



SITE REMEDIATION

Region 8 Sustainability & Environmental Management System

1.0 Purpose & Scope

The purpose of this procedure is to provide the basic as related to how to manage observed/discovered contamination during excavation activities at the Denver Federal Center (DFC) and throughout the region. It is also to inform those doing soil disturbing activities about the fact the DFC is under legal obligation to handle these discoveries through Colorado Department of Public Health and Environment (CDPHE) approved plans.

2.0 Activities & Departments Affected

This procedure affects all GSA personnel and contractors who disturbed soil at GSA facilities in Region 8.

3.0 Exclusions

No exclusions from this procedure are allowed for any discovered soil which is stained, has odor, and/or discovers asbestos or constriction debris during soil disturbing activity.

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

☐ **Federal and State Forms and Permits:**

PERMIT / FORM / REPORT	SUBMITTED TO: FEDERAL OR STATE AGENCY	SUBMITTAL FREQUENCY
RCRA Facility Investigation (RFI) Work Plan (WP)	For DFC projects: CDPHE (1)	Each occurrence
Corrective Measure (CM) WP	For DFC projects: CDPHE (1)	Each occurrence
Site Characterization and Management Plan (SCMP)	For DFC projects: CDPHE (1)	Each occurrence

(1) For projects other than located at the Denver Federal Center, work with the GSA Environmental Programs Group (EPG) so as to coordinate with the proper state and local agencies.

☐ **In-house GSA Region 8 and Contractor Forms:**

Dig permits at the DFC; a requirement stemming from a Consent Order from CDPHE

5.0 Acronyms, Abbreviations, and Definitions

Acronyms	Meaning
CDPHE	Colorado Department of Public Health and Environment
CEQ	Council of Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act; (Superfund)
CFR	Code of Federal Regulations
CM	Corrective Measure
CO	Contracting Officer
COR	Contracting Officer's Representative
DBMS	Database Management System
DFC	Denver Federal Center
COR	Contracting Officers Representative
EO	Executive Order



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Acronyms	Meaning
EPA	Environmental Protection Agency
EPG	Environmental Programs Group
GSA	General Service Administration
IH	Industrial Hygienist
O&M	Operations and Maintenance
PBS	Public Building Services
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
SCMP	Site Characterization and Management Plan
SOP	Standard Operating Procedures
WP	Work Plan

6.0 Procedure

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

Each state as an agency that needs to be informed and may manage in some capacity; depending upon the agreement between the state and the Environmental Protection Agency (EPA). Contact the GSA Environmental Programs Group (EPG) for added information and requirements.

Standardized Procedure:

- 6.1 When the Contracting Officer's Representative (CORs), Project Manager, or Property Manager discovers debris, staining, or odor at an interior or exterior excavation site, site remediation activity may be required. Similarly, Environmental Programs Group (EPG) soil disturbance activities and RCRA Facility Investigation Project action require site remediation as well.
- 6.2 If the COR, Project Manager, or Property Manager discovers debris, staining, or odor at an excavation site, they will contact the EPG if at the DFC, or the Industrial Hygienist (IH)/EPG if in Region 8 but outside the DFC.
- 6.3 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 Database Management System (DBMS) procedure will be followed.
- 6.4 The EPG (or IH/EPG outside the DFC) will evaluate information that results from sampling and analysis and/or evaluate non analytical information and determine which regulatory authority may be relevant to the issue.
- 6.5 If the issue is of concern environmentally at the State or Federal level and occurs at the DFC, the EPG, will handle it as required by the DFC consent order for all EPG projects (with all other following the *Excavation "Dig" Procedure*). If not at the DFC but in Region 8, the IH (or EPG is appropriate) will work with the



Project and/or Property Manager to remediate and clean up the problem.

6.6 Issue of no environmental concern at a State or Federal level no action is required.

7.0 Records Management

For records off the DFC, the Industrial Hygienist, Building Manager, or Project Manager will retain records of the work for project files. If state of local government reporting is required, the appropriate agency will have file records.

On the DFC, records can be found with the EPG. Copies of formal reports on activities can be found at the State of Colorado Department of Health.

8.0 References

For work off the DFC, the appropriate city, county, or state guidance documents and regulations will contain requirements for performance of the work and reporting requirements.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); (Public Law 96-510), 42 U.S.C. §§ 9601–9675, December 11, 1980.

Resource Conservation and Recovery Act (RCRA); (Public Law 94-580), 42 U.S.C. §6901 et seq. (1976)

For work on the DFC the following documents control the site remediation:

- Compliance Order on Consent 97-07-18-01 (July 18, 1997) covering required investigation and remediation of the DFC.
- Quality Assurance Project Plan (QAPP) for the Denver Federal Center Site-Wide RCRA Facility Investigation prepared for the GSA by URS and revised by Summit Technical Resources in June 2004; Vol. 1 RFI Risk Assessment Workplan for the Denver Federal Center and Vol. 2 Standard Operating Procedures (SOP).
- Project specific work plan

9.0 Appendices

Attachment A: Site Remediation Flowchart

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Document Revision and Update:		
Revision Date	Nature of Revision	Revision made by:
07/09/2012	Working Draft Flowchart created, original database program has been around for nearly 10 years	John Kleinschmidt, Mike Gasser
07/25/2012	Written summary procedure prepared, emphasize Roles and Responsibilities in section 6, update flowchart	Nick Gutschow, John Kleinschmidt, Mike Gasser, Robert Melvin
02/15/2013	Added acronyms to lists	Robert Melvin

ATTACHMENT A: Site Remediation Flowchart

