

Comment Summary on the Second Draft of the State Solid and Hazardous Waste Plan 2021 Update



Introduction

The Washington Department of Ecology is completing an update to the *State Solid and Hazardous Waste Plan: Moving Washington Beyond Waste and Toxics* (State Plan). We strive to update the State Plan every five years, although challenges related to the COVID-19 pandemic delayed this update.

We published a second draft of the State Plan's update¹ in August 2021. We solicited public comments from Sept. 2, 2021 to Sept. 30, 2021, through the State Plan email List, other email lists, the Washington State Recycling Association and other newsletters, Ecology's Shoptalk publication, and the Ecology website. We accepted comments through an online comment platform, letters, and emails.

This document summarizes the comments we received and how we addressed them in the final plan update.

Overall Comments

We received public comments from eight entities: one local association; one national association, one state agency, four local governments, and one member of the public.

Comments centered on three areas: making edits to language or terminology; providing suggestions for additional or altered content, and thanking us for making changes suggested on the first draft.

The second draft of the State Plan included an updated introductory "Frameworks and Foundations" section. Suggestions for this section centered around further highlighting waste reduction and adding more focus on design, which we incorporated.

Commenters posed questions on the graphs in the introductory section. We did not add a per capita line to Figure 2 as the graph already shows growth in population along with waste. We also clarified recycling and recovery rates later in the document.

Section One: Managing Hazardous Waste & Materials Comments

This section includes four subsections: pollution prevention (P2); compliance and compliance assistance; permitting and corrective action; and small volume hazardous waste and materials (moderate risk waste or MRW). We did not receive public comments on this section.

¹ <https://apps.ecology.wa.gov/publications/SummaryPages/2104040.html>

Section One: Managing Solid Wastes & Materials Comments

This section includes three subsections: solid waste system issues; solid waste materials and infrastructure; and organic materials and infrastructure. The majority of the comments received relate to this section.

Reduction and Reuse: There were calls to increase focus on waste reduction and to acknowledge the growing reuse and refill efforts. As this is in full support of the plan's vision, we did so where appropriate.

Recycling: One suggestion we did not accept was to set a goal to move away from commingled recycling. The State Plan addresses challenges with commingled recycling and references best management practices (BMPs) for collection and reducing contamination. Based on significant work with stakeholders on this issue, our approach is to provide the pros and cons of different systems in our BMPs and encourage programs to consider those carefully.

One commenter suggested the Recycling Development Center (Center) provide education to the public on the changing list of recyclable materials. We do not see this as the work of the Center, but rather one of the roles of the Contamination Reduction and Outreach Plans discussed in Goal 5. This is also a potential role for producer responsibility programs.

Requests were made that we emphasize the use of post-consumer recycled content in products and labeling standards for recyclable and compostable materials. Both of these areas were already included in multiple places in the second draft. Other than noting that labels can cause confusion leading to contamination, additional emphasis was not added.

There was a request to do more enforcement to stop sham recycling. As enforcement on sham recycling is already included as a focus in the state plan and in our work, no changes were made.

Plastics: There were also comments specific to plastics, including that plastics are beneficial, which we acknowledge. There was a suggestion that Ecology should work with a specific industry group working on recycling and plastic waste issues. Staff currently engage with this and other groups, and engagement with industry groups is included in at least two actions.

There was one suggestion to change the plastic goal and actions to encompass all single-use products. We preferred to keep the plastic goal specific to plastics. Other single-use items are included elsewhere.

There were also requests that we encourage policy initiatives that support chemical or advanced recycling of plastics. We have an action to stay abreast of these emerging technologies. Because they have not yet been proven technically or economically feasible at scale, endorsement of them is premature.

We updated the text on plastics to include the new laws that passed in the 2021 session, as suggested.

Litter: While the litter goal and actions were edited from the first draft to include more focus on brands and design and policy opportunities, additional focus was still requested. We added producers as a partner to advance litter prevention and pick-up efforts.

Landfills: There was a comment about referencing the benefits of landfills. As requested, we added language that indicates for some materials, landfills are the best option at this time. Commenters also requested we recognize and support landfill gas to energy. We added acknowledgement of this complex and evolving landscape.

Organics: The main comments to the organics section focused on terminology and other minor content corrections. We changed the word bioenergy to the broader term biopower, as suggested. We made clarifications to the discussion of anaerobic digesters at wastewater treatment plants. In addition, we added acknowledgement that the new Clean Fuels Program (Chapter 70A.535 RCW) will likely increase the markets for biofuels made from in-state organic materials. We also clarified the opportunities for organics management that may stem from the Climate Commitment Act (Chapter 70A.65 RCW).

There was a suggestion to add support for demand side policies that incentivize compost use. We added mention of efforts to incentivize pilot projects for agricultural use and encouragement for agriculture use of compost.

Section Three: Reducing Impacts of Materials and Products Comments

This section focuses on upstream work, such as reducing toxics in products, better product design, environmentally preferred purchasing, and product stewardship. One commenter expressed appreciation for including this upstream work. A few called for increased focus on design and reuse, with the acknowledgement of the rapid increase of interest in the area of reuse and refill.

Other comments requested more focus on postconsumer recycled (PCR) content and truth in labeling. Generally, we feel we addressed these important items sufficiently. We already mention PCR content in four goals, three actions, and the priorities section, but we did add it to the future directions section. Better labeling is mentioned in four goals and actions. We also added it to the commingled recycling discussion.

Section Four: Measuring Progress Comments

There were no direct comments on this section. However, the comment on the Providing Outreach and Information Section relates to measuring progress.

Section Five: Providing Outreach and Information Comments

The only suggestion for this section was to add a goal and action about documenting the progress of implementing the plan via a website. We have an existing platform for sharing data and are developing additional methods to measure our progress and display our data, which are included in the Measuring Progress section. Therefore, we did not act on this suggestion.

Contact information

Solid Waste Management Program

Janine Bogar
P.O. Box 47600
Olympia, WA 98504-7600
Phone: 360-407-6900

Hazardous Waste and Toxics Reduction Program

Amy Correa
P.O. Box 47600
Olympia, WA 98504-7600
Phone: 360-407-6700

Website²: [State Plan Website](#)

Publication information

This report is available on the Department of Ecology's website at
<https://apps.ecology.wa.gov/ecy/publications/SummaryPages/2207003.html>

ADA accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6900 or email at SWMpublications@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](#) for more information.

² <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Washington-state-waste-plan>