



# REGULATED SUBSTANCES STANDARD OPERATING PROCEDURES (SOPs) TRAINING FOR CMs AND REs

# OUTLINE

- What encompasses Regulated Substances?
- CCDD vs. Landfill: Differences in Soil Disposal Requirements
- CCDD vs. Landfill: Typical Soil Testing Parameters
- Soil Management Requirements
- Relevant PAY ITEMS for Special Waste
- Regulated Substances Pre-Construction Plan (RSPCP), Regulated Substances Monitoring, and Regulated Substances Final Construction Report (RSFCR)
- Conclusion and Key Takeaways
- Frequently Asked Questions
- Q&A Discussion

# Changes for CDOT CMs & REs (Regarding Regulated Substances)

## Contact Regarding Regulated Substances:

Reach out directly to both for QA Services:

- **Adam Kittler**

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Phone: 630-684-4429 / 224-423-3500

- **Cory Wilson**

E-mail: [cory.wilson@gza.com](mailto:cory.wilson@gza.com)

Phone: 630-684-4445 / 224-471-4732

Questions previously directed to the Department of Assets, Information and Services (AIS) and/or Department of Fleet and Facility Management (2FM) are now to be directed to Adam and Cory. Adam and Cory function as a liaison to AIS and/or 2FM, determining when AIS and/or 2FM should be engaged and will do so on behalf of your project.

# Regulated Substances / Spoils Characterization

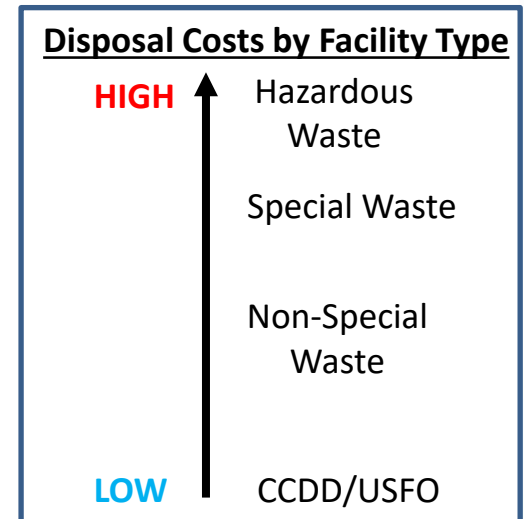
## Regulated Substances Encompasses Multiple Waste Streams:

### Soil/Earthwork

- Clean Construction or Demolition Debris (CCDD)/ Uncontaminated Soil Fill Operation (USFO); (*Clean Fill Material*)
- Non-Special Waste (*Subtitle D Landfill*)
- Special or Hazardous Waste (*Subtitle C*)

### Groundwater

### Asbestos Containing Material (ACM) and/or Lead-Based Paint (LBP) Waste



# Differences in Soil Disposal: CCDD vs Landfill

## CCDD Soil Disposal:

- Soils assessed in design, prior to construction
- Assessment considers Potentially Impacted Properties (PIPs)/Recognized Environmental Conditions (RECs)
- IEPA Form LPC-663 used to certify soils for CCDD disposal; must be signed and stamped by IL licensed P.E. or P.G.; **the CCDD facility must be permitted with IEPA**
- LPC-663 Form included with bid documents

## Landfill Soil Disposal:

- Soil assessed during construction, prior to excavation.
- For (“risk-managed”), or for CCDD-ineligible soil
- Testing parameters are for Subtitle D landfill disposal acceptance and profile (*these are different than CCDD testing parameters*)
- Soil samples collected and analyzed for landfill disposal acceptance are under the pay item **SOIL DISPOSAL ANALYSIS**



# Differences in Soil Testing: CCDD vs. Landfill

## CCDD Soil Testing Parameters (Typ)

Results to be Compared to CCDD Maximum Allowable Concentrations (MACs) in 35 Illinois Administrative Code (IAC) Part 1100

### Approach:

- Is the soil considered clean fill material for reuse? Can the CCDD/USFO meet it's IEPA CCDD permit requirements?
- Results are reported in mg/kg

### Testing Parameters:

- Volatile Organic Compounds (VOCs)
- Semi-Volatile Organic Compounds (SVOCs) or Polynuclear Aromatic Hydrocarbons (PNAs), a subset list of SVOCs
- Resource Conservation and Recovery Act (RCRA) Metals (List of 8: arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver)
- Soil pH (in units of "S.U.")



