

# Changes in CCDD & Uncontaminated Soil Operations

Impact of new rule on  
CCDD/USFO Facilities





# Overview

- Approving a source site for acceptance
- Load acceptance and inspection procedures
- Handling a rejected load



# Source site approval

- Every facility is different, approval process varies for a receiving facility
- Check with the individual receiving facility for minimum approval requirements
- Be prepared that your LPC - 662 / 663 may not be accepted



# Due Diligence

- Varies by receiving site
  - Historical property research (public and private database reviews), site walkthrough/assessment, review of data
  - Additional analytical testing may be required based on findings
  - More information that can be provided up front - the better



# A Due Diligence checklist

- Are there any recognized environmental conditions present?
- For PIPs, was the number of samples and type of analysis appropriate?
- Did a PID screen indicate elevated readings and potential contamination?
- Do portions of the site require exclusion or additional investigation?
- What are the requirements of the receiving facility?



# Evaluating the information

- Age of sample data?
- Volume and type of material
  - Boring logs available?
  - Urban fill layers
- Is the adjacent property a PIP?
- PID readings available?
  - Verify VOC analytical
- Presence of non-conforming debris
- Presence of a suspicious odor
- What kind of analytical data is available?
  - Waste characterization
  - Totals
  - SPLP/TCLP



