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**From:** Dorcas Hanson-Lugo [dlugo@ph.lacounty.gov](mailto:dlugo@ph.lacounty.gov)

**Sent:** Thursday, February 16, 2023 11:19 AM

**Subject:** FW: Beneficial Reuse

Dee,

Here is an email that I sent to CalRecycle a couple of years ago requesting clarification if soil was considered beneficial reuse. Based on this email, CalRecycle does not classify soil as a beneficial reuse. In Condition 4.c of the SWFP, it states:

Permitted Maximum Tonnage: 12,000 tpd for all materials received for disposal and/or beneficial reuse & recycling

Since soil is not considered a beneficial reuse and therefore not restricted in site's permitted tonnage.

David Thompson

----- Forwarded message -----

From: **Escotto, Benjamin@CalRecycle** <[Benjamin.Escotto@calrecycle.ca.gov](mailto:Benjamin.Escotto@calrecycle.ca.gov)>

Date: Thu, Mar 26, 2020 at 2:16 PM

Subject: RE: Beneficial Reuse

To: David Thompson <[david.thompson@lacity.org](mailto:david.thompson@lacity.org)>

Cc: Hackett, Jeff@CalRecycle <[Jeff.Hackett@calrecycle.ca.gov](mailto:Jeff.Hackett@calrecycle.ca.gov)>

Hi David,

Title 27, Section 20686 – Beneficial Reuse: *Beneficial reuse of **solid wastes** at a solid waste landfill shall include, but not be limited to, the following: alternative daily cover, alternative intermediate cover, final cover foundation layer, liner operations layer, leachate and landfill gas collection system, construction fill, road base, wet weather operations pads and access roads, and soil amendments for erosion control and landscaping.*

Clean soil is not a solid waste.

Title 14, Section 18801.1 - Use of Soil for Alternative Daily Cover, Alternative Intermediate Cover, or Beneficial Reuse: ***Beneficial reuse does not include the use of clean or contaminated soil segregated prior to receipt by a landfill; however, loads of materials reused beneficially may include small amounts of soil (such as found in construction and demolition waste loads). For the purpose of this Article,***

*amounts of other beneficial reuse shall be reported separately from amounts of alternative daily cover and from amounts of alternative intermediate cover.*

So you are correct in your interpretation that clean soil would not be considered as beneficial reuse.

-Ben

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**From:** David Thompson <[david.thompson@lacity.org](mailto:david.thompson@lacity.org)>  
**Sent:** Thursday, March 26, 2020 12:11 PM  
**To:** Hackett, Jeff@CalRecycle <[Jeff.Hackett@CalRecycle.ca.gov](mailto:Jeff.Hackett@CalRecycle.ca.gov)>; Escotto, Benjamin@CalRecycle <[Benjamin.Escotto@calrecycle.ca.gov](mailto:Benjamin.Escotto@calrecycle.ca.gov)>  
**Subject:** Beneficial Reuse

[[ EXTERNAL ]]

Hello Jeff and Ben,

I have been asked for clarification if incoming clean soil to a landfill would be considered as beneficial reuse. After reviewing the regulations, there is not a very clear definition as to what materials are considered to be beneficial reuse, except that they are solid wastes. In my experience this is usually applied to inert debris used as road base or green mulch used as erosion control. Clean soil would not be considered to be a solid waste, so therefore it would not be considered as a beneficial use at a landfill.

If you could please confirm if this is a correct interpretation of the regulations or not. If I am missing something, please let me know.

Thank you,

David

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David Thompson, Program Manager

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