



## **1.0 Purpose**

The purpose of this procedure is to identify wastes and hazardous materials in a building scheduled for demolition, remodeling, or utility upgrade.

## **2.0 Activity/Department**

### 1. Activities:

- a. Building demolition
- b. Building renovation
- c. Utility repairs within a buildings

### 2. Departments:

- a. DFC Project Managers
- b. Building Managers
- c. Environmental Programs Group

## **3.0 Forms Used**

Pre-Demolition Inspection Checklist

## **4.0 References**

Colorado Department of Public Health and Environment (CDPHE), Air Quality Control Commission, 5 CCR 1001, Regulation 8- Control of Hazardous Air Pollutants - Parts A, C, D, & E [10] - (Amended 07/21/2005, effective 09/30/2005)

CDPHE, Air Quality Control Commission, 5 CCR 1001, Regulation 8, Part B - Asbestos [10]- (Amended 12/16/2004, effective 03/02/2005)

CDPHE, Hazardous Waste Commission, 6 CCR 1007-3, Regulations under Part 260-279

CDPHE, Colorado Solid Waste, Regulations 6 CCR 1007-2, Regulations Pertaining to Solid Waste Disposal Sites & Facilities

General Services Administration (GSA), Denver Federal Center, Excavation 'Dig' Permit Procedure

GSA's Site wide Consent Order 97-07-18.

Gladu, Nicole, "Buyer Beware: Managing EHS Aspects of Facilities" Occupational Hazards, Penton Media, Inc., March 12, 2004

## **5.0 Acronyms, Abbreviations, and Definitions**



Term	Definition
ACM	Asbestos Containing Material
ASTs	Above ground Storage Tanks
BGS	Below Ground Surface
CCR	Colorado Code of Regulations
CDPHE	Colorado Department of Public Health and Environment
CFCs	Chlorofluorocarbons
CO	GSA Contracting Officer
DFC	Denver Federal Center
EHS	Environmental, Health and Safety
EPG	Environmental Program Group
GAC	General Asbestos Contractor
GSA	General Services Administration
LCP	Lead/Heavy Metal Contaminated Paint
PCBs	polychlorinated biphenyls
PM	Project Manager
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RFP	Request for Proposal
SOW	Statement of Work
TCLP	Toxic Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
USTs	Underground Storage Tanks
XRF	X-Ray Fluorescence Spectroscopy

## **6.0 Exclusions**

There are no known exclusions. If tenants plan to remodel or do utility repair within a building or under a sub-slab, they have a responsibility to comply with GSA's Consent Order and State and Federal hazardous waste regulations.

## **7.0 Procedure**

- 7.1 Contact EPG prior to developing the SOW for the demolition, renovation, or repair.
- 7.2 Review the building Asbestos Report, EPG RFI documents and other relevant environmental information.
- 7.3 Complete the Pre-Demolition Inspection Checklist with technical support from EPG.
  - 7.3.1 Use a building plan or map to locate features, as required on the checklist.
  - 7.3.2 Determine the number of paints used in the area. Sample for



heavy metals analysis. Consider using XRF to analyze for lead.

7.3.3 Identify chemicals and cleaning solvents in the area.

- 7.4 Submit the completed Pre-Demolition Inspection Checklist to the contractor. The contractor shall prepare a site-specific health and safety plan to minimize impact to workers and tenants.
- 7.5 Obtain sampling requirements from EPG or the Safety Group for the SOW or RFP.
- 7.6 Include relevant requirements for demolition, remodeling or utility repair (Appendix A) in the SOW or RFP.
- 7.7 Prepare an Excavation Dig Permit, if required.

## **8.0 Records**

Pre-Demolition Checklist  
Paint sampling analytical results  
ACM sampling analytical results  
Asbestos abatement permit



**PRE-DEMOLITION INSPECTION**  
*DFC Environmental Management System*

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Project: \_\_\_\_\_ Inspection Date: \_\_\_\_\_

Project Manager: \_\_\_\_\_

EPG Personnel: \_\_\_\_\_

Other Personnel: \_\_\_\_\_

Surveys for some of the regulated building materials require qualified EHS personnel who are licensed to perform this type of work. Accreditations, certifications and other requirements for performing asbestos and lead inspections are specified by federal, state and local regulations.

- Obtain a building interior map of the project area
- Obtain building utility maps for both interior/exterior sewer lines
- Do room by room inspections; Number of Total Rooms: \_\_\_\_\_
- Accurately mark on map on a room by room basis:
  - Floor drains,
  - LCP (Lead/Heavy Metal Contaminated Paint), Different color painted brick/concrete walls
  - ACM (Walls/wall board with potential ACM walls, Steam Pipes not contained or subslab, Steam Pipes contained or subslab, Floor tile types)
  - PCBs (Asphalt sealing materials such as roofing or air ducts, electrical equipment such as transformers, light ballasts, and capacitors (older than 1979) polychlorinated biphenyls (PCBs).
  - Mercury-containing light tubes, switches, and thermostats,
  - USTs/ASTs (Under/Above ground Storage Tanks),
  - Refrigerants (Halogenated Fluorocarbons, CFCs), and
  - Other stored chemicals, products, or cleaning agents. Note spills.





