



March 20, 2018

Mr. Kyle Dorsey  
 Department of Ecology  
 Waste 2 Resources Program  
 PO Box 47600  
 Olympia, WA 98504-7600

**RE: Rulemaking - Chapter 173-350 WAC Solid Waste Handling Standards**

Dear Mr. Dorsey:

Thank you for the opportunity to provide comments regarding the Proposed Rule Language for WAC 173-350. Lakeside Industries, Inc. operates 13 hot-mix asphalt plants in the State of Washington and is committed to preserving the environment through recycling. Where possible, we incorporate Reclaimed Asphalt Pavement (RAP) and Recycled Asphalt Shingles (RAS) into new hot-mix asphalt for paving projects throughout Western Washington.

We are concerned about how the proposed rule language addresses RAS. As the proposed rule is currently written, there is no clear exemption from solid waste handling permitting regarding RAS. We believe this could impose costly and unnecessary permitting for recycling and material recovery facilities discouraging recycling of asphalt shingles.

To encourage continued recycling of asphalt shingles, we offer the following addition to Table 320-A in WAC 173-350-320 to allow an option for solid waste handling permitting exemption for asphalt shingle recycling:

**Table 320-A**

**Terms and Conditions for Solid Waste Permit Exemptions**

	<b><u>Waste Materials</u></b>	<b><u>Volume, Storage Time, and Capacity Requirements</u></b>	<b><u>Specific Requirements for Activity or Operation</u></b>
(6)	<u>Source separated asphalt roofing shingles (tear off and manufactured waste) processing facilities with a water quality sand and gravel or construction stormwater general permit</u>	<u>No volume limits</u>	<u>Facilities that recycle these wastes must comply with the recycling standards in WAC 173-350-210, including notification and reporting and must recycle 100% into hot mix asphalt or cold patch asphalt products.</u>

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Lakeside is committed to reducing waste and recycling in a responsible manner in accordance with its existing Department of Ecology issued permits (e.g. water quality sand & gravel stormwater general permit) which already meet or exceed the proposed solid waste handling permit requirements for asphalt shingle storage and processing.

We respectfully request you give serious consideration to our comments, so we can continue to operate sustainably.

Respectfully,



Amanda Neice  
Environmental Engineer  
Lakeside Industries, Inc.