Nebraska Department of Roads

Planning and Project Development

Hazardous Materials Memorandum

Date: April 22, 2016

To: Ryan Walkowiak, Highway Environmental/NEPA Specialist, Planning and Project Development

From: Will Packard, Highway Environmental Specialist, Planning and Project Development

Subject: Hazardous Materials Review Memo for the NDOR Project Talmage North Bridges (C.N. 12974A).

Overview

A hazardous materials review (HMR) was completed by HDR for the Talmage North Bridges project and approved by NDOR on April 22, 2016. A HMR was required for this project because the scope of work exceeds the project exemptions. The purpose of the HMR is to identify environmental concerns associated with hazardous materials and petroleum products which could potentially be encountered during the construction project. This memo summarizes the conclusions and applicable mitigation measures found in the HMR and assists the Environmental Documents manager in completing the Hazardous Materials section of the CE Determination Form for Federal-Aid Projects. The HMR can be found in the NDOR project file.

The project description updated on April 7, 2016 was used for preparation of this PQS memo.

Hazardous Material Site Discussion

The HMR identified one facility within the hazardous materials study area. Otoe County Shop is listed as having a leaking underground storage tank. Upon removal of the tank in 1991, only minimal contamination was found and NDEQ closed the file with no further remedial action necessary. This site is located on the east side of Lorton about 300 feet from the limits of construction of the bridge and culvert replacements. Based on this information, there is a low potential of encountering contamination during construction. No Superfund sites were identified within 1 mile of the bridge/culvert replacement locations.

Asbestos

Structures S067 05312 and S067 05206 were tested for Asbestos Containing Material (ACM). Structure S067 05312 was found negative for ACM. NDOR will submit the NESHAP notification form to NDOR for this bridge.

Structure S076 05206 tested positive for ACM in the bituminous coating on all the steel bridge members. The contractor shall comply with a special provision for management and disposal of ACM during removal of the bridge structure. The special provision for Asbestos on Existing Structure is attached to this document.

Lead Commitments

There is the potential for lead based paint to be found on the bridge components of structure S067 05312. If the method of removal of the components generates paint debris, the waste shall be handled in accordance with NDOR's Standard Specification for Highway Construction Section 732 (Lead-based Paint Removal) and Title 128 - Nebraska Hazardous Waste Regulations. Extreme caution shall be taken to minimize the amount of potential lead based painted material or debris from causing or threatening to cause pollution of the air, land and waters of the State. The Contractor's implementation plan efforts shall be documented in ECOD.

There is potential of lead bearing plates or lead shims to be found on structure S067 05312, S067 05206 during removal. The Contractor shall recycle any lead bearing plates and/or lead shims at a legitimate recycling facility as referenced in paragraph 3 (Environmental Requirements) in Section 203.01 of the Standard Specification for Highway Construction and in accordance with Title 128. The Contractor's implementation plan efforts shall be documented in ECOD.

Unexpected Waste Commitment

If contaminated soils and/or water or hazardous materials are encountered, then all work within the immediate area of the discovered hazardous material shall stop until NDOR/FHWA is notified and a plan to dispose of the Hazardous Materials has been developed. Then NDEQ shall be consulted and a remediation plan shall be developed for this project. The potential exists to have contaminants present resulting from minor spillage during fueling and service associated with construction equipment. Should contamination be found on the project during construction, the NDEQ shall be contacted for consultation and appropriate actions to be taken. The Contractor is required by NDOR's Standard Specification section 107 (legal relations and responsibilities to the public) to handle and dispose of contaminated material in accordance with applicable laws (NDOR District, Contractor).

Sincerely,

Will Packard 4/22/16

Name Date

Will Packard, Highway Environmental Specialist
Planning and Project Development
NDOR

Attachment - Asbestos on Existing Structure Special Provision

Asbestos on Existing Structure

Bridge structure S067 05206 tested positive for asbestos containing material (ACM) in the bituminous coating covering most steel components including the girders, bearings, bridge rail and trusses. The following table shows the analytical results of the samples obtained from the bridge:

INSP.	SAMPLE NUMBER	DATE	MATERIAL DESCRIPTION	MATERIAL & SAMPLE LOCATION	LAB RESULTS	QUANTITY
R.P./T.T.	5206-EJ-01	9/30/15	black expansion joint	concrete curbs	ND	NA
R.P./T.T.	5206-TP-02	9/30/15	textured paint/tar sealant	on steel girders and trusses	8%	*
R.P./T.T.	5206-EJ-03	9/30/15	black expansion joint	at ends of bridge deck	ND	NA
R.P./T.T.	5206-TP-04	10/17/15	textured paint/tar sealant	northwest end of truss	3%	*
R.P./T.T.	5206-TP-05	10/17/15	textured paint/tar sealant	north center truss	4%	*
R.P./T.T.	5206-TP-06	10/17/15	textured paint/tar sealant	south center steel railing	3%	*
R.P./T.T.	5206-TP-07	10/17/15	textured paint/tar sealant	west girder	3%	*

*unknown quantity

The contractor shall be responsible for proper handling and disposal of ACM during the bridge demolition in accordance with the Nebraska Department of Health and Human Services (DHHS) Nebraska Asbestos Control Program Regulations, Title 178. The contractor's responsibilities for management and disposal of ACM are outlined below.

Bridge Removal Plan

1. A bridge removal plan, as it relates to removal of the steel components coated with ACM, shall be developed in coordination with a licensed Asbestos Abatement Contractor and/or licensed Asbestos Supervisor and the Nebraska DHHS.
2. The plan shall include a discussion of safety work practices to be followed during bridge demolition as it relates to ACM. The use of appropriate personal protective equipment shall be outlined in the plan.
3. The plan shall be approved by DHHS at least 30 days prior to the commencement of the bridge demolition. A copy of the plan shall be submitted to the NDOR environmental section upon DHHS approval. A letter from DHHS to the contractor documenting approval of the plan shall be prepared and submitted to the NDOR environmental section.
4. The contractor shall comply with all federal, state and local regulations as it pertains to the ACM abatement.

Disposal of Asbestos Containing Material

1. All ACM waste shall be taken to a landfill that accepts ACM. Coordination with the landfill shall occur prior to the commencement of the bridge demolition.
2. Landfill receipts shall be provided to NDOR and DHHS.
3. The method of shipping of the ACM shall be included in the removal plan and developed in coordination with the DHHS.
4. The contractor shall comply with all federal, state and local regulations as it pertains to the ACM shipping and disposal.

Notification Forms

1. The contractor shall submit a NESHAP notification form to the Nebraska Department of Environmental Quality (NDEQ) at least 10 days prior to commencement of bridge demolition activities.
2. The contractor shall submit DHHS Form 5 (Asbestos Project Notification) to DHHS at least 10 days prior to commencement of bridge demolition activities.
3. The 10-day clock starts with the day the NESHAP notification is postmarked, hand delivered, or picked up by a commercial delivery service, such as UPS, FedEx, etc. The use of a FAX is not an acceptable meaning of notification.
4. The NDOR Project Manager shall be provided copies of said notifications and their submittal date, which shall be recorded in the ECOD.