

Granite Construction Company

[Oral testimony]. Hi, my name is Steve Hitzel. And I am with Granite Construction Company. We operate a number of hot-mix asphalt production facilities across the state.

And my comment is, as currently written the Solid Waste Handling rule proposed changes do not encourage responsible waste reduction or recycling for the only currently endorsed method for recycling source separated three-tab roofing shingles. This is not in keeping with the DOE's legislative priority to reduce waste and encourage recycling. Asphalt producers should be able to use existing permits such as the water quality sand and gravel, or the construction stormwater general permits that currently meet or exceed the solid waste handling permit requirements for asphalt shingles. An exemption for shingles being 100% recycled in a hot-mix asphalt or cold-patch asphalt, should be implemented. This would harmonize with the DOE's own study titled Acceptable Uses for Recycled Asphalt Roofing in Washington State, which concluded that the use of asphalt roofing as part of a hot-mix asphalt or cold-patch does not need to go through an approval process under state solid waste regulation. As currently written, DOE is indeed adding the state solid waste regulation requirement and in essence discouraging and erecting barriers to the responsible operators who have historically shown very good compliance in operating under sand and gravel stormwater general permits. Asphalt producers are the problem solvers in diverting this from landfills to a 100% recycled use. We encourage Ecology to extend the solid waste handling exemption within Table 320A for source-separated roofing shingles stored for processing on property covered by water quality sand and gravel permit, in order to encourage responsible operators recycling asphalt shingles one-hundred percent into hot-mix or cold-patch asphalt. This exemption would be similar to the exemption now granted for other recycled asphalt materials. That's all.