



COLORADO

Department of Transportation

Office of the Chief Engineer

CONSTRUCTION BULLETIN

Division of Engineering
Materials and Geotechnical
Services Branch

Updated Environmental Product
Declaration (EPD) Standard Special
Provision (SSP)
2025 Number 3
Date: July 23, 2025

Insert these sections into 106.14 (new section) of the CDOT Construction Manual.

Revisions to the Environmental Product Declaration (EPD) Specification

The purpose of this Bulletin is to provide information and instruction regarding revisions to the Environmental Product Declaration (EPD) requirements per the Standard Special Provision (SSP) [Revision of Section 106 - Environmental Product Declarations](#) published on July 1, 2025.

This SSP has been updated to comply with CDOT's portion of [Colorado House Bill 21-1303](#) (Colorado Revised Statutes 24-92-118) and is a comprehensive single document for ease of use on projects that compiles information/requirements from prior documents including the [Buy Clean Colorado Act policy document](#), the [Buy Clean Colorado Act limit values document](#), previous specification(s), and previous protocol document(s).

Projects advertised after July 1, 2025, should use the latest SSP and its requirements will remain in effect until further notice. Projects advertised before July 1, 2025 with prior versions of the EPD SSP should comply with the requirements listed in those applicable SSPs and the relevant version of the EPD protocol document (Appendix O of the [CDOT Field Materials Manual](#) (FMM)). The [Environmental Product Declarations \(EPD\) Construction Bulletin](#) published on August 5, 2022 still applies to projects advertised before July 1, 2025.

Eligible Projects

The guidance provided in this Bulletin should be followed for all CDOT advertised construction projects with an Engineer's Estimate of \$3,000,000 or greater, not including Construction Engineering (CE), Direct to Project Staffing Charges, Indirect, or Force Account (F/A) item costs. EPD requirements do not apply to Emergency projects as defined by §24-33.5-704, C.R.S. and Colorado Fiscal Rule 3-1 § 2.9 or Local Agency projects.

Eligible Materials

Eligible materials requiring EPDs include cement and concrete mixtures, asphalt and asphalt mixtures, and steel permanently incorporated into eligible projects. The specific project bid items requiring EPDs are detailed in Table 106-4 of the SSP.

CONSTRUCTION BULLETIN

Division of Engineering
Materials and Geotechnical Services Branch

Updated EPD SSP
2025 Number 3
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EPD requirements for specific materials are not included in the Quality Assurance Checklist and will need to be reviewed/identified on projects manually by the Project Engineer. An excel worksheet that can help with the identification of materials requiring EPDs can be found on the [CDOT EPD webpage](#). Note: Bid Item minimum quantity limits under which EPD requirements do not apply are listed in Table 106-5 of the SSP.

Necessary Actions

Prior to beginning construction, the Construction Project Engineer should follow these steps:

1. Check the project specification package for the Standard Special Provision - Revision of Section 106 - Environmental Product Declarations.
 - a. If not included, no further action is necessary.
 - b. If included, proceed with items 2 through 11 below.
2. Identify materials requiring EPDs.
 - a. Review the project bid items and quantities to determine which items will require EPD submittals.
 - b. The excel sheet linked on the [CDOT EPD webpage](#) may be used for assistance.
3. Determine items with Global Warming Potential (GWP) limits.
 - a. Refer to Table 106-6 of the SSP to identify materials subject to GWP limits.
 - b. For items containing concrete, determine the class of concrete used in the bid item in order to apply the correct GWP limit.
 - c. For items containing asphalt, determine the binder type and gradation used in the bid item in order to apply the correct GWP limit.
 - d. Note: Items that do not have GWP limits listed in Table 106-4 of the SSP still require EPD submissions but are not subject to limits at this time.
4. Pre-Construction meeting preparation.
 - a. Share the list of required EPD and GWP-limited materials with the Contractor before or during the meeting.
 - b. Include the following topics in the meeting with the Prime Contractor:
 - i. Overview of the EPD specification and submission requirements.
 - ii. Identification of materials requiring EPDs and materials with GWP limits.
 - iii. Clarification of Exceptions to EPD/GWP requirements as outlined in the SSP and in the “during construction” section below.
5. Review the Contractor schedule.
 - a. Ensure the Contractor’s schedule includes activities for EPD development, EPD obtainment, and EPD submittal as required by the SSP.

CONSTRUCTION BULLETIN

Division of Engineering
Materials and Geotechnical Services Branch

Updated EPD SSP
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During construction, the Construction Project Engineer should follow these steps:

6. Monitor EPD submissions.
 - a. Verify that EPDs are submitted for all eligible bid items and materials that meet the minimum quantity thresholds.
 - b. Review the submitted EPDs to ensure completeness and compliance with the SSP requirements. Additional guidance, including annotated EPDs indicating what information to focus on, can be found on the [CDOT EPD webpage](#).

Note: The Contractor is required to submit EPDs per the SSP. The Project Engineer will also receive an email with the completed submission form and a PDF of the EPD.