# Differences in Soil Testing: CCDD vs. Landfill



## Landfill Soil Testing Parameters (Typ)

Soil Results to be Compared to Toxicity Characteristic Maximum Concentrations in 40 Code of Federal Regulations (CFR) 261.24

### Approach:

- Is the soil considered Non-Hazardous
- Results are reported in units of mg/L for the TCLP constituents

### Testing Parameters:

- Toxicity Characteristic Leaching Procedure (TCLP) VOCs
- TCLP SVOCs or TCLP PNAs
- TCLP RCRA Metals (8)
- TCLP Pesticides and TCLP Herbicides
- Total Polychlorinated biphenyls (PCBs)
- Total Phenols
- Reactive Sulfide and Reactive Cyanide
- Paint Filter (in units of "Pass/Fail")
- Flashpoint (in units of "degrees F")
- Corrosivity/pH (in units of "S.U.")

# Differences in Soil Disposal: CCDD vs Landfill

## CCDD Soil Disposal Form (IEPA LPC-663)



Illinois Environmental Protection Agency

2520 West Iles Avenue • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

### Uncontaminated Soil Certification by Licensed Professional Engineer or Licensed Professional Geologist for Use of Uncontaminated Soil as Fill in a CCDD or Uncontaminated Soil Fill Operation LPC-663 Revised in accordance with 35 Ill. Adm. Code 1100, as amended by PCB R2012-009 (eff. Aug. 27, 2012)

This certification form is to be used by professional engineers and professional geologists to certify, pursuant to 35 Ill. Adm. Code 1100.205(a)(1)(B), that soil (i) is uncontaminated soil and (ii) is within a pH range of 6.26 to 9.0. If you have questions about this form, please telephone the Bureau of Land Permit Section at 217/524-3300.

This form may be completed online, saved locally, printed and signed, and submitted to prospective clean construction or demolition debris (CCDD) fill operations or uncontaminated soil fill operations.

#### I. Source Location Information

(Describe the location of the source of the uncontaminated soil)

Project Name: \_\_\_\_\_ Office Phone Number, if available: \_\_\_\_\_

Physical Site Location (address, including number and street): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

County: \_\_\_\_\_ Township: \_\_\_\_\_

Lat/Long of approximate center of site in decimal degrees (DD.ddddd) to five decimal places

Latitude: \_\_\_\_\_ Longitude: - \_\_\_\_\_  
(Decimal Degrees) (-Decimal Degrees)

Identify how the lat/long data were determined:

GPS  Map Interpolation  Photo Interpolation  Survey  Other \_\_\_\_\_

IEPA Site Number(s), if assigned: BOL: \_\_\_\_\_ BOW: \_\_\_\_\_

Approximate Start Date (mm/dd/yyyy): \_\_\_\_\_ Approximate End Date (mm/dd/yyyy): \_\_\_\_\_

Estimated Volume of debris (cu. Yd.): \_\_\_\_\_

#### II. Owner/Operator Information for Source Site

Site Owner

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

PO Box: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Zip Code: \_\_\_\_\_ Phone: \_\_\_\_\_

Contact: \_\_\_\_\_

Email, if available: \_\_\_\_\_

Site Operator

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

PO Box: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Zip Code: \_\_\_\_\_ Phone: \_\_\_\_\_

Contact: \_\_\_\_\_

Email, if available: \_\_\_\_\_

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42). This form has been approved by the Forms Management Center.

Project Name: \_\_\_\_\_ Latitude: \_\_\_\_\_ Longitude: - \_\_\_\_\_

Uncontaminated Soil Certification

#### III. Basis for Certification and Attachments

For each item listed below, reference the attachments to this form that provide the required information.

a. A Description of the soil sample points and how they were determined to be sufficient in number and appropriately located 35 Ill. Adm. Code 1100.610(a):

b. Analytical soil testing results to show that soil chemical constituents established pursuant to 35 Ill. Adm. Code Part 1100, Subpart F and the documentation of chain of custody control, a copy of the lab analysis; and certification by an authorized agent of the laboratory with the Agency's rules for the accreditation of environmental and the (g), 1100.205(a), 1100.610:

This will be completed in design, to be signed/stamped by Environmental Professional

#### IV. Certification Statement, Signature and Seal of Licensed Professional Engineer or Licensed Professional Geologist

I, \_\_\_\_\_ (name of licensed professional engineer or geologist) certify under penalty of law that the information submitted, including but not limited to, all attachments and other information, is to the best of my knowledge and belief, true, accurate and complete. In accordance with the Environmental Protection Act [415 ILCS 5/22.51 or 22.51a] and 35 Ill. Adm. Code 1100.205(a), I certify that the soil from this site is uncontaminated soil. I also certify that the soil pH is within the range of 6.25 to 9.0. In addition, I certify that the soil has not been removed from the site as part of a cleanup or removal of contaminants. All necessary documentation is attached.

**Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))**

Company Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Phone: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Licensed Professional Engineer or  
Licensed Professional Geologist Signature: \_\_\_\_\_

Date: \_\_\_\_\_

P.E or L.P.G. Seal:

# Differences in Soil Disposal: CCDD vs Landfill

## Landfill Soil Disposal Form (WM as an Example)



EZ Profile™

Requested Facility: \_\_\_\_\_ Profile Number: \_\_\_\_\_  
 Multiple Generator Locations (Attach Locations)  Request Certificate of Disposal  Renewal? Original Profile Number: \_\_\_\_\_

**A. GENERATOR INFORMATION (MATERIAL ORIGIN)**

1. Generator Name: City of Chicago, Dept. of Transportation  
2. Generator Site Address: \_\_\_\_\_  
(City, State, ZIP) Chicago, IL  
3. County: Cook County  
4. Contact Name: \_\_\_\_\_  
5. Email: \_\_\_\_\_  
6. Phone: \_\_\_\_\_ 7. Fax: \_\_\_\_\_  
8. Generator EPA ID: \_\_\_\_\_  N/A  
9. State ID: \_\_\_\_\_  N/A

**B. BILLING INFORMATION**  SAME AS GENERATOR

1. Billing Name: \_\_\_\_\_  
2. Billing Address: \_\_\_\_\_  
(City, State, ZIP) \_\_\_\_\_  
3. Contact Name: \_\_\_\_\_  
4. Email: \_\_\_\_\_  
5. Phone: \_\_\_\_\_ 6. Fax: \_\_\_\_\_  
7. P.O. Number: \_\_\_\_\_  
8. Payment Method:  Credit Account  Cash  Credit Card at Gate

**C. MATERIAL INFORMATION**

1. Common Name: Construction debris from alley, sidewalk & roadway projects  
Describe Process(es) Generating Material:  See Attached  
2. Material Composition and Contaminants:  See Attached  
1. Urban Fill 50  
2. Loose Soil 49  
3. Concrete & CA-6 1  
4. \_\_\_\_\_  
Total comp. must be equal to or greater than 100%  ≥100%  
3. State Waste Codes: \_\_\_\_\_  N/A  
4. Color: brown  
5. Physical State at 70°F:  Solid  Liquid  Other: \_\_\_\_\_  
6. Free Liquid Range Percentage: \_\_\_\_\_ to \_\_\_\_\_  N/A  
7. pH: \_\_\_\_\_ to \_\_\_\_\_  N/A  
8. Strong Odor:  Yes  No Describe: \_\_\_\_\_  
9. Flash Point:  <140°F  140°-199°F  ≥200°  N/A

**E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION**

1. Analytical attached  Yes  
Please identify Lab Report(s) and list specific representative Sample ID#s:  
\_\_\_\_\_  
2. Other information attached (such as SDS)?  Yes

**G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)**

By signing this Waste Management ("WM") Profile, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that relevant information necessary for proper material characterization and to identify known or suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261.1 - Appendix E or by using an equivalent method. All change occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to WM prior to providing the material to WM. I am aware that there are significant penalties for knowingly submitting false information.

I am authorized to sign on behalf of the Generator and I have confirmed with the Generator that information contained in this profile, as well as supporting documents provided, are accurate and complete.  
 I am a duly authorized employee of Generator holding a position of technical responsibility with direct knowledge of the waste stream and the information contained in this profile, and I confirm that information contained in this profile, as well as supporting documents are accurate and complete.

