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March 20, 2018

Kyle Dorsey
Department of Ecology
Waste to Resources Program
PO BOX 47600
Olympia, Washington 98504-7600

RE: Comments on Solid Waste Rules Draft WAC 173-350

Mr. Dorsey:

Miles Resources would like to take the time to comment on the draft Solid Waste Rules WAC 173-350 language. We appreciate the opportunity to comment on the proposed draft and continue to support the outreach from the Department of Ecology (DOE) on impactful rule changes. Below are our comments regarding the draft rule language:

- Definition of Cured Concrete (WAC 173-350-100)
 - The proposed definition extremely complex and appears to be developed with the intention of limit materials containing cement being treated as concrete. The definition needs to be more descriptive of the material in a meaningful way. How are material handlers going to determine the engineering specifications, such as a 28 day design strength which has an ASTM spec, for material coming into a facility? What testing standard do we use to determine compliance?
 - Miles Recommends the following definition change:
 - **Cured Concrete:** hardened material primarily composed of processed aggregate, sand, cement and/or fly ash that has undergone hydration.
- Positive Market Value
 - What is the definition of positive market value? Does this definition take into account the value of the market or the value of the product within the market? Does this include the negative value associated with disposal vs recycling?
 - Additionally, the description for positive market value given in section 173-350-021 3c does not address market fluctuations. How does this description impact material like scrap steel, where steel values can fluctuate greatly. Scrap companies will pay for the scrap steel at a certain price but if the price drops then the customer has to pay for disposal. Will those facilities need solid waste permits on a temp basis?
 - Recommend including a definition of positive market value specific to the goals of this rule in section 172-350-100



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- o Recommendation: Remove the tonnage limit from the draft language, as large off road vehicle tires can be several thousand pounds each.

Miles appreciates the effort put forward in the updated draft rules and looks forward to working with DOE to increase recycling efforts in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ryan Ransavage', with a long horizontal flourish extending to the right.

Ryan Ransavage
Environmental

CC: Brad Griffith
Dave Lewis

Miles Resources
Miles Resources