

HazMat
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NDOR Hazardous Material Review Guidance Manual

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Site Specific Hazardous Material Review (SSHR)

- For all activities in or around a highway right-of-way
- Typically CE level
- Scope of an SSHR project

Site Specific Hazardous Material Review (SSHR)

Highway

- Low Potential Sites: Activity undertaken within the highway right-of-way
- Medium Potential Sites: Limited excavation or other activities in or near the highway right-of-way
- High Potential Sites: Large scale excavation or other activities in or near the highway right-of-way

Additional Information to Worksheet

- Project Name
- Location
- Project Description
- Project Number
- Project Date
- Project Status

Questions

SSHR for Alternatives Analysis

- Project Name
- Location
- Project Description
- Project Number
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NDOR Review and Comments

Identify all sites in the project area that require a hazardous material review.

New Projects in CE Projects

- Identify all sites in the project area that require a hazardous material review.
- Identify all sites in the project area that require a hazardous material review.
- Identify all sites in the project area that require a hazardous material review.

Hazardous Material Review (HMR)

1. Site Specific 2. Alternatives Analysis

Hazardous Material Review (HMR)

Identify hazardous materials concerns prior to construction

Identify the location and release potential of hazardous materials in the project area. Determine whether the release potential is significant. Determine whether the release potential is significant. Determine whether the release potential is significant.

Project Types

Pavement Preservation

- Typically excluded from a hazardous material review

Resurfacing, Restoration, Rehabilitation (RR)

- CE level analysis
- Review needed if excavation occurs outside pre-existing roadway (if not)

New and Reconstruction

- HMR review necessary

Bridge work

Project

Identify the location and release potential of hazardous materials in the project area. Determine whether the release potential is significant. Determine whether the release potential is significant. Determine whether the release potential is significant.



Purpose

Assists in performing hazardous material reviews (HMR)

HMR:

- Identifies project related hazardous material concerns
- Materials management plans
- Identifies health and safety concerns
- Facilitate alternatives analysis

Regulations

| Forced | Self |
|---|--|
| CENCLA Comisión Nacional de Energía y Ambiente Elabora y emite las normas técnicas de calidad ambiental y de calidad del aire. Regula y controla la contaminación ambiental. MORSA Comisión Nacional de Medio Ambiente y Recursos Acuáticos | WQO TRL 124 Norma Técnica de Calidad Ambiental para el Aire. WQO TRL 125 Norma Técnica de Calidad Ambiental para el Agua. |

Federal

CERCLA

*Comprehensive Environmental Response,
Compensation and Liability Act*

- Superfund
- Response to releases (remediation)

RCRA

Resource Conservation and Recovery Act

State

NDEQ Title 128

Nebraska Hazardous Waste Regulations

management of hazardous wastes

NDEQ Title 132

Integrated Solid Waste Management Regulations

Project Types

Pavement Preservation

- Typically excluded from a hazardous material review

Resurfacing, Restoration, Rehabilitation (3R)

- CE level analysis
- Review needed if excavation occurs outside pre-existing roadways fill material

New and Reconstruction

- HMR review necessary

Bridge work

Projects with Higher Potential to Encounter Hazardous Materials

- Extensive grading activities adjacent to hazardous waste facilities and service stations
- Urban projects with soil disturbance
- Utility work including storm sewer, sanitary sewer signals and lighting (where trenching will occur)
- Excavations encountering groundwater
- Full property acquisition

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Hazardous Materials Definition (NDOR)

Broad category of materials that pose a significant hazard to human health and safety or to the environment if released into the environment.





- Petroleum products
- Solvents
- RCRA metals
- Industrial haz waste

3

Project Footprint

Area on a project site *where excavations or work* occurs to construct the project improvements



Typical Search Distances

Superfund NPL: 1.0 mile

Solid waste disposal facilities: 1.0 mile

CERCLIS (non-NPL)

LST

RCRA related

Brownfield

0.1 miles

Hazardous Material Review (HMR)

Identify hazardous materials concerns prior to construction

- *Identifies facilities and releases*
- *Potential for contamination in project footprint*
- *Summarizes subsurface investigations*
- *Summarizes regulatory agency correspondence*
- *Includes mitigation measures (commitments)*



Basic Steps of the HMR:

1. Agency environmental database review

- NDEQ IMS
- EnviroMapper
- EDR
- State Fire Marshal list of USTs
- NDEQ spills
- NRC

2. *Visual reconnaissance

- visual recon. form
- site photographs

3. *Additional analysis

- regulatory file review
- historical records
- agency coordination

4. *Subsurface investigation

5. Compile information into HMR

*if necessary

Hazardous Material Review (HMR)

1. Site Specific
2. Alternatives Analysis

Site Specific Hazardous Material Review (HMR)

- No alt. analysis or minimal difference in alt.
- Typically CE level
- Majority of NDOR projects

Site Specific Hazardous Material Review (HMR)

Findings:

Low Potential Site: Unlikely contamination would be encountered during construction

Medium Potential Site: Unclear if contamination is in project footprint or subsurface investigation determines contamination is not present.

High Potential Site: Likely that contamination is in the project footprint

HMR for Alternatives Analysis

Findings are risk based

- budget
- schedule
- extent of contamination
- remediation
- Human Health and Safety

HMR for Alternatives Analysis

Findings:

Low Risk: Unlikely contamination is within HMR study area.

Medium Risk: Potential for contamination in project HMR study area. Minimal impact for materials management, health and human safety and schedule.

High Risk: Contamination likely to impact construction. Extensive materials management and health and human safety plans. Could create substantial delays and increase in project cost. Avoidance of high risk sites where possible

NDOR Review and Clearance

Submit HMRs to NDOR Hazardous Materials PQS for approval

Approved HMR to project file

PQS HMR summary and mitigation memo attached to NEPA form

New Process vs. Old Process

Format: Technical Document instead of memo

Visual Reconnaissance - not windshield survey

New Site Reconnaissance form

Coordinate more with NDOR PQS

Change in finding language: Potential of encountering contamination during construction.

HMR not attached to CE form - PQS attached

Additional Information in Guidance

Examples:

- HazMat site discussions
- HazMat site risks
- Commitments

Regulations

References:

- Definitions
- Example HMR
- QA/QC form
- Visual reconnaissance form

Questions