

MEMORANDUM



To: Construction and Demolition Debris Discussion Participants

From: Andrew Booker, Ohio EPA

Date: Friday, May 31, 2013

Re: **Ohio EPA Solid Waste Management Review – Construction and Demolition Debris Discussion**

Thank you once again for your participation in the May 14th 2013 meeting to discuss Construction and Demolition Debris (C&DD) management in Ohio. That meeting was the first to focus on C&DD management as part of Ohio EPA's Solid Waste Management Review project.

As you will recall, most of the meeting was focused on an agenda item focused on identifying the impacts and challenges of C&DD management in Ohio. At the conclusion of the meeting I indicated that I would summarize the issues that were identified during the meeting. This summary is to be used as a starting point for our June 4th meeting, where we will be focused on possible ways to address these challenges.

You may recall that the majority of the meeting was spent discussing issues associated with C&DD recycling and unidentifiable C&DD. Only during the last portion of the meeting were other issues identified.

I have summarized the issues identified during the meeting below, and have tried to organize them by topic area. In addition, I have identified some issues that Ohio EPA has concerns about that may not have been brought up during the May 14 meeting. These items are presented separately from the issues that were identified during the meeting.

“Impacts and Challenges” identified during the May 14 Meeting

- Confusion over Definitions
- C&DD Recycling
 - Unidentifiable/unrecognizable issue
 - Managing C&DD fines created during recycling process
 - Disposal of Material (MSW vs C&DD landfill)
 - Development of Markets for material
 - Fines could be a product, not a waste
 - Markets Driving Need for more C&DD Recycling
 - Examples: Turner Construction goal to recycling 50-75%; LEED Certification
 - End markets not clearly defined or developed
 - A New Industry – only 6-7 years old in Ohio
 - Bigger challenges when off-site recycling (not at C&DD landfill)
 - Problem Recyclers
 - Sham/fly-by-night recyclers
 - Large accumulations of material
 - Grant program – opportunity to address market development
 - CDAO supports guidelines for legitimate recycling
 - C&DD recycling needs legitimate home, such as license program
- Notice of Intent to Fill w/ Clean Hard Fill – no mixed loads should be allowed
- Groundwater Impacts at C&DD Landfills
- Penalty for illegal C&DD Disposal only \$700
- C&DD Fees and Funding
 - HD funding from C&DD fees
 - Can result in more funds to HD than can be reasonably applied to program (use limited to C&DD program)
- C&DD not a solid waste, so not included in State recycling goals

Other C&DD Issues identified by Ohio EPA

- C&DD Recycling - appropriate storage of material – quantity & length of time
- C&DD transfer facilities not regulated (may have been mentioned as part of C&DD recycling discussion)
- Complexity of having two separate laws/rules/programs for C&DD and MSW facilities
- Complexity of C&DD license (existing facilities) – review of engineering components outside of expertise of many HDs
- Complexity of C&DD fee system