

# Reclamation Roundtable

## CCDD as a potential for reclamation

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## Topics

- Determining the need and cost of a CCDD
- From a Land permitting Standpoint
- Final Reclamation (Pictures)
- Questions

## Determining the Need and cost of a CCDD or USFO

- Location and reason for having it.
  - Is it to fill areas of a mine for commercial, industrial or residential purposes and this needed in the area (lots of these uses building up in the area). I would always look at the option of just dirt and recycling the concrete and asphalt as a profit center
  - Is in an area that will actually be needed or will you be waiting years to fill and use the property for this use. Always perform a search of the amount of CCDD sites in the area to determine if you will have the customer base you are hoping for.
  - Ensuring that your end use is actually feasible with the material coming in. (huge chunks of concrete will most likely not be a good base to build buildings on.
  - Is it to bring in material to finish of the sloping of a mine and/or topsoil for the final grade (would a USFO work better in this case with less regulations). Also as stated in Title 35:

# Determining the Need and cost of a CCDD or USFO

TITLE 35: ENVIRONMENTAL PROTECTION  
SUBTITLE J: CLEAN CONSTRUCTION OR DEMOLITION DEBRIS  
CHAPTER I: POLLUTION CONTROL BOARD  
PART 1100 CLEAN CONSTRUCTION OR DEMOLITION DEBRIS FILL  
OPERATIONS AND UNCONTAMINATED SOIL FILL OPERATIONS  
SECTION 1100.101 SCOPE AND APPLICABILITY

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**Section 1100.101 Scope and Applicability**

b) This Part does not apply to:

- 1) CCDD or uncontaminated soil that is not used as fill material in a current or former quarry, mine, or other excavation;

This section states, in my opinion, that material brought onto a quarry, mine or other excavation that is either stockpiled for future use (recycling) or used to build berms or hills on non-excavated parts of the facility would be exempt from CCDD rules and regulations

- 4) Current or former quarries, mines, and other excavations that do not use CCDD or uncontaminated soil as fill material;

Again, as in Section (b)(1) above, my opinion is that material brought onto a quarry, mine or other excavation that is either stockpiled for future use (recycling) or used to build berms or hills on non-excavated parts of the facility would be exempt from CCDD rules and regulations

This is only my opinion, but check with your inspector, consultant or IEPA permitting official, for their thoughts on this part of the regulation

# Determining the Need and cost of a CCDD or USFO

- Cost and timing of a CCDD
  - State permits can be expensive so this is where a study needs to be done to ensure your payback for the facility.
    - Cost of a consultant for the project
    - Cost of the equipment needed for the project
    - Cost of the personnel and training of the personnel for the project
  - We all need to consider additional cost if certain regulations that are now being considered pass (i.e. ground monitoring wells and monthly monitoring and testing of those wells)

## Determining the Need and cost of a CCDD or USFO

- Getting a CCDD Permit
  - Can take several months for the state to process the permit application
  - If there are county or city zoning requirements, this can take time to get the proper zoning and or conditional use for the project with the potential to not get this at all so I would make sure you have local approval before applying for the permit
  - A USFO is much easier to get and may be a starting point for getting the CCDD permit and the proper local zoning.

## Determining the Need and cost of a CCDD or USFO

- Once you have the permit
  - Making sure the operation is run in the correct manner that is required in both the regulation and the permit
    - Proper paperwork and forms
    - Testing of loads
    - Extra but always a good idea - Historical checks on sites bringing in material
  - The potential for NOV from the IL EPA if all of these are not being performed

## From a Land Permitting Standpoint

- A CCDD or USFO has the potential to be released from the Surface Mining Permit, but talk with your IL DNR official for their determination.
- Some things to consider
  - Is it non-permitted or permitted soils from the site itself being brought into the CCDD or just outside materials being shipped in.
  - Is your reclamation plan with the IL DNR correct for this type of operation or does your permit need to be amended for the correct reclamation use?
- Potential that if the end use in the IL DNR permit is industrial it can be released, but again, talk with your IL DNR official for the options that you are considering
- This could potentially reduce your reclamation obligations and bonding requirements



## Final Reclamation

Final reclamation of a site can be beneficial for your company as well as the neighboring communities around the site. Whether you use the CCDD, NCSFO, or just reclaiming, the end uses can be profitable for your company or the landowner. It can also be a great way of promoting yourself and the industry to the public and not just leaving an unusable future use for a mine.

## Staring of Final Reclamation



## Working on Final Reclamation



Reclamation finished with trails and a parking lot for a city park



A CCDD Site in 2008



Same CCDD Site in 2018



A Quarry in 2000



Same Quarry in 2018