7. Verify GWP limit compliance (based on materials being used on the project with established GWP Limits).
 - a. Review EPD submissions prior to material placement to ensure materials do not exceed GWP limits.
8. Review proposed alternate materials.
 - a. If the Contractor is unable to source a material with an EPD or a material with an EPD that complies with the applicable GWP limits, an alternate material with an EPD that complies with the GWP limits shall be proposed. The alternate material shall meet all Contract specification requirements.
9. Address Exceptions.
 - a. If an alternate material with an EPD that complies with the applicable GWP limits is not available for a reasonable cost or on a reasonable basis, the Contractor shall submit an explanation to the Project Engineer and to CDOT_EPD@state.co.us prior to material placement.
 - b. Explanations should include:
 - i. The material category and associated bid item(s) the explanation applies to.
 - ii. List of material suppliers and plant locations contacted for an alternate material.
 - iii. Supplier responses explaining why an EPD or GWP-compliant material is unavailable.
10. Weekly update meetings.
 - a. Ensure all EPD-related activities and updates are discussed during weekly project meetings per the SSP.
11. Project documentation.
 - a. File all EPD submissions and any Contractor explanations received in the corresponding material project folder.

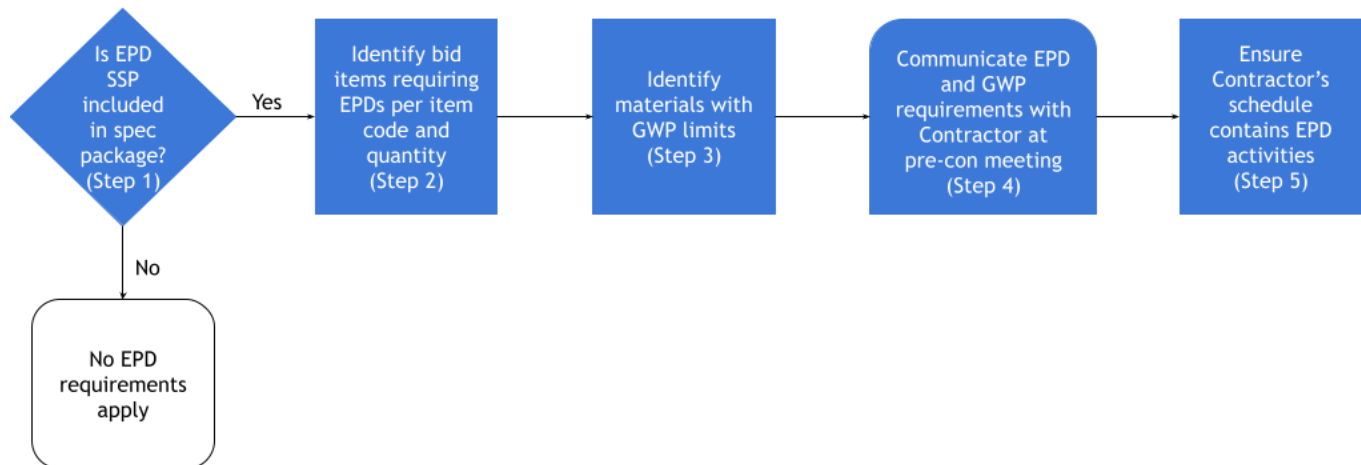
CONSTRUCTION BULLETIN

Division of Engineering
Materials and Geotechnical Services Branch

Updated EPD SSP
2025 Number 3
Date: July 23, 2025

Flowcharts for these processes are shown below. Questions on the requirements outlined above or that come up on projects should be directed to CDOT_EPD@state.co.us.

Construction Project Engineers (prior to start of project):

