Region 8 Sustainability & Environmental Management System

1.0 Purpose & Scope

Excavation Permits are required, if:

- Any work is done in a public right-of-way; this is governed by city and local ordinances across all states in Region 8, and
- Special circumstances (e.g., removal of contaminated soils under a government decree, such as a Consent Order)

The Denver Federal Center (DFC) is required to meet requirements set in three Orders on Consent from the State of Colorado. These Orders on Consent are driven by 6 CCR [Code of Colorado Regulations] 1007-2 and 6 CCR 1007-3. These cover the investigation and environmental clean up of soil and groundwater on the DFC. As part of these Orders on Consent, the Excavation Permit process was created to control the movement and distribution of contaminated soils on the DFC. This process 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 process:

- Provides a safe work environment for contractor employees;
- Ensures that contractor storm water protection meets the Environmental Protection Agency (EPA) issued Municipal Separate Storm Sewer Permit (MS4);
- 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 Activities & Departments Affected

Regional:

• A permit is required for all excavation activities done in a public right-of-way, unless otherwise excluded.

Denver Federal Center:

• Excavation Permit requirements at the DFC apply to GSA and tenant agencies, excluding the exceptions listed in Section 3.0.

3.0 Exclusions

The following activities are excluded from the DFC 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.

GSA Excavation 'Dig' Permit Region 8 Sustainability & Er

Region 8 Sustainability & Environmental Management System

• Paving and 8 to 10-inch road base under-pavement is excluded from the permitting and manifesting requirements.

4.0 Forms Used & Permits Required: (include reporting requirements)

Federal and State Forms and Permits:

- No Federal or State Permits are required
- Permits are likely for any work done in a public right-of-way; this is governed by city and local ordinances across all states in Region 8, except at the DFC

☐ In-house GSA Region 8 and Contractor Forms:

- Excavation Permit Request
- Erosion Control Plan
- Waste Inventory Tracking
- Excavation Inspection Report
- Excavation Permit Tracking Database

5.0 Acronyms, Abbreviations, and Definitions

Acronyms	Meaning
CCR	Code of Colorado Regulations
CO	Contracting Officer
DFC	Denver Federal Center
COR	Contracting Officers Representative
EPA	Environmental Protection Agency
EPG	Environmental Program Group
GSA	General Service Administration
MS4	Municipal Separate Storm Sewer Permit
PBS	Public Building Services

Definitions:

<u>Environmental Program Group</u>: The group responsible for issuance of excavation permits at the DFC.

<u>GSA or Tenant Project Manager (PM)</u>: 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 3.0.

6.0 Procedure

State Specific Procedures & Requirements [refer to individual State Legal Reviews for details on Statues, Laws, and Rules]:

- There are no State regulations in Region 8 governing excavation permits
- If contamination is of a concern, then state (e.g., 6 CCR 1007-03 for the DFC) and federal regulations do apply

 Ordinances do exist at the city and local level for any excavation work done in a public right-of-way

Standardized Procedure:

- 6.1 For excavation work occurring in public right-of-ways, the <u>Property Manager</u> will obtain, fill out, and submit any necessary city and local excavation permits ordinances relevant to where the work is planned.
- 6.2 For excavation work at the DFC; anyone who plans on disturbing soils will fill out a Permit Request Form (provided by the <u>Environmental Programs Group (EPG)</u>, Building 41, DFC). Include the Erosion Control Plan. Mark the location of the excavation on the Figure 1 map.
- 6.3 The party who filled out the Permit Request Form will submit it to the (EPG).
- 6.4 The <u>EPG</u> follows the *Excavation Permit Procedure, Revision No.10, (latest version)*. The <u>EPG</u> 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 <u>EPG</u> will generate the permit requirements.
- 6.5 The <u>EPG</u> 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 are applicable. The Permit will be signed by both the <u>EPG Program Manager</u> and the <u>GSA Project/Tenant Manager</u>.
- 6.6 The Region SEMS Manager tracks Excavation Permit Requests.
- 6.7 At DFC the <u>EPG</u> shall provide the <u>GSA Project Manager</u> a signed copy of the Permit. It is the <u>GSA Project Manager's</u> responsibility to provide the <u>Contracting Officer</u> a copy for inclusion in the contracting project files. An electronic copy of the permit can be requested to facilitate development of SOW. The project <u>CO</u> and <u>requestor</u> should retain copies of the permit with contract and project files.
- At the DFC the <u>EPG</u> will provide contracting language to the <u>GSA Project Manager</u> to be included in the SOW after they have determined handling requirements.
- 6.9 The <u>EPG</u>, upon request, can provide general cost information on soil testing, sampling, and disposal.6
- 6.10 At the DFC it is the responsibility of the <u>GSA/Tenant Project Manager</u> and associate <u>Contracting Officer (CO)</u> to share the information in the Permit with the <u>excavation Contractor</u> to assure compliance with the permit. Afterwards the Contractor can begin work.

- 6.11 At the DFC the <u>EPG</u> may perform random inspections on 1 out of 25 permitted dig sites and generate an Excavation Inspection Report.
- 6.12 Should any sampling and analysis for asbestos or chemical suites occur at any point during this process, on soil, water, air, or other solid sample, and should the project or program be under DFC or EPG jurisdiction, the *DBMS* procedure will be followed.

