



### 1.0 Purpose & Scope

#### **This only applies to the Denver Federal Center.**

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 cleanup 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 permit 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:

- Paving and 8 to 10-inch road base under-pavement is excluded from the permitting and manifesting requirements
- Emergency situations (e.g., broken water line) are excluded from the DFC excavation permit requirements, excluding CABI oversight and RACS



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determination provided the soil is placed back into the excavation (top 3 ft. segregated and replaced on top) and/or temporarily staged in a secure and stabilized manner.

Other than in an emergency situation, the EPG will review the DFC database management system (DBMS) for chemical contamination to determine if any special handling or management activities are required. The location and depth of soil disturbance at the DFC will drive the potential for more stringent management measures.

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

- Federal and State Forms and Permits:** 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:

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

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 3.0.



### 6.0 Procedure

**State Specific Procedures & Requirements** [refer to individual State Legal Reviews for details on Statutes, 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 Property Manager will obtain, fill out, and submit any necessary city and local excavation permits.
- 6.2 For excavation work at the DFC; anyone who plans on disturbing soils will fill out a Permit Request Form (provided by the Environmental Programs Group (EPG), Building 41, DFC), include the Erosion Control Plan, and mark the location of the excavation on the attached Dig Permit Basemap. To aid the evaluation, Project Manager and/or Contractor should provide detailed map of project.
- 6.3 The party who filled out the Permit Request Form will submit the required documents to the EPG.
- 6.4 The EPG follows the *Excavation Permit Procedure, Revision No.10, (latest version)*. The 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 EPG will generate the permit requirements.
- 6.5 The EPG will provide the Permit to the requestor with a determination if the soils are presumed clean, potentially contaminated, or contaminated and if any storage, handling, and/or disposal requirements are applicable. The Permit will be signed by both the EPG Program Manager and the GSA Project/Tenant Manager.
- 6.6 The Region SEMS Manager tracks Excavation Permit Requests.
- 6.7 At DFC the EPG shall provide the GSA Project Manager a signed copy of the Permit. It is the GSA Project Manager'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. The project CO and requestor should retain copies of the permit with contract and project files.
- 6.8 At the DFC the EPG will provide contracting language to the GSA Project Manager to be included in the SOW after they have determined handling requirements.



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- 6.9 The EPG, upon request, can provide general cost information on soil testing, sampling, and disposal.
- 6.10 At the DFC it is the responsibility of the GSA/Tenant Project Manager and associate Contracting Officer (CO) to share the information in the Permit with the excavation Contractor to assure compliance with the permit. Afterwards the Contractor can begin work.
- 6.11 At the DFC the EPG 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 media, and should the project or program be under DFC or EPG jurisdiction, the DBMS procedure will be followed. Reference Standard Operating Procedure No. 15 of the DFC Quality Assurance Project Plan for more information on the DBMS.
- 6.13 The Excavation Permit will be issued as soon as possible, but with a goal of within 3-4 weeks from the date the application was submitted. Complexity of site specific conditions or incompleteness of the application will drive the response time by the EPG and the permit being issued.

## 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

## 9.1 Appendices

Attachment A: Excavation Permit Flowchart  
Attachment B: Excavation Activity Permit, Environmental Program Group (EPG), Denver Federal Center, Rev. July 9, 2018



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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 Flowchart	Robert Melvin
04/02/2010	Update requirements at DFC	Mike Gasser
06/09/2010	Add state regulations and outline Regional requirements	Robert Melvin, Mike Gasser
07/20/2012	Emphasize Roles and Responsibilities in section 6, update flowchart	Mike Gasser, Nick Gutschow, Robert Melvin
06/20/2013	EISA and NOI added to Appendix B	Mike Gasser
7/9/18	Update SEMS Procedure	Rick Mruz (CDPHE), John Kleinschmidt (GSA), Bill Fieselma/Fritz Heneman (MiraCorp)