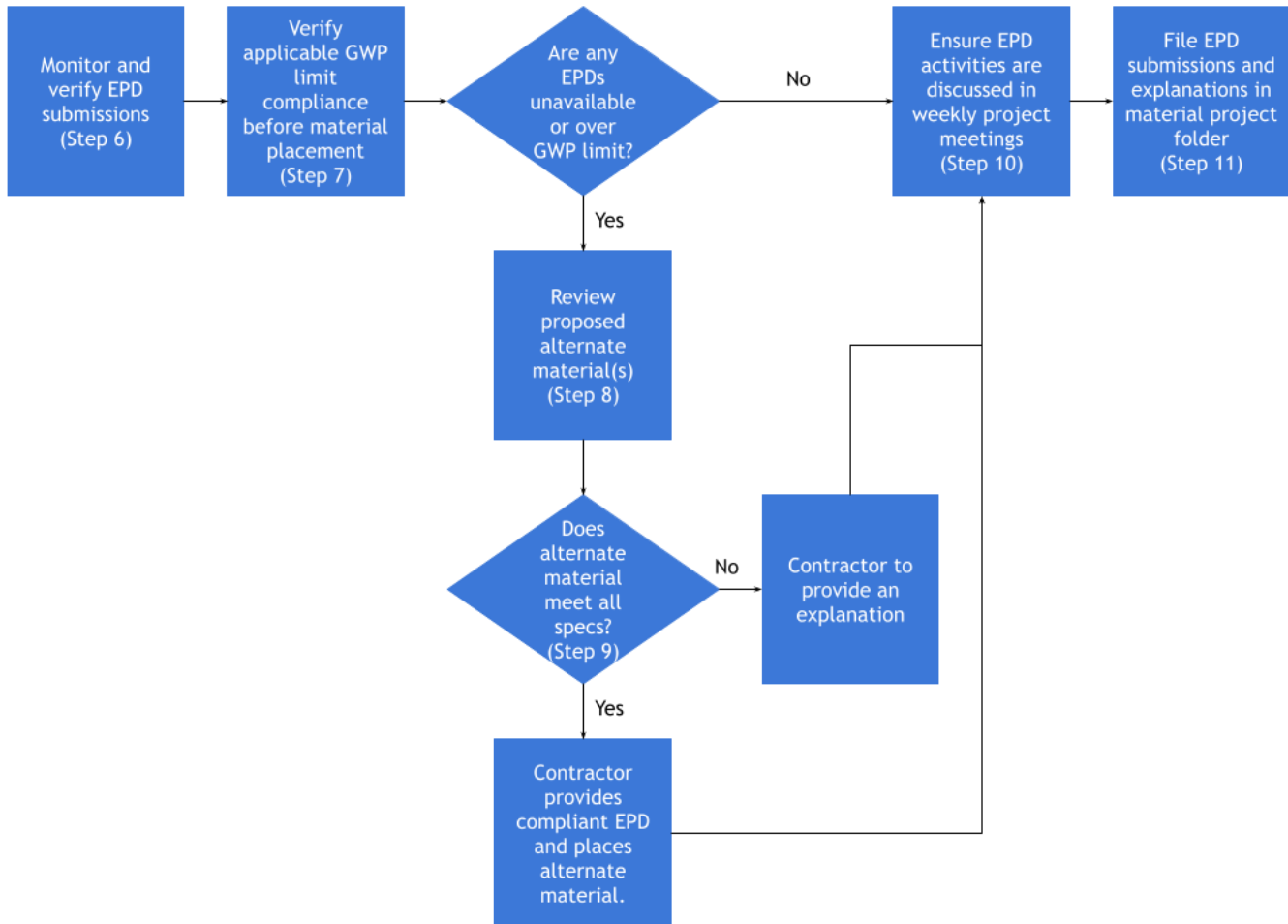


CONSTRUCTION BULLETIN

Division of Engineering
Materials and Geotechnical Services Branch

Updated EPD SSP
2025 Number 3
Date: July 23, 2025

Construction Project Engineers (during construction):



Key Revisions to the SSP

The most notable revisions since the 10/1/2023 version of the EPD SSP are summarized below. Additional details on changes to the EPD SSP can be found on the [CDOT EPD webpage](#).

- Global Warming Potential (GWP) limits:
 - Eligible materials placed on eligible projects shall meet the Global Warming Potential (GWP) limits listed in Table 106-6 of the specification.
- Exceptions section:
 - If a material meeting the GWP limit is not available for a reasonable cost or on a reasonable basis, the Contractor shall propose an alternate material.
 - If an alternate material meeting the EPD requirements (either the EPD is over the published GWP limit or an EPD is unavailable for a specific material), the Contractor shall provide an explanation to the Project Engineer and CDOT_EPD@state.co.us.

CONSTRUCTION BULLETIN

Division of Engineering
Materials and Geotechnical Services Branch

Updated EPD SSP
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EPD Submission Form

A simplified EPD Submission form is available for the project's use here:
<https://form.jotform.com/251424918039055>

EPD Program Development and Implementation

CDOT's EPD program was developed in early 2022 in response to HB 21-1303. Since its inception, the EPD team has prioritized stakeholder communication, outreach, and collaboration. This has included CDOT staff (including the Executive Management Team, Construction Area Engineers, Contracts, Cost Estimating, Materials and Geotechnical Services Branch unit managers, Project Engineers, Resident Engineers, etc.), external project staff, contractors, material suppliers, and industry trade associations at the local and national levels. CDOT has encouraged these stakeholders to review and provide comments and concerns on all documents and requirements prior to publication and has implemented much of the feedback received.

Questions and Resources

CDOT EPD webpage: <https://www.codot.gov/business/designsupport/materials-and-geotechnical/epd>

Please print a copy of this bulletin and keep it with your copy of the Construction Manual. The Construction Manual and Construction Bulletins can be found on the Design and Construction Project Support web page: https://www.codot.gov/business/designsupport/bulletins_manuals

If there are any questions on how to implement these changes on projects, the Project Engineer should contact the CDOT EPD team or the Sustainable Materials Engineer.

CDOT EPD Team Email: CDOT_EPD@state.co.us

Sustainable Materials Engineer: Hailey Goodale - hailey.goodale@state.co.us or 918-346-5009