sources.
- RPA project number 17 which includes new signage at SWMD facilities required by the implementation of new RPA programs, as well as some general advertising related to new programs.

I.A.2.a. Optimize Private Sector Efforts

RPA project number 1 and research related to MRW conclude that the most cost effective method for the system to divert inappropriate materials out of the solid waste stream is through private sector efforts. This activity will assist the private sector in successfully establishing sites, new services, and new markets for MRW and recyclable materials by:

- Creating an interagency task force to facilitate permitting, siting and regulatory reform.

- Working with relevant groups, such as the Economic Development Council, to locate new recycling and MRW related industries and expand existing businesses in the county.
- Providing information and advice to existing businesses to expand their activities into locations, sectors, and targeted materials not adequately served at present.

I.A.2.b. Increase Collection Customers

Since residents with garbage service automatically receive curbside recycling and have a very high rate of participation, RPA project number 2 has the goal of increasing the number of collection customers. This program will be implemented in coordination with haulers, and develop and implement an outreach campaign for getting more residents who do not subscribe to garbage service to recycle, either through curbside service or other options.

In addition, as called for in the SQG panel document, the system will work with SQG businesses and vendors to encourage the availability and attractiveness of appropriate levels of service, including collection services.

I.A.2.c. Yard Debris/Wood Drop-Off

Drop-off opportunities are needed for contractors, residents, and landscapers to deliver yard debris and clean wood. If the private sector has not provided adequate opportunities by 2005, RPA project number 6 calls for the system to contract with a firm to site and operate two drop-off collection sites.

I.A.2.d. Multi-Family Expansion

RPA project number 8 seeks to expand the number of multifamily residences with recycling services. This is important in light of the fact that Snohomish county's existing multi-family recycling rate is 16%, as compared to nearly 38% for the single family sector. Three components make up the activity:

- Combine multi-family recycling fees with multi-family garbage fees.
- Educate architects and builders to provide adequate space for recycling.
- Provide an outreach program for multi-family owners, managers and residents.

I.A.2.e. Expand Curbside to Business

RPA project number 9 will attempt to expand curbside recyclable collection to very small businesses, which could utilize a recycling collection service similar to that provided residents. Recently, some haulers have begun to offer this service, but

only on the edges of their residential routes. This program will work with haulers to expand the availability of this service and effectively promote its availability.

I.A.2.f. Target Specific Business Types

The County currently monitors business recycling through reports sent by haulers, through informal discussions with businesses and recycling industries serving businesses, and through miscellaneous sources, such as the state recycling survey. RPA project number 10 and SQG related activities will identify groupings of businesses by type, material, or location, with the goal of determining which collection services can be more effectively provided for identified materials. An outreach program will be created for the targeted business types, and barriers to recycling and MRW waste prevention and appropriate disposal will be determined and addressed. Initial emphasis will be on collection of paper and disposal of paints and solvents. Targets will likely need to change with time and more accurate information. As a result activity II.D.5.a., which calls for all programs to contain an evaluation element, will be particularly important in successfully selecting targets.

I.A.2.g. Non-Residential Drop-Off Opportunities

RPA project number 11 will set up five new drop-off locations for small businesses such as the following: those which produce small volumes of recyclables; those which are located far from recycling collection routes; and those for whom the cost of recycling collection service is not economically feasible. This program will be evaluated prior to implementation to determine if the private sector has already fulfilled the need. In addition, the system will continue to ensure that businesses have drop-off opportunities to dispose of MRW at the fixed MRW Facility, and explore opportunities to develop “milk runs” for businesses that generate wastes in amounts too small to work independently with service vendors.

I.A.2.h. Transfer Station Staff Training

The system will develop and implement a training program for its transfer station/ drop box staff to enable them to oversee recycling activities, enforce new policies, and educate the public about recycling and MRW options. Job descriptions of these staff will be changed to include these skills within their current positions.

I.A.2.i. Improve In-House Program

The system and cities need to set a good example to other institutions and businesses. Currently, the system’s in-house recycling rate is lower than the commercial sector average, and more materials are being disposed of which could be recycled. RPA program number 20 includes the system and cities passing motions

requesting that government business be conducted using copies printed on two sides, as well as other waste prevention activities. Moreover, a more proactive in-house recycling strategy will be developed and implemented.

I.A.3.a. Advance Disposal Fees

Advance Disposal Fees (ADFs) could be the most effective and appropriate incentive mechanism for waste and pollution prevention, especially of moderate risk wastes, and for collection of needed funds for proper recycling or disposal. In order to be effective ADFs must be implemented on a state-wide basis. SWMD will participate in regional and state-wide activities that consider, and if deemed feasible promote, the establishment of ADFs.

I.A.3.b. Mandatory Separation of Cardboard

Cardboard represents approximately 8% of the remaining solid waste stream and is often generated in significant quantities by a relatively small number of generators. In addition, cardboard recycling has significant environmental benefits. Therefore, cardboard recycling is particularly advantageous. If all other private sector and RPA initiatives have not resulted in the capture of most of the remaining disposed-of cardboard by 2005, RPA project number 5 proposes the enactment of an ordinance to require the separation of cardboard from garbage prior to garbage disposal, with the cardboard available to the private sector for collection.

I.A.3.c. Mandatory Separation of Yard Debris

If the private sector has not adequately captured the remaining yard debris being disposed of as garbage, RPA project number 7 calls for the enactment of an ordinance to require that yard debris be separated from garbage prior to disposal.

In addition to recycling related issues, the activities under I.A.1., I.A.2., and I.A.3. are also intended to help resolve the following issues:

- waste prevention
- content of disposed material
- moderate risk waste

I.A.4.a. Single Family Residential Curbside Recyclable Collection

The curbside recycling service zone defines those areas within which curbside recycling is economically reasonable and operationally feasible. This zone is legally established, defined, and modified by Snohomish County Code (SCC)

section 7.42, a copy of which is found in the Appendix of this Plan. The materials that are to be collected for recycling, by haulers within the zone and by other County programs, are also defined by this ordinance.