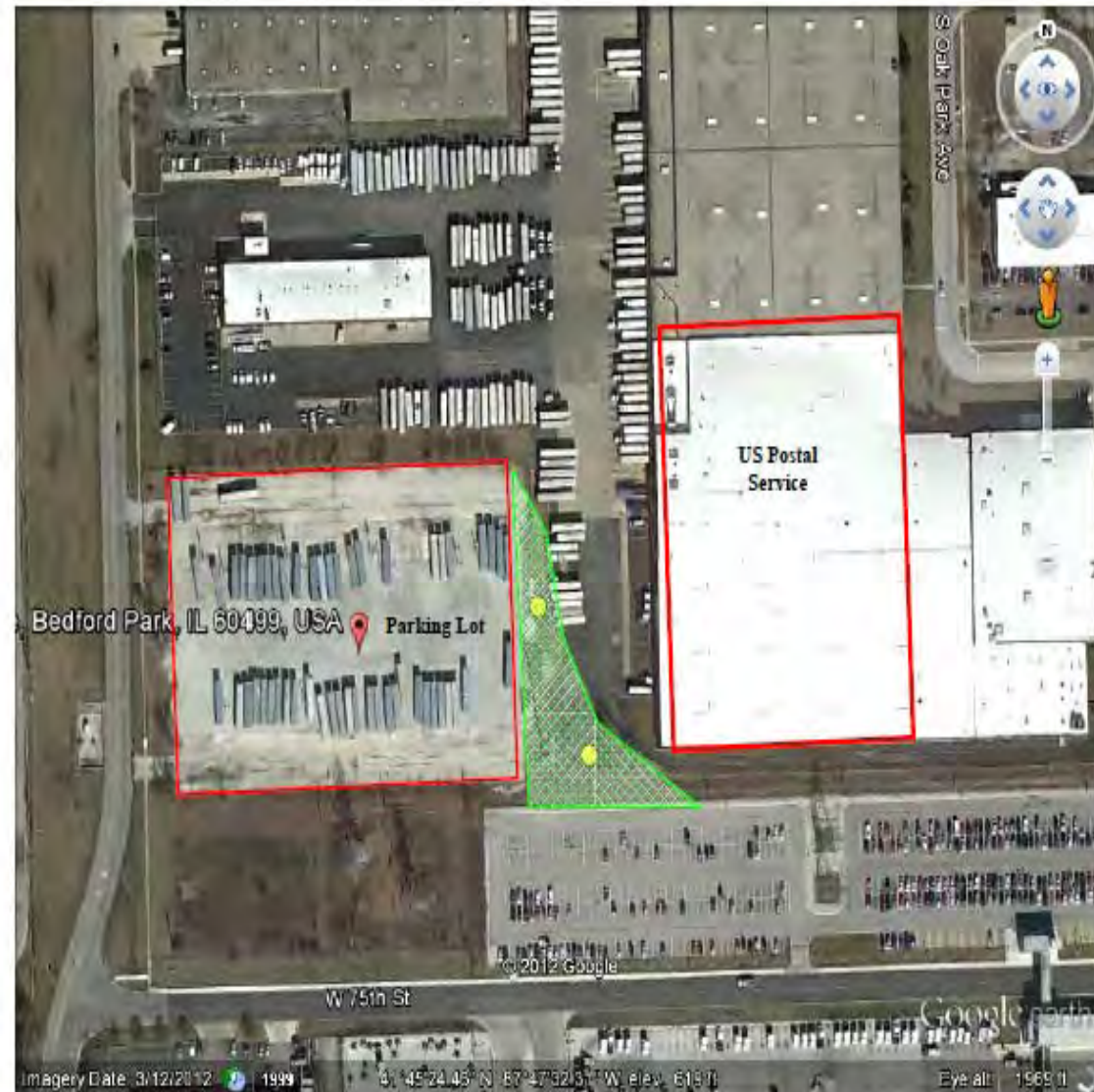
# PIP scenario

## ■ LUST incident

- Is the incident open, closed, or closed in place?
- Is the sampling of the soil representative?
  - Was there enough sampling done to delineate the affected area?
- Is the excavation part of a site cleanup activity?
  - Material cannot be taken to a CCDD or USFO site
- What is the policy of the CCDD/USFO site you are trying to use with respect to a LUST incident?

# PIP Scenario

- Chromium (totals) above MAC
- Chromium (extraction) below MAC levels
- TCE contamination
- GW contamination
- Phase II ESA performed