**QUESTIONS? CALL 800 963 4776 FOR ASSISTANCE**

Contractor responsible for excavation/soil hauling



Profile Addendum: State of Illinois  
GENERATOR'S NON-SPECIAL WASTE CERTIFICATION

**F. Additional Waste Stream Information**

Profile Number: \_\_\_\_\_  
Generators Name: City of Chicago, Department of Transportation  
Generators SITE Address: \_\_\_\_\_  
(The location where the waste is generated)  
Waste Name: \_\_\_\_\_

The Illinois Environmental Protection Act allows a Generator to certify that their pollution control waste or industrial process waste, is not an Illinois Special Waste (Section 3.45). By completing the following questionnaire, you may certify that the waste stream represented by the Waste Management Profile referenced above is not an Illinois Special Waste as defined in the Act.

Is the waste referenced above any of the following:

1. A Potentially Infectious Medical Waste (PIMW)?  Yes  No  
2. A Hazardous Waste as defined in 40 CFR 261 or in 35 IAC 722.111?  Yes  No  
3. A Liquid Waste (fails the paint filter test as defined in 35 IAC 811.107)?  Yes  No  
4. A regulated PCB waste as defined in 40 CFR 761?  Yes  No  
5. A NESHAP regulated asbestos waste other than waste from renovation or demolition?  Yes  No  
6. A waste resulting from the shredding recyclable metals (auto fluff)?  Yes  No  
7. A delisted Hazardous Waste or Treated Characteristic Hazardous Waste, subject to LDR requirements under 35 IAC 728.107?  Yes  No

In determining that this waste is not a liquid, I have used knowledge of the processes generating the waste and the attached supporting documentation:  MSDS  Analytical  Other (explain below): \_\_\_\_\_

In determining that this waste is not RCRA hazardous, I have used knowledge of the processes generating the waste and the attached supporting documentation:  MSDS  Analytical  Other (explain below): \_\_\_\_\_

8. Is the waste represented by this profile sheet exempt from Illinois Solid Waste Management Act fee?  Yes  No  
Select option:  Pollution Control Waste  Other \_\_\_\_\_

By signing below, I certify my waste is NOT an Illinois Special Waste, and that I understand that a person who knowingly and falsely certifies that a waste is not special waste is subject to the penalties set forth in subdivision (6) of subsection (h) of section 44 of the Illinois Environmental Protection Act.

Name: (Print) \_\_\_\_\_ Title: \_\_\_\_\_  
Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signed by  
Generator (CDOT)



# Relevant Special Waste Pay Items

**SP 202-2** Refers to CDOT CODED PAY ITEM to include on CDOT Local Projects

IDOT PAY ITEM (CDOT PAY ITEM)	IDOT CODED PAY ITEMS TITLE (CDOT CODED PAY ITEMS)	UNIT	DESCRIPTION OF PAY ITEM
20200100 (SP 202-2)	EARTH EXCAVATION (EARTH EXCAVATION (SOIL TO CCDD))	CU YD	Used for earthwork excavation, specifically to provide payment for CCDD-eligible soil. CCDD testing and LPC-663 form to be completed in design (not in construction). <b>CDOT CODED PAY ITEM</b> only used for <b>CDOT Local Projects</b> .
66900105	UNDERGROUND STORAGE TANK REMOVAL	EACH	Design will include this PAY ITEM only when UST is anticipated to be encountered during construction.
66900200 (SP 202-2)	NON-SPECIAL WASTE DISPOSAL (EARTH EXCAVATION (SOIL TO LANDFILL))	CU YD	Used for disposal of CCDD-ineligible soil. The soil testing for this will be included in "SOIL DISPOSAL ANALYSIS" and is exclusively for landfill waste characterization for Non-Hazardous/Non-Special Waste disposal. <b>CDOT CODED PAY ITEM</b> only used for <b>CDOT Local Projects</b> .
66900205	SPECIAL WASTE DISPOSAL	CU YD	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66900210	HAZARDOUS WASTE DISPOSAL	CU YD	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66900400	SPECIAL WASTE GROUNDWATER DISPOSAL	GALLON	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66900425	HAZARDOUS WASTE GROUNDWATER DISPOSAL	GALLON	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66900530	SOIL DISPOSAL ANALYSIS	EACH	Used for landfill waste characterization sample collection and analysis. Work with QA to provide overview, guidance, and split sampling alongside contractor's Environmental Professional.
66900575	VOCS GROUNDWATER ANALYSIS	EACH	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66900580	SVOCS GROUNDWATER ANALYSIS	EACH	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66900605	RCRA METALS GROUNDWATER ANALYSIS	EACH	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66901000	BACKFILL PLUGS	CU YD	Design will include this PAY ITEM only when this is required for construction.
66901001	REGULATED SUBSTANCES PRE-CONSTRUCTION PLAN (RSPCP)	L SUM	Design will include this PAY ITEM for projects which will require earthwork/earth excavation. This plan should be prepared by the contractor's Environmental Professional and details the soil and/or groundwater disposal plans, Health and Safety Plan, dust and site control methods, and erosion control. Work with QA to provide review and approval of the RSPCP using IDOT form BDE 2730.
66901003	REGULATED SUBSTANCES FINAL CONSTRUCTION REPORT (RSFCR)	L SUM	Design will include this PAY ITEM for projects which will require earthwork/earth excavation. This plan should be prepared by the contractor's Environmental Professional and details the volume of soil and/or groundwater disposal, disposal load tickets, regulated substances monitoring results, daily observations, and environmental challenges. Work with QA to provide review and approval of the RSFCR using IDOT form BDE 2733.
66901004	HERBICIDES SOIL ANALYSIS	EACH	Design will include this PAY ITEM only when Phase II Environmental Report(s) indicate this is required for construction.
66901005	ENGINEERED BARRIER	SQ YD	Design will include this PAY ITEM only when this is required for construction.
66901006	REGULATED SUBSTANCES MONITORING	CAL DA	Design will include this PAY ITEM for projects which will require earthwork/earth excavation. The Environmental Professional will use IDOT form BDE 2732 to include On-Site Daily Monitoring observations and tracking of soil and/or groundwater disposal and incoming fill. QA will review this completed form during the RSFCR review.

