



<i>Environmental Guideline</i> <b>Property Assessment</b>	
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<b>Activity Description</b>
Property Assessment – Any real property to be acquired by the City must undergo an environmental review. The environmental review may consist of an evaluation of any environmental documents that may exist related to the proposed property acquisition, public records relating to historical uses of the property, and may require intrusive sampling and other activities on the property. If there are improvements on the property refer to Environmental Guideline Asbestos/Lead-Based Paint Management.

<b>Potential Environmental Risks</b>
The following environmental concerns are associated with this activity: <ul style="list-style-type: none"><li>• Improper disposal of contaminated media</li><li>• Contamination of clean soils</li><li>• Contamination of surface water</li><li>• Contamination of groundwater</li><li>• Generation of hazardous wastes</li></ul>
Potential consequences from performing the activity incorrectly: <ul style="list-style-type: none"><li>• Property damage, personal injury, damage to the environment.</li><li>• Possible regulatory non-compliance,</li><li>• Environmental liability</li><li>• Delays to other agencies' project/property acquisition schedule</li></ul>

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**Critical Operating Requirements**

<b>A. General Requirements</b>	
<b>Prohibited Activities</b>	
<ul style="list-style-type: none"> <li>• If the property proposed for acquisition is contaminated and action is required to remediate the contaminated property to regulatory standards, the City should avoid acquiring the property.</li> <li>• If the City decides to acquire the property despite the environmental risks and potential liability then an appropriate acquisition strategy must be determined.</li> <li>• During intrusive sampling investigation derived waste (IDW) should not be left on the property.</li> </ul>	
<b>General Considerations</b>	
<ul style="list-style-type: none"> <li>• Each person conducting site assessment activities is responsible for understanding the applicable regulations and managing the activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations.</li> <li>• As possible, separate clean from contaminated materials to minimize the volume of material requiring remediation and/or disposal.</li> <li>• Properly containerize, characterize and dispose of wastes. See EG Management of Soil Waste and Water-from excavations for additional guidance.</li> </ul>	
<b>Training Requirements</b>	
<ul style="list-style-type: none"> <li>• Individuals that review or perform property assessments should receive training in ASTM 1527-05 Environmental Site Assessment and the All Appropriate Inquiry (AAI) Rule.</li> <li>• Individuals that handle or manage wastes should receive site-specific training in accordance with all applicable State and Federal requirements.</li> </ul>	
<b>Storage &amp; Material Handling Requirements</b>	
<ul style="list-style-type: none"> <li>• Investigation Derived Waste (IDW) should be containerized if contamination is suspected.</li> <li>• Maintain legible labels and markings on all containers.</li> </ul>	

<b>B. Planning Requirements</b>	<i>Responsible: Environmental Specialist/Contractor</i>
B1. Work collaboratively with all agencies (Asset Management, Design Construction Management, etc) to identify projects/properties that need an Environmental Site Assessment.	
B2. Identify probable future use for property.	
B3. Identify historical uses of property through databases, aerial photographs, Sanborn Fire Insurance Maps, etc.	
B4. Identify areas of concern and appropriate media and analytical suites to be sampled.	
B5. Ensure that site access has been obtained.	
B6. Ensure that all required laboratory bottles for proposed analytical samples have been requested.	
B7. Compile and submit Waste Stream Characterization forms to Denver Arapahoe Disposal Site (DADS) for prior approval, where necessary.	
B8. Have appropriate PPE available, if necessary.	

<b>C. Critical Tasks</b>	<i>Responsible: Environmental Specialist/Contractor</i>
C1. Identify project or property for which Environmental Site Assessment is to be performed	
C2. Secure site access from property owner for Environmental Specialist/Contractor performing work on the property	
C1. If intrusive sampling is planned, ensure that a utility locate has been performed prior to	

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sampling.
C2. Properly secure IDW for storage prior to disposal.
C3. Dispose of IDW according to applicable local, state, and federal requirements.
C4. Use PPE where appropriate
C5. Complete Phase I or Phase II Environmental Site Assessment to provide to collaborating agencies.