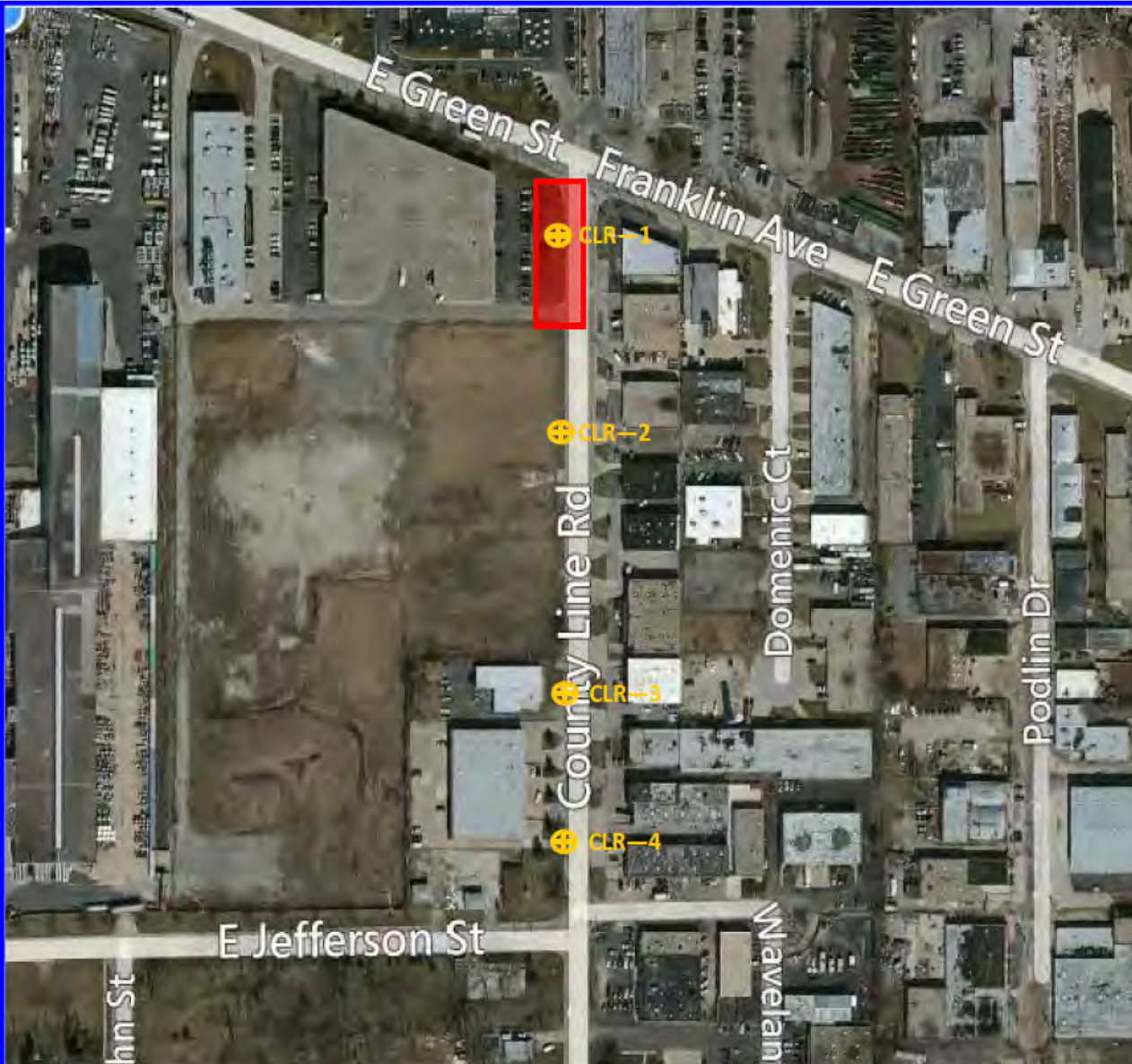


# PIP Scenario

## Excerpts from a LPC - 663

- *The sample results identified in the report were derived from a composite sample taken and analyzed for RCRA metals and PNAs. The consultant identified the subject property as non-residential in nature.*
  - The receiving facility identified the subject property as potentially impacted.
- Based on the current and historical use of the subject property, and properties adjacent to the subject properties, a LPC-663 certification is required. This certification must include data which is not analyzed from a composite sample.
- *Not all LPC-663 forms are completed properly!*

# PIP Scenario



- Location 1: Chromium totals and SPLP above MAC
- Location 3: No hits
- How can we define the plume of contamination?
- What parts are actually clean?



# PIP Scenario



- Extent of arsenic contaminated area relative to excavation area
- Is the arsenic plume well defined and understood?



# Other impacts of the Rule change

- What is the receiving site's requirements for pH testing?
  - Are field instruments acceptable?
  - Is an accredited laboratory requirement in place to demonstrate pH compliance?



# Inspection Procedures

- PID/FID – Every load
  - Detects Volatile Organic Compounds (VOCs)
  - Not compound specific
  - Interpreted based on the manufacturer's margin of error
    - Varies between PID units
  - Reject for readings in excess of background and margin of error
- Visual inspection
  - Elevated structure
  - Designated ground point (or Agency approved location specified in permit)
- Olfactory inspection



# Random Load Inspection

- A CCDD/USFO facility is required to perform at least one (1) random load inspection on a daily basis
  - Load is taken to a separate, designated area within the facility and spread out.
  - Material subject to additional PID screening and additional visual inspection
  - Results must be documented



# Rejected Loads

- Facility must report rejected loads to the Illinois EPA.
- Rejected loads can be accepted if the following is obtained by the Facility:
  - Copy of written notice of rejection
  - Handling information pertaining to rejected load
  - Additional testing data for rejected material or documentation of removal of non-conforming debris
  - Certification for rejected material (does not apply to loads rejected for non-CCDD or non-soil)
    - Can be certified by P.E., P.G., source site owner, or source site operator



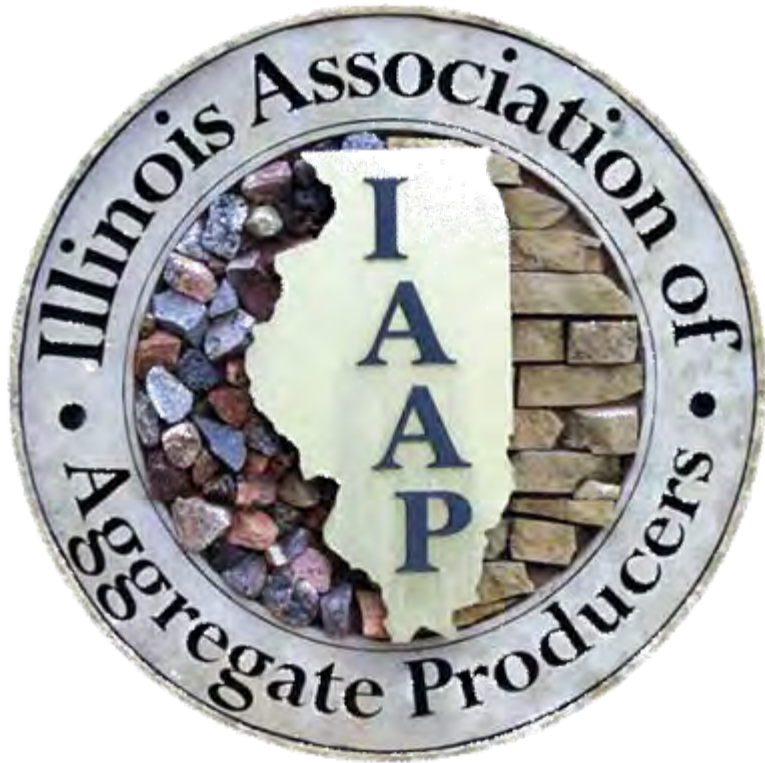
# Rejected Loads

- Each CCDD/USFO Facility may approach this material differently
- From the Illinois EPA's CCDD Webpage:
  - Please note: The CCDD/USFO Facility may reject any load at their own discretion. The responsibility falls to them to make sure only CCDD and uncontaminated soil are accepted for fill.



# Thank You

- Questions?



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