



Clean Construction and Demolition Debris - CCDD

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Why do CCDD sites have different Standards?

- ❑ PID Screening Procedure.
- ❑ Not worth the liability
- ❑ Current Law still vague and subject to interpretation.

Senate Bill 3721 signed into law

July 30, 2010

❑ **Uncontaminated soil:** Means soil contains no contaminants in concentrations that:

“pose a threat to human health and safety and the environment.”

❑ Additional rules proposed by IEPA in July 2011

❑ Illinois Pollution Control Board to draft final rules for adoption July 2012.

Why do some P.E. get CCDD approval and others don't - and why do costs vary so much?

- ❑ IEPA has proposed several different definitions of “Clean CCDD” over last few years

- ❑ Soil Testing Procedures are subject to interpretation by P.E. and CCDD site.

Example IEPA changing rule for “Clean CCDD”

- ❑ IEPA published proposed standard for Arsenic at 0.4 mg/kg in May 2011.
- ❑ Typical soils in Chicago Metro Area have average Arsenic concentration of 13.0 mg/kg
- ❑ LRRA worked with industry – Latest IEPA proposal for Arsenic is now 13.0 mg/kg

Example of Wrong Test

- ❑ Typically P.E. has used “Totals” test for Lead – values under 107 mg/kg are OK per TACO Table.
- ❑ Current Proposed IEPA Standard for Lead using Totals Test – 23 mg/kg - Below typical background level for soils in Chicago Metro Area.
- ❑ IEPA allows use of more expensive SPLP or TCLP test in lieu of totals test. Lead under 120 mg/kg usually passes test.

Beware “TACO Most Stringent Rule”

- ❑ Current proposed IEPA rules and recent legislation allow for TACO Background tables to be used for PNA Compounds.

Benzo(a)Pyrene Most Stringent

0.09 mg/kg

Benzo(a)Pyrene Current Rule

0.98 – 2.1 mg/kg

Depending on fill site location.

Example of Cost Saving Techniques

- ❑ PID soil samples during collection for VOC – don't waste money testing if fail.
- ❑ Composite samples of similar soils to reduce testing cost and get more representative data for all soil.
- ❑ Discuss testing plan with selected CCDD site operator prior to sampling

Current Rules Being Considered by IEPA

- ❑ Require Quarries and Mines being filled to have a groundwater monitoring program.
- ❑ Use TACO Tier 1 – Residential Standards as limits for contaminants in soil - for all three pathways:
 - ❑ Groundwater
 - ❑ Inhalation
 - ❑ Ingestion



Thank you

Questions?



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