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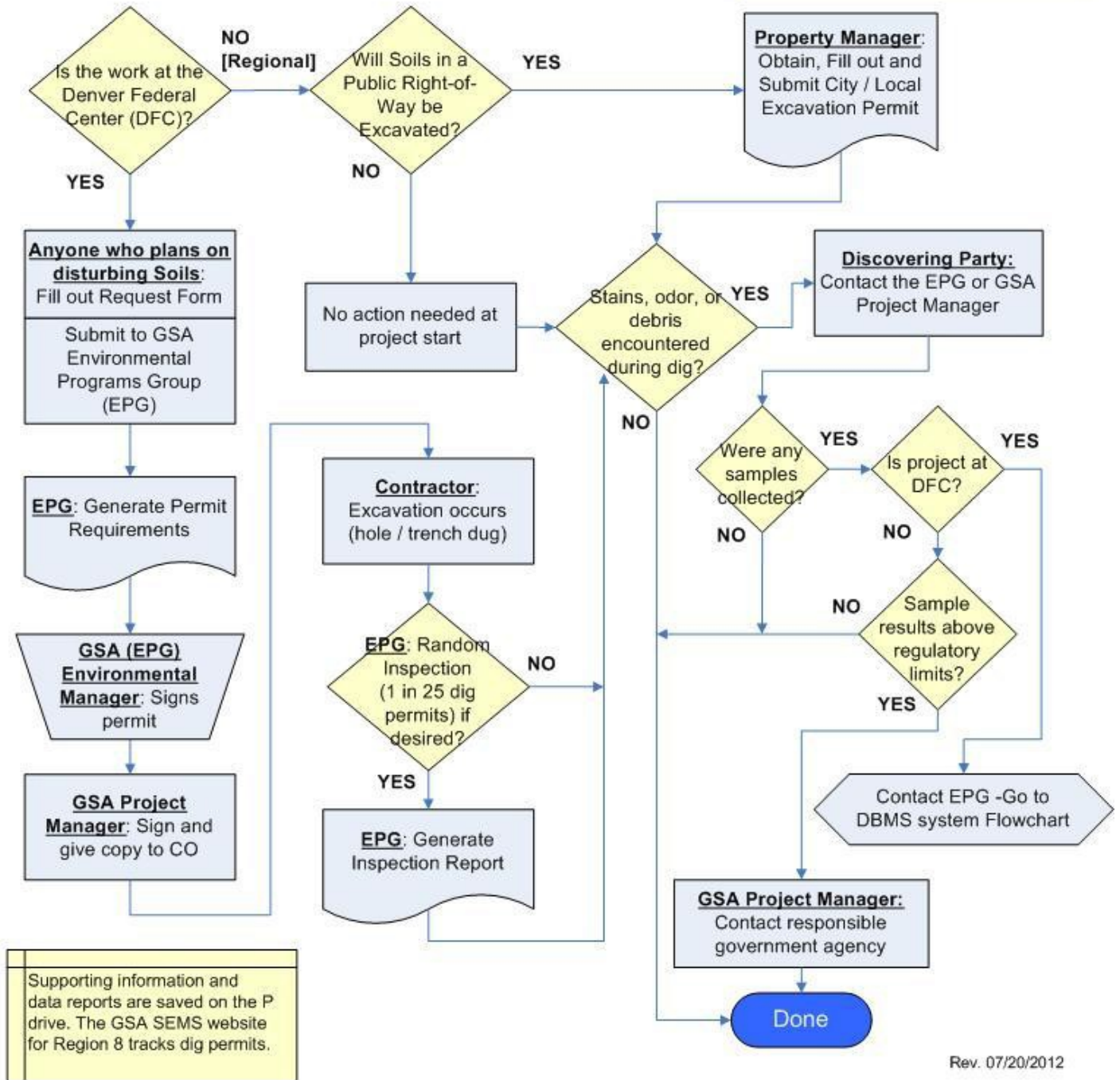
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## ATTACHMENT A: Excavation Permit Flowchart

**This applies to Anyone who plans on disturbing Soils:** Assess Project Requirements

**Responsible Parties:**

- Anyone who plans on disturbing Soils (i.e., Property Manager, Project Manager, Contractor)
- Contracting Officer
- Environmental Programs Group (EPG)





Attachment B:

Excavation Activity Permit  
Environmental Program Group (EPG), Denver Federal Center  
Rev. July 9, 2018

**Filling Out a Permit Request Form by the GSA Project Manager**

1. Is your new project going to disturb soils? **Yes** then continue, **No** 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.





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## 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 material:  
\_\_\_\_\_

*Soil disturbed area includes all area within construction boundary's and specialty roads built for the project (improved or un-improved).*

IS THE PROJECT AREA 5,000 SQ FT OR LESS: CIRCLE ONE **YES** OR **NO**

For all projects that disturb less than 5,000 sq. ft. of area, Best Management Practices (BMPs) are required to control runoff and erosion from the disturbed area and prevent project sediment discharge to the storm sewer system.

IS THE PROJECT AREA GREATER THAN 5,000 SQ FT (70 BY 70 FT): CIRCLE ONE **YES** OR **NO**

Is there a change from vegetative cover to hard surface?

**Yes (see below)      No (no requirement for EISA)**

If project disturbs greater than 5,000 sq. ft. Energy Independence & Security Act (EISA) requirements apply. If it is a change from vegetative cover (xeriscape, grass, flower gardens, shrubbery) to hardscape (black top, concrete, new building foot print) then runoff modeling and runoff mitigation is required (infiltration structures, use of permeable surfaces, impoundments, etc.) If the project is returning the disturbed area to some type of vegetative cover, this is not required.

**Provide documentation of runoff calculations or runoff model of area.**

IS THE PROJECT AREA GREATER THAN 43,560 SQ FT (208 BY 208 FT): CIRCLE ONE **YES** OR **NO**

If soil disturbance is greater than one acre (43,560 sq. ft.) an EPA Notice of Intent (NOI) is required to be filed with EPA (online: <http://cfpub.epa.gov/npdes/search.cfm>) and a Stormwater Pollution Prevention Plan (SWPPP) developed, reviewed, and accepted by EPG.

In addition, the above EISA requirements may apply.





**EMERGENCY EXCAVATION ONLY**

Name of EPG representative contacted \_\_\_\_\_

Date and time of Excavation Authorization: \_\_\_\_\_

RACS Determination: \_\_\_\_\_

Map Provided: \_\_\_\_\_

**LOCATE AND CLEARLY MARK ALL EXCAVATION SITES ON  
ATTACHED MAP**

*The Excavation Permit will be issued as soon as possible, but with a goal of 3 to 4 weeks from the date the application was submitted. Complexity of site specific conditions or incompleteness of the application will drive the response time by the EPG and the permit being issued.*

*However, if project manager/contractor can provide a better detailed map, this will aid the review process and potentially minimize dig permit requirements. (e.g., narrowing the project area will minimize the area evaluated and potentially narrow the potential to impact known areas of contamination)*



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Excavation Permit Number:

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

