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REQUIRED BY CONTRACT AND PLANTWIDE HEALTH AND SAFETY PLAN PRIOR TO BEGINNING CONSTRUCTION/EXCAVATION ACTIVITIES.

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M.C. BROSEARD

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A-SW-002321

**Rocky Flats
Environmental Technology Site
1-F20-ER-EMR-EM.001
REVISION 0**

**ENVIRONMENTAL APPROVAL PROCESS FOR
CONSTRUCTION/EXCAVATION ACTIVITIES**

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DOE RFFO/ER Submittal Required Yes No NA

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Responsible Organization: Environmental Restoration Effective Date: 9-25-96

CONCURRENCE BY THE FOLLOWING DISCIPLINES IS DOCUMENTED IN THE PROCEDURE HISTORY FILE:

Administration Services	Organizational Effectiveness
Analytical Services	Performance Assurance
Building Deactivation	Planning and Integration
Communications	SNM Management and Storage
Economic Development	Support Services
Engineering and Safety Services	Waste Management
General Counsel	Waste Stabilization
Internal Audit	

USE CATEGORY 4

ORC review not required

The following have been incorporated in this revision:
93-DMR-000585

This procedure supersedes procedure 3-21000-ADM-GT.24, Revision 0

Periodic review frequency: 1 year from the effective date

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PER R.B. HOFFMAN, CLASSIFICATION OFFICER
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1. **PURPOSE**

This procedure provides instructions for obtaining review and approval for construction or excavation activities on or near an Individual Hazardous Substance Site (IHSS), Potential Area of Concern (PAC) or other Environmental Areas of Concern (EAC) at the Rocky Flats Environmental Technology Site (Site).

This procedure specifies the steps required to ensure compliance with:

- 29 CFR 1926, Subpart P, Excavations and Trenching (CFR 1926)
- Interagency Agreement (IAG)
- Department of Energy (DOE)
- Environmental Protection Agency (EPA) directives and regulations
- Colorado Department of Public Health and Environment (CDPHE) directives and regulations

2. **SCOPE**

This procedure is applicable to all operations conducted at the site involving construction or excavation activities as defined in 1-B37-HSP-12.08, Excavations and Trenching, that result in the disturbance of potentially contaminated soil for purposes other than sampling. This procedure describes required personnel responsibilities and qualifications, and procedures for construction and excavation activities that result in the disturbance of potentially contaminated soil for purposes other than sampling.

This procedure supplements procedure 1-B37-HSP-12.08, Excavations and Trenching.

This procedure is applicable to all operations in EAC where a hazardous waste determination has not yet been made.

This procedure supersedes procedure 3-21000-ADM-GT.24, Approval Process for Construction Activities On or Near Individual Hazardous Substance Sites (IHSSs).

3. **DEFINITIONS**

Hazardous Waste Determination. A determination made by a person designated to be a qualified hazardous waste generator as to whether any hazardous waste has been or will be generated by an activity. This determination is documented on a Hazardous Waste Determination Form, EM.001A (Appendix 1).

Historical Release Report (HRR). A listing of historical releases and events occurring at the site since 1951 including current IHSS information as mandated in the Environmental Restoration IAG.

Individual Hazardous Substance Sites (IHSSs). As defined in the Environmental Restoration IAG and as used at the site, individual locations at the site where hazardous substances have been released or may have been released. These sites were previously identified as Solid Waste Management Units (SWMUs). The Environmental Restoration Program Division (ERPD) will identify locations of IHSSs and be responsible for reporting new information regarding other areas of environmental concern through the HRR reporting process.

3. **DEFINITIONS (continued)**

Near an IHSS. Those locations determined close enough to a suspected IHSS to have the potential to be contaminated. IHSS boundaries can not be staked to the nearest foot and are subject to interpretation. Interpretations are the responsibility of the ERPD.

Soil Disturbance Assessment Committee. The site committee established to evaluate and approve soil-disturbing activities and ensure that these activities have acceptable impacts on health, safety, the environment, plant operations, plant property facilities, and systems. This committee consists of representatives from ERPD, Construction Management (CM), Radiological Engineering (RE), Central Engineering (CE), Occupational Safety (OS), and Industrial Hygiene (IH).

4. **RESPONSIBILITIES**

4.1 Environmental Restoration Program Division (ERPD)

Responsible for determining if the activity will occur in or near an IHSS or other area of environmental concern and thus whether the controls identified in this procedure are applicable.

Determines if proposed construction activities will have an adverse environmental impact or interfere with ongoing remedial investigations.

Notifies Operable Unit (OU) managers of proposed activities within or near an IHSS as early in the planning process as possible.

Provides guidance for the preparation of sampling plans and laboratory analysis requirements.

Provides assistance to Hazardous Waste Generators and Responsible Managers preparing Hazardous Waste Determination Forms.

Assists Hazardous Waste Generator in determining if additional sampling (soil and/or water) is required.

Reviews and approves Site Survey Determination for Environmental Impact and Worker Exposure Form for prejob environmental and worker potential hazard(s) exposure assessment. Reviews Hazardous Waste Determination Form.