<u>D. Emergency Response</u>	<i>Responsible: Environmental Specialist/Contractor</i>
D1. If a spill occurs, refer to Environmental Guideline Spill Response. <ul style="list-style-type: none"> <li>• <b>Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills.</b></li> </ul>	
D2. Control spills to minimize property damage and eliminate imminent risk to human health and the environment.	
D3. Containerize all collected wastes and evaluate for labeling, storage and disposal.	

<u>E. Inspection &amp; Maintenance Requirements</u>	<i>Responsible: Environmental Specialist/Contractor</i>
E1. Document all activities performed or observed.	

<b><i>Expected Records / Outputs</i></b>	
<u>Record / Output</u>	<u>Instructions</u>
Chain of Custody forms	<ul style="list-style-type: none"> <li>• Chain of Custody forms are provided by the contract laboratory.</li> </ul>
Electronic and hard copies of analytical data	<ul style="list-style-type: none"> <li>• Electronic and hard copies of analytical data are provided by the analytical laboratories.</li> <li>• Electronic and hard copies of analytical data are to be filed and kept in accordance with the DEH records retention policy.</li> </ul>
Phase I and Phase II Environmental Assessment Reports	<ul style="list-style-type: none"> <li>• Reports authorized by the City are provided in both electronic and hard copy.</li> <li>• Other reports which are provided by outside parties may be either electronic and/or hard copy.</li> </ul>
Internal Memorandum	<ul style="list-style-type: none"> <li>• Stored on the network.</li> <li>• Summarizes the environmental conditions of the property.</li> <li>• Memorandum is sent to the client with a copy for the file.</li> </ul>

<b><i>References</i></b>
<u>Phone Numbers</u>
<ul style="list-style-type: none"> <li>• <b>311 (for Spill Reporting during normal business hours).....3-1-1</b></li> <li>• DEH DEQ Emergency Response (after normal business hours)..... (303) 206-0001</li> <li>• Alice Luhan (DEQ Environmental Scientist Supervisor)..... (720) 865-5431</li> </ul>
<u>Guidance Materials (list not limited to the following)</u>
<ul style="list-style-type: none"> <li>• ASTM 1527-05</li> <li>• All Appropriate Inquiry Rule, 40 CFR Part 312</li> <li>• DOT Labeling and Placarding Guidance</li> <li>• CCoD Soil Screening Levels and User's Guide, September 2005</li> </ul>
<u>Training Materials (list not limited to the following)</u>
<ul style="list-style-type: none"> <li>• Operating procedures training (On-the-Job)</li> <li>• Site specific training materials for handling contaminated materials</li> </ul>

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## **References**

### Related Environmental Guidelines (list not limited to the following)

- Asbestos/Lead-Based Paint
- Outdoor Facility Management
- Spill Response
- General Waste Management

### Applicable Regulations (list not limited to the following)

- 40 CFR Parts 136-149 Safe Drinking Water Act (SDWA)
- 40 CFR 239-299 Resource Conservation and Recovery Act (RCRA)
- 40 CFR Parts 300-399 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- 40 CFR Parts 300-399 Superfund Amendments and Reauthorization Act (SARA)
- 5 C.C.R. 1002-1003 Water Quality Control
  - Regulation 41- Basic Standards for Groundwater
- 2 C.C.R 402 Well Installations
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 312 Standards and Practices for All Appropriate Inquires; Final Rule
- 6 CCR 1007-3, Part 261 State RCRA Regulations
- CCoD Ordinances
- Denver Wastewater Management Division Rules & Regulations
- Metro Wastewater Reclamation District Rules & Regulations

### Other Documents

- American Society for Testing Materials International (ASTM) E-1527-05 Environmental Site Assessments: Phase 1 Environmental Site Assessment Process
- ASTM Standards related to the Phase II Environmental Site Assessment Process (ASTM Stock #: Phase 2)
- Compliance Bulletins
- CCoD Executive Order 100