



April 4, 2012

Mr. Paul Gildersleeve  
NH Department of Environmental Services  
Waste Management Division, Permitting & Design Review Section  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

**RE: Response to March 28, 2012 Letter Regarding EnviroPave Certified Waste Derived Product (CWDP) Application**

Dear Mr. Gildersleeve:

This letter serves to respond to your letter dated March 28, 2012 and to address the specific comments and information needs. Our telephone conversation on March 29, 2012 provided clarified NHDES's rationale for what I believed were redundant questions. However, after our discussion I understand that NHDES wants more specifics as to how the material will be used and the information below seeks to address these concerns.

*I want to reiterate that the intended uses of EnviroPave are identical to the uses NHDES has already approved for Commercial Paving.* We intend to use this material on non-industrial sites only, using the information provided in the package submitted to NHDES that includes NHDES environmental screening criteria and recommended use guidelines for those parties buying it for use. To reiterate, once the material passes the NHDES environmental testing guidelines it will be used only on non-residential sites.

The planned uses for the material are as a recycled, low cost pavement material. This will include use of the material as a subbase aggregate, a base course, an unbonded surface course, surface course/cover and roadway shoulder material. We included the various blends of EnviroPave to give us flexibility in how it can be used on the non-residential sites. These blends are provided on the attached table with additional information for how the material should be placed and recommended placement subgrade preparation. This response answers your questions #1, #2 and #3.

In response to your question #4, if any incoming load contains more than 10% of non-asphalt shingle waste material it will be rejected. It is not uncommon for a roofer to include minimal amounts of paper and cardboard waste from the new shingle packages into the roll-off the first time material is being sent to a recycling facility. The reduced fees to use the recycling services are an incentive for the roofers and rolloff companies to ensure that only waste asphalt shingles are included in future loads. If more than 10% of the volume of the load being evaluated contains non-waste shingle material the load will be rejected. Additionally, each load will be monitored for visual evidence of any asbestos containing material. *If a load contains any evidence of asbestos containing material it will be rejected.*

The Permit By Notificaiton is being reviewed and will be submitted in the immediate future.

We look forward to receiving the approved CWDP application. Please feel free to contact me at 508-254-0394 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven B. Radel". The signature is stylized with a large, sweeping initial "S" and a horizontal line extending to the right.

Steven B. Radel

**PAVEMENT CONSTRUCTION DETAILS FOR ENVIROPAVE BLENDS**

<b>EnviroPave Mix</b>	<b>Existing Subgrade Class/Type</b>	<b>Constructed Layer</b>	<b>Lift Thickness</b>	<b>Design Suggestions</b>
<p>100% Ground Asphalt Shingles;</p> <p>The 100% mix design requires placement on an aggregate surface, not ground surface. The material can then be placed in layers of aggregate and EnviroPave to achieve desired properties.</p>	<p>Aggregate Base</p> <p>Aggregate Base</p> <p>Aggregate Base</p>	<p>Surface Course</p> <p>Subbase Course</p> <p>Base Course</p>	<p>1-3"</p> <p>3-6"</p> <p>6-8"</p>	<p>-----</p> <p>Alternate courses of subbase and base course and aggregate to construct layers of EnviroPave and recycled aggregate</p>
<p>80% Ground Asphalt Shingles;</p> <p>Similar to above, this mix should be placed in areas with aggregate as a subbase</p>	<p>Aggregate Base</p> <p>Aggregate Base</p> <p>Aggregate Base</p>	<p>Surface Course</p> <p>Subbase Course</p> <p>Base Course</p>	<p>1-3"</p> <p>3-6"</p> <p>6-8"</p>	<p>-----</p> <p>Alternate courses of subbase and base course and aggregate to construct layers of EnviroPave and recycled aggregate</p>
<p>40% - 70% Ground Asphalt Shingle Blended with Recycled Aggregate;</p> <p>To be applied on prepared ground cover.</p>	<p>Prepared ground cover. If ground cover is in poor condition then thicker lifts are appropriate.</p>	<p>Surface Course</p> <p>Subbase Course</p> <p>Base Course</p>	<p>1-3"</p> <p>3-6"</p> <p>6-8"</p>	<p>Place material in suggested lift thicknesses. If additional strength properties are required use higher aggregate blend or layer in aggregate to strengthen pavement course.</p>