# IDOT BDE Forms for Soil Management



## Regulated Substances Pre-Construction Plan (RSPCP)

E-mail    Reset Form

The Contractor shall complete this Regulated Substances Pre-Construction Plan (RSPCP), describing the methods and manners in which regulated substances will be managed during construction activities. The RSPCP is applicable to all contractor specific work areas. The Site Contamination Health and Safety Plan (SCHASP), an attachment to the RSPCP, shall pertain to the Contractor, state employees, and any visitors at the work area. After acceptance of the RSPCP, the Contractor shall be responsible for monitoring and reporting any detected area shall immediately cease and the Contractor shall not resume until BDE/D1 ESU issues written instructions and those instructions are not eligible to conduct regulated substances monitoring until the BDE 2730 form is submitted.

Contractor's EP to complete if RSPCP pay item provided

The BDE 2730 form should be submitted from the edit enabled BDE 2730. Attachment BDE 2730 should be provided separately from the submittal package.

### Section 1.

#### A. Project Information

District	Route	Marked Route	Section	Letting Date
IDOT Job Number		County	Municipality(ies)	
Scope of Work				
Land Use in Area <input type="checkbox"/> Urban/Industrial <input type="checkbox"/> Residential <input type="checkbox"/> Agricultural <input type="checkbox"/> Other				
Contract Number	PESA(s)	PESA Date(s)	Prime Contractor	
Prepared By	Firm	E-mail	Phone	
Illinois Department of Transportation (IDOT) Use Only				
BDE Sequence Number	Date Received by RE	Date Received by DESU	Date Received by BDE	
Requesting Entity	PSI Number/RMP Number	Revision		

#### B. Endorsement

This plan must be approved by an Illinois licensed Professional Engineer (PE) or Professional Geologist (PG).

Print Name	Title	Company/Firm
<input type="checkbox"/> By checking this box and typing my name below, I acknowledge this plan has been approved by an Illinois licensed Professional Engineer (PE) or Professional Geologist (PG).		
Signature	Date	
IL PE/PG Registration Number	IL PE/PG License Expiration Date	

- If “REGULATED SUBSTANCES PRE-CONSTRUCTION PLAN” was included as a PAY ITEM, the EP will complete this BDE 2730 form
- Provides plans for soil management (volume, areas of contamination, disposal destination(s))
- Provides plans for Health & Safety during excavation work
- Provides plans for management of groundwater, storm water, and erosion control
- RE will review and approve completed RSPCP prior to construction
- **Takeaway:** *engage CDOT QA to review this form, if needed*