Within the curbside recycling zone curbside recycling will be provided to all single family garbage service customers. It will also be offered as a separate service available to all households within the curbside service zone, even if they do not subscribe to garbage service. The curbside service zone boundaries will be reviewed by the system for possible expansion at least every other year. Additional details of the single family residential curbside collection program include:

- All new garbage service customers within the curbside recycling service zone receiving recycling receptacles automatically when they subscribe to garbage service.
- Haulers collecting the following materials in all curbside programs: newspaper, cardboard, mixed paper, container glass, metal cans (tin, aluminum, bi-metal), PETE #1 screw top plastics, HDPE #2 bottles and jugs. In addition, the system and haulers will work to add scrap metal.
- Increasing the number of collection customers, as discussed in I.A.2.b above.

I.A.4.b. Residential Multi-Family Recyclable Collection

Service equivalent to single family residential curbside recycling, as described immediately above, will be provided to multi-family complexes with garbage service and located within the curbside recycling service zone. It will also be offered as a separate service available to all complexes within the curbside service zone, whether or not they subscribe to garbage service. In the past, this service has been offered to garbage service customers as a separate subscription service. In the future, this service is to be provided with garbage service as a combined charge. Additional details include:

- Materials to be collected are the same as for single family curbside recycling service.
- Multi-family collection service is to be provided to all garbage service customers which have central garbage collection (rather than curbside pick-up from individual residences) including trailer parks, condominiums, 5-plexes and above. When more appropriate, curbside containers and service can be provided to multi-family residences. Likewise, central containers can be provided to duplexes, tri-plexes and four-plexes if more appropriate.

In addition, Multi-Family Expansion, as described in I.A.2.d., will be undertaken to support this activity.

I.A.4.c. Residential Yard Debris Collection

Residential yard debris collection for composting is offered wherever it is deemed economically reasonable and operationally feasible. In this context “economically reasonable” means that the cost of yard debris processing does not significantly exceed the cost of mixed waste disposal. The total cost of this service to the consumer ultimately depends on the cost associated with physically collecting and transporting the material, plus the cost of composting (or, if disposed, disposing) of the material. In regards to the first component, the cost of physically collecting and transporting the material, the County attempts to control costs to the consumer by considering the operational feasibility of the collection operation.

In reference to the second component, the cost of composting the material, the County has attempted to lower costs in a number of ways. First, the County advises and works with composting operations and entrepreneurs considering operating composting operations. In addition, the County attempts to increase demand for compost by encouraging consumers to use the product, and through programs such as “Soils for Salmon”.

Yard debris service will be available to all single family residents within the yard debris service zone, including those who do not subscribe to garbage collection service. It will be a voluntary subscription service in unincorporated county but may be a mandatory service within the cities. In the future, this service could be adapted to include the collection of select compostables such as food waste, clean wood, and non recyclable paper.

I.A.4.d. Public Residential Recyclable Self-Haul Opportunities

Self-haul (or drop-off) opportunities will be provided at system transfer stations and drop boxes for those who self-haul their garbage. The materials accepted will vary depending upon opportunity and circumstance but will include the widest range of materials, including, where practical, MRW, that can be collected within economic and spatial constraints.

In addition, RPA project number 19 calls for a Transfer Station Staff Training program. Under this program, the system will develop and implement a training program for its existing transfer station/drop box staff to provide information and skills necessary for these staff to oversee recycling activities, enforce new policies, and educate the public about all their recycling options. Furthermore, where appropriate, staff will be trained in the correct handling of MRW. Finally, the Yard Debris/Wood Drop-off (RPA project number 6) described in I.A.2.c., will be implemented in conjunction with this activity.

I.A.4.e. Private Residential Recyclable and Recyclable MRW Self-Haul Opportunities

Private buyback/recycling centers provide important opportunities to self-haul recyclers. It is important to SWMD customers that these centers successfully site and operate in the county. Therefore the system and cities will assist these private activities in the following ways:

1. The system will keep an updated list of properly permitted private drop-off facilities and will make this list available to the public upon request. This list will be used to make phone referrals in response to queries.
2. When possible and appropriate, the system will promote private recycling drop-off facilities in conjunction with other recycling promotional activities.
3. Zoning codes will be reviewed and revised if necessary to ensure that there are reasonable and appropriate opportunities for the establishment of private recycling facilities.
4. Any privatization policies enacted by the system will be favorable to recycling activities.

In addition, activity I.A.2.a. Optimize Private Sector Efforts, presented earlier, will be undertaken in conjunction with this activity.

I.A.4.f. Commercial Recycling Collection

Commercial recycling collection is provided by the private sector. Collectors include waste haulers, buyback centers, large private collection firms such as Weyerhaeuser and Smurfit, and small “mosquito fleet” operators, often consisting of a single pick-up truck and driver. While rapidly expanding, suitable recycling collection service is still not universally available to businesses in Snohomish county. Considerable recyclable paper fiber continues to be landfilled, along with other recyclable commodities of value. Large businesses are now refining their waste management strategies, and thus ensuring that they have the opportunity to recycle, rather than dispose of, the wastes they generate. Medium sized businesses are beginning to receive expanded and more aggressive attention from service providers, while small and more rural businesses still do not have adequate access to service.

The system and cities will assist these private collection activities in the following ways:

1. The system will keep an updated list of properly permitted private collection providers and will make this list available to the public upon request. This list will be used to make phone referrals in response to queries.

2. When possible and appropriate, the system will promote private recycling collectors in conjunction with other recycling promotional activities.
3. The system will work with private collection providers to expand and promote services to businesses that currently lack adequate collection opportunities.

In addition, the following activities, all presented earlier, will be undertaken in conjunction with this activity.

- I.A.2.a. Optimize Private Sector Efforts
- I.A.2.e. Expand Curbside to Businesses
- I.A.2.f. Target Specific Business Types

I.A.4.g. Commercial Self-Haul Opportunities

As in the case of other self-haul recyclers, private buyback/recycling centers provide important opportunities to commercial self-haul recyclers. The activities above under 1.A.2.h., Transfer Station Staff Training, and 1.A.4.e., Private Residential Self-Haul Opportunities, will be implemented with the needs of commercial self-haulers being considered.

