

Soil Disposal & Re-Use Capacity Listening Session Summary/Next Steps

The screenshot shows the top of a web page. At the top left is the Mass.gov logo. To its right is a search bar with the text "Search Mass.gov" and a magnifying glass icon. Below the search bar, on the left, it says "PART OF [Soil Transport, Re-Use and Disposal](#)". On the right, it says "OFFERED BY [Massachusetts Department of Environmental Protection](#)". The main heading is "Soil Management/Capacity Discussions". Below this is a paragraph: "Material related to the ongoing policy and program discussions about the management of contaminated soil in Massachusetts and limits on re-use, recycling and disposal capacity." There is a yellow banner with a warning icon and the text "Notices & Alerts" and a link "Hide Notices & Alerts". Below the banner is a notification: "MassDEP's office buildings are currently closed to the public. | Jun. 18, 2021, 12:01 am". The main content area has two columns. The left column contains a paragraph: "The Department of Environmental Protection (MassDEP) is hosting a series of policy discussions and listening sessions related to disposal capacity issues for contaminated soil coming from Massachusetts developments and disposal sites ('contaminated' soil meaning concentrations > RCS-2)." The right column has a "CONTACT" section with the name "Elizabeth J. Callahan, Acting Assistant Commissioner - Waste Site Cleanup" and an "Address" section with the text "One Winter Street, Boston, MA 02108" and a "Directions" link with an arrow icon.

Mass.gov

Search Mass.gov

SEARCH

PART OF [Soil Transport, Re-Use and Disposal](#)

OFFERED BY [Massachusetts Department of Environmental Protection](#)

Soil Management/Capacity Discussions

Material related to the ongoing policy and program discussions about the management of contaminated soil in Massachusetts and limits on re-use, recycling and disposal capacity.

⚠ Notices & Alerts [Hide Notices & Alerts](#)

📢 MassDEP's office buildings are currently closed to the public. | Jun. 18, 2021, 12:01 am

The Department of Environmental Protection (MassDEP) is hosting a series of policy discussions and listening sessions related to disposal capacity issues for contaminated soil coming from Massachusetts developments and disposal sites ("contaminated" soil meaning concentrations > RCS-2).

December 16, 2021 Listening Session

CONTACT

Elizabeth J. Callahan, Acting Assistant Commissioner - Waste Site Cleanup

📍 Address

One Winter Street, Boston, MA 02108

[Directions](#) →

<https://www.mass.gov/service-details/soil-managementcapacity-discussions>



Problem Statements

- Lack of capacity/facilities in Massachusetts
 - Fitchburg limiting non-MSW to save capacity (now ~ 30,000 tons/yr, down 40%)
 - Fitchburg will close in 2024 unless expansion approved
 - Taunton & Chicopee closed (160,000 tons/yr)
 - All but 1 landfill to close by 2030
- Lack of facilities specifically for dredge spoils
 - Vermont has one
- Not just soil – it is also C&D Residuals, recycling residuals, asbestos wastes, biosolids... BUD material
- Demolition projects
 - After separating out the ABC, steel & glass, there's a lot left over for disposal
- ACM Wastes
 - Again, one facility that can take it most of the time
- Diminishing capacity in other NE states
 - Threat that these will close too
 - Turnkey stopped accepting in September (325,000 tons from MA).
 - Crossroads (Maine) stopped accepting in August and capacity from MA dropped to 30,000 tons/yr
 - Maine's new fees - \$5 (non haz) & \$10/ton (biosolids)
 - New York landfills require preference for local communities
- Environmental Justice component
 - Communities need brownfields sites cleaned up for public health and jobs reasons
 - Remediation projects delayed



Problem Statements, continued...

- MA landfills do not generally take stabilized TCLP Pb soils – goes out of state to RCRA Subtitle D landfills
- No options for Asbestos-contaminated soil → subtitle D
- Options for petroleum contaminated soil are scarce. Aggregate in Stoughton & Eliot, ME closed. Ondrick is left.
- Uncertainty about application of Brownfields Tax Credit to soil management
- Lack of outlets for treated soils, or “post-process material”
- Went from 140 trucks/day to 70 at one point.
- What happens when the 4 unlined facilities close or limit their capacity?
- PCB bulk product is going to landfills, taking up space
- Lots of asbestos-in-soil – more than 10 years ago
- PFAS in soil is on the horizon
- We could take waste by rail, but that would create another choke point in Worcester terminal
 - Hard to find rail shipping containers



Effect the Lack of Capacity Has

- Increased costs
 - new fees (Maine)
 - supply/demand
- Projects are turned away
- Jobs that flat-out stop
- Host communities being told facilities can't take their wastewater scum & residual & catch basin sediments (can't fulfill existing
- One project used to move 1,500-2,000 tons/day, now its down to however many trucks can make the run to New York... 8 one day, 15 another.
- Schedule delays
 - Unplanned – just stops excavation
 - Planned - push projects into new year with re-opened capacity
- Modifying plans to limit excavation, minimize costs
- Transport to more distant facilities
 - Midwestern states
 - Canada
- Increased carbon emissions – well beyond 1990 figures for the industry – instead of reductions

Suggestions (from you) - Things the Private Sector Is Doing or Could Do

-

- Reduce volume going off-site
 - Modify plans, minimize excavation
- Treat on-site – *in-situ* stabilization (ISS)
 - Then leave in place
- Screen out cobbles, boulders, concrete to re-use simply save weight on what is disposed
- Propose More Subtitle D landfills in MA
- Helpful to have a rail transfer station near Boston (BUT...costs would still be double)
- Enter into contracts with landfills to lock-in capacity, but...
 - benefits bigger players
 - locks out small generators/projects)
- Find opportunities to re-use
 - Boston Blue Clay for caps/liners
 - Geotechnically suitable gravels, sandstone
- Thermal treatment
 - Then bring back to site
 - Or re-use elsewhere



Suggestions (from you) - What MassDEP Can/Should Do

- Change COMM-15 to allow <RCS-2 Remediation Waste to go to COMM-15 facilities
- Adjust COMM-97 to allow higher concentrations (take pressure off Subtitle D facilities)
- Allow COMM-97 soil to be re-used at other 21E sites using ACO approach (e.g. use to raise grade to address sea level rise & resiliency – cap & AUL)
- Allow more re-use of treated soils rather than disposal in landfills
- “relax” landfill expansion regulations (in site-specific situations)
- Permit more Subtitle D landfills in MA
- Expand the market for post-process materials
- Simplify the soil recycling regulatory environment (SW, 21E, HW overlaps)



MORE Suggestions (from you) - What MassDEP Can/Should Do

- Follow up on SWMP-identified need to assess ash, sludges and soil
- MassDEP could provide brownfields tax breaks/credits for landfill capping projects that are upside down financially [that would be DOER, not DEP, but...]
- Permit more rail sidings to haul away waste
- Allow higher volumes or levels of contamination in soil to go to landfills
- Look at CT general permit to allow storage of contaminated soil – staged, transloaded out
- Facilitate soil re-use ACROSS projects as well as within a project – allow coordinated cut/fill projects
 - Figure out how to deal with liability issues
- Redefine “active track bed” to allow re-use of soil at train layover facilities, under buildings, parking lots, etc...
- Set up a system like the COMM-15 ACO process. That worked

