



March 14, 2017

Kyle Dorsey  
Program Rules and Policy Coordinator  
Statewide Resources Section  
Waste 2 Resources Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

*Re: Solid Waste Handling Standards Rulemaking at Washington Administrative Code 173-350*

Dear Mr. Dorsey,

Thank you for considering the Association of Washington Business's (AWB) questions as part of Department of Ecology's rulemaking process at WAC 173-350. AWB members have asked the following questions about Ecology's implementation of the proposed language post-adoption of the CR-103. AWB appreciates the Waste 2 Resources Program responding to these inquiries either as part of a final rulemaking summary or in formal correspondence with AWB.

1. How does Ecology intend to apply the test for "positive market value" proposed at 173-350-021(3)(c) WAC in practice?
2. How will Ecology measure whether the proposed rule amendments to 173-350 WAC meet the following statutory performance objectives of state solid waste management and recycling:
  - a. RCW 70.95.020(4) To encourage the development and operation of waste recycling facilities needed to accomplish the management priority of waste recycling, to promote consistency in the requirements for such facilities throughout the state, and to ensure that recyclable materials diverted from the waste stream for recycling are routed to facilities in which recycling occurs;
  - b. RCW 70.95.020(7) To encourage the development and operation of waste recycling facilities and activities needed to accomplish the management priority of waste recycling and to promote consistency in the permitting requirements for such facilities and activities throughout the state.

We look forward to continued dialogue with the Waste 2 Resources program as the rulemaking moves forward.

Sincerely,

Gary Chandler

A handwritten signature in black ink that reads "Gary Chandler". The signature is written in a cursive, flowing style.

Vice President, Government Affairs  
Association of Washington Business