I.A.4.h. Construction, Demolition and Landclearing Debris Recycling

Construction, demolition and landclearing (CDL) recycling is undergoing rapid change, and CDL recycling opportunities are especially critical to contractors and developers. Construction and demolition debris represents a significant component of the county system's waste stream, and these materials will continue to be generated in large quantities so long as Snohomish County's population continues its rapid growth. Restrictions on the burning of these materials are more effective if adequate recycling opportunities exist. In addition, local industries are in need of feedstock for manufacturing which is derived from these recyclables.

The system and cities will assist private CDL recycling activities in the following ways:

1. The system will keep an updated list of properly permitted private CDL recyclers and will make this list available to the public upon request. This list will be used to make phone referrals in response to queries.
2. When possible and appropriate, the system will promote CDL recycling opportunities in conjunction with other recycling promotional activities.
3. The system will work with private CDL recyclers to expand and promote services to contractors, developers and other interested parties.

4. Zoning codes will be reviewed and revised if necessary to ensure that there are reasonable and appropriate opportunities for the establishment of private recycling facilities.

In addition, the Solid Waste Advisory Committee has suggested that cities, towns, and County government could possibly increase construction and demolition debris recycling in two ways. First, these governments could include, within their own bid requirements, a requirement that any contractor performing work for the government recycle some proportion of the waste produced during the construction project. Second, these governments could include a requirement for recycling within their building or demolition permit requirements.

Each of these options requires further study, and as a result this Plan calls for staff and SWAC to research and analyze the issues by no later than the year 2004. After this analysis SWAC will decide whether these options should be presented to County Council for their consideration.

Finally, the following activities, previously described, will be implemented in conjunction with this activity:

- I.A.1.e., Volunteer Outreach Program
- I.A.2.a., Optimize Private Sector Efforts
- I.A.2.c., Yard Debris/Wood Drop-off
- I.A.2.h., Transfer Station Staff Training

In addition to recycling, all activities under I.A.4. will also assist in addressing the following planning issues:

- content of disposed material
- illegal dumping/other enforcement issues
- moderate risk waste

I.A.5.a. Garbage and MRW Service Options

Garbage service options have been established and will continue to be offered which encourage recycling and waste prevention. Mini-can or equivalent service will be available to all garbage service customers, and haulers are expected to seek garbage service rate structures which economically reward recycling and discourage unnecessary garbage disposal. To the degree allowable by the WUTC, rate structures should encourage recycling by providing significant cost differential between various levels of service. Haulers are encouraged to consider “garbage by

the pound” collection and billing systems as soon as this technology is operationally and economically feasible.

I.A.5.b. Differential Rate Policy

This program, RPA project number 18, will consider the feasibility of charging lower rates for certain recyclable wastes arriving at system facilities as compared with the charges for garbage. The differential rate policy could also allow for a surcharge upon garbage delivered to SWMD facilities with a high percentage of recyclables in it. In addition, activity I.A.3.a., Advance Disposal Fees, may be implemented in conjunction with this activity.

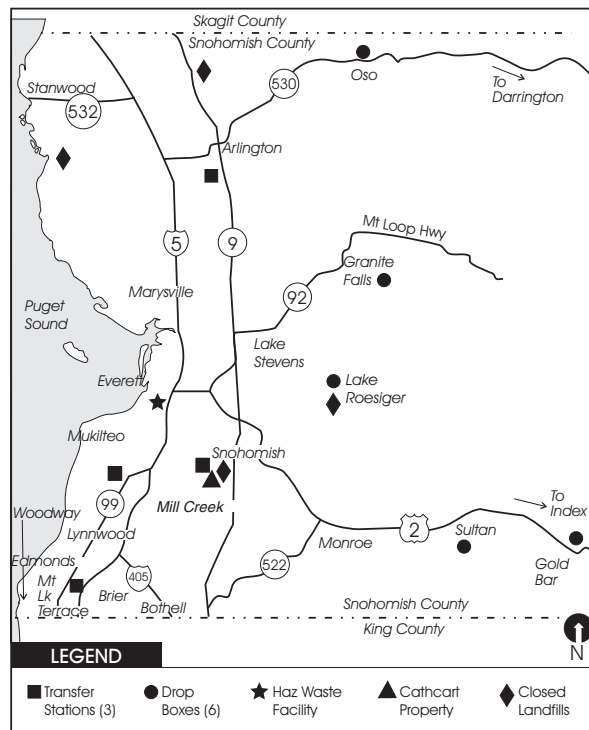
In addition to recycling, activities I.A.5.a. and b. will also help address the waste prevention, moderate risk waste, illegal dumping/other enforcement issues, and content of disposed material planning issues.

I.A.6.b. Recyclable Collection/Transfer Station Compatibility

New truck configurations allow for the collection of separated materials (recyclable, garbage and/or compostables) in a single unit. This can potentially reduce costs, truck traffic and emissions. These configurations will only be practical if transfer stations are able to receive the

various material streams or receiving facilities for select materials are clustered near each other. The ability to deal with recyclable streams has been built into the Airport Road Recycling and Transfer Station, as well as the new Southwest Recycling and Transfer Station. In addition, future proposals for public or private garbage (including Construction & Demolition) transfer or disposal sites should address the need for and feasibility of receiving commercial loads of separated recyclables, compostables and garbage.

In addition, activity I.A.2.a., Optimize Private Sector Efforts, will be implemented in conjunction with this activity.



This activity will also assist in resolving the content of disposed material planning issues in addition to recycling issues.

I.A.7.a. Procurement Policies

The system and at least 15 of the cities covered in this plan have established procurement policies favorable to recycled content materials. These policies will be adhered to, reviewed and updated periodically. The system will provide system, city, and school district purchasing agents with updated information as available. To the degree possible, bid documents should be written such that recycled content materials and recycling opportunities are priced as an option and given preference.



The system will cooperate with other agencies, trade organizations, such as the Washington Organic Recycling Council and the Industrial Materials Exchange, and private companies to promote the use of recycled content products. When possible, the system will participate in regional “buy recycled” campaigns.

The system and cities will request that bid documents and consultant reports be submitted on recycled content paper and double-sided for waste prevention. The system and cities will encourage haulers and other private recycling service providers to establish and use procurement policies favorable to recycled content materials.

This activity will also help resolve the moderate risk waste issue as well as the recycling issue.

