



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

March 12, 2015

CIRCULAR LETTER 2015-05

SPECIAL WASTE SAMPLING

COUNTY ENGINEERS/SUPERINTENDENT OF HIGHWAYS
MUNICIPAL ENGINEERS/DIRECTORS OF PUBLIC WORKS/MAYORS
CONSULTING ENGINEERS

Chapter 20-12 of the Bureau of Local Roads and Streets (BLRS) Manual discusses Special Waste Procedures required by environmental regulations during the engineering phase for a project. More specifically, BLRS Manual Section 20-12.04 discusses the Preliminary Environmental Site Assessment (PESA) requirements.

According to Section 20-12.04, if no Recognized Environmental Condition (REC) is present on a Potentially Impacted Property (PIP), this should be documented in the Project Development Report and no further action is necessary. However, if a REC is present on a PIP and the site cannot be avoided by the project, a Preliminary Site Investigation with soil testing is required.

Soil materials which must be removed from a non-REC property on the project may be taken to a Clean Construction or Demolition Debris (CCDD) facility for disposal. These soil materials will be tested for hazardous materials prior to disposal at the facility and may be rejected. Soil materials which must be removed from a REC property on the project must be taken to an approved landfill facility.

In urbanized areas, the potential for occurrence of a REC on project properties is increased due to the nature of the use of properties within urbanized areas. The databases and historical information used to develop the PESA reports will capture all known instances of hazardous materials present on a property. However, these databases cannot track unknown hazardous materials, spills, and transfer of materials between locations. Without proper testing of the soils on a non-REC site during the engineering phase of a project, there are no guarantees a hazardous material will not be uncovered during project implementation.

The practice (while not required) of soil testing all REC and non-REC properties impacted by a project during the engineering phase, with full disclosure of the testing results included as part of the contract bid documents, can greatly reduce the risks assumed by all contractors placing bids on the project implementation. The reduction in risk to the contractors may more than offset the cost to the project owner for conducting the additional soil testing during the engineering phase.

Circular Letter 2015-05
Page 2
March 12, 2015

This practice can also reduce construction delays and costly project overruns if the contractor is forced to find an alternative location to dispose of the materials taken off the project construction site.

At a minimum, the local public agency should be completing and signing an Illinois EPA Form 662 for those parcels that were determined to be non-REC, will have soil removal, and were not tested for special waste. In order for a contractor to take soil material from a non-REC site to a CCDD facility, they must have a completed and signed Illinois EPA Form 662. Information on the Illinois Environmental Protection Agency's regulations for CCDD and related forms may be found at:
<http://www.epa.state.il.us/land/ccdd/>

Please contact the BLRS Local Policy unit at DOT.LocalPolicy@illinois.gov with any questions.

Sincerely,

A handwritten signature in cursive script that reads "James K. Klein".

James K. Klein, P.E., S.E.
Acting Engineer of Local Roads and Streets

TP/tw

Attachment

cc: Greg Smothers, Illinois Association of County Engineers
Joe Schatteman, Illinois Municipal League
Bryan Smith, Township Officials of Illinois
Darrell Maxheimer, Township Highway Commissioners of Illinois