

Miles Sand & Gravel

Mr. Kyle Dorsey,

We at Miles Sand & Gravel appreciate the efforts that Ecology has taken in the revisions to the Solid Waste Handling Standards, WAC 173-350. With any task as large and complex, as this has been, there will always be concurrences and difference of opinions. With this in mind, following are our comments:

173-350-100 Definitions; Cured Concrete—Ecology has used terms which relate to the Design Compressive Strength of a cement concrete mix. The twenty-eight-days refers to the number of days

the mix will take to reach a required strength. There are several different design mixes which are designed to reach a specified strength in 3, 8, 14, etc. days. While the 28 days used is a common mix it should not be used in this definition. There is not a good way to determine if the hardened concrete being accepted at a recycle site has been produced from design mixtures of 3, 14 or 28 day design. The definition also includes that the concrete must have a compressive strength of 1200 psi. This again is an arbitrary requirement. As long as the concrete is comprised of a mixture of sound sand and gravel mixed with cement, and/or fly ash the product can be recycled into a useful commodity. We recommend that the definition of Cured concrete be changed to read: Cured concrete; Hardened, nonfluid material composed of processed sand and gravel, cement and/or fly ash that has undergone hydration.

We recommend that Asphalt shingles be added to the definitions. The use of the proper roofing material (RAS) within asphalt concrete mixes has become a very beneficial means to reduce the roofing being hauled to landfills. We are not including modified bitumen, tar products, built-up hot mop or cold mop roofing, rolled roofing, or other types of non-asphalt roofing within our suggested definition. Our suggested definition is as follows:

Asphalt singles; A type of wall or roofing shingle, including 1-/2-/3-tab, architectural and dimensional shingles, that are produced from asphalt, fiber (commonly fiberglass or cellulose), and surface granules of stone, ceramic, brick, or other materials.

Table 210-A Terms and Conditions for Solid Waste Permit Exemption. This is a well written table and will become very useful. We do suggest that Asphalt Shingles be added to (2).

Table 320-A Terms and Conditions for Solid Waste Permit Exemptions Again a very well written table. We suggest that the following be added to this table:

Under the column Waste Material add:

(6)Source separated asphalt shingles materials with a water quality sand and gravel general permit or construction stormwater general permit.

Under the column Volume, Storage time, and Capacity Requirements add:

None,

Under the column Specific Requirements for Activity or Operation add:

Facilities that recycle asphalt shingles must comply with the recycling standards in WAC 173-350-210, including notification and reporting. Must recycle 100% into hot mix asphalt or cold patch Asphalt products.

Thank you considering the above comments for the proposed revisions to WAC 173-350. If you

have any questions or require backup data, please advise us.
Respectively,
Dave

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