



FREQUENTLY ASKED QUESTIONS SITE DEVELOPMENT - EVIDENCE OF CONTAMINATED SOIL

Upon removal of the concrete floor slab at our facility, stained and odorous soil was uncovered. Our facility expansion requires excavation in the affected area. What steps must be implemented to protect the health and safety of our construction personnel and the removal/disposal of these soils? All work has been halted pending proper/planned decision making to move forward.

ANSWER:

Step #1: Report Release to National Spill Response Center at 800-424-8802.

Step #2: Review Facility Records to identify potential contamination sources such as underground storage tanks which may be present or previously removed or abandoned in-place at the site. Rule out, where feasible, previous spills or discharge from facility operations/floor drains. Odorous soils generally involve a hydrocarbon source (such as gasoline, diesel fuel or hydraulic fluid, etc.) or in the case for plant facilities, a process chemical.

Step #3: Characterize the type and extent of release. Collect samples of the odorous soil. Samples should be analyzed for VOCs, SVOCs and PCBs. Sample analysis for metals may also be necessary depending upon your facility records. Detail/characterize the scope of release including the depth and width of the spill.

Step #4: Develop Site Specific Excavation Health and Safety Plan to remove odorous soil. Soil should be segregated (unimpacted/clean and impacted/regulated) during excavation based on visual inspection/staining odors or PID instrumentation measurements.

Step #5: Clean Fill Sampling of unimpacted soil pile should be performed to verify future use/disposal of this soil. Where laboratory analysis meets clean fill criteria, the confirmed clean fill can be reused without restriction. Specific states may require documentation such as Commonwealth of Pennsylvania form (FP-001) to be signed by the clean fill generator and retained by the owner of the property receiving the clean fill.

Step #6: Regulated Fill includes impacted soil with odorous, stained or soil with elevated PID readings. This regulated fill is normally best disposed of at a landfill. The landfill itself may have specific testing requirements prior to disposal.

When you need professional help or advice, email Alan Sutherland, CIH, CHMM at a.sutherland@aetinc.biz or call 610-891-0114. We provide nationwide services; phone consultations are free. Check out the full range of environmental contracting/consulting services we provide at our website www.aetinc.biz.

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