Solid Waste System Capacity

Waste Disposal System Design

The system uses facilities and activities to manage solid waste in the county. The facilities include three transfer stations and five drop box sites located to handle disposal for the four service areas. These include the North County Recycling and Transfer Station in Arlington, Airport Road Recycling and Transfer Station in Everett, Southwest Recycling and Transfer Station in Mountlake Terrace and five drop box facilities to serve East and part of North county, located in Gold Bar,

Granite Falls, Lake Roesiger, Oso and Sultan. Drop boxes are operated primarily for use by residential and small commercial self-haulers of uncompacted waste. See Appendix A for location maps of the transfer stations and drop boxes.

Recycling containers for glass, metals, paper, cardboard and newspapers are located at every transfer station and drop box site. Recycling stations for automotive wastes are located indoors at automotive supply stores countywide and at our sites.

Prior to 1999, household hazardous waste was collected during several widely-advertised free roundups each year. Each event was held in a different service area of the county to offer the greatest possible disposal convenience to county residents. All events each year included collection/swap activities for latex paint and garden supplies. In 1999, a permanent fixed disposal facility opened and is located in Everett. This facility offers year-round disposal of household hazardous waste. The facility is also open for a fee to Small Quantity Generator businesses generally on an appointment-only basis.

System Tonnage 1997-2002 (Actual Disposal)

	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>
January	30,963	30,814	32,383	32,484	37,024	34,300
February	27,153	27,113	29,546	32,422	30,103	33,509
March	29,950	33,634	34,618	37,056	36,575	34,538
April	30,820	33,451	33,958	35,290	34,989	38,487
May	33,777	32,290	35,262	38,658	38,566	38,663
June	32,570	34,894	36,122	37,153	40,325	38,114
July	34,785	36,683	38,407	38,176	38,266	41,663
August	32,954	34,924	37,485	40,959	39,551	39,595
September	32,891	35,780	35,744	37,556	37,626	37,084
October	34,278	35,467	37,672	36,398	36,372	38,454
November	29,319	30,075	33,509	35,683	37,822	34,895
<u>December</u>	<u>30,378</u>	<u>32,336</u>	<u>35,035</u>	<u>32,919</u>	<u>33,759</u>	<u>35,082</u>
Total	79,838	397,461	419,741	434,754	440,978	444,384
% increase	+ 11.7 %	+ 4.6 %	+ 5.6 %	+ 3.6 %	+ 1.4 %	+ .8 %

Solid waste collected at the drop box sites is transported to the transfer stations, where it is compacted into shipping containers, and hauled to a rail head at Everett. There, it is loaded aboard container trains for export to a landfill in Klickitat County, Washington.



During the late 1990's, there was a significant upsurge in solid waste disposed of within the county. Factors which contributed to this include increases in population, economic vitality, unstable recyclable markets, and commercial and industrial development. Construction activity kept pace to facilitate these increases, and this generated additional quantities of construction and demolition debris. System recycling programs decreased, and this too may have played a role in increased disposal. Finally, average income in the county rose, and per capita waste generation tends to rise with income.

Tonnage growth began to slow in 2000, and in 2002 system tonnage actually declined slightly from the prior year. This was the first time in a decade that tonnage declined. As is the case with increased tonnage, factors leading to lower generation rates include slower population growth, less construction activity, higher unemployment rates, and an overall less robust economic climate.

System Tonnage (Actual Disposal) 1985-1996

<u>Year</u>	<u>Tonnage</u>	<u>Year</u>	<u>Tonnage</u>
1985	234,826	1991	313,592
1986	260,971	1992	301,417
1987	280,086	1993	309,026
1988	311,584	1994	314,746
1989	341,994	1995	323,662
1990	357,788	1996	340,179

In addition to overall changes in countywide tonnage, one additional factor must be considered. Land use patterns are changing, and as a result waste generation is increasing relatively rapidly in east county, where there is no excess capacity.

This Plan anticipates the system being responsible for ensuring the availability of necessary solid waste processing capacity. However, the questions of who will site, finance, construct, and operate facilities remain open. The system has traditionally sited, financed, and operated its stations, and contracted for their construction. Whether the system will do so in the future will be decided for each needed facility on a case-by-case basis.

The system desires that county citizens and businesses pay the lowest rates for solid and moderate risk waste disposal and receive an appropriate level of customer service, when viewed over the long term. One relevant issue is providing service throughout the county, in both urban and rural areas. In addition, the system must consider that waste must be handled and disposed of so as to minimize risks to human health and environmental quality, including minimizing risks to the safety and health of customers and employees of facilities in the County system. In the future, when considering the need for additional waste handling capacity, the system will examine the options available, and choose that option which results in low long term costs, as well as the requisite level of control necessary to ensure that neither human health nor environmental quality are jeopardized. In some cases this decision process could result in a publicly owned and managed facility, in others a publicly owned but privately managed facility, and still others a facility which is privately owned as well as privately managed.

Solid Waste Projections

The Snohomish County Solid Waste Management Division commissioned SERA (Skumatz Economic Research Assoc., Inc.) to compile the Snohomish County Solid Waste Forecast Final Report, 1999.

Key points from this include:

- Mid-90's saw large increase with growth of 11 % in 1997 and 7 % in 1998.
- Growth has since slowed to between 4 % and 5 %, and after 2000 growth rates of approximately 3.5 % annually were expected. The recession of 2001 decreased 2001 growth to just over 1 %, and in 2002 tonnage was slightly lower than in 2001.
- Materials comprising the largest share of potential disposal (i.e., what is left after recycling) include food waste, wood waste, non-recyclable paper, plastic packaging, and construction and demolition debris.

The following data indicates the current and expected future waste generation at each of the existing major system handling facilities.

