

C&D annual report form suggestions for improvement

Work Shop at MassDEP Boston Office
100 Cambridge Street, Boston, MA 02114
October 21, 2024
10:00 AM – 12:00 PM

Conduct workshop to improve C&D facility annual report form submittals

- Suggested improvements based on input from:
 - MassDEP observations/experience
 - Best practices in surrounding states
 - Construction managers observations/experience
- Conduct a workshop with stakeholders
 - Draft 1st set of revisions during a workshop in October
 - Obtain internal management approval in November/December
 - Revise annual report forms/instructions by year end 2024
- Strive for continuous improvement
 - Evaluate effectiveness of revisions (mid-year 2025)
 - Draft further refinements

MassDEP Observations/Experience

Suggested Improvements:

- Existing 5-page instructions document contains three sections:
 1. Obtaining Forms
 2. Reporting Process
 3. Conversion Factors and Material Types
- Develop more detailed guidance in “Reporting Process” Part 2
 - Ensure greater consistency and precision
- Add more material types to Part 3

Instructions for Annual Solid Waste Facility Report – Construction and Demolition Processors and Transfer Stations	
Reporting Process	
Important	If your facility accepts both Construction and Demolition Waste and Municipal Solid Waste you must report these separately in the Solid Waste Facility Report in Sections C and D.
Facility Identification	Fill in all information on page 1.
Signature	Sign and date the Form at the bottom of Page 1.
Due Date	Construction and Demolition Processing and Transfer Station Annual Report Forms are due by February 15.
Mailing to DEP	Complete and Return this form via the web based upload portal (Compliance Reporting System) by February 15 to: (Use the weblinks provided): Link to the MassDEP information page about the upload portal which contains a link to the upload portal: https://www.mass.gov/info-details/compliance-reports-upload-portal Link to the upload portal called the Compliance Reporting System: https://ecaonline.eca.state.ma.us/EEA/ComplianceReport/
Questions	Contact Eshua Mbua at MassDEP in Boston at eshua.mbua@mass.gov

Excerpt of Existing instructions
“Reporting Process” pg. 2 of 5

MassDEP Observations/Experience

Suggested Improvements:

- C&D materials accepted (Table C.1)
 - Require detailed break-out of accepted materials
 - Use “Materials Types” listed in Part 3 of Instructions
 - Specify “Other ”materials
 - Require break-out of inbound Category-2 Residuals showing quantities and facilities of origin
 - Supplemental worksheet attachment

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention
Solid Waste Facility Report - Construction & Demolition Processor or Transfer Station

C. C&D Operations

1. C&D Materials Accepted

Please record the tons of Materials Accepted by each Material Type for each State of Origin. Next, sum each Material Type into the TOTALS column, then sum that column into the Total Accepted box. For Material Type definitions refer to the Material/Waste Type Table on pages 3 - 5 in the accompanying “Instructions for Annual Solid Waste Facility Report – Construction and Demolition Processors and Transfer Stations”.

- Round all amounts to the nearest ton. If any material type is less than 0.5 tons, do not include that material.
- No NOT include Municipal Solid Waste accepted in this table.
- Do NOT include any waste oil or household hazardous waste/products.
- If the state of origin is not listed or an additional state is needed, fill in the blank column or cross out a state in an unused column and fill in the other state.
- If the material type is not listed, use one of the “Other” lines and fill in the name of the material. If more “Other” lines are needed, cross out an unused material type and fill in the other material name.

Material Type	State of Origin							TOTALS
	MA	CT	ME	NH	NY	RI	VT	
Asphalt/Brick/Concrete								
C & D WASTE								
C & D WOOD								
C & D RESIDUALS								
CRTs/ELECTRONICS/COMPUTERS								
CLEAN GYPSUM WALLBOARD								
METALS								
TIRES								
CLEAN WOOD								
BULKY WASTE								
OTHER:								
OTHER:								
OTHER:								
OTHER:								
Total								

Existing Table C.1.

Existing Table C.2.

Suggested Improvements:

- [illegible]

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MassDEP Observations/Experience

Suggested Improvements

- For C&D Materials Disposed (Table C.4.)
 - Add category for “Disposed via Rail”
 - “Material Type” column should match material types in Part 3 of Instructions
 - Same material sent to different destinations should be reported on separate lines
 - Unprocessed or partially processed C&D Waste cannot be sent for disposal (see MPS policy)

[illegible]

Existing Table C.4.

MassDEP Observations/Experience

Suggested Improvements for Compare Totals Table D.4.:

- Report mass balance summaries for C&D and MSW separately
 - Add separate tables at the end of the C&D and MSW sections
- Report beginning/ending inventories
- Report estimated tonnage of “crossover materials”
 - Mixed loads containing different waste types (e.g., MSW vs. C&D), separated on tip floor, and moved over to other waste stream
- Report volume/weight of water used for misting/dust control when a major source of mass balance discrepancy

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention

2012 Solid Waste Facility Report - Construction & Demolition Processor or Transfer Station

4. Compare Totals

Line 1	Enter the amounts listed in the Total Accepted boxes on pages 3 and 7 (if applicable)	
Line 2	Enter the amounts in the Total box under Materials Recycled/Reused on page 4 and total diverted on page 8 (if applicable)	
Line 3	Enter the amount in the Total box under Materials Transferred on page 5	
Line 4	Enter the amount in the Total box under Materials Disposed on page 6 and 9 (if applicable)	
Line 5	Add Lines 2, 3 and 4	
Line 6	Subtract Line 5 from Line 1, if the result is zero skip to part E	
Line 7	Divide Line 6 by Line 1 and multiply by 100	%

If Line 7 is greater than 1% or less than -1%, explain the difference in the Discrepancy box below. Attach another sheet if needed.

Discrepancy Explanation:	
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Existing combined mass balance work sheet

Construction Managers Observations/Experience

- A number of construction managers from large construction firms have raised concerns about C&D Annual Report Form
 - Need for greater accuracy and precision
- These firms are customers of the C&D processing facilities

Construction Managers Observations/Experience

- Continuity between...
 - MassDEP SWCDFAR form
 - Signed letters for C&D-processing facilities' annual diversion rates
 - 3rd-party verification (RCI)
- What is the intent behind transfers?
 - Recycled?
 - Further Processing?
- Overutilization of "C&D Waste" line item
- Ultimately, better data management leads to...
 - Better understanding of waste generated in demolition/construction
 - Improved waste diversion within the industry