**PRE-DEMOLITION INSPECTION**  
*DFC Environmental Management System*

Are any above or below ground storage tanks, vent or filler pipes located on the premises? (\_\_\_ Yes \_\_\_ No)

AST / UST	Location	Age	Staining (Y or N)	Known Leaks	Comments (e.g. last tested, known problems)

Is there a transformer on the property? (\_\_\_ Yes \_\_\_ No) Has the transformer been tested? (\_\_\_ Yes \_\_\_ No)

Identification Number	Location	Age	Staining (Y or N)	Known Leaks	Comments (e.g. last tested, known problems)

Is there a loading dock on the building? (\_\_\_ Yes \_\_\_ No)

Loading Docks	Location	Hydraulic Lifts	Storage Areas (describe contents; e.g. drums)	Staining (Y or N)	Comments (e.g. discoloration, oil sheens, foul/unusual odors, leaks)



**APPENDIX A: ENVIRONMENTAL REQUIREMENTS FOR DEMOLITION,  
RENOVATION OR UTILITY UPGRADE**

Demolition only:

**BUILDING CLEAN OUT** - The building will be cleaned out of all chemical and chemical residues stored in the building.

**LIGHT FIXTURES, TRANSFORMERS, AND LIGHT BULBS** - Light fixtures, if they contain ballast with potential PCB will be separated and drummed for disposal per regulation. Building transformers will be tested for PCBs and appropriately disposed under TSCA. Fluorescent light bulbs will be collected and recycled.

All activities:

**PAINTED SURFACES** - Old paints commonly contain lead, may contain chrome, and other heavy metals. PCB's have rarely been used in paints. Determination of lead may be through use of XRF.

- Sample paint surfaces for waste disposal with suspected hazardous components, run Toxic Characteristic Leaching Procedure (TCLP) analysis for metals. Sample should be of the paint surface and underlying strata (e.g., wood, brick, concrete). If knowledge of the material or paint is known which can tell it is not metal-based paint (e.g., latex paint on wallboard), no sampling is required for the specific surface.
- Sample all concrete, brick, etc., which are painted have the potential to be recycled.
- Sample all painted soft material such as wood which may be disposed.

**ASBESTOS** - If suspected ACM is present, a State Asbestos Certified Building Inspector will inspect the building. The inspector will collect samples of the suspected ACM for analysis at an accredited laboratory. If ACM is determined to be present by either analysis or knowledge of material (building asbestos survey report), indicate ACM present. The ACM must be abated by State Certified Abatement Contractor.

- Types of material which may be ACM are as follows: insulation on steam pipes, mud for wall board, floor tile, mastic for floor tile. Sub-slab steam pipes are known to have ACM used for insulation.
- An abatement permit must be obtained and abatement of the asbestos for the building must be completed prior to demolition. The permit must be applied for by a licensed General Asbestos Contractor (GAC) and is obtained through CDPHE's Air Division. Only the GAC can apply for the permit.

**SUBSLAB** If sub-slab of building **has not** been pre-cleared by EPG the following is required, (EPG personnel will aid PM on this portion of the project):

- The sewer line must be flushed to clean the line.



- The water used to flush the line may have to be captured and analyzed for full TCLP constituents and other constituents. This is based on the use of the building. If no indication that the material has potential environmental issues related to the sewer, the water may be allowed to be reintroduced into the sewer. The PM should contact the EPG to discuss the historic use of the building. The EPG will contact Metro Waste Water to determine if sampling is required and what it should consist of. This will determine if the water needs to be sampled or can simply be released back into the sewer. At a minimum, all granular material or other components that could plug the sewer system must be filtered and removed. If the water has been sampled, Metro Waste Water will be contacted by EPG for permission to dispose of the water back into the sanitary sewer. All of the analytical data collected in support of the discharge request will be transmitted to Metro Waste Water. If based on the analysis the water is classified as hazardous waste or does not meet Metro Waste Water discharge requirements, it will be collected and disposed at an appropriate facility.
- During excavation, the soils surrounding the sewer line and floor drains must be observed for potential contamination (e.g., odor/staining). If contamination is observed, soil samples are required. The stained soils, if excavated, shall be segregated so that they can be containerized and disposed of appropriately.

If sub-slab of building has been pre-cleared by EPG the following is required, (EPG personnel will aid PM on this portion of the project):

During excavation, the soil surrounding the sewer line and floor drains must be observed for potential contamination (e.g., odor/staining). If stained soils/contamination is observed, contaminated soils will be segregated and sampling will be required. Contact EPG for support in determining what analytical suite should be run. At a minimum, a full TCLP should be run.