



## King County

Department of Natural Resources and Parks  
**Wastewater Treatment Division**

King Street Center, KSC-NR-0500  
201 South Jackson Street  
Seattle, WA 98104-3855

June 19, 2015

Federal Trade Commission  
Office of the Secretary  
600 Pennsylvania Ave., NW  
Room CC-5610 (Annex D)  
Washington, DC 20580

SUBMITTED ELECTRONICALLY

Re: Proposed Consent Agreement and Request for Public Comments In the Matter of Nice-Pak Products, Inc., File No. 132-3272

The King County Department of Natural Resources, Wastewater Treatment Division (WTD), would like to thank the Federal Trade Commission (FTC) for the opportunity to comment on the proposed settlement agreement with Nice-Pak Products, Inc. Our agency serves an area where the product has been sold and WTD fully supports the FTC Board's action and proposed settlement agreement.

As King County's clean-water utility, WTD provides wholesale treatment services to 34 local sewer agencies (17 cities, 16 special purpose districts and the Muckleshoot Indian Tribe) throughout the Puget Sound. WTD operates 353 miles of pipelines, 42 pump stations, 19 regulator stations and three regional wastewater treatment plants that serve 1.6 million people.

In recent years, our operations employees have noticed an increasing number of mechanical problems, equipment breakdowns and other impacts that seem to be linked to the growing popularity of "flushable" cleaning wipes and pads.

In response to the increased volume of trash in the system, King County has invested millions of dollars to install grinders and specialized equipment to capture paper debris, which must be removed and hauled to a landfill for disposal at a cost of over \$100,000 each year.

Though King County has not conducted any formal field testing to determine which specific brands of wipes are impacting our system, we are closely following the studies of several other utilities and industry groups. Their results indicate a significant number of wipes products marketed as "flushable" do not disperse in a municipal sewer system.

Operators and off-site crews deal daily with the scourge of improperly flushed trash, debris and grease, which costs ratepayers money and increases the possibility of sewage overflows. To clear

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obstructions, pumps and valves must be shut down, removed and dismantled, directly affecting our system operation.

For this reason, we spend significant resources to educate the public that toilet paper is the only safe manufactured product to flush. Everything else belongs in the trash can, not the toilet, regardless of how it is labeled.

Thank you again for your diligence to protect the public and private wastewater systems throughout the United States, and ultimately, the environment.

Sincerely,



Pam Elardo, P.E.  
Division Director