

Identifying Environmental Commitments and Tracking Compliance during Construction

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Initial Agency Attempts

2002 – establish Environmental Compliance Reporting (ECR) Program

- **Statewide Environmental Monitors**
- **Commitment Tracking beginning in CEDAR**
- **Focus on ESC & stormwater compliance**

2003 – Organizational shift for ESC & stormwater permitting responsibility

2009 – Agency downsizing, elimination of Environmental Monitors, ECR responsibility transferred to Construction Division

2010–14 – Water Quality Permit staff assist as needed

Round 2 - The Environmental Compliance Assistance Program

2014 & 2015 VDOT Business Plans:

“Strengthen and implement a program for environmental commitments and compliance assistance”

- **Focused attention on construction projects**
 - Define Eligible pool of projects
 - Discretion for District Environmental Managers
- **Enhanced existing Environmental Commitments Program in CEDAR**
- **What does Compliance & Technical Assistance look like?**
- **Program Delivery – resourcing**

Environmental Compliance Assistance Program Goals

- **Strengthen VDOT's compliance during construction projects**
- **Documentation of commitment implementation**
- **Tool to resolve inconsistencies with commitment identification**
- **Vehicle for internal staff, contractors to obtain technical assistance**
- **Enhance construction team's awareness**

Enhancing Existing Commitment Module

Summary	IPM Activities	Tasks	Forms	Documents	Commitments	Journal	Assets
Commitments							
<input type="checkbox"/> Date	Task Related	Identified By	Name	End Date	Status	Assigned To	Inspector
HAZARDOUS MATERIALS							
<input type="checkbox"/> 04/18/2017	Yes	District Environmental	Asbestos Removal for Road Construction - Demolition Projects	06/08/2017	Complete	No	
NATURAL RESOURCES							
<input type="checkbox"/> 08/08/2014	Yes	Salem District Env. Mgr.	Fish Plant & Wildlife - Protection of Migratory Birds		In Progress	No	
<input type="checkbox"/> 08/27/2015	No	District Environmental	Fish Plant & Wildlife - Limitation of Operations - Tree Removal/Protection of Federally Protected Bats		In Progress	No	
<input type="checkbox"/> 08/27/2015	No	District Environmental	Fish Plant & Wildlife - Limitation of Operations - Bridge Work/Protection of Federally Protected Bats		In Progress	No	
<input type="checkbox"/> 08/27/2015	No	District Environmental	Fish Plant & Wildlife - Limitation of Operations - Roanoke logperch		In Progress	No	
<input type="checkbox"/> 12/27/2016	No	District Environmental	Fish Plant & Wildlife - Limitation of Operations/Protection of Federally Protected Bats - Structures		In Progress	No	
WATER QUALITY PERMITS							
<input type="checkbox"/> 11/22/2016	No	C.O. Environmental	Authorized Permit Package for Bid Proposal/Contract		In Progress	No	
<input type="checkbox"/> 11/29/2016	No	District Environmental	COE COC Submittal		In Progress	No	
AIR							
<input type="checkbox"/> 11/14/2014	Yes	C.O. Environmental	Volatile Organic Compound (VOC) Emission Control Areas		In Progress	No	

Tightening Existing Commitment Program - Definitions

Environmental Commitments = conditions that VDOT accepts or offers to meet legal or regulatory requirements for avoidance, minimization or compensation for effects on environmental resources

Category 1 - Process Environmental Commitments

Category 2 - Specification Environmental Commitments

Category 3 - Project Specific Environmental Commitments (Contractor)

Category 4 - Program Environmental Commitments (VDOT)

CEDAR – Capturing Commitments

Commitment Properties

Project Info | **Commitment** | **Inspection** | **Supporting Docs**

Commitment Type

Date Entered: 08/08/2014 **Commitment Status:** In Progress

Relevant Program Area: Natural Resources

Commitment Name: Fish Plant & Wildlife - Protection of Migratory Birds

Description:

Location Information

Parcel #: **Station #:**

VDOT Structure #: 1039 **VDHR Property #:**

Latitude: 37° 10' 44" (36°32')-(39°28')

Longitude: - 79° 56' 08" (-75°14')-(-83°41')

Crossing #: 2

Crossing Name: Bridge over Back Cr.

