



May 4, 2021

SENT VIA EMAIL

Thomas Egleston, Solid Waste and Division Manager
Washington County
155 N. First Avenue
Hillsboro, Oregon 97124

Re: WCC 8.04.130(C): Exemption request to collect hard-to-recycle materials

Dear Mr. Egleston:

Ridwell's goal is to help people and communities reduce waste and find innovative ways to reuse, recycle, and repurpose materials. Many materials are able to be recycled through Washington County's certificate holders in its "single stream" or "commingled" collection system. Recyclable materials not able to be collected through the "single stream" system are "hard to recycle" materials. There is no convenient option to recycle "hard to recycle" materials.

Pursuant to WCC 8.04.130(C), Ridwell requests an exemption from the requirement to obtain a certificate for the collection, storage, transportation, and disposal (hereinafter referred to as "the collection") of source separated recycling materials that are not designated or required to be collected through Washington County's Solid Waste and Recycling rules, Section 14(M)(c)(8) and 14(N)(g)(1), or otherwise designated by the County for recycling in its Recycling Guide (hereinafter referred to as "hard to recycle" materials).

In short, Ridwell requests an exemption from the requirement to obtain a certificate for the collection of hard to recycle materials.

The goal of a certificated hauler system is to provide a comprehensive solid waste collection system that is economical and efficient. WCC 8.04.130 allows an exemption when a certificate is not "necessary for the implementation of a "county or regional solid waste management system."

This exemption request provides background information about Ridwell and the basis for findings that a certificate is not necessary for the implementation of the county's solid waste management system. Granting this exemption (1) increases recycling rates, reuse, and waste diversion in the community, (2) promotes innovation to find new markets for reuse and "hard to recycle" materials, (3) creates efficiency for the collection of "hard to recycle" materials, and (4) does not impact, overlap or compete with the existing certificate system, both because certificate haulers are not required to collect hard-to-recycle materials, nor are they currently collecting these hard-to-recycle recyclable materials through their service.

1. **WHAT IS RIDWELL?** Ridwell is a specialized delivery service that collects specific source separated materials from residences and delivers them to partners who will reuse, recycle, or repurpose them.

2. **WHAT DOES RIDWELL COLLECT?** Ridwell collects plastic film, household batteries, household light bulbs, clothing, and Styrofoam for recycling. Ridwell collects a rotating category of items for reuse to be donated to local partner organizations. None of the materials Ridwell collects are recycled thru Washington County's certificate recycling system.

3. **WCC SOLID WASTE CODE.** WCC 8.04.128 prohibits any person from the collection of waste or solid waste in the unincorporated areas of the county for compensation unless he or she first obtains a certificate.

4. **WASHINGTON COUNTY CODE.** WCC 8.03.344 requires certificate holders to provide "on-route collection of source separated recyclable material ... consistent with the service standards established within the county's Solid Waste and Recycling Administrative Rules."

5. **ADMINISTRATIVE RULES.** Certificate holders are required to collect mixed recycling from residential and multi-family customers as listed in Section 14, Service Standards, Subsections M(c)(8) and N(g)(1). The list of recyclable materials mirrors the list of "principal recyclable materials" defined in OAR 340-090-0070, and can be updated by the County, as long as it contains the minimum requirements set forth in OAR 340-090-0070.

6. **RECYLCING GUIDE.** Washington County also publishes a Recycling Guide to assist customers with what can and cannot be recycled thru the curbside recycling program.

7. **COLLECTING "HARD TO RECYCLE" MATERIALS IS OUTSIDE THE CERTIFICATE.** Certificate holders have the right to collect solid waste and recyclable materials "consistent with the service standards...in the Administrative Rules." (WCC 8.03.344). The Administrative rules require certificate holders to collect a designated list of recyclable materials, not "hard to recycle" materials. Therefore, if others collect "hard to recycle" materials, the certificate is not violated and the certificate holders are not harmed.

8. **RIDWELL MATERIALS DO NOT CONFLICT OR OVERLAP WITH CERTIFICATE HAULERS.** There is no overlap in the materials Ridwell collects and the materials collected by the certificate holders. The materials Ridwell collects are categorized in Washington County's Recycling Guide as either not to be placed in recycling (plastic film, styrofoam, light bulbs), not to be placed in solid waste or recycling (household batteries), or are reuse items which are neither solid waste nor recyclables (clothing, other materials to be donated for reuse).

9. **PICK-UPS MUST BE REQUESTED.** Ridwell's customers pay a membership fee which gives them the option to request a pick up. Pick-ups are not automatic, but must be requested. This eliminates unnecessary trips to a person's home.

10. **COLLECTION FROM PRIVATE PROPERTY.** Materials are collected from a Ridwell box located on the member's private property, not curbside.

11. **VEHICLES.** Ridwell uses passenger vehicles or cargo vans to collect materials. The volume of materials collected does not require larger vehicles.

12. **CUSTOMER EDUCATION.** The preparation and proper sorting of materials is very important in making sure there are partners for "hard to recycle" materials. Ridwell spends a lot of time and attention educating people about what can and cannot be collected and how to properly prepare materials for collection. This education is very important to maintain successful partnerships with the specialized recyclers and to ensure members have a satisfactory and successful experience.

