



## **1.0 Purpose**

The Denver Federal Center (DFC) is under three consent orders from the State of Colorado. These cover the investigation and environmental clean up of soil and groundwater on the DFC. As part of these consent orders, the Excavation Permit System was created. This system is administered by the Environmental Program Group (EPG). The EPG generates the Excavation Permit (permit), which outlines contractor requirements **for all soil handling** on the DFC. This system:

- Provides a safe work environment for contractor employees;
- Ensures that contractor storm water protection meets the EPA issued Storm Water Discharge Permit;
- Prevents relocation of contaminated soil to clean areas on the DFC;
- Provides GSA and the contractor a means to be able to characterize excavated soils for disposal (as non-hazardous or hazardous waste); and
- Protects the public from contaminated soils being used at off site projects.

## **2.0 Activity/Department**

The permit is required for all excavation activities, excluding the exceptions (see 6.0), on the DFC. This permit applies to GSA and tenant agencies which will be excavating on the DFC.

## **3.0 Forms Used**

Excavation Permit Request  
Erosion Control Plan  
Waste Inventory Tracking  
Excavation Inspection Report  
Excavation Permit Summary

## **4.0 References**

Excavation Permit Procedure, Revision No. 9, March 2004.  
RCRA Pre-RFI Historical Data Report Addendum, 1998  
FEC Memo regarding Staging Piles

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

**Environmental Program Group:** The group responsible to issuance of the permit.

**GSA or Tenant Project Manager (PM):** Person directly responsible for managing / oversight of the project under which the excavation is taking place.



**Soil Excavation:** Any excavation of soils on the DFC not excluded in Section 6.0.

## **6.0 Exclusions**

The following activities are excluded from the excavation permit requirements provided the soil is placed back into the excavation:

- Landscaping work associated with removal of old landscapes, constructing new landscapes, planting flower and shallow bushes, repairing and installing new sprinkler heads and lines, and other activities, which do not exceed more than 18 inches in depth. All landscape materials from this activity is excluded from permitting and manifesting requirements.
- Paving and 8-10 inch road base under-pavement is excluded from the permitting and manifesting requirements.

## **7.0 Procedure**

- 7.1 Fill out the Permit Request Form (provided by EPG, Bldg. 41 Room 190 or second floor Bldg. 41 Room 240). Include the Erosion Control Plan. Mark the location of the excavation on the Figure 1 map.
- 7.2 Deliver the completed Permit Request Form to EPG.
- 7.3 EPG follows the *Excavation Permit Procedure, Revision No. 9, March 2004*. EPG checks the *RCRA Pre-RFI Historical Data Report Addendum, 1998*, and any additional reports on the area to determine the extent and nature of contamination. Based on this information the permit requirements will be determined.
- 7.4 EPG will provide the Permit to the requestor with a determination if the soils are presumed clean, potentially contaminated, or contaminated and any storage, handling, and disposal requirements where applicable. The Permit will be signed by both the EPG Program Manager and the GSA Project/Tenant Manager.
- 7.5 EPG tracks Excavation Permit Requests on a summary form
- 7.6 The GSA Project Manager shall provide the requestor a signed copy of the Permit. It is the requestor's responsibility to provide the Contracting Officer a copy for inclusion in the contracting project files. An electronic copy of the permit can be requested to facilitate development of SOW.
- 7.7 The EPG will provide contracting language to be included in the SOW after they have determined handling requirements.



- 7.8 The EPG, upon request, can provide general cost information on soil testing, sampling, and disposal.
- 7.9 It is the responsibility of the GSA/Tenant PM and associated Contracting Officer (CO) to share the information in the permit with the excavation contractor to assure compliance with the permit.
- 7.10 The GSA/Tenant PM may conduct an inspection of the excavation and complete the Excavation Inspection Report form.
- 7.11 The project CO and requestor should retain copies of the permit with contract and project files.

## **8.0 Records**

Completed Excavation Permit Request (electronic and hard copy)  
Summary of Excavation Permit Request  
Completed Excavation Inspection Report