

Meeting Notes

173-350-210/310 Update Workgroup

June 17th, 2015

Please send corrections, edits, or additions to allison.kingfisher@ecy.wa.gov by July 17, 2015

	Andrew Kenefick	Waste Management
	Art Starry	Jurisdictional Health Authorities
X	Rod Whittaker	Washington Refuse and Recycling Association
	Bruce Chattin	Washington Aggregates & Concrete Association
	Ken Stone	Washington State Department of Transportation
	Scott Windsor	Local Government - City of Spokane
X	Sego Jackson	Local Government – Seattle Public Utilities
X	Suellen Mele	Zero Waste Washington
X	Ted Silvestri	Jurisdictional Health Authorities
X	Troy Lautenbach	Washington State Recycling Association
Ecology:		
X	Gary Bleeker	Washington Department of Ecology
X	Wayne Krafft	Washington Department of Ecology
X	Alli Kingfisher	Washington Department of Ecology
Guests:		
X	Jim Sells	Washington Refuse and Recycling Association
X	Penny Ingram	Washington Utilities and Transportation Commission
X	Pam Smith	Washington Utilities and Transportation Commission
	Betty Young	Washington Utilities and Transportation Commission
	Susan Thoman	Cedar Grove
X	Jerry Bartlett	Cedar Grove
X	Bart Kale	Bart Kale & Associates/Nucor Steel
X	Holly Chisa	ISRI
X	Jody Snyder	Waste Connections
X	William Cook	Skagit River Steel & Recycling/ISRI

Meeting Objectives

Review language in 210 and 310	✓ Completed.
Determine direction needed for changes	✓ Completed.
Provide guidance and recommendations to Ecology	✓ Completed.

Action Items

WHO	WHAT	WHEN
Sego	<ul style="list-style-type: none"> Provide a copy of the comments from Gabriella Uhlar-Heffner to Alli and Gary. 	July 17
Alli & Gary	<ul style="list-style-type: none"> Look at incorporating reporting requirements into the new definitions section. 	August 8
Alli & Gary	<ul style="list-style-type: none"> Draft language that creates a tiered permitting system. 	August 8
Gary	<ul style="list-style-type: none"> Work to gather data from Gretchen and Dan on facilities that are currently using NOI vs. permitting. Breakdown the data between recyclers, mrf's and other. 	August 8
Alli & Gary	<ul style="list-style-type: none"> Add definition of baling and compaction sites 	August 8

General Notes on Discussion

- Discussion of why it would not work to combine the recycling section into Intermediate handling facilities section. In summary: recycling is an act and the intermediate handling facilities are facilities.
- The scrap representatives talked about their goal in this process to have scrap steel not be considered solid waste once it is commoditized. They also mentioned that they do not want their industry considered solid waste and that scrap steel is exempted from being considered solid waste in other parts of the country. They are manufacturers not recyclers. The issue was addressed that even in the Notice of Intent for exemption that it references the material is a Solid Waste. They hope this will be corrected with the new definitions section. It was cautioned that once it is decided that something is not a SW then you have no legal authority to require oversight or reporting.
- Tracking of recycling rates: It was brought up that if scrap recyclers were exempted then the materials that they recycle would no longer be captured in reporting requirements. It was suggested to add a phrase such as "except for the reporting requirements" to the new definitions section to try to capture this. There is interest in trying to correct some of the double counting of recycled materials. There are challenges associated with materials sent overseas or originating from outside of Washington State. Reporting has value so we can better plan for the material across the state.
- Strong interest in having more inspections of facilities to create more oversight.
- Interest in lessening the engineering requirements for certain types of facilities such as drop boxes.
- It was suggested that we get rid of exemptions and move towards only having solid waste permits. But before we advance to far down this path there needs to be a better understanding of what percentage of facilities are exempt now, who would fall under the new permitting requirements and who would fall off from being in the system at all. It was suggested that it would be beneficial to have the databases of facilities publicly available online. This would strengthen the transparency and sharing of info between JHD and Ecology and could create better consistency across the state.
- Ecology acknowledged that the quality of the list does have issues – the problem current with a permit exemption is the JHD have no authority to do inspections; it is a complaint driven issue;

- In considering the variety of types of facilities it was suggested that while moving towards getting rid of exemptions then we develop a two-tiered permitting structure. With Tier 1 facilities such as drop boxes requiring one level of permitting and oversight. Tier 1 could also include totally harmless activities such as mattresses and polystyrene. Tier 2 facilities such as commingled curbside MRFs, mixed load C&D facilities.
- Things to consider in creating a tiered system:
 - It was cautioned that we need to examine exemptions and allow some facilities to operate in places where they would not be able to due to code and land use issues at the county levels.
 - Consider language concerning engineering – where appropriate and not required – buildings are already built to code; Also, what about when you use an existing building?
 - The requirement of providing protection of tipping floors from wind and rain – for example in a C&D facility when you have two sides of the building open to bring in C&D then you are not protected fully from wind but functionally it makes sense for the facility.
 - Do drop boxes need an engineering stamp? Depends on how these folks interpret these words.