# IDOT BDE Forms for Soil Management



## Regulated Substances Monitoring Daily Record (RSMDR)

E-mail    Reset Form

A Regulated Substances Monitoring Daily Record (RSMDR) shall be completed for each day of on-site regulated substances monitoring work and submitted to the Resident Engineer (RE) by the designated environmental professional who completed the monitoring work for all work areas regulated under Section 669 of the Standard Specifications for Road and Bridge Construction (SSRBC).  
**The BDE 2732 forms are to be submitted as edit disabled (flat) PCFs without additional embedded attachments.**

### Section 1 - Project Specific Information

District	Date	Contract Number	Route	Marked Route
Description		Excavation Contractor	Requesting Entity	
On-Site Monitoring Personnel		Monitoring Company/Firm		

### Section 2 - Daily Monitoring Calibration Record

Start Time (24 hr format)	End Time (24 hr format)	RE/RT Assigned to the Project
---------------------------	-------------------------	-------------------------------

### Contractor's Field Screening Equipment

Equipment Used On Site	Model No.	Serial No.	Equipment Operator	Firm's			
FID/PID Calibration Gas (Include Bump Checks)	Time (24 hr)	Calibrated Reading (MU)	Background Reading (MU)	Weather	Wind Speed and Direction	Temp. (F)	Cond

Note: The FID/PID should be calibrated regularly, including: the start of work day, significant temperature changes, pre-change in wind direction, change in barometric pressure or humidity, change in work location, non-zeroing meter, equipment etc.

### Section 3 - Planned Activities / Deviations

Provide a narrative of the activities completed during the daily regulated substances monitoring activities including Special P monitored.

Provide a narrative of deviations from Regulated Substances Special Provisions including management changes or disposal changes.\*

\*Note: Areas shown in Regulated Substances Special provision shall not be reduced without prior approval from BDE/D1.

### Section 4 - Acknowledgment by Personnel Conducting Regulated substances Monitoring

By checking this box and typing my name below, I acknowledge this form is accurate and complete to the best of my knowledge.

Prepared by	Company/Firm	Date
-------------	--------------	------

Contractor's EP to complete with daily monitoring observations

- If "REGULATED SUBSTANCES MONITORING" was included as a PAY ITEM, the EP will complete this BDE 2732 form each day
- Provides soil management documentation (volume, areas of contamination, disposal destination(s))
- Provides observations from excavation work
- RE will review and approve these as included in completed RSFCR
- **Takeaway:** *engage CDOT QA to review this form, if needed*

### Section 5 - Regulated Substances Daily Monitoring Oversight Record

Regulated Substances Daily Construction Oversight Record												
Time (24 Hr)	Station From/ To (include off-set)	PESA Site Number/Site Location	BDE/D1 Classification from Special Provision	PID/FID Reading (MU)	PID/FID Reading Location	Estimated Volume (CY)	Management Method	Management Location/Facility	Manifest Number (If applicable)	Landfill Weight Ticket Number	Disposal Weight (Tons)	Notes
1												
2												
3												
4												
5												

Notes (Reference the row number from above)

NSW Landfill - Non-Special Waste Landfill (manifest not required)  
 SW Landfill - Special Waste Landfill (manifest required)  
 HW Landfill - Hazardous Waste Landfill (manifest required)  
 CCDD - Clean Construction / Demolition Debris  
 USFC - Uncontaminated Soil Fill Operation  
 TESP Stage - Temporary Staging/Stock piling  
 \*All IDOT Project - with the same MSA restrictions and approved by both (sending & receiving) project engineers. Provide a copy of the approval letter from both project engineers.  
 Other - Provide a full description and copy of written authorization for alternative disposal method.  
 MU - Meter Unit  
 CY - Cubic Yard

Notes:  
 If material from one area is managed in multiple ways, i.e. (a)(2) material is partially used on site and the remaining volume is taken to CCDD, use multiple lines to document how the material was managed.

Material loaded onto trucks, or equivalent, after the NSW landfill, CCDD, etc. has closed is not considered "temporarily staged material" subject to SSRBC 669.07, provided material is disposed the next day.

Use the daily Photograph Log (Below) to reference specific rows from above using the "Oversight Record Reference Row" space provided on the Photograph Notes (below).

Edits to a daily log shall only be made by the person who completed the daily monitoring. Edits shall be lined out, initialed, and dated such that the original text remains legible.