Impact Area:

CEDAR – Capturing Commitments (continued)

Commitment Properties

Identified by: Salem District Env. Mgr. ▼

POC: Willis, Brenda R

Project Phase: Construction ▼

VDOT Project Manager: Wright, John W

Implementing party: Area Construction Engineer ▼

Commitment Source: T&E Clearance

Date Completed: 

Date Implementing Party Notified in Writing: 11/12/2014 

Plan Sheets: ▼

Item to appear on Plan Sheets

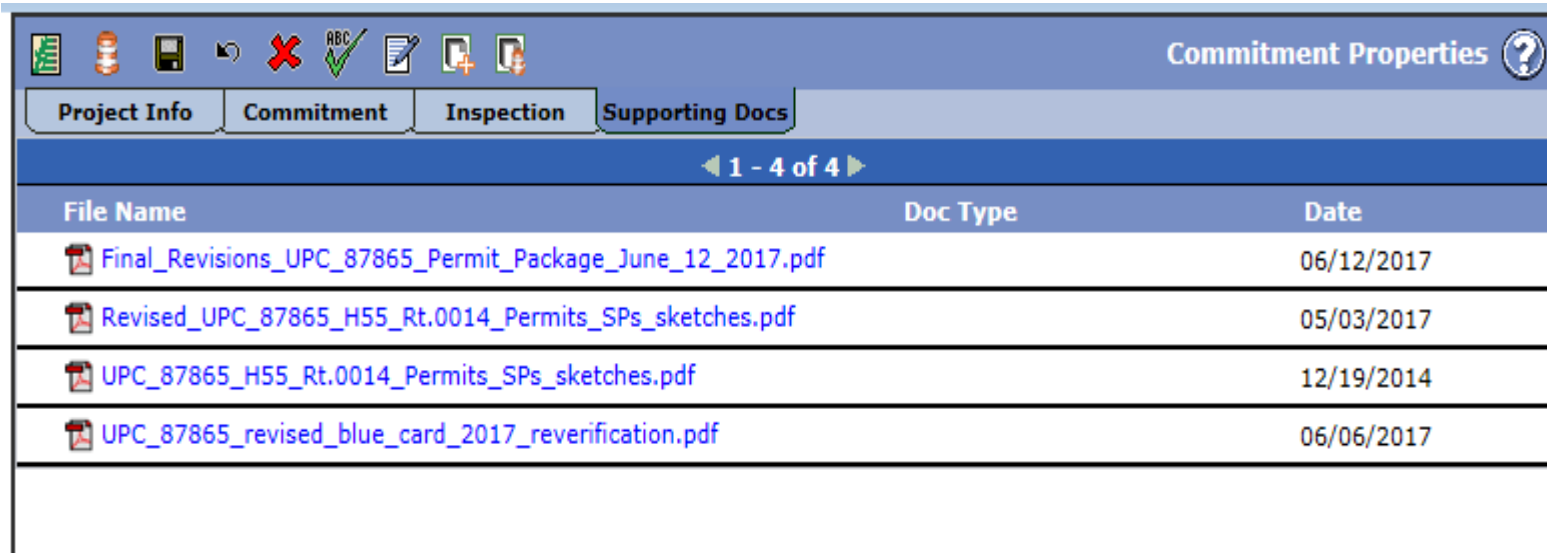
Supporting Doc Type:

Other
Special Provision Copied Note
Supplemental Specifications



Special Provision





CEDAR – Gathering Supporting Documentation

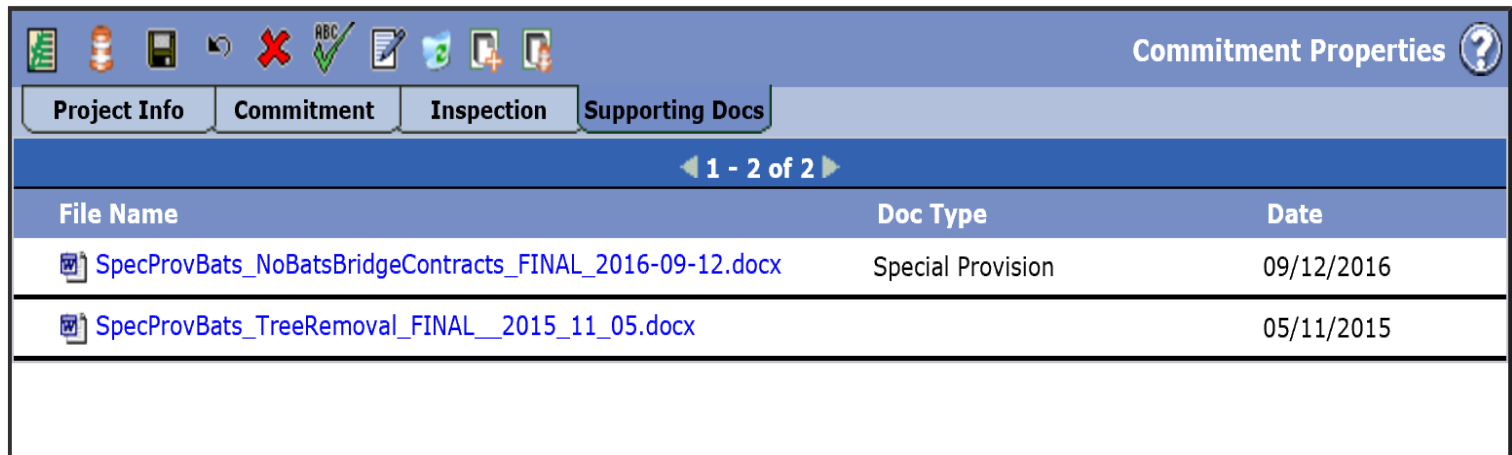


Commitment Properties ?