13. **RIDWELL TRACKS AND MONITORS DATA.** Ridwell tracks each category of materials collected by volume and collection date. Ridwell tracks where the material goes and how much volume each partner receives. This data can be aggregated at the household, neighborhood, city, county, or regional level showing the impact that members are having towards waste reduction and community donations.

14. **LESS CONTAMINATION IN CURBSIDE BINS.** Many of the materials Ridwell collects have the potential to contaminate recycling loads or be an environmental hazard. People have been known to "wish cycle" items that they hope can be recycled, but cannot. For example, if plastic film is placed in the recycling bin, it can jam up the sorting machinery at processing facilities. Materials in those contaminated loads often end up in a landfill. Maintenance costs are increased. Batteries and light bulbs placed in the solid waste bin create an environmental hazard. These improper disposal practices are unfortunately common. Ridwell offers an optional service that can inform people about alternatives and decrease contamination and costs.

15. **INCREASES RECYCLING AND REUSE.** Without Ridwell, people interested in recycling or repurposing their "hard to recycle" materials would need to find specialized partners and deliver the materials to each specialized partner. People do not often have the time, resources, or knowledge to find these specialized partners or drive them to the multiple locations for drop off. Instead, people often end up throwing their "hard to recycle" materials in the garbage or "wishcycling" and contaminating the recycling load.

16. **MORE EFFICIENT.** Without Ridwell, many more vehicles would be on the street taking individual trips to deliver "hard to recycle" materials. Instead, Ridwell takes materials from a neighborhood at one time, reducing trips and miles traveled on local roads.

17. INCREASES COMMUNITIES RATE OF RECYCLING. In 2018, the recycling market was substantially impacted when China changed their policies around importing American recyclable material. Materials eligible for curbside recycling were reduced. The model Ridwell uses has been a way for other jurisdictions to increase the overall rate of recycling in a time when that has been very difficult.

18. “HARD TO RECYCLE” MATERIALS DO NOT HAVE STABLE MARKETS. Material Ridwell collects do not have stable values. Many, like donations of books, coats, eyeglasses, unused diapers, and art supplies are distributed free of charge to local community groups. Others have a recycling cost that ensures safe handling, while a small number involve some monetary trade-in value. It would lead to a heavy regulatory burden to take into consideration this range of categories and values to set rates, as is done thru the certificate process for solid waste and “single stream” recycling.

19. RECYCLING INNOVATION HAS STAGNATED. The recycling structure to create new recycling opportunities has stagnated. Requiring a certificate system for “hard to recycle” materials, prevents the opportunity for people to seek out innovative solutions and partners for recycling and reuse. Ridwell, along with other innovative organizations such as James’ Recycling, have helped create innovations in recycling and reuse.

20. RESEARCH AND DEVELOPMENT. Ridwell spends a lot of time researching and finding new partners to divert reuse and “hard to recycle” materials from the landfill. As new partners are identified, Ridwell adds these “hard to recycle” materials or reuse opportunities for collection.

21. WHEN “HARD TO RECYCLE” BECOMES “SINGLE STREAM”. If a “hard to recycle” material becomes eligible for “single stream collection,” it would no longer be a material Ridwell would collect. The certificate holders would collect this material curbside.

22. SMALL VOLUME. The materials Ridwell collects represent only a small fraction of the total material in the solid waste management system. Not everyone is interested or able to spend the extra time or money to recycle “hard to recycle” materials. Requiring a certificate for the collection of this incidental volume is not efficient. When “hard to recycle” material becomes eligible for “single stream” recycling, it makes sense for the certificate system to apply.

23. “HARD TO RECYCLE” COLLECTED WITHOUT A CERTIFICATE IN OTHER JURISDICTIONS. Other jurisdictions across the country have adopted codes or policies allowing “non-designated” or “hard to recycle” recyclable material to be collected without a certificate or franchise. Some examples include Oakland, Berkeley, and Walnut Creek, California, and the City and County of Denver, Colorado.

24. **RIDWELL IN PACIFIC NW.** Ridwell successfully operates alongside franchise haulers in cities across the State of Washington, which has a franchise system similar to Oregon. Ridwell successfully operates in the City of Portland.

25. **REASONS TO GRANT EXEMPTION.** Granting this exemption (1) increases recycling rates, reuse, and waste diversion in the community, (2) promotes innovation to find new markets for reuse and “hard to recycle” materials, (3) creates efficiency for the collection of “hard to recycle” materials, and (4) does not impact or compete with certificated haulers, because certificate haulers are not required to collect hard-to-recycle materials, nor are they currently collecting these hard-to-recycle recyclable materials through their service.

26. **LEADERSHIP AND VISION.** Solving our environmental problems takes leadership and vision. We at Ridwell are trying to do our small part and respectfully request Washington County approve this exemption request to help support waste reduction for the region.

Thank you for your consideration of this request for an exemption. I am available to answer any questions.

Sincerely,

Ryan Metzger
CEO and Co-Founder of Ridwell