

# SOLID WASTE REGULATIONS FOR RECYCLING ASPHALTIC ROOFING

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# You can do it!

The solid waste requirements for processing and storing asphalt shingles are simple to understand and implement. Don't be intimidated by the regulations!

# Types of operations

- Materials Recovery – sorting, processing, grinding
- Recycling – adding shingles to hot mix
- ~ All facilities with shingle piles, both materials recovery and recycling, must adhere to storage standards

# Materials Recovery Facilities

- Facilities that take in raw shingles and process them
- Most will need a **piles permit** for the storage of material
- Permits are issued by the **local health department**
- Permitting usually takes a few months
- Concerns include **dust, noise, and stormwater runoff** from the piles

# Recycling

- **"Recycling"** means transforming or remanufacturing waste materials into usable or marketable materials for use other than landfill disposal or incineration. Recycling does not include collection, compacting, repackaging, and sorting for the purpose of transport.
- Recycling only happens when shingles are transformed into a usable product like hot mix.

# Recycling

- Recycling shingles into hot mix at a batch plant **may qualify for an exemption** from solid waste facility permitting
- The key to qualifying for exemption is not keeping a pile of ground or unground shingles onsite.
- Storage of shingles indoors or in containers avoids piles standards, or only store as much material in pile as you can use in a few weeks and completely use all material before importing more
- **Continuous piles** at a hot mix plant **will require a piles permit**

# Applicable Regulations

- Solid waste handling requirements can be found in the Washington Administrative Code, chapter 173-350 – applicable sections include:
  - ▣ WAC 173-350-040, -100, -210, -310, -320, and -990
- Solid waste laws are in the Revised Code of Washington 70.95 – applicable sections include:
  - ▣ RCW 70.95.170, .180, .305, .315, .400, .410, and .430

# Process for getting a permit or exemption

- Identify what kind of operation you want
- Contact your county health department for information and assistance
- Read the sections of the WAC that the health department indicates will apply to your operations
- Assess what infrastructure you may need to add to meet requirements, such as a concrete or asphalt pad, drainage to sanitary sewer, etc.
- Be sure you check your assumptions with the health department before you build so you don't spend money needlessly!

# If a permit is required...

- Obtain the permit applications from Ecology's website
- Begin to develop an operations plan in conjunction with the health department to meet all permitting needs
- Collect any required engineering documents and site plans
- Get approval from the health department before building so you build what you need
- Sign and have the application notarized prior to submitting
- Put together two copies of the complete permit package to submit to the health department and Ecology
- Remember, other permits (fill and grade, NPDES) may be required

# If no permit is required...

- Obtain a notification of exemption form from Ecology's website
- Provide sufficient information with the form to demonstrate how your facility will meet requirements – this may mean attaching additional documents
- Submit one copy of the notification form to the health department and one to Ecology
- Expect a compliance inspection and comply with annual reporting requirements

# Best Management Practices

- Keep shingles, either whole or ground, on an asphalt or concrete pad, in a building, or in a container
- Prevent storm- or surface-water impacts for outdoor piles by keep shingles under a tarp or hoop structure, or collecting runoff to a leachate tank or diverting to sanitary sewer
- Do not take in more shingles than you can use/distribute in a reasonable amount of time – speculative accumulation can lead to bigger piles than you can market
- Have watering/misting equipment to keep down dust generated during grinding

# Remember – We Can Help!

Only the county health department can tell you for sure if you need to get a permit or not. Don't assume your operation will or will not require a permit until you talk to them.

- Open communication with your county health department and Ecology can help you do the right thing the first time and save you money!
- Don't be afraid to ask questions! We can sometimes give you different options to address requirements in less-expensive ways.