

Beneficial Use of Fill-Like Materials Survey: Association of State and Territorial Solid Waste Management Officials Report



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The Association of State and Territorial Solid Waste Management Officials (“ASTSWMO”) has issued a February 2020 document titled:

Beneficial Use of Fill-Like Materials Survey Report (“Report”)

The *Report* was prepared by the Beneficial Use Task Force of ASTSWMO’s Materials Management Subcommittee.

Non-hazardous residuals, debris and by-products can sometimes substitute for virgin resources. This may include the manufacture of new products, use of fuel for energy recovery, or utilization as construction projects.

A term sometimes used to describe the practice of utilizing these wastes in such a manner is “beneficial use.” Such use of these materials constitutes material management as opposed to waste management. It obviously presents a net benefit from an environmental standpoint if done properly because the amount of materials disposed are decreased. This can result in the decrease in the use of virgin materials and potentially reduce lifetime greenhouse gas emissions.

The states vary in how they address beneficial use. They may provide regulatory or statutory exclusions of certain materials. Other states may conduct an assessment and identify allowable beneficial uses where a prior determination has been undertaken by the state agency. These state reviews or mechanisms vary in terms of their formality.

The ASTSWMO *Report* states that the Beneficial Use Task Force initiated a survey of the states and territories in late 2019 addressing beneficial uses of various fill-like materials in the United States.

The *Report* both summarizes the results of the survey and discusses such results.

The fill-like materials that the Report addresses are stated to range from:

. . . concrete and crushed glass to auto shredder waste and waste water treatment plant residuals.

Also noted is the amount and variety of such materials that are generated which the *Report* characterizes as:

. . . a struggle to determine how to best manage them. Generators tends to look for the simplest and/or cheapest solution, which is typically sending it to a landfill for alternate daily cover (ADC). While that

certainly provides an alternative to virgin soil, the BUTF wondered what other ways States are using these fill-like materials.

The rationale for considering beneficial use of fill-like materials are described as (depending on the region):

- Cost of disposal can be costly
- Landfill capacity is finite
- Substituting a suitable fill-like material for virgin material saves natural resources
- Reduced energy use
- Reduced water use

Forty-one states responded to the survey.

Information and/or issues addressed in the *Report* include:

- List of Fill-Like Materials Surveyed
- List of Uses Surveyed
- Definitions
- Beneficial Use Approval Process
- Issues with Approved Beneficial Use of Fill-Like Materials
- Regulatory Oversight of Mildly Contaminated Fill-Like Materials
- Challenges to Beneficial Use of Fill-Like Materials
- Additional State Comments
- Beneficial Uses of Fill-Like Materials by EPA Region

A copy of the *Report* can be downloaded [here](#).