Responsible for surveillance and oversight of activities conducted within an IHSS or that potentially affect an IHSS, a PAC, or other area of environmental concern to ensure that the activities comply with applicable environmental regulations, permits, guidelines, and directives.

Maintains a map system documenting the location of IHSSs and PACs. This responsibility includes issuance of updated IHSS and PAC map(s).

4. **RESPONSIBILITIES (continued)**

4.2 **Qualified Hazardous Waste Generator**

Makes hazardous waste determinations.

Determines requirements for control and disposition of waste soils.

4.3 **Responsible Manager**

Ensures compliance with the requirements of this procedure.

Ensures that adequate funding and time are allotted within the activity for completion of the requirements of this procedure.

Prepares the Hazardous Waste Determination Form in conjunction with the Qualified Hazardous Waste Generator for review by ERPD.

Ensures all applicable waste transfer paperwork is completed as required for the generation of containerized waste .

Ensures the area disturbed is restored, as nearly as possible, to the original condition.

Initiates the soil disturbance package by completing the Soil Disturbance Evaluation Form and appropriate attachments.

Ensures all records are complete and quality assurance records are delivered to the ERPD Project File Center.

5. INSTRUCTIONS

5.1 Screening Excavation and Soil Disturbance Packages

ERPD

- [1] **WHEN** the initial Excavation and Soil Disturbance Package is received,
THEN verify that the package has been processed by the Excavation Specialist.
- [2] **IF** the package has **NOT** been processed by the Excavation Specialist,
THEN return the package to the requester and advise the requester to deliver the plan to the Excavation Specialist for processing in accordance with 1-B37-HSP-12.08, Excavations and Trenching.
- [3] **IF** the package has been processed properly,
THEN review the excavation plans to determine if the activity will be conducted within or near an IHSS or potentially affect an IHSS or other area of environmental concern.
- [4] Walk down the project with the Responsible Manager or other personnel to delineate the most accurate IHSS boundary.
- [5] **IF** the activity is determined to be external to an IHSS or other area of environmental concern
AND there are no negative environmental effects identified,
THEN approve the activity and forward the package to the Excavation Specialist.
- [6] **IF** the excavation activity will be conducted within or near an IHSS or potentially affect an IHSS or other area of environmental concern,
THEN determine appropriate hold points to be inserted in the work plan.
- [7] Determine the extent of the impact to the IHSS.
- [8] Determine what regulatory agencies must be notified of the proposed impact.
- [9] Provide instructions to Responsible Manager for notification to DOE and regulatory agencies.
- [10] Forward the package to the Excavation Specialist.

5.2 Evaluating Impact

Responsible Manager

- [1] Ensure that construction does **NOT** proceed until approval from the Soil Disturbance Assessment Committee is obtained.
- [2] Ensure that the Hazardous Waste Determination Form (Appendix 1) is properly completed and one copy is submitted to ERPD with all available analytical data prior to work starting on the project.
- [3] **IF** the soil disturbance approval was obtained more than 60 days prior to work starting,
THEN do **NOT** start work until a new approval is obtained from the Soil Disturbance Assessment Committee.

5. **INSTRUCTIONS (continued)**

Responsible Manager

- [4] **IF** an approved procedure is used in lieu of an Integrated Work Control Program (IWCP) work package,
THEN submit the Soil Disturbance Package as an independent document with the approved standard operating procedures (SOP) and health and safety plan.

5.3 **Sampling**

Responsible Manager

- [1] **IF** a proposed construction project has been deemed to impact an IHSS or other area of environmental concern,
AND analytical data is not available from ERPD remedial investigations or other projects,
THEN consult with ERPD to determine the necessity for sampling.
- [2] **IF** the proposed project is in an area of environmental concern other than an IHSS or PAC,
THEN complete sampling, if required, to provide data for a Hazardous Waste Determination.

ERPD

- [3] **WHEN** sampling is complete,
AND data has been received from the laboratory,
THEN notify the Qualified Hazardous Waste Generator.
- [4] Provide data interpretation assistance to the Qualified Hazardous Waste Generator if requested.

Qualified Hazardous Waste Generator

- [5] Make a Hazardous Waste Determination to determine the control and disposition of the soils.
- [6] **IF** additional sampling or analysis is needed for any impact or risk assessment,
THEN inform the Responsible Manager of the need for additional sampling.
- [7] **IF** generated waste requires containerization
THEN complete all appropriate waste transfer paperwork.

6. **RECORDS**

Management of all records is consistent with 1-77000-RM-001, Records Management Guidance for Records Sources.

Responsible Manager

[1] Ensure that the original and one copy, as required, of the following quality assurance (QA) records are transmitted to the ERPD Project File Center in accordance with 2-G18-ER-ADM-17.01, Records Capture and Transmittal:

- Memos indicating the activity will or will not be in an IHSS
- Soil Disturbance Package
- Sampling Plan
- Risk Assessment
- Rocky Flats Soil Disturbance Approval form
- Site/Activity logbook or equivalent documentation
- Environmental Impact and Worker Exposure form
- IHSS map
- Hazardous Waste Determination form

Submission of record copies to the ERPD Project File Center is in accordance with Administrative Record requirements, as defined in 2-S65-ER-ADM-17.02, Administrative Record Document Identification and Transmittal.