Tonnage by Facility

<u>Facility</u>	<u>2000</u>	<u>2005</u>	<u>2010</u>
SWRTS.....	167,758	188,853	217,274
ERTS	154,918	N/A	N/A
ARTS	N/A	174,398	200,643
<u>NCRTS</u>	<u>104,135</u>	<u>117,229</u>	<u>134,971</u>
Total	426,811	480,480	552,888

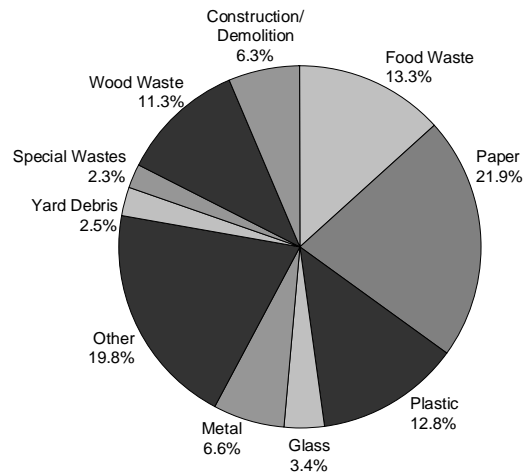
Note: all data are derived from the 1999 study performed by SERA.

The 2001 edition of this Plan contained significant discussion on capacity needs and options for meeting those needs in the southern and central portions of the county. With the reconstruction of the Southwest Recycling and Transfer Station, serving the southern portion of the county, and the construction of the Airport Road Recycling and Transfer Station, serving the central county, the eastern portion of the county is the only area still requiring significant attention.

In conjunction with addressing capacity needs, the system will seek to reduce those needs through waste prevention and recycling activities. With less waste, there is less need for facilities to handle waste. Where practical, waste prevention and recycling are the most environmentally friendly and economically efficient means of reducing the need for new or enhanced facilities.

As a result, the system will implement waste prevention and recycling activities called for within this plan and the Recycling Potential Assessment in a manner designed to reduce pressure on the solid waste handling system. Under this implementation philosophy the system may emphasize programs which prevent waste or increase recycling in areas where capacity is particularly limited. Similarly, the system may seek to minimize particular materials in the waste stream through waste prevention and recycling activities where handling those materials pose operational difficulties. The system may also encourage the development of private recycling facilities so as to reduce pressure on solid waste handling facilities.

Composition of Snohomish County Waste



Unfortunately, it is not feasible to expect waste prevention and recycling programs, by themselves, to fulfill future capacity needs.

Projected Waste Generated by Material Type

<u>Material Type</u>	<u>2000</u>	<u>2008</u>
Newspaper	7,464	9,889
Cardboard	19,014	25,567
Mixed waste paper, including		
ioffice paper & magazines	29,276	34,322
PETE, HDPE bottles	4,336	5,725
Metals	28,154	37,974
Glass bottles	10,523	13,844
Yard debris	10,297	13,760
Clean wood	11,237	14,921
Rocks, brick, concrete, soil, asphalt	9,702	13,082
Gypsum	7,740	10,397
Plastic film	33,836	44,630
Food waste	53,752	69,838
Carpet, textiles	23,464	31,538
Other recyclables	2,465	3,241
<u>Roofing</u>	<u>10,493</u>	<u>15,014</u>
Recycling Tons	261,753	343,742
<u>Non-Recyclable Tons</u>	<u>181,111</u>	<u>241,624</u>
Grand Total	442,864	585,366

Note: all data are derived from the 1999 Waste Forecast by SERA.

I.C.1.a. Privatization Policy

During 1994 the Solid Waste Management Division worked with the Solid Waste Advisory Committee and representatives of the private sector to develop a system policy regarding private solid waste handling facilities. In May 1994, the U.S. Supreme Court issued its Carbone decision on flow control. As a result, the established ground rules which had defined the relationship between public and private sector solid waste service providers became uncertain. Hoping this uncertainty would be resolved quickly, it was decided to delay formally implementing the policy. The uncertainty has not been resolved, further delay is undesirable, and accordingly, this Plan will formally implement the policy, which is described below.

Figures may not total 100% due to rounding.

It must be stressed that this policy pertains to facilities which handle “traditional” solid wastes. Recycling facilities as well as moderate and hazardous risk waste facilities are not affected by the policy, and their presence in the county is only limited by health, safety, environmental, and zoning regulations, ordinances and statutes.

A. Introduction

The Comprehensive Solid Waste Management Plan Update adopted in 1989 encouraged “private initiatives in solid waste management,” and allowed for the private development and operation of solid waste handling facilities. “Solid waste handling” is defined in RCW 70.95.030(20) and by the Snohomish Health District regulations as “. . . the management, storage, collection, transportation, treatment, utilization, processing and final disposal of solid wastes, including the recovery and recycling of materials from solid wastes, the recovery of energy resources from solid wastes or the conservation of the energy in solid wastes to more useful forms or combinations thereof.”

The intention of the system in developing this policy is to set out a framework for negotiations between the parties by defining the reasons the system has developed this policy, and by delineating the requirements which the system will impose upon private parties. Accordingly, the only obligation and legal duty which this policy creates is for the system and private parties to act in good faith.

A basic assumption underlying this policy is that solid waste management is ultimately a system responsibility. This policy further assumes it may be beneficial to county citizens for private parties to help the system fulfill this responsibility. Therefore, all solid waste facilities, whether owned and operated by the system or by private parties, should be seen as components of that solid waste management system identified as optimal by the system. Privately owned facilities are operationally, but not legally, part of the system, except as provided for by specific contracts.

B. Policy Purposes

The general purposes of this policy are to:

1. Allow the development of a competitive environment for the provision of solid waste related services that will preserve the system’s ability to fulfill its solid waste related financial obligations and legal mandates, and preserve the system’s ability to make and ensure the implementation of solid waste related ordinances and policy; and
2. Encourage the development of such an environment where it will advance these system interests.

C. Policy Application

The system intends that this policy apply to all private facilities where any of those solid wastes destined for disposal and traditionally controlled by the system as part of the solid waste stream are handled, and to rail yards where intermodal transfer of containers of waste occurs. However, this policy is not intended to apply to private facilities that handle only materials intended for recycling, composting, or energy recovery. Materials shall be considered to be “intended” for recycling, composting, or energy recovery when the facility’s incoming material has been source separated for the intended use and when the incoming stream of materials does not contain more than 10% , by load, of material unsuitable for recycling, composting, or energy recovery.