7.0 Records Management

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

8.0 References

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

9.0 Appendices

Attachment A: Excavation Permit Flowchart

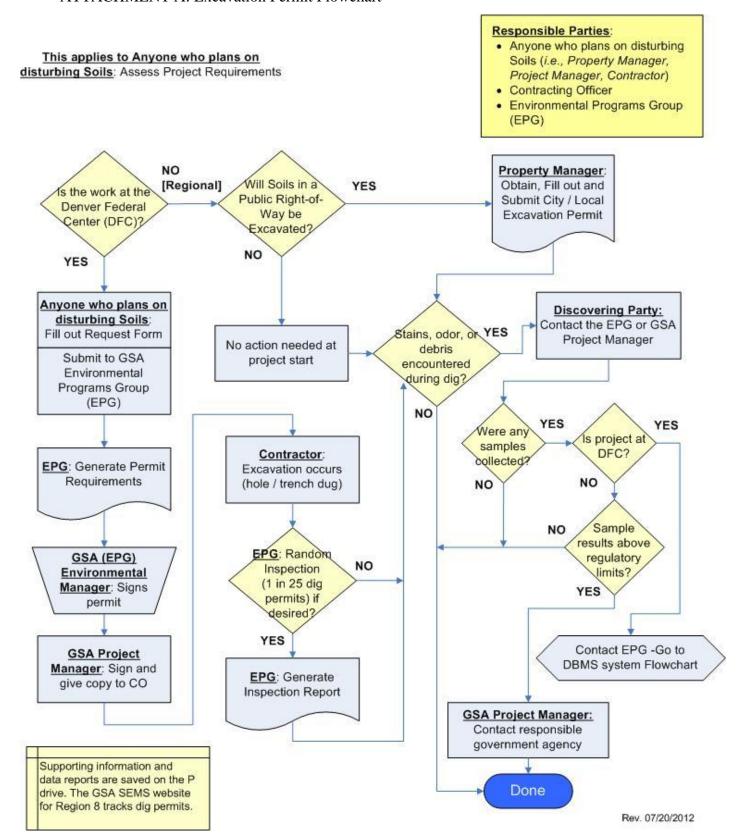
Attachment B: Excavation Activity Permit, Environmental Program Group (EPG),

Denver Federal Center, Rev. March 27, 2002

Document Control Information:	Approved & Dated:
Excavation Permit "Month-Date-Year".doc	RJM July 20, 2012

Document Revision and Update:				
Revision Date	Nature of Revision	Revision made by:		
12/19/2005	Working Draft	Mike Gasser, John Kleinschmidt		
03/16/2006	Original Release	Mike Gasser, John Kleinschmidt		
02/01/2010	Add ISO 14001 Document Controls, add	Robert Melvin		
	Flowchart			
04/02/2010	Update requirements at DFC	Mike Gasser		
06/09/2010	Add state regulations and outline Regional	Robert Melvin, Mike Gasser		
	requirements			
07/20/2012	Emphasize Roles and Responsibilities in section	Mike Gasser, Nick Gutschow,		
	6, update flowchart	Robert Melvin		

ATTACHMENT A: Excavation Permit Flowchart



Attachment B:

Excavation Activity Permit Environmental Program Group (EPG), Denver Federal Center Rev. March 27, 2002

Filling Out A Permit Request Form By The GSA Project Manager

- 1. Is your new project going to excavate soils? <u>Yes</u> then continue, <u>No</u> then no Permit is required.
- 2. Fill out the Permit request form (provided by EFG, DFC Building 41) and mark on Figure 1 map the location of the excavation.
- 3. Deliver filled out Permit request form to EPG.
- 4. EPG will provide the Permit to the requestor with a determination if the soils are presumed clean, potentially contaminated, or contaminated and the storage, handling, and disposal requirements. The Permit will be signed by both the DFC Environmental Manager and the GSA Project Manager.
- 5. The GSA Project Manager will send a signed copy (with both signatures) to the Contracting Officer (CO) for inclusion in the contracting project files.
- 6. EPG will provide contracting language to be included in the SOW after they have determined handling requirements.
- 7. EPG, upon request can provide general cost information on soil sample collection, analysis (full TCLP), and disposal.
- 8. All soils leaving the DFC must be under a manifest signed by the DFC Environmental Manager.

EXCAVATION PERMIT REQUEST FORM (To be filled out by GSA Project Manager)

All projects involving any degree of excavation will require an Excavation Permit.

Date	
Project Title	
GSA Project Manager	
Contractor Name (if known)	
Proposed Date of Excavation	
Excavation Period (days)	
Reason for Excavation	
Number of Excavations	
Approx. depth (ft)	
Approx. length & width (ft)	
Proposed method of handling, storage and/or disposal of excavated mate	
This section for EMERGENCY EXCAVATION ONLY :	
Name of EPG representative contacted	
Date and time of Excavation Authorization	

LOCATE AND CLEARLY MARK ALL EXCAVATION SITES ON ATTACHED MAP

The Excavation Permit will be issued within 3 days of submittal. All special handling, storage and /or disposal methods will be documented and explained in the issued Permit.

Excavation Permit Number:

Erosion Control Plan for DFC Excavation					
Location:					
Excavation Start Date:	: End Date:				
Contractor:	Project Manager:				
Terrain Slope Direction	n:				
Type of Slope:	Steep	Mid	Mostly Flat		
Comments:					
Type of Surface:	Concrete or Asphalt	Lawn	Field		
Comments:					
Distance to Storm Water	er Inlet:	feet			
Type of Inlet:	Storm Area Drain	☐ McIntyre Gulch	Ag Ditch		
Comments:					
	1.				
Best Management Practice(s)	2.				
Implemented	3.				
	4.				
GSA EPG Approval					
	Signed		Date		