[2] **IF** waste is generated by the excavation,
THEN a copy of the Hazardous Waste Determination form must be processed as part of the administrative records.

There are no non-QA records generated by this procedure.

7. **REFERENCES**

A Compendium of Superfund Field Operations Methods. EPA/540/P-87/001, December 1987 (not cited in text)

Background Geochemical Characterization Report, September 1993

Colorado Hazardous Waste Regulations, 6 CCR 1007-3

Conduct of Construction Management Manual

DOE Order 4700.1, Project Management System

DOE Order 5440.1D, National Environmental Policy Act Compliance Program

EG&G Rocky Flats Plant, Conduct of Engineering Manual, 2-80000-COEM-2.0,
Engineering and Technology Organization Charts

7. REFERENCES (continued)

- EG&G Rocky Flats Plant, Quality Assurance Manual
- EG&G Rocky Flats Plant, Health and Safety Practices Manual (HSP)
- Environmental Restoration Interagency Agreement, (IAG), August 1990
- Historical Release Report, June 1992
- RFF Policy Manual 9-12, National Environmental Policy Act
- Title 29, Code of Federal Regulations (CFR), Labor
- 1-B37-HSP-12.08, Excavations and Trenching
- 1-C91-EPR -SW.01, Control and Disposition of Incidental Waters
- 1-74000-IWCP, Integrated Work Control Program
- 1-77000-RM-001, Records Management Guidance for Records Sources
- 2-E02-ER-ADM-05.05, ERM Administrative Procedure, Document Review
- 2-E20-ER-ADM-05.09, ERM Administrative Procedure, Work Plan Development
- 2-G18-ER-ADM-17.01, Records Capture and Transmittal
- 2-S65-ER-ADM-17.02, Administrative Record, Document Identification and Transmittal
- 2-L92-COEM-PMG-302, Overview to Quality, Environmental, Davis-Bacon, Security and Safety and Health for Project Manager.
- 4-F99-ENV-OPS-FO.23, ERM Operations Procedure, Management of Soil and Sediment Investigation Derived Materials
- 5-21000-OPS-FO.1, EPM Operations Procedure, Air Monitoring and Dust Control
- 5-21000-OPS-FO.3, ERM Operations Procedure, General Equipment Decontamination
- 5-21000-OPS-FO.4, ERM Operations Procedure, Heavy Equipment Decontamination
- 5-21000-OPS-FO.15, ERM Operations Procedure, Photoionization Detectors (PIDs) and Flame Ionization Detectors (FIDs)
- 5-21000-OPS-FO.16, ERM Operations Procedure, Field Radiological Measurements
- 5-21000-OPS-SW.16, EPM Operations Procedure, Sampling of Incidental Water

HAZARDOUS WASTE DETERMINATION

Rocky Flats Project: _____ Soil Sample Location: _____

Date: _____ Sampling Coordinates (If Available): _____

Responsible Manager (Print): _____

Note: A copy of this form must accompany the Soils Disturbance Permit prior to the start of work

INFORMATION USED TO MAKE HAZARDOUS WASTE DETERMINATION (Process Knowledge)	
<input type="checkbox"/> Historical Data (Clarify in basis for determination section)	<input type="checkbox"/> IHSS
<input type="checkbox"/> Analytical Results (Attach all data to this form and show total number of pages in the upper right hand corner)	<input type="checkbox"/> PAC
<input type="checkbox"/> No Hazardous Waste will be generated due to this activity	<input type="checkbox"/> AAC

SAMPLING INFORMATION:
SAMPLING METHOD(S): <input type="checkbox"/> Surficial Grab, <input type="checkbox"/> Depth Integrated, <input type="checkbox"/> Composite, <input type="checkbox"/> CDH method, <input type="checkbox"/> RFP Method, <input type="checkbox"/> Soil Gas, <input type="checkbox"/> Other(s) (specify)

LABORATORY ANALYSIS:
ANALYTICAL METHOD(S): (How are samples analyzed):
<input type="checkbox"/> TCLP <input type="checkbox"/> CLP <input type="checkbox"/> Total <input type="checkbox"/> Dissolved <input type="checkbox"/> X-Ray Fluorescence <input type="checkbox"/> Infra-Red Spectroscopy <input type="checkbox"/> Other Screening <input type="checkbox"/> Other (specify):

ANALYTICAL RESULTS: Validation Complete <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Non-Hazardous Waste
<input type="checkbox"/> Hazardous Waste (Metals and/or Organics Above TCLP or Upper Tolerance Level [UTL])

Basis for Determination: _____

Qualified Hazardous Waste Generator: _____ Date: _____

Responsible Manager: _____ Date: _____

Appendix 1
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ENVIRONMENTAL APPROVAL PROCESS
FOR CONSTRUCTION/EXCAVATION ACTIVITIES
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