Examples of the types of facilities to which this policy does not apply include medical incinerators, other incinerators that burn only materials source separated for energy recovery, waste wood chippers, tire reclamation facilities, and material recovery facilities receiving and handling only source-separated recyclables. In addition, this policy is not intended to address facilities which handle hazardous and moderate risk wastes.

In instances where the applicability of this policy to a proposed facility is open to question, the Director of the Solid Waste Management Division shall have the discretion to apply the policy or exempt the facility from the policy. When a party is aggrieved by the decision of the Director, that party may appeal that decision to the County Executive.

D. Policy Goals

This Policy, and any contract as described in G. below, are intended to achieve the following goals:

1. Ensure environmentally sound solid waste handling and disposal;
2. Promote long term rate stability;
3. Ensure the opportunity for meaningful public participation in decisions about private solid waste facilities;
4. Preserve the system’s solid waste revenue base to meet solid waste related obligations, and to support programs and policies;
5. Ensure the system’s recycling, waste prevention, resource conservation, and moderate risk waste goals and policies are met;
6. Provide for economic benefit to county citizens;
7. Provide for and encourage comprehensive and convenient services to customers of the system; and
8. Provide for monitoring of contract and permit compliance.

E. Applicable Laws and Regulations

Private solid waste facilities must comply with all applicable laws and regulations, including land use, health, and environmental requirements. Such facilities shall be required to obtain necessary land use permits and perform SEPA review as required. Private project applicants shall develop and provide to the system a plan for obtaining and considering public comment and input on the proposed facility. For private projects proposed in incorporated areas, the system will coordinate with the city or other agency during the SEPA process. The private project applicant shall make the Solid Waste Management Division a party of record in any SEPA process involving the project.

F. Project Initiation

The system envisions that owners/operators of private solid waste facilities may establish their enterprises either in response to a system procurement for solid waste services, or upon their own initiative to site, permit and operate such facilities in the open market in accord with this policy.

G. System/Operator Contract

The system and the owner/operator of a private solid waste facility shall negotiate a contract that addresses at a minimum the following topics. The system shall approve the contract if it is substantially in accord with each of the goals stated in D above and the owner/operator's proposed activities do not conflict with any other provision of this policy.

1. A description of the types of materials to be handled at the private facility;
2. An identification of the customer type, geographic source, destination, disposal and/or final disposition of materials handled at the private facility;
3. Reporting procedures to ensure the ability of the system to effectively plan for system-wide comprehensive solid waste management, including accurate accounting by the contractor for materials handled at the private facility, regardless of whether such materials are generated in or outside the county;
4. Protection for the system in case of disruption of service or default of this contract by the owner/operator;
5. Protection for the system from liabilities arising from the negligent acts or omissions of the private owner/operator;
6. Provision for system commitments under other contracts it has entered into;
7. Provisions for the payment of fees that the system and the private party may owe to each other under the contract, or under local, state, or other applicable law.

H. Effect on System Employees

The system and private owners/operators shall make every reasonable effort to arrange for employment of system employees whose jobs may be lost as a direct result of the private facility operations either elsewhere within the county or at the private facility.

I. Contract Compliance

In all instances the facility scale house will either be operated by or under the direct authority of the system or the facility will be otherwise monitored to the satisfaction of the system to ensure that all contract provisions are met.

J. Role of System Plans

Private facilities handling waste from outside the county shall do so in compliance with the Snohomish County Comprehensive Solid Waste Management Plan and the Moderate Risk Waste Plan, and with the Comprehensive Solid Waste Management Plan of the jurisdiction in which the waste is generated, if applicable.

I.C.2.a. Waste Generation Assessment

Waste generation forecasting has and will continue to be an ongoing and vital element of solid waste management planning. Waste generation models will be updated periodically and used in conjunction with program and facility planning and evaluation.

This activity will also help address the waste prevention, recycling, special wastes, waste import, and siting disposal/ recycling facilities issues.

I.C.3.a. Transfer System Needs Assessment

The Solid Waste Management System currently operates three urban recycling and transfer stations (RTS) and five rural drop box sites. These facilities are located as follows:

Transfer Stations:

- North County Recycling and Transfer Station (NCRTS) Arlington
- Airport Road Recycling and Transfer Station (ERTS) Everett
- Southwest Recycling and Transfer Station (SWRTS) Mountlake Terrace

Drop Box Sites:

- Oso
- Lake Roesiger
- Sultan
- Granite Falls
- Gold Bar

With the construction of the Airport Road recycling and Transfer Station and the reconstruction of the Southwest Recycling and Transfer Station, the most immediate capacity needs discussed in this Plan's 2001 edition have been addressed. Two needs remain: the overall requirement for generators to be able to dispose of special wastes, and how to most conveniently and economically meet the disposal needs of those living and doing business in the rapidly growing east county area.

Disposal opportunities for generators of special wastes, including moderate risk wastes, must be available. In some situations the system will provide these opportunities directly, but in other cases the system will either subcontract with the private sector, or encourage the private sector to provide these services.

For a number of reasons, including assessing the adequacy of facilities, the SWMD will maintain and analyze data on system and hauler collected materials including materials destined for disposal, recycling, composting and energy recovery. In order to gather this data, haulers and system subcontractors will submit monthly data reports to the SWMD detailing recycling tonnage, participation, and other information. The system will, on a continuing basis, analyze these data, as well as other information, including information on demographic and economic development trends. The purpose of the analysis will be to determine whether special waste disposal opportunities exist, assess the capacity of the existing solid waste management system to handle anticipated future wastes, and ensure that facilities will exist to handle those wastes.

I.C.3.d. East County Needs

The 1989 update to the Comprehensive Solid Waste Management Plan identified the potential need for a transfer and recycling station to serve the east county area and potentially replace the Monroe Drop Box. A potential location for this facility was identified at that time at the intersection of State Route 2 and New Bunk Foss Road. After reviewing traffic conditions around the area, the project was canceled.

Discussions were held with the City of Monroe in 1995 to assess the need for a new solid waste facility in or near the City of Monroe. Monroe indicated that since mandatory solid waste collection had been implemented within the City, the need for a solid waste transfer site within the city had been significantly diminished.

