

POLICY GUIDANCE: SPECIFICATIONS FOR THE USE OF RECYCLED GLASS IN LANDFILL ROADBEDS

**Approved by DEQ's Solid Waste Program Management Team
Effective Date: December 10, 2004**

I. PURPOSE

The purpose of this policy guidance is to establish criteria for approval for a landfill to use source separated glass as roadbed material within the footprint of the landfill in a manner that allows the material to be counted toward recovery.

II. BACKGROUND

The Oregon Refuse and Recycling Association on behalf of its members has asked the Department to clarify under what circumstances source separated glass can be used as roadbed material within the footprint of the landfill and be counted toward recovery in a watershed's material recovery rate calculation. DEQ Land Quality Division (LQ) recognizes the difficulties that rural areas of the state have in managing recycled glass. This is especially true for commingled, multi-colored recycled glass. The use of recycled glass in engineered fill applications has been allowed and counted toward recovery and is therefore, not in question. The LQ Division has also allowed source separated glass to be used and counted for recovery as roadbed material outside the footprint of the landfill.

During the 2003 Legislative session, a bill (HB 3736) was proposed that would have allowed glass collected for recycling to be landfilled. This bill did not pass but the Oregon Refuse and Recycling Association subsequently asked DEQ to clarify under what circumstances glass used as roadbed material can be counted toward recovery. The issue of using glass as roadbed material within the footprint of a landfill was discussed by the Oregon Solid Waste Advisory Committee (SWAC) on three separate occasions: 10/15/2003, 1/21/2004, and 4/21/2004. It was also discussed by DEQ's Solid Waste Program Management Team (PMT) on 6/3/2003, 12/5/2003, and 1/21/2004 (following the SWAC meeting held that same day). At the April 21, 2004 SWAC meeting, Mary Sue Gilliland, manager of DEQ's Solid Waste Policy and Program Development Section presented a draft version of this policy guidance and questionnaire. Because SWAC was running short on time, SWAC members were instructed to e-mail or submit their comments to DEQ in advance of the May SWAC meeting, and that the comments would be discussed at that meeting. No comments were received and the issue was not discussed at the May SWAC meeting. At its October 20, 2004 meeting, the Solid Waste PMT reviewed slightly revised versions of the policy guidance and questionnaire and approved them, directing that implementation of the guidance should be discussed at the next quarterly meeting of regional solid waste TAs. This discussion was held at the TA meeting on November 17, at which time it became apparent that portions of the guidance and questionnaire were unclear or unnecessary. Both documents were revised and re-

approved by the Solid Waste PMT via e-mail. The revised documents were sent to SWAC members via e-mail on December 3 with a final request for comments. No comments were received and the policy guidance went into effect on December 10th. Landfills currently using glass in roadbeds will have until March 10th, 2005 (90 days from the effective date of this policy) to submit the completed questionnaire and associated documentation to DEQ in order for glass used in roadbeds during this period to be counted towards recovery.

III. DISCUSSION

A. Oregon Department of Transportation (ODOT) Specifications for the Use of Reclaimed Glass in Construction Applications.

The Department's Solid Waste Advisory Committee (SWAC) reviewed the specifications contained in the ODOT Glass Fact Sheet #1 released in 1996. The consensus was that the fact sheet processing specifications were not practical or cost effective in short dirt roads applications.

B. Beneficial Use Statement

The SWAC did agree that it was appropriate to require that the source separated glass be used for a beneficial purpose. The landfill operator should substantiate that the use of the glass would be to replace material that would otherwise have to be acquired from alternative sources such as rock quarries or sand and gravel pits.

C. Department's Role/Responsibility

It is the responsibility of the Department to assure the citizens of the state that material they have source separated for recycling will truly be recycled and not thrown away. It is not in the best interest of the state to have whole bottles used as "roadbed material" on the working face of a landfill. As added protections, the glass used as roadbed material must contain no more than 10% non-glass residual from the glass recycling collection process (labels, lids, caps, etc) and there can be NO level of hazardous or dangerous materials used in a roadbed application.

IV. POLICY

A landfill operator that wishes to use source separated glass as road bed material within the footprint of the landfill will need to provide the following documentation to the Department:

1. Where the material will be used in the landfill.
2. How long the specific road(s) would be used by the landfill.
3. How the material would be processed.

4. What materials would be replaced by using source separated glass as a roadbed material.
5. Why a higher use can not be achieved for the material.

The Solid Waste Technical Assistant assigned responsibility for the wasteshed that the landfill is operating in will review the documentation and approve or not approve the use of source separated glass as roadbed material within the footprint of the landfill based on the landfill's operating plan for this material as referenced above.

V. DISCLAIMER

The approval of the use of source separated glass for this purpose is not intended to replace the higher value closed-loop use of glass to be recovered and recycled into new containers. However, in areas where transportation and processing costs to container recycling plants or collectors are prohibitive and the value of diverting recycled glass from the waste stream is recognized, the use of source separated glass in roadbed applications may help relieve the buildup of excess collected material.

This policy guidance is intended solely as guidance for employees of the Department. It does not constitute rulemaking by the Environmental Quality Commission and may not be relied upon to create a right or benefit, substantive or procedural, enforceable at law or in equity, by any person. The Department may take action at variance with this policy.

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