### Duties of Personnel Implementing Regulated Substances Construction Monitoring:

- \* Accurately read, understand, and implement engineering contract plans, regulated substances special provision and BDE 2730/2730A.
- \* Field screening for potential contaminants associated with regulated substances in real-time using field instrumentation. Typically, PID/FID is used but other instruments may be required based on the nature of regulated substances present or suspected.
- \* Accurately document the management of materials with regards to the project requirements. This includes accurately marking areas of regulated substance, and confirm that the materials excavated are manifested and sent to their proper disposal facilities (CCDD, non-special waste landfill, etc.) Notify the Resident Engineer (RE) of any deviations from the BDE/D1 Special Provision immediately.
- \* Observe and document soil destined for CCDD to verify materials will meet entrance criteria with respect to volatile organic compounds and other forbidden materials, as required by 35 Ill. Admin. Code 1100.
- \* All BDE 2732 forms are to be filled out completely and no sections are left blank.
- \* Accurately document how the areas containing regulated substances were managed. Notify RE of any soil or groundwater managed differently than listed in the BDE Regulated Substances Special Provision immediately.
- \* Notify RE of any unexpected regulated substances or other conditions that differ from the expected conditions in the Regulated Substances Special Provision, and immediately engage the District Environmental Studies Unit (DESU).
- \* Verify, in real time, the conditions encountered during construction are consistent with the classification(s) issued by D1 ESU/BDE.
- \* Complete BDE 2733, (Regulated Substances Final Construction Report).

# IDOT BDE Forms for Soil Management

- If “REGULATED SUBSTANCES FINAL CONSTRUCTION REPORT” was included as a PAY ITEM, the EP will complete this BDE 2733 form
- Provides FINAL soil management report (volumes, disposal destination(s), excavation issues, monitoring results)
- RE will review and approve completed RSFCR for final payment
- **Takeaway:** *engage CDOT QA to review this form, if needed*



## Regulated Substances Final Construction Report (RSFCR)

E-mail    Reset Form

The Contractor shall complete and submit one electronic, and editable, PDF copy of the Regulated Substances Final Construction Report (RSFCR) to the Resident Engineer (RE) describing the regulated substances related activities conducted during the life of the project. The BDE 2733 form should be submitted as an edit enabled PDF. The attachments to BDE 2733 should be provided separately from the edit enabled BDE 2733. Attachments shall be provided as a separate PDF document of the submittal package. BDE 2732 forms are to be submitted as edit enabled PDF documents.

Contractor's EP to complete if RSFCR pay item provided

**Section 1.**

**A. Project Information**

District Route  Letting Date

IDOT Job Number  County

Contract Number  PESA(s)  Prime Contractor Firm  Date(s) BDE 2730/2730B Accepted

Prepared By  Firm  E-mail  Phone

*Illinois Department of Transportation (IDOT) Use Only*

BDE Sequence Number  Date Received by RE  Date Received by DESU  Date Received by BDE

Requesting Entity  PSI Number/RMP Number  Revision Number

**B. Endorsement**

Print Name  Title  Company/Firm

By checking this box and typing my name below, I acknowledge this document and all attachments were prepared under my direction or supervision in accordance with a process designed to assure that designated environmental professionals accepted by IDOT on the BDE 2730 properly gathered and evaluated the submitted information. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submitted information is true, accurate, and complete to the best of my knowledge.

Signature  Date

IL PE/PG Registration Number  IL PE/PG License Expiration Date

**C. Environmental Firm Completing Regulated Substances Work**

List personnel and firm name that conducted monitoring on the regulated substances project.

Designated Environmental Professional Name  Company/Firm  Date Accepted on BDE 2730/2730B by BDE/D1 ESU

Add Personnel    Remove Personnel

Revision Number  Contract Number

**Section 2.**

**A. Summary of Work Completed**

1. Mark all regulated Substances Management concerns based on special provision memo.

NSW Mgmt  CY     SW Mgmt  CY     HW Mgmt  CY

669.05(a)(2-4) Mgmt  CY     669.05(b)(c) Mgmt  CY     Another IDOT Project

Railroad Ties  Engineered Barriers  Backfill Plugs  CY

UST Removal #      Radiation Monitoring  Groundwater Mgmt  gal

Monitoring Well Abandonment     Landfill Waste Disposal Characterization Sample(s)

Number of samples collected for landfill waste disposal characterization

Number of days regulated substances were monitored in the field

Other, describe below

1a. How was Cubic yardage determined? (Acceptable methods to determine Cubic Yardage include: calculations conducted by the RE based on field measurements, volumes provided by the RE or direct information from site drawings.)