Subsequent studies of customer use at the Monroe Drop Box indicated that over 80% of the users were from the unincorporated areas of the county around Monroe. In addition, discussions with haulers servicing Monroe and adjacent areas indicated that significant economies would continue to be lost if haulers had to continue traveling to existing more distant facilities to empty their trucks. This loss

of hauler efficiency results in higher garbage collection costs to those in the area. Waste projections show that increasing tonnage can be expected in the eastern part of the county.

In 2002 the Monroe Drop Box was closed. Since then the area has been served by the other drop boxes and, while SWRTS was undergoing reconstruction, the Temporary Recycling and Transfer Station at Cathcart.

Use of this facility has served the area, and few negative impacts to the surrounding area have been noted. The system will have to decide how to best serve this area, and the permanent use of TRTS will be one option examined. As mentioned previously, proper permits would be acquired and extensive public involvement and input sought prior to any change in the present status of TRTS, or any construction of new facilities.

I.C.5.a. Facility Planning Processes

Since additional MRW, recyclable, and solid waste transfer capabilities will be necessary, facilities will be modified or built. The system commits to developing and implementing planning processes to address these needs which integrate early and thorough public involvement and environmental assessment elements. In addition, these processes will also integrate consideration of the proposed facility's impact upon waste prevention and recycling activities. Finally, opportunities to increase financial and other involvement by stakeholders in a fixed MRW facility will be pursued.

Activity I.C.4.a. and I.C.5.a. will also help address the recycling, MRW, special wastes, waste import, and siting disposal/recycling facilities issues.

Identifying the Need For and Siting Disposal/ Recycling Facilities

Solid waste, recycling and composting facilities are often unwelcomed by their potential neighbors. Nevertheless, they are necessary, and so a means of ensuring the ability to locate them must be found. While environmental and land use controls are not a responsibility of the system, the Solid Waste Management Division will cooperate with agencies and jurisdictions with land use and environmental control powers to ensure that such facilities can be located in a fair and equitable manner for those throughout the county who need the facilities as well as those who will be impacted by their location.

In addition to traditional siting difficulties, the siting of recycling facilities has a

further complication. Since recyclables are legally a form of solid waste, recycling facilities must generally meet the same requirements as solid waste handling facilities. Solid waste generally poses environmental dangers which most recyclables don't, and therefore, the criteria for facilities which will handle only recyclables are often excessively rigorous. By having to meet the same criteria, recyclers have an unnecessarily difficult time locating facilities, and the costs for siting and building the facilities is also excessive.

The following programs are designed to address this planning issue and are further described elsewhere in this section.

- I.C.1. Ensure the operation of solid waste and MRW transfer and processing facilities, including those operated by the private sector, sufficient to handle wastes generated within the county in an environmentally safe and economical manner.
- I.C.2. Assess existing and projected waste generation patterns, including the generation of moderate risk and special wastes, and waste prevention and recycling trends, to determine future program, transfer, processing, and transport needs.
- I.C.3. Assess the ability of facilities to meet existing and future needs, including for MRW and special wastes, and for area now served by the Temporary Recycling and Transfer Station.
- I.C.4. Determine whether any deficiency in needs can be met by modifying the overall system, existing facilities or constraints on the system or facilities.
- I.C.5. Design and implement planning processes, including public involvement elements, for those situations where modification to existing facilities or the overall system will enable the system to meet future needs, or where new construction will be necessary.
- III.B.2. Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Snohomish County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.

Special Wastes

The system has a responsibility to ensure that generators of wastes have a means of disposing of those wastes. If the system desires to continue in the business of solid waste handling, it will be in its own competitive self interest to give generators the opportunity to dispose of a large variety of wastes. In this way generators will find it convenient to use system facilities, and will be more likely to do so.

However, even if the system does not itself provide disposal options, there are at least two reasons why it is necessary for the system to ensure that options exist. First, waste disposal is an economic development issue. Businesses rarely locate, and can not thrive, in places where they cannot conveniently dispose of the waste they generate. Those industries without convenient disposal options will, in the long run, choose to locate elsewhere. When they do so, they take jobs and tax revenues with them.

Even more important than the impact of waste disposal on economic development, the system is responsible for the protection of health and environmental quality. Unfortunately, if generators do not have a convenient means of disposing of their waste, some irresponsible generators will be more likely to dispose of their waste illegally. Others may store the waste while they seek disposal. In any case, such storage or dumping is at best unsightly, and at worst involve environmental and health risks.

Managing these risks and preventing associated damages is the most important role the system has in solid waste management. As a result, ensuring that there are disposal opportunities for waste generated in the county will be a high priority system responsibility.

Although these special wastes represent only a relatively small proportion of the total solid waste generated within the county, the Health District and Solid Waste Management Division receive a significant number of inquiries about a variety of unusual and new wastes. Each of these inquiries represents a customer with a problem. It is the system's responsibility to develop a safe and reasonable disposal option, and also to consider whether to alter system policies or operations in order to provide that disposal option.

The following programs will address this planning issue, and are described elsewhere in this section of the Plan.

- I.C.1. Ensure the operation of solid waste and MRW transfer and processing facilities, including those operated by the private sector, sufficient to handle wastes generated within the county in an environmentally safe and economical manner.
- I.C.2. Assess existing and projected waste generation patterns, including the generation of moderate risk and special wastes, and waste prevention and recycling trends, to determine future program, transfer, processing, and transport needs.
- I.C.3. Assess the ability of facilities to meet existing and future needs, including for MRW and special wastes, and for area now served by the Temporary Recy-

cling and Transfer Station.

- I.C.4. Determine whether any deficiency in needs can be met by modifying the overall system, existing facilities or constraints on the system or facilities.
- I.C.5. Design and implement planning processes, including public involvement elements, for those situations where modification to existing facilities or the overall system will enable the system to meet future needs, or where new construction will be necessary.

Illegal Dumping/Other Enforcement Issues

Illegal dumping is the disposal or handling of waste in a location not permitted for that activity. In some instances this activity will threaten human health or environmental quality, and in other situations it will primarily be more of a nuisance to the owner of the land or adjacent owners. In most situations in Snohomish County current levels of solid waste illegal dumping and unsafe storage practices are not significant health or environmental threats. This is contrary to similar situations involving moderate risk and hazardous wastes, where such practices constitute significant threats.

