



March 20, 2018

Kyle Dorsey
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Solid Waste Handling Standards Update

To the Washington State Department of Ecology (DOE),

The current language associated with the update to WAC 173-350 - Solid Waste Handling Standards does not meet the state's commitment to reducing and recycling waste wherever possible. By specifically excluding tabbed roofing shingles from exemptions listed in Table 320-A, the state will be placing a prohibitive burden on asphalt producers who repurpose tabbed roofing shingles into Recycled Asphalt Shingles (RAS) for usage in hot mix and cold mix asphalt. Operations under existing permits, such as the water quality sand and gravel general permit, is more restrictive than the solid waste permit requirements and achieves the same goal of effectively protecting water quality. Instead of reuse, this resource would be diverted to landfills instead of providing a benefit to the environment or our communities.

The benefits of recycling Construction and Demolition (C&D) debris are documented in the DOE's February 2015 study, "Benefits of Recycling: Metals, Paper, Construction Debris and Organics." C&D debris can be remade into "new building projects and the 2.8 million tons that was diverted from landfills in 2013 prevented over 100,000 tons of GHG emissions, equivalent to keeping 72,000 cars off the road." Asphalt producers provide great benefits to the public by recycling more materials each year than any other industry. In 2014, over 2 million tons of asphalt and concrete was recovered in the state of Washington, which is more than any other single waste stream. Materials that are being disposed of in landfills would otherwise be used to improve our state's transportation infrastructure.

The DOE performed a study in 2010, called "Acceptable Uses for Recycled Asphalt Roofing in Washington State", which concluded that "Roofing materials bound in asphalt are not mobile in the environment. DOE does not expect these uses to go through an approval process under solid waste regulations." By updating WAC 173-350 to include tabbed roofing shingles as a solid waste, the DOE is directly contradicting its own findings. A like-permit exemption for tabbed roofing shingle recyclers who use this material exclusively for the production of asphalt should be included in Table 320-A of the rule update.

In conclusion, we would encourage the DOE to meet its responsibility to reduce waste and encourage recycling by adding tabbed roofing shingles to the exemptions listed in Table 320-A for facilities who are covered under, and compliant with, their Sand and Gravel General Permits. This will increase the

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feasibility of recycling tabbed roofing shingles for operators who intend to use them in asphalt mix designs on county and state roadway improvement projects. This exemption, would be similar to the exemption currently granted for other recycled asphaltic materials. Our industry would like to work with the DOE to be a part of the solution to reduce landfill waste, increase recycling and protect the environment.

Thank you,
Granite Construction Company

A handwritten signature in black ink, appearing to read "Steve Hitzel". The signature is written in a cursive, flowing style.

Steve Hitzel
Environmental Engineer
Washington Region