State of California   California State Transportation Agency
DEPARTMENT OF TRANSPORTATION

M e m o r a n d u m

Serious drought.
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To: DEPUTY DISTRICT DIRECTORS, Construction   **Date:**   May 28, 2015
DEPUTY DIVISION CHIEF, Structure Construction
CONSTRUCTION MANAGERS
SENIOR CONSTRUCTION ENGINEERS   **File:**   Division of Construction
RESIDENT ENGINEERS   CPD 15-3

From: RACHEL FALSETTI, Acting Chief
Division of Construction

Subject: **PROPER CHARGING FOR STORMWATER CONTRACT ADMINISTRATION WORK**

Proper charging and coding practices are detailed in Deputy Directive 41, "Caltrans Charging Practices," Project Delivery Directive 12, "Capital Outlay Support (COS) Charging Practices," the *Capital Outlay Support (COS) Charging Practice Guidelines*, and other supporting references. For Project Delivery, these practices are described in the *Workplan Standards Guide, Release 11.0, for Capital Outlay Projects*, which includes the Work Breakdown Structure (WBS) for project charging. The general effects of recent WBS modifications to construction charging are detailed in Construction Procedure Directive 14-6, "Guidance for the Work Breakdown Structure and Workplan Standards Guide." A significant change in the WBS was the addition of the new Level 5 activity 280 to address the administration of permits, licenses, agreements and certifications (PLACs), and environmental stewardship in general. This directive explains how to properly charge for time spent on PLACs.

Activity 280 covers temporary and permanent work performed during the construction phase of a project to ensure compliance with PLACs. This includes field inspection, item and change order work, documentation, storm water pollution prevention plan and water pollution control work, and other environmentally-related work.

To properly capture this work, seven reporting codes have been established. The authorized reporting codes are:

Reporting Code	Description
401COMP	401 permit compliance during construction of a project.
401VIO	Response to PLAC violation(s) under the 401 permit.
COMP	Compliance to regulation not included in the 401 permit.
VIO	Response to alleged PLAC violation(s) not under 401 permit.
UPDECR	Updates to the Environmental Commitments Record (ECR).
REEV	Changes that affect project's environmental documentation.
UPDPLAC	Renewal and/or extension requests for previously issued PLACs.

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These seven codes can be used with overhead and other project-specific WBS codes (280, 285, 290, and so on) to record work directly related to and traceable to an environmental PLAC activity. However, reporting codes 401COMP or 401VIO can be used only when work is specifically required by Section 401 of the Clean Water Act. If there is no 401 certificate issued for the project, then charging codes COMP or VIO would be used. The other three reporting codes address the environmental document and process as a whole. Therefore, they are not limited to the 401 permits or even stormwater. For example, the UPDECR code would be used whenever there is a need to update the environmental commitment record which could tie to a hazardous material issue, endangered species, or other environmental issue. Also, reporting code UPDPLAC can apply to any permit, not just the 401 certificate or Construction General Permit.

Other activity COMP work includes, but is not limited to:

- Air quality conformance work.
- Hazardous material and hazardous waste work.
- Permanent BMP work that is necessary to satisfy non-401 permit PLAC requirements.

The goal is to reasonably determine the portion of environmentally-related support costs in Caltrans' overall capital support costs. The allocation of time charges between activity 280 and other WBS activities can be subject to interpretation as to if that work is actually required to satisfy an environmental PLAC. Supervisors and employees should attempt to determine reasonable allocations of time to the appropriate WBS code.

If you have questions about this directive, please contact Hamid Hakim, Division of Construction, at hamid.hakim@dot.ca.gov or (916) 653-7289.