Despite not being generally dangerous, solid waste illegal dumping and improper storage are localized problems in the county where found. Both are aesthetically displeasing, can reduce real estate values, and represent unwanted costs to property owners. In addition, the improper storage of solid waste can pose local health problems for the offending property owner as well as those living close by. For these reasons this plan assumes the Snohomish Health District and the system will address illegal dumping and other enforcement issues.

The work of the system affects the work of the Health District. The system seeks to minimize illegal dumping and its impacts through advertising campaigns and grant programs. Conversely, actions of the system can unintentionally increase illegal dumping. For instance, when tip fees rise the Health District notices increases in illegal dumping and illegal and unsafe solid waste storage practices.

The following programs are designed to address this planning issue.

II.A.1. Define and Undertake the System's Role in Dealing with Illegal Dumping, and Work with Other County, State and Federal Agencies, and Other Jurisdictions, to Establish the Roles of These Other Parties.

Illegal dumping continues to be a problem throughout the county- in urban and rural areas, and within both the incorporated municipalities and the unincorporated county. Both the Health District and the Solid Waste Management Division play relatively active roles in combating illegal dumping. Unfortunately, the responsibilities and roles of other parties are somewhat unclear, and there is no coordinated approach to the problem. As a possible solution, the system will work with others to define roles and activities, and the Solid Waste Management Division will undertake the role identified. The Solid Waste Advisory Committee has previously examined the role that mandatory garbage collection may play in reducing illegal dumping, and the results of this examination will be considered when considering how illegal dumping may best be prevented and cleaned up.

II.A.3. Develop and Implement Educational Programs Aimed at Those Who Illegally Dump Solid and Moderate Risk Wastes as Well as Landowners Who Suffer Illegal Dumping and Could Secure Their Land to Reduce the Problem.

While an educational effort will not eradicate illegal dumping, education can reduce the problem. Educational activities will be developed and implemented in conjunction with other parties, as identified by activity II.A.1., immediately above. These activities will include public education on special waste alternatives, and problems caused by and the possible legal penalties associated with illegal dumping. Other elements will include educating landowners on how to secure their land so as to discourage illegal dumping.

II.A.4. Develop and Implement a Program to Provide Financial Assistance to Those Citizens and Citizen Groups Who Voluntarily Undertake Cleanup of Lands They Do Not Own, to Certain Landowners Who Have Had Waste Illegally Dumped Upon Their Lands, and to Certain Cities, Towns and Community Groups Which Have Community Cleanups.

The system has developed a program to partially or totally reimburse the solid waste disposal costs of individuals and groups who must dispose of waste they did not generate. In certain cases these are innocent landowners, who permit their land to be used for public recreation, and in other cases they are public service groups which clean up public lands. The system will continue this program and seek ways to increase its effectiveness.

Content of Disposed Material

Many of the programs undertaken by the system are designed to alter the content of waste which generators dispose of. Both waste prevention and recycling programs are designed to alter the quantity and variety of wastes. Moderate risk waste programs are designed to reduce the toxicity of the leachate produced by waste, as well as reduce the toxicity of sewage and runoff which could degrade ground and surface waters.

While these programs have shown considerable progress, waste from Snohomish county generators still contains useful items, materials which could be easily recycled, and materials which increase the toxicity of our waste's leachate. The Recycling Potential Assessment and the system's future moderate risk waste programs are designed to address these problems. The following activities are designed to address this planning issue and are further described elsewhere in this section.

- I.A.1. Assess needs and educate children, the general public, and businesses and institutions, including governmental entities, concerning solid and moderate risk waste prevention and recycling.
- I.A.2. Develop and implement programs that will make waste prevention and recycling easier and more convenient for the general public and businesses and institutions, including governmental entities.
- I.A.3. Assess the desirability and feasibility of legal mandates and public incentives designed to encourage or require solid and moderate risk waste prevention and recycling, and implement as appropriate.
- I.A.4. Ensure that residents, businesses, and institutions have the opportunity to safely recycle solid and moderate risk wastes, through public or private measures.
- I.A.5. Develop, and where feasible implement, or recommend to the WUTC or other appropriate party, garbage and recycling rate incentives, or other financial incentives, which will encourage solid and moderate risk waste prevention and recycling.
- I.A.6. Assess present and future recyclable transport, processing, and remanufacturing needs and opportunities, and encourage such capability through coordinated actions with private enterprise.
- I.B.4. Ensure the availability of self-haul MRW disposal opportunities for residents and SQG's.
- I.B.5. Consider the desirability of MRW route collection opportunities, and implement as appropriate.
- I.D.2. Utilize the MRW Facility to provide economic year round disposal of household and SQG wastes, and to maximize opportunities for reuse, recycling, pollution prevention, and education.

- III.B.2. Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Snohomish County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.

Waste Import/Regional Implications of Decisions

The issue of whether out of county generators should be able to use system facilities is one aspect of regional solid waste management. Since commerce of every other sort is undertaken without regard to county borders, it is questionable whether solid waste management should operate otherwise. On the other hand, the state solid waste management regime assigns responsibility for solid waste management planning to counties and other local governments, which encourages the development of county by county solid waste management systems (see, in general, RCW 70.95 and RCW 36.58).

As a result, Snohomish County, as well as the counties it borders (King, Island, Skagit, and Chelan) manage their wastes individually. While Counties informally cooperate with each other and ensure disposal options will be available in the event of an emergency (for instance, Island and Snohomish County have an agreement under which Island County may use the Snohomish County solid waste management system for its disposal needs in an emergency) such cooperation is relatively informal and sporadic. Facilities are constructed, contracts entered into, and systems financed based on the wastes generated within their borders. As a result the system will seek regional solutions to solid waste problems, but base those solutions on the recognition that the financial integrity of each County's solid waste management system should be protected.

The following programs are designed to address this planning issue and are further described elsewhere in this section.

- I.C.3. Assess the ability of facilities to meet existing and future needs, including for MRW and special wastes, and for area now served by the Temporary Recycling and Transfer Station.
- I.C.5. Design and implement planning processes, including public involvement elements, for those situations where modification to existing facilities or the overall system will enable the system to meet future needs, or where new construction will be necessary.
- III.B.2. Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Snohomish County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.