

Appendix G

Ecology Comments and Responses on Preliminary Draft Plan

Spokane County Draft Solid Waste and Moderate Risk Waste Management Plan

Review Comments: Jim Wavada
Solid Waste Planner, ERO
January 13, 2015

Introduction:

Ecology's review comments are provided to assist Spokane County in the development of a comprehensive, approvable, and useful solid waste management plan.

The task of comprehensive plan development is not an easy assignment considering the multitude of responsibilities confronting the Spokane County Utilities Division. Ecology recognizes the significant level of effort that has been expended in developing and updating the Spokane County Solid Waste and Moderate Risk Waste Management Plan.

Ecology's comments on the preliminary draft are organized into three categories: procedural, compliance, and general.

Procedural comments address whether or not an application is complete as to its required elements and in terms of how it was developed. If there are significant elements of the planning package missing or if key required processes were not followed, Ecology may decline to review the plan until all required items are included and processes are met.

Compliance comments address any shortcomings in the required contents of the plan per RCW 70.95.090. These items must be addressed in the final draft to Ecology's satisfaction in order to receive Ecology's final approval of the plan.

General comments are suggestions for more precise language, or for content adjustments or expansions not required by the RCW, but which Ecology feels would improve the overall plan. Any grammatical or spelling errors Ecology finds would also be noted in this section. Direct response to these comments is not required for plan approval by Ecology.

PROCEDURAL COMMENTS

Due to the extraordinary circumstances surrounding this plan update, Ecology agreed to accept an otherwise incomplete plan package. With the impending expiration of the interlocal agreement between Spokane County and incorporated jurisdictions and the uncertainty as to future plan participants at the time the update was being initiated, it became necessary for Ecology to initiate review without all supporting documents in hand.

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The understanding between the Spokane County and Ecology is that all required supporting documentation will be provided prior to submission of the final draft of the plan. It should be noted that Ecology was in possession of the entire required content of the main body of plan as it began this review. Items that must be submitted before or with the final draft of the plan:

Evidence of SWAC Participation: SWAC is still reviewing the draft plan and a schedule of the meetings at which the plan draft was presented should accompany or be incorporated as an addendum to the final draft of the plan.

Inter-local Agreements: These must be submitted with the final draft of the plan in order to gain Ecology approval.

Washington Utilities and Transportation Commission (WUTC)

Cost Assessment Questionnaire: Spokane County should have submitted the Cost Assessment Questionnaire to the WUTC at the same time this plan was submitted to Ecology. WUTC is allowed 45 days to respond. A completed questionnaire with WUTC responses must be filed with the final draft of the plan.

SEPA Review: As with all comprehensive solid waste management plans a State Environmental Policy Act (SEPA) review must be completed at some point prior to final adoption. At submission of the final plan, subsequent to this preliminary review, Spokane County must include evidence that you have completed the SEPA review process on this Plan with either an environmental impact statement for the plan or a Declaration of Non-significance (DNS).

COMPLIANCE COMMENTS

Page 1-16 and 17, Exhibit 1-3, Item 11 on both pages: The byproduct synergy project has been tabled for now due to lack of business participation. You should delete it from this list of projects, or change its status by deleting “Ongoing” from the description.

Page 5-3, Section 5.2.2 Publicly Operated Recycling Facilities: (ms)

- Rockford is in the process of developing a compost site. It should be listed in Section 5.2.6.7.
- Medical Lake has a publicly operated materials recovery facility and a limited Moderate Risk Waste (MRW) facility. It should be listed in Section 5.2.6.5.
- Fairchild Air Force Base has a limited MRW facility as well. Please include these facilities in this section of the plan.

Page 5-12, Busy Bee Recycling Company: As you later note in Exhibit 11-1, Page 11-3, Ecology does not classify asphalt roofing shingles inert. While Busy Bee may be processing them, they are not allowed to dispose of them as inert waste. Maybe you should simplify by simply deleting roofing shingles from this list to avoid confusion about their regulatory status in this Section of the plan.