2. The Contractor shall provide a narrative discussing the regulated substances concerns on the project and how they were addressed. Indicate areas that did not require monitoring and provide the rationale for omission. (Best management practice: list each regulated substances special provision in the order they appear, and how the material was managed in the field.)

3. Was regulated substances material temporarily staged during the construction project in accordance with Section 669.07?

Yes     No

Written approval of temporary staging is required through the BDE 2730/BDE 2730A for soils classified by BDE/D1 as 669.05(a)(1), 669.05(a)(3), 669.05(a)(4), 669.05(a)(5), 669.05(a)(6), 669.05(b)(2) or 669.05(d).

Provide a narrative of how soil and groundwater were staged in accordance with the approved BDE 2730/BDE 2730A and in accordance with BDE 2730 and Article 669.07. Include a discussion: (1) of the source location(s), (2) of staged material(s), stationing and PESA site numbers, (3) the source area special provision classifications provided by BDE/D1, (4) where soils were staged, (5) types of containerization or barriers and cover used, (6) regulated setback zones from water supply wells and sensitive environmental receptors.

Provide a narrative of the final disposition of temporarily staged materials. For materials classified as 669.05(a)(5) or 669.05(a)(6), include dates when temporary staging started and ended. Note: Material that is staged overnight is considered temporarily staged. Material preloaded onto trucks, or equivalent, after the NSW landfill, CCDD etc. has closed is not considered temporarily staged material subject to SSRBC 669.07, provided material is disposed the next day.

**B. Project Details**

1. Describe the measures taken to mark areas containing regulated substances, manage, and dispose of soil and/or groundwater containing regulated substances to prevent further migration of regulated substances and to protect workers. This information shall be provided as **Attachment 1**.

2. Provide Regulated Substances Daily Monitoring Records (BDE 2732). Each BDE 2732 shall be signed by the designated environmental professional completing the regulated substances monitoring. BDE 2732s are to be filled out completely and sections are not to be left blank.

3. Were there deviations from the Contract regulated substances special provisions, or accepted RSPCP, for soil and groundwater management?

Yes     No

If yes, describe below.



# Key Takeaways

- ❑ There are differences in the requirements for CCDD Soil Disposal and Landfill Soil Disposal
  - CCDD Soil Testing to be completed in Design; testing parameters different than Landfill requirements
  - Landfill Soil Testing to be completed in Construction (using SOIL DISPOSAL ANALYSIS pay item); testing parameters consider concentration of contaminants in *landfill leachate*
- ❑ Be sure to **engage the Contractor and their Environmental Professional prior to construction to ensure Soil Management plans are prepared**
  - Pay Items “REGULATED SUBSTANCES PRE-CONSTRUCTION PLAN”, “REGULATED SUBSTANCES MONITORING”, and “REGULATED SUBSTANCES FINAL CONSTRUCTION REPORT” are used
  - **RE to keep track of soil management using appropriate CDOT and/or BDE forms**
- ❑ **Coordinate with CDOT Regulated Substances QA throughout project for confirmation on approach and requirements to ensure proper Spoils Management and reduce/eliminate expensive change orders.**



# Frequently Asked Questions

**Q:** When should the construction team (PM, CM, RE) engage CDOT QA for soil split sampling?

**A:** For State (IDOT) Jurisdiction projects, CDOT QA should always be present for soil split sampling.

For local City projects, it is on an as-needed-basis.

# Frequently Asked Questions

**Q:** Why is the CCDD/USFO dump facility saying that we need an Engineer's Statement on the LPC-663 CCDD Certification for my project? What does this mean?

**A:** Some Chicago area CCDD/USFO facilities require this if more than 2 years have elapsed since CCDD testing was completed.

Engineer's Statement simply entails conducting renewed due diligence on the project (e.g., has the land use changed that could have introduced soil contamination in the last 2 years?).

# Frequently Asked Questions

**Q:** The contractor wants to have their Environmental Professional (EP) Consultant collect additional CCDD samples on the project. Can we have them collect these additional samples?

**A:** Unless major omissions were made in the bid documents (Regulated Substances pay items), we don't recommend additional CCDD samples. Contractor should only collect waste characterization (Landfill Profile) samples under "SOIL DISPOSAL ANALYSIS".

**Questions or Feedback?**