

**Approach
(cont'd)**

Most developers conduct pre-construction environmental assessments as a matter of routine. Recent court rulings holding **contractors liable for cleanup costs** when they unknowingly move contaminated soil, highlight the need for contractors to confirm that a site assessment is completed **before earth moving begins**.

The following steps will help reduce stormwater pollution from contaminated soil:

- Conduct thorough site planning including pre-construction geologic surveys.
- Look for contaminated soil as evidenced by discoloration, odors, differences in soil properties, abandoned underground tanks or pipes, or buried debris.
- Prevent leaks and spills to the maximum extent practicable. Contaminated soil can be expensive to treat and/or dispose of properly. However, addressing the problem before construction is much less expensive than after the structures are in place.
- For a quick reference on disposal alternatives for specific wastes, see the table presented in the Employee/Subcontractor Training BMP fact sheet, [Table GHP-14-1](#).

Application of this BMP Fact Sheet

Excavation, transport, and disposal of contaminated material and hazardous material shall be in accordance with the rules and regulations of the following agencies (the specifications of these agencies shall supersede the procedures outlined in this BMP):

- United States Environmental Protection Agency (USEPA)
- Kentucky Division of Water (KDOW)
- UST Branch, Kentucky Division of Waste Management (KDWM)
- Kentucky Division of Occupation Safety and Health Administration (OSHA)

Education

- Prior to performing any excavation work at the locations containing material classified as hazardous, employees and subcontractors shall complete a safety-training program.
- Educate employees and subcontractors on contaminated soil handling and disposal procedures.
- Instruct employees and subcontractors in identification of contaminated soil.
- Hold regular meetings to discuss and reinforce disposal procedures (incorporate into regular safety meetings).
- Provide additional training for field supervisors and inspectors, including hazardous material safety training.

Handling Procedures for Material with Aerially Deposited Lead

- Materials from areas designated as containing aerially deposited lead may, if allowed by the contract special provisions, be excavated, transported, and used in the construction of embankments and/or backfill.
- Excavation, transportation, and placement operations shall result in no visible dust.
- Use caution to prevent spillage of lead containing material during transport.
- Monitor the air quality during excavation of soils contaminated with lead.

**Approach
(cont'd)*****Handling Procedures for Contaminated Soils or Hazardous Materials***

- Test suspected soils at a certified laboratory.
- If the soil is contaminated, work with KDOW or environmental contractor to develop options for treatment and/or disposal.
- Avoid temporary stockpiling of contaminated soils or hazardous material.
- If temporary stockpiling is necessary:
 1. Cover the stockpile with plastic sheeting or tarps.
 2. Install a berm around the stockpile to prevent runoff from leaving the area.
 3. Do not stockpile in or near storm drains or watercourses.
 4. Implement stockpile controls as presented in [GHP-04: Material Delivery, Storage, and Use](#).
- Contaminated material and hazardous material on exteriors of transport vehicles shall be removed and placed either into the current transport vehicle or the excavation prior to the vehicle leaving the exclusion zone.
- Monitor the air quality continuously during excavation operations at all locations containing hazardous material.
- Procure all permits and licenses, pay all charges and fees, and give all notices necessary and incident to the due and lawful prosecution of the work, including registration for transporting vehicles carrying the contaminated material and the hazardous material.
- Collect water from decontamination procedures and dispose of at an appropriate disposal site.
- Collect non-reusable personal protective equipment (PPE), once used by any personnel, and dispose of at an appropriate disposal site.
- Install temporary security fence to surround and secure the exclusion zone. Remove fencing when no longer needed.

Procedures for Underground Storage Tank Removals

- Prior to commencing tank removal operations, obtain the required underground storage tank removal permits and approval from UST Branch, Kentucky Division of Waste Management, which has jurisdiction over such work.
- Arrange to have tested, as directed by the design professional, any liquid or sludge found in the underground tank prior to its removal to determine if it contains hazardous material.
- Following the tank removal, take soil samples beneath the excavated tank and perform analysis as required by UST Branch, Kentucky Division of Waste Management and the local agency representative(s).
- The underground storage tank, any liquid and/or sludge found within the tank, and all contaminated material and hazardous material removed during the tank removal shall be transported to disposal facilities permitted to accept such material by a licensed hazardous waste hauler.

Activity: Contaminated Soil Management**GHP-08****Approach
(cont'd)*****Water Control***

- Take all necessary precautions and preventive measures to prevent the flow of water, including ground water, from entering hazardous material or underground storage tank excavations. Such preventative measures may consist of, but are not limited to berms, cofferdams, grout curtains, freeze walls, and seal course concrete or any combination thereof.
- If water does enter an excavation and becomes contaminated, such water, when necessary to proceed with the work, shall be discharged to clean, closed top, watertight, transportable holding tanks, and disposed of in accordance with federal, state, and local laws.

Maintenance

- Inspect excavated areas daily for indications of contaminated soil.
- Implement [GHP-05](#): Spill Prevention and Control, to prevent leaks and spills as much as possible.
- Monitor air quality continuously during excavation operations at all locations containing hazardous material.
- Coordinate contaminated soils and hazardous material management with the appropriate federal, state, and local agencies.
- Inspect hazardous waste receptacles and areas regularly.

**Inspection
Checklist**

- The procedures and practices presented in this BMP are general. The contractor shall identify appropriate practices and procedures for the specific contaminants known to exist or discovered on site.
- Contaminated soils that cannot be treated on-site must be disposed of off-site by a licensed hazardous waste hauler.
- The presence of contaminated soil may indicate contaminated water as well. See [GHP-01](#): Dewatering Operations for more information.