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Page 6-5, Section 6.2.2 Municipalities: Even though they are implementing their own solid waste plans, equally brief descriptions of the programs in the cities of Cheney, Spokane Valley and Liberty Lake should be included here. The same is true for the *Existing conditions, Municipalities* section in the Recycling chapter. From the state's perspective, these municipalities remain part of the integrated county solid waste and recycling system, even if they operate under their own plans. They need to at least be mentioned here as testament to the county's recognition that they exist as a resource to some stakeholders in the county.

Page 9-2, Existing Conditions: Should read "A map depicting the location of municipal solid waste (MSW) landfills. . . There are several more specialized, private landfills in Spokane County that do not accept municipal solid waste. You need not list those landfills, but you should make it clear that Exhibits 9.1 and 9.2 that you are talking about MSW landfills only.

Page 13-1, Section 13 Administration and Enforcement: As with the above comments regarding municipalities language in Chapters 5 and 6, it is important here to at least acknowledge the existence of the independent municipal solid waste plans in Cheney, Spokane Valley and Liberty Lake under Existing Conditions.

An appropriate observation under a heading that might read "Independent Planning Jurisdictions Within Spokane County," might address how the county will deal with spillover or inadvertent attempts to use county facilities by residents of these independent jurisdictions. You might also address the potential for cooperative media or education efforts where appropriate. I would recommend you add this brief new Section directly addressing the existence of these other plans just after "Section 13.2.4, Participating Cities and Fairchild Airforce Base."

Ecology is not looking for any cooperation commitments at this point. However, the plan must acknowledge that these separate planning jurisdictions do exist within the county's legal boundaries and that the county is committed to working out any plan implementation issues that may arise in the future from concurrent implementation of these multiple plans.

GENERAL COMMENTS

A general note: As this document is for public use, we cannot assume that the readers will know what we mean with some commonly used acronyms from the solid waste and recycling industries. Please scan this draft for acronyms and spell them out on first reference or footnote them to a glossary of acronyms.

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Another general note related to page formatting: Will you be revising your page footer to reference the Chapter titles, where it currently shows just “Preliminary Draft?” That would be a good idea.

Page 1-1, Section 1.1, second paragraph, last sentence: Suggest adding “to the Waste to Energy facility for incineration or transfer for seven years beginning”

Page 1-2, Section 1.1.1. Suggest adding “significant” in front of “...change in level of recycling service.”

Page 1-3, last sentence: “and led to the development...”

Page 1-4: Just a general note on the format of Goals and Objectives. Normally goals describe an end state, rather than an action, and objectives usually describe the result of one of more actions toward the goals and usually include target dates.

Page 1-5, Exhibit 1-2, #2: Did you mean “techniques?”

Page 1-5: Please define “community based social marketing,” (term used in Exhibit 1-2) and list an example, so the reader will know what implementation will look like on the ground. This definition/example could be inserted as a footnote to the reference to it in Exhibit 1-2.

Page 1-6, Exhibit 1-2, Section 5. Recycling, Row 5. You should spell out PAYT on first reference, followed by the acronym in parentheses.

Page 1-6, Exhibit 1-2, Section 5. Recycling, Row 10. As this is a 20-year plan and we don’t know if Barr Tech is the only organics facility that will be available, you may want to be less specific, and refer instead to “...all permitted compost facilities in Spokane County,” which would then include, but not be limited to Barr Tech.

Page 1-7, Exhibit 1-2, Recycling, #13: Don’t understand what “...as well as promote to...” means. Would read better if you delete this phrase from sentence.

Page 1-8, Exhibit 1-2, Asbestos Waste: I would add a Recommended Action to the effect: “Spokane County will ensure that solid waste staff and contractors are aware of and can refer customers to the appropriate certified asbestos abatement contractor and/or advise them of the proper packaging for disposal of non-friated asbestos.”

Page 1-9, Exhibit 1-2, Section 13: Enforcement with no mention of the Health District’s role. Seems like an odd omission, since Ecology gives them tens of thousands of dollars to do enforcement every biennium.

