Nebraska Department of Roads

Planning and Project Development

Hazardous Materials Memorandum

Date: July 7, 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 Deweese Spur North (C.N. 42566).

Overview

A hazardous materials review (HMR) was completed by Burns and McDonnell for Deweese Spur North project and approved by NDOR on July 7, 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 February 3, 2016 was used to for the preparation of the HMR.

Hazardous Material Site Discussion

The HMR identified two facilities where past releases have occurred. These facilities are non-NPL Superfund sites located just outside the search radii but were discussed in the HMR. The Aurora Co-op Elevator Company (401 W Fairfield St.) is located about 2400 feet northwest of the project. This site is a USDA Superfund grain bin site and has had several releases related to petroleum products. The most recent investigation occurred in July of 2013 and no further remedial action was warranted and the file was closed. Based on the minimal scope of work and the distance from the facility to construction activities, there is a low potential of encountering contamination originating from this site during construction.

The Dahlsten Truck Line Inc. (101 W Edgar St.) is located about 1500 feet north of the project. Several releases related to petroleum products have occurred in the past. Soil sampling was conducted July 17, 2000 and no detectable levels of petroleum hydrocarbons were identified. Based on the lack of contamination in the soil, the minimal scope of work for the project and the distance from the facility to construction activities, there is a low potential of encountering contamination originating from this site during construction.

Asbestos and Lead

An asbestos containing material (ACM) survey was completed for Structures S014 02929 and S014 03182. No ACM was found on either structure; therefore, no contractor commitments are needed for

asbestos. NDOR will submit the National Emission Standards for Hazardous Air Pollutants (NESHAP) notification form to NDEQ. The following mitigation section outlines the contractor commitment associated with lead paint and lead plates/shims.

Lead Commitments

Bridge Structure No. S014 02929 is being repaired and Bridge Structure No. S014 03182 is being replaced. There is potential for lead-based paint to be found on the bridge's painted components. 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 Contractors implementation plan efforts shall be documented in either the ECOD or Site Manager. (Contractor)

The bearings of Bridge Structure S014 02929 will be cleaned and painted. There is potential for lead based paint to be found on the bearings. If lead-based paint is being removed in a manner that would create waste debris (i.e. sandblasting, abrasive removal, scraping), the Contractor shall remove the paint 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 Contractors implementation plan efforts shall be documented in ECOD.

The Bridge Structure S014 03182 is being replaced. The Contractor shall recycle any lead bearing plates and/or lead shims at a legitimate recycling facility as found in paragraph 3 (environmental requirements) in Section 203.01 of the Standard Specification for Highway Construction and in accordance with Title 128, Nebraska Hazardous Waste Regulations. The Contractors 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 7/7/16

Name Date

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