

Okay, I am Kris Beatty with King County Solid Waste Division's Linkup Program, which has been involved in market development efforts for asphalt shingles since 2007. After a decade of work to develop a market for recycled asphalt shingles in asphalt pavement production, I am pleased to report that this local market is established and growing. This is not a material that has relied on unstable overseas markets for recycling to be viable, it's local.

In the past three years, LinkUp is aware of hundreds of paving projects by multiple companies, that have been completed using hot-mix asphalt containing recycled asphalt shingles. Responsible for the recycling of more than 28 thousand tons of asphalt shingles that would otherwise have gone to waste. Asphalt shingles recycling is increasingly being conducted by asphalt paving mix producers. And this development is promising, but it's also emerging. If asphalt producers face barriers to collecting and processing asphalt shingles for use in paving mix production, progress in recycling this material may stall or worse recede. Without asphalt producers increasing involvement in collection, processing, and use of asphalt shingles in asphalt production, the environmental benefits of recycling that material will be lost. King County is as concerned as the Department of Ecology is, about orphan asphalt shingles piles that have been speculatively stockpiled. Asphalt paving mix producers have not been the source of those piles, and in fact in some cases have provided the solution to drawing those piles down. King County Solid Waste Division urges the Department of Ecology, to make clear in the rule language that asphalt producers collecting, processing and using asphalt shingles in asphalt production, are not subject to solid waste handling permit requirements. King County will be submitting more detailed comments and suggestions, and suggested changes to the rule language in writing. Thank you so much.