Page 1-19, Exhibit 1-3, Section 8. Energy Recovery, #2: Wasn’t this assessment of a third boiler potential part of the City of Spokane’s “business planning” for the WTE

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during the past year? Check with Chuck Conklin or Ken Gimpel. You may want to update the Comments column for this item.

Page 1-21, Exhibit 1-3, Section 10, Miscellaneous Wastes, #7: Did you mean SRHD as in Spokane Regional Health District, rather than DH.

Page 1-23, Exhibit 1-3, Section 10, Miscellaneous Wastes, #22: Why was this recommendation not implemented? It seems simple enough to do.

Pages 2-1 to 2-20: Nicely done chapter. Graphics and tables are legible and impressive amount of information can be gleaned from them. Good job.

Page 2-13, Intro for Exhibit 2-16: Last sentence should read: "...of the self-hauled waste stream, by weight."

Page 3-6, Exhibit 3-4: Given the exclusions described in 3.4.1 Demographics, the label for Exhibit 3-4 should read: "Population Included in County Solid Waste Plan" to be accurate.

Page 3-7, Exhibit 3-5: Same as comment above. Should be relabeled to reflect who is being counted.

Page 3-8, Section 3.4.2.2 Employment, Exhibit 3-6: In the introduction to this Section, you call out the federal government and healthcare services as major employers, yet they don't show up as an industry in the table of Exhibit 3-6. Isn't information on total government employment (federal, state and local) available? The same for the health care industry? It would be more accurate to list the significant contribution of all forms of government to the total employment picture in Spokane County as it probably constitutes close to 15%, maybe even more of the total jobs in the county. Healthcare and academia in Spokane are quite visibly linked as well. It probably is not worth doing a lot of extra research and delaying plan preparation, but you may find these numbers relatively easy to locate and place in this section if you have the opportunity. It would paint a more accurate picture of employment in Spokane County, which does have a bearing on likely support for government initiatives and environmental programs like recycling and waste reduction.

Page 3-9, third paragraph, highway descriptions: Actually, 395 and 195 are both US highways. 195 is also designated a state route, but was incorporated into the US highway system decades ago. Most citizens and the local media refer to them as US highways. Some readers may scratch their heads at references to them as State Routes. It is also true that the segment of 395 that passes through Spokane County is not really a divided highway, but Division Street. Still, it is a US route.

Page 4-3, Northwest EcoBuilding Guild-Inland Chapter: This chapter has since disbanded for lack of participation. You should delete this reference to them.

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Page 4-10, Green Procurement, last paragraph of Section, typo correction: Should delete “it” in the last sentence, now reading “...so it the County...”

Page 4-11 and 4-12: 6. Promote onsite..., and Self-haul Waste Reduction: Delete reference to Northwest EcoBuilding Guild as Spokane Chapter no longer exists.

Page 5-7, City of Spangle: So is it a city or a town?

Page 5-3, Designated Recyclables, Plastic: Aren't #7 plastics still collected curbside, at least within city of Spokane?

Pages 5-10 to 5-12, Private Processing Recycling Facilities: There are several other facilities in Spokane County that could be included in this list. Many accept some materials from the public. Some are captive facilities, used exclusively by the owner and others accept commercial customers by appointment or contract. Attached to these comments is a printout of a list from Ecology's facilities database. You may wish to include some or all of them in this Section of the plan.

Page 5-15, Residential Composting Programs. It would probably be a good idea to mention Rockford's composting facility in this section, even though it may not yet be completed. You might say something to the effect that a compost facility will be available to Rockford residents when it is completed in the near future.

Page 6-4, Waste Management of Washington, Inc.: Waste Management also provides services to one incorporated municipality, City of Spokane Valley. That should be included in this Section as well.

Page 7-1, County Transfer Facilities: This should read “County owned Transfer Facilities, since it excludes Sunshine Disposal, which while privately-owned, is still in Spokane County and is permitted to accept waste county wide. Adding “owned” to the title of this section would help to avoid any confusion on the part of the readers of this plan.