Project Info Commitment Inspection Supporting Docs

◀ 1 - 4 of 4 ▶



File Name	Doc Type	Date
 Final_Revisions_UPC_87865_Permit_Package_June_12_2017.pdf		06/12/2017
 Revised_UPC_87865_H55_Rt.0014_Permits_SPs_sketches.pdf		05/03/2017
 UPC_87865_H55_Rt.0014_Permits_SPs_sketches.pdf		12/19/2014
 UPC_87865_revised_blue_card_2017_reverification.pdf		06/06/2017



Commitment Properties ?

Project Info Commitment Inspection Supporting Docs

◀ 1 - 2 of 2 ▶

File Name	Doc Type	Date
 SpecProvBats_NoBatsBridgeContracts_FINAL_2016-09-12.docx	Special Provision	09/12/2016
 SpecProvBats_TreeRemoval_FINAL__2015_11_05.docx		05/11/2015

Assignment to ECI's – Targeted Reviews

Commitments							
<input type="checkbox"/> Date	Task Related	Identified By	Name	End Date	Status	Assigned To	Inspector
HAZARDOUS MATERIALS							
<input type="checkbox"/> 06/18/2014	No	Fredericksburg Dist. Env. Mgr.	Management of contaminated soil	05/05/2014	Complete	No	
<input type="checkbox"/> 04/14/2017	No	Fredericksburg Dist. Env. Mgr.	Management of Low Level Petroleum Contaminated Soils		In Progress	Yes	
WATER QUALITY PERMITS							
<input type="checkbox"/> 12/19/2014	No	C.O. Program Manager	Authorized Permit Package for Bid Proposal/Contract		In Progress	Yes	

Commitment-Inspector Assignment ?

Commitment Type

Date Assigned: 04/14/2017 **Assignment Status:** Assigned

Relevant Program Area: Hazardous Materials **Commitment Status:** In Progress

Commitment Name: Management of Low Level Petroleum Contaminated Soils

Description:

Coordinate with district Haz Mat staff 24 hours prior to beginning work on Route 14

Assign By: Snead, Leo C. **Inspection Frequency:** Other

Assign To: Diallo, Ibrahima T.

Comments:

Coordinate with Project Manager on Route 14, per haz mat concerns.

Technical Assistance:

Planned Start Date: 07/10/2017

Planned End Date: 09/29/2017

ECI Inspection Tracking

Commitment Inspection Form

Project Info | Commitment | **Inspection** | Supporting Docs | Report Images

Relevant Program Area: Water Quality Permits

Commitment Name: Monitor Compliance with Water Quality Permits

Inspector: Henderson, Karen **Prime Contractor:** TUTOR PERINI CORPORATION

Report Date: 06/01/2017 **Inspection Date:** 06/01/2017

Inspection Frequency: Monthly **Project Phase:** Construction

Inspection Status: Inconsistent

Inspector Remarks:

During my inspection, I overall found the project looked poor. There has been a lot of heavy rain storms recently, which has caused a lot of sediment to move. A lot of sediment was found in the jurisdictional stream. The sediment needs to

Area of Technical Assistance:

Summary of Assistance Provided:

All sediment bags should be secured properly. Water shall not be pumping out of the entrance of the sediment bag. The bag shall be placed upland on a non-erodible material.

Follow Up Date: 06/07/2017

Additional Program Tools

- **Commitment Reporting**
 - **Project Specific**
 - **Robust Ad-hoc Reporting**
- **Environmental Certification & Commitments Checklist**
- **Advertisement Certification**

ECI Training and Resources

Environmental Commitments and Compliance Assistance Program

Assistance Program ▸ ECI Resources ▸ All Documents ▾

Construction ▾ Maintenance ▾ Operations ▾ Business ▾ Resources ▾

Type Name

- Construction Division Resources
- Inspection Binder
- Structure and Bridge Resources
- CEDAR Enhancement_Attaching Photographs_June 2017**
- Jan 2016_ECI CEDAR Quick Reference Guide
- Oct 20 2015_ECI Guidance Manual
- SOP_Final_Draft_Environmental Compliance Assistance May 12 2015

Virginia Department of Transportation

Environmental Compliance Inspector (ECI) Guidance Manual

Environmental Division

Diane N. Russell
10/20/2015

Challenges and Opportunities

Challenges

- Hourly or consultant staff as an ECI – high turnover rate
- Viewed as a Resource & not a “Black Hat”
- Multiple layers of inspectors on a project
 - Coordination of inspection schedules

Opportunities

- Relationship building with Construction & Design Divisions
 - Overlap with WQ Permit, MS4, Construction General Permit
- Training
- Capture “field data” on commitments implementation
 - Feedback loop to PE teams

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