Page 10-2, Section 10.3: The role of federally licensed asbestos abatement contractors should be described somewhere in this Section. Effective education and enforcement about the role of these contractors will add to the safety of transfer station employees who might otherwise encounter more improperly contained asbestos.

Page 10-5, 10.5.1.1, Regulations, Definitions: For all the non-chemists who may want to review this plan, it might be a good idea to insert a parenthetical with a short-hand definition of “etiological.”

Page 10-13, Section 10.9.1 Existing Conditions: You may want to add a closing paragraph that Spokane County hosts a private contractor, L&S Tire that gathers and

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bales tires from multiple collection sites and sells those bales for use in road construction sites as structural components.

Page 10-15, 2. "Continue to promote...": Typo to correct: "Windshield stickers are used to remind maintenance facilities..."

Page 11-6, Exhibit 11-3, CDL and Inert Facilities: There are several facilities that could be added to this table, although not all of them are open to public use. Some are listed in Section 11.3.5.3. Perhaps it would be more accurate to label Exhibit 11-3 "CLD and Inert Waste Facilities Accepting Waste from the General Public and Commercial Clients," or some clarification to that effect.

Page 11-8, Wood Waste. Please add Canon Hill Industries, Inc. to this list of locations that accept wood waste for recovery.

Page 13-2, Section 13.2.3, Spokane County, last sentence of first paragraph of this Section: I am confused by this statement. I understood that up until now (most of 2014) effective administration of the County Solid Waste System has remained (per the interlocal agreement) with the Regional System Office at City of Spokane. Has this not been the case?

Page 13-3, Section 13.2.6, Solid Waste Advisory Committee: You should also note that SWACs are required under RCW 70.95 and their composition and minimum number of members are specified also in that same RCW. It think it's important for the plan to recognized the statutory status of SWACs. They are not just a good idea. They are required.

Page 13-5, Section 13.2.8, third bullet: The County also should be tracking on an annual basis the effectiveness of education and social marketing techniques mentioned earlier for waste reduction, recycling and other support functions.

Pages 13-5 and 6, Section 13.2.9.3-5: You should add to each of the sections that their responsibilities extend to all solid waste planning jurisdictions in the county, including the independent municipalities. This helps a reader understand that Ecology, the Health District and the WUTC have a span of responsibility that extends beyond the county plan. That means they can act as conduits for cooperation in their areas of responsibility between the parent county and its municipalities.

-end-

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**SPOKANE COUNTY SOLID WASTE MANAGEMENT PLAN
ECOLOGY COMMENTS AND COUNTY RESPONSES**

ECOLOGY COMMENT	PROPOSED COUNTY RESPONSE	PLAN SECTION AND PAGE NUMBER
COMPLIANCE COMMENTS		
Page 1-16 and 17, Exhibit 1-3, Item 11 on both pages: The byproduct synergy project has been tabled for now due to lack of business participation. You should delete it from this list of projects, or change its status by deleting “Ongoing” from the description.	Item 11 on pages 1-16 and 1-17 revised	Section 1.5.6, Exhibit 1-3, page 1-16 Section 1.5.6, Exhibit 1-3, page 1-17
Page 5-3, Section 5.2.2 Publicly Operated Recycling Facilities: (ms) • Rockford is in the process of developing a compost site. It should be listed in Section 5.2.6.7.	A new section 5.3.2.5 City of Rockford has been added to include a description of the planned composting site.	Section 5.3.2.5, page 5-16.
• Medical Lake has a publicly operated materials recovery facility and a limited Moderate Risk Waste (MRW) facility. It should be listed in Section 5.2.6.5.	Section 5.2.6.5 includes a description of the Medical Lake facility, including material types and tons collected. The facility does not accept HHW.	Section 5.2.6.5, page 5-7
• Fairchild Air Force Base has a limited MRW facility as well. Please include these facilities in this section of the plan.	Section 5.2.7.1 revised to include MRW	Section 5.2.7.1, page 5-8.
Page 5-12, Busy Bee Recycling Company: As you later note in Exhibit 11-1, Page 11-3, Ecology does not classify asphalt roofing shingles inert. While Busy Bee may be processing them, they are not allowed to dispose of them as inert waste. Maybe you should simplify by simply deleting roofing shingles from this list to avoid confusion about their regulatory status in this Section of the plan.	The description of Busy Bee Recycling Company in Section 5.2.8 has been revised to include only a discussion of wood waste recycling.	Section 5.2.8, page 5-12.
Page 6-5, Section 6.2.2 Municipalities: Even though they are implementing their own solid waste plans, equally brief descriptions of the programs in the cities of Cheney, Spokane Valley and Liberty Lake should be included here. The same is true for the Existing conditions, Municipalities section in the Recycling chapter. From the state’s perspective, these municipalities remain part of the integrated county solid waste and recycling system, even if they operate under their own plans. They need to at least be mentioned here as testament to the county’s recognition that they exist as a resource to some stakeholders in the county.	A new Section 5.2.8 Jurisdictions Not a Part of County Solid Waste System has been added, with descriptions of recycling programs in the cities of Cheney, Liberty Lake, and Spokane Valley. A new section 5.3.2.7 has been added with descriptions of organics programs in Cheney, Liberty Lake, and Spokane Valley.	Section 5.2.8, pages 5-9 and 5-10. Section 5.23.2.7, page 5-17.
Page 9-2, Existing Conditions: Should read “A map depicting the location of municipal solid waste (MSW) landfills. . . There are several more specialized, private landfills in Spokane County that do not accept municipal solid waste. You	The paragraph on page 9-2 has been revised, and the titles of Exhibits 9.1 and 9.2 have been revised.	Section 9.2, page 9-2; Exhibit 9.1, page 9-2; Exhibit 9.2, page 9-3.

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ECOLOGY COMMENTS AND COUNTY RESPONSES**

need not list those landfills, but you should make it clear that Exhibits 9.1 and 9.2 that you are talking about MSW landfills only.		
Page 13-1, Section 13 Administration and Enforcement: As with the above comments regarding municipality’s language in Chapters 5 and 6, it is important here to at least acknowledge the existence of the independent municipal solid waste plans in Cheney, Spokane Valley and Liberty Lake under Existing Conditions.	A new section 13.2.5 has been added to discuss those cities that are not a part of the County system.	Section 13.2.5, page 13-3.
GENERAL COMMENTS		
A general note: As this document is for public use, we cannot assume that the readers will know what we mean with some commonly used acronyms from the solid waste and recycling industries. Please scan this draft for acronyms and spell them out on first reference or footnote them to a glossary of acronyms.	A list of acronyms has been added to the document	Appendix D
Another general note related to page formatting: Will you be revising your page footer to reference the Chapter titles, where it currently shows just “Preliminary Draft?” That would be a good idea.	The footer has been revised to include the Chapter Titles and current date	All Section footers
Page 1-1. Section 1.1, second paragraph, last sentence: Suggest adding “to the Waste to Energy facility for incineration or transfer for seven years beginning”	Suggested change made	Section 1.1, page 1-1.
Page 1-2, Section 1.1.1. Suggest adding “significant” in front of “...change in level of recycling service.”	Suggested change made	Section 1.1.1, page 1-2
Page 1-3, last sentence: “and led to the development...”	Suggested change made	Section 1.2, page 1-4
Page 1-4: Just a general note on the format of Goals and Objectives. Normally goals describe an end state, rather than an action, and objectives usually describe the result of one of more actions toward the goals and usually include target dates.	Comment noted; no change required	N/A
Page 1-5, Exhibit 1-2, #2: Did you mean “techniques?”	Suggested change made	Exhibit 1-2, page 1-5
Page 1-5: Please define “community based social marketing,” (terms used in Exhibit 1-2) and list an example, so the reader will know what implementation will look like on the ground. This definition/example could be inserted as a footnote to the reference to it in Exhibit 1-2.	Comment noted. Community Based Social Marketing is explained in detail in Section 4.3 Waste reduction Alternatives	No change made
Page 1-6, Exhibit 1-2, Section 5. Recycling, Row 5. You should spell out PAYT on first reference, followed by the acronym in parentheses.	Suggested change made.	Exhibit 1-2, Page 1-6.
Page 1-6, Exhibit 1-2, Section 5. Recycling, Row 10. As this is a 20-year plan and we don’t know if Barr Tech is the only organics facility that will be available, you	Comment noted; section revised	Exhibit 1-2, page 1-7.

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may want to be less specific, and refer instead to "...all permitted compost facilities in Spokane County," which would then include, but not be limited to Barr Tech.		
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Page 1-9, Exhibit 1-2, Section 13: Enforcement with no mention of the Health District's role. Seems like an odd omission, since Ecology gives them tens of thousands of dollars to do enforcement every biennium	Comment noted; changes made	Exhibit 1-2, page 1-9; Section 13.4, page 13-7.
Page 1-19, Exhibit 1-3, Section 8. Energy Recovery, #2: Wasn't this assessment of a third boiler potential part of the City of Spokane's "business planning" for the WTE during the past year? Check with Chuck Conklin or Ken Gimpel. You may want to update the Comments column for this item.	Comment noted; No change necessary	
Page 1-21, Exhibit 1-3, Section 10, Miscellaneous Wastes, #7: Did you mean SRHD as in Spokane Regional Health District, rather than DH.	Comment noted; section revised.	Exhibit 1-3, page 1-21
Page 1-23, Exhibit 1-3, Section 10, Miscellaneous Wastes, #22: Why was this recommendation not implemented? It seems simple enough to do.	Comment noted; no response necessary.	
Pages 2-1 to 2-20: Nicely done chapter. Graphics and tables are legible and impressive amount of information can be gleaned from them. Good job.	Comment noted; no response necessary.	
Page 2-13, Intro for Exhibit 2-16: Last sentence should read: "...of the self-hauled waste stream, by weight."	Comment noted; changes made	Section 2.6.4.3, page 2-13.
Page 3-6, Exhibit 3-4: Given the exclusions described in 3.4.1 Demographics, the label for Exhibit 3-4 should read: "Population Included in County Solid Waste Plan" to be accurate.	Comment noted; change made	Exhibit 3-4, page 3-6.
Page 3-7, Exhibit 3-5: Same as comment above. Should be relabeled to reflect who is being counted.	Comment noted; change made	Exhibit 3-5, page 3-7.
Page 3-8, Section 3.4.2.2 Employment, Exhibit 3-6: In the introduction to this Section, you call out the federal government and healthcare services as major	Comment noted; changes made to Exhibit 3-6	Exhibit 3-6, page 3-8.

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Page 3-9, third paragraph, highway descriptions: Actually, 395 and 195 are both US highways. 195 is also designated a state route, but was incorporated into the US highway system decades ago. Most citizens and the local media refer to them as US highways. Some readers may scratch their heads at references to them as State Routes. It is also true that the segment of 395 that passes through Spokane County is not really a divided highway, but Division Street. Still, it is a US route.	Comment noted; changes made.	Section 3.4.2.4, page 3-9
Page 4-3, Northwest EcoBuilding Guild-Inland Chapter: This chapter has since disbanded for lack of participation. You should delete this reference to them.	Comment noted; change made.	Section 4.2.1.3, page 4-3
Page 4-10, Green Procurement, last paragraph of Section, typo correction: Should delete "it" in the last sentence, now reading "...so it the County..."	Comment noted; change made.	Section 4.3, page 4-10
Page 4-11 and 4-12: 6. Promote onsite..., and Self-haul Waste Reduction: Delete reference to Northwest EcoBuilding Guild as Spokane Chapter no longer exists.	Comment noted; changes made	Section 4.3, page 4-11; Section 4.4, page 4-12.
Page 5-7, City of Spangle: So is it a city or a town?	Spangle is a city; change made	Section 5.2.6.8; page5-7
Page 5-3, Designated Recyclables, Plastic: Aren't #7 plastics still collected curbside, at least within city of Spokane?	Yes, # 7 Plastics are collected in the City of Spokane and other areas in the County	Section 5.2.1, page 5-3
Pages 5-10 to 5-12, Private Processing Recycling Facilities: There are several other facilities in Spokane County that could be included in this list. Many accept some materials from the public. Some are captive facilities, used exclusively by the owner and others accept commercial customers by appointment or contract. Attached to these comments is a printout of a list from Ecology's facilities database. You may wish to include some or all of them in this Section of the plan.	The facilities were reviewed and researched for potential incorporation, and appropriate changes were made	Section 5.2.10, page 5-13
Page 5-15, Residential Composting Programs. It would probably be a good idea to mention Rockford's composting facility in this section, even though it may not yet be completed. You might say something to the effect that a compost facility will be available to Rockford residents when it is completed in the near future.	Comment noted; changes made to Section 5.3.2.7	Section 5.3.2.7, page 5-17.
Page 6-4, Waste Management of Washington, Inc.: Waste Management also provides services to one incorporated municipality, City of Spokane Valley. That should be included in this Section as well.	Comment noted, new section 6.2.2.4 has been added to describe collection services in jurisdictions not participating in the County plan	Section 6.2.2.4, page 6-6.

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Page 7-1, County Transfer Facilities: This should read “County owned Transfer Facilities, since it excludes Sunshine Disposal, which while privately-owned, is still in Spokane County and is permitted to accept waste county wide. Adding “owned” to the title of this section would help to avoid any confusion on the part of the readers of this plan.	Comment noted; change made	Section 7.2.1, page 7-1.
Page 10-2, Section 10.3: The role of federally licensed asbestos abatement contractors should be described somewhere in this Section. Effective education and enforcement about the role of these contractors will add to the safety of transfer station employees who might otherwise encounter more improperly contained asbestos.	Comment noted; change made	Section 10.3, page 10-2.
Page 10-5, 10.5.1.1, Regulations, Definitions: For all the non-chemists who may want to review this plan, it might be a good idea to insert a parenthetical with a short-hand definition of “etiological.”	Comment noted; change made	Section 10.5.1.1, page 10-5
Page 10-13, Section 10.9.1 Existing Conditions: You may want to add a closing paragraph that Spokane County hosts a private contractor, L&S Tire that gathers and bales tires from multiple collection sites and sells those bales for use in road construction sites as structural components.	Comment noted, change made	Section 10.9.1, page 10-13.
Page 10-15, 2. “Continue to promote...”: Typo to correct: “Windshield stickers are used to remind maintenance facilities...”	Comment noted, change made	Section 10.9.3, page 10-15.
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Page 13-3, Section 13.2.6, Solid Waste Advisory Committee: You should also note that SWACs are required under RCW 70.95 and their composition and minimum number of members are specified also in that same RCW. I think it’s important	This is included in Section 1.1.2 of the plan. No change made to Section 13	

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ECOLOGY COMMENTS AND COUNTY RESPONSES**

<p>for the plan to recognize the statutory status of SWACs. They are not just a good idea. They are required.</p>		
<p>Page 13-5, Section 13.2.8, third bullet: The County also should be tracking on an annual basis the effectiveness of education and social marketing techniques mentioned earlier for waste reduction, recycling and other support functions.</p>	<p>Comment noted; change made</p>	<p>Section 13.2.9,pge 13-4</p>
<p>Pages 13-5 and 6, Section 13.2.9.3-5: You should add to each of the sections that their responsibilities extend to all solid waste planning jurisdictions in the county, including the independent municipalities. This helps a reader understand that Ecology, the Health District and the WUTC have a span of responsibility that extends beyond the county plan. That means they can act as conduits for cooperation in their areas of responsibility between the parent county and its municipalities.</p>	<p>Comment notes, changes made</p>	<p>Sections 13.2.10.3, 13.2.10.4, and 13.2.10.5, pages 13-5 to 13-6.</p>