Nebraska Department of Roads

Planning and Project Development

Hazardous Materials Memorandum

Date: August 4, 2016

To: Anthony Marshall, 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 I-80/480/US-75 Interchange Bridges (C.N. 22595).

Overview

A hazardous materials review (HMR) was completed by TranSystems for I-80/480/US-75 Interchange Bridges project and approved by NDOR on April 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 August 19, 2015 was used to for the HMR.

Hazardous Material Site Discussion

The HMR identified several facilities where past releases have occurred within the hazardous materials study area. Many of the sites were related to leaking underground storage tanks and non-NPL Superfund sites. The scope of work consists primarily of bridge repairs with no soils disturbance. There will be minor areas of soil disturbance for construction of scour pads, riprap and grading on the fore slopes. All activities are within the previously disturbed roadway fill material.

All but one of the sites identified were far enough away from the proposed project that regulatory file review and an in depth discussion were not warranted. There is a low potential of encountering contamination from these sites during construction. The Omaha Shot and Lead Company (non-NPL Superfund) is adjacent and south of the proposed project. According to the information on CERCLIS, in 1988 a site inspection was complete and no remedial action was warranted. The proposed work is above the grade of the facility. Based on the this information

and the fact that only minor soil disturbance will occur, there is a low potential of encountering contamination originating from this site during construction.

The project is located within the Omaha Lead Superfund Site (OLS) geographic boundaries. The OLS includes surface soils that have been contaminated as a result of deposition of air emissions from historic lead smelting and refining operations. However, the OLS site only includes residential sites within this boundary; therefore, the project is not technically within the OLS. Excavations are **not** occurring beyond the pre-existing roadway fill material within the OLS. However, the ASARCO lead refinery did not discontinue operations until 1997, a few years after the construction of the I-480/I-80/US-75 interchange. There is potential that small amounts of lead released into the air settled onto the roadway fill material in that time period. Commitments to the contractor for work within the Omaha Lead Superfund Site are outlined below.

Asbestos and Lead

The scope of bridge work does not require an asbestos survey or lead paint commitments. No asbestos or lead mitigation is required as it relates to bridge work.

Commitments:

Omaha Lead Superfund Site

Lead contaminated soils could be encountered during excavations associated with scour pad, riprap construction and minor grading activities. Worker notification is required for soil disturbance within the Superfund site. The EPA suggests conducting sanitation practices, such as washing hands and face before ingesting food or water and before smoking or tobacco chewing. The EPA also suggests the need for dust suppression and dust masks when dry and dusty conditions are present to reduce the inhalation of dust/lead particles.

All excess materials removed from the project sites shall be disposed of at locations acceptable to the City of Omaha. The Contractor shall provide this information at the pre-construction meeting. During the project construction, the Contractor shall keep a log AND keep the City's Project Engineer (or designated representative) informed of each disposal date, excess material source location, material description, disposal location, and approximate material quantity. It is the Contractor's responsibility to make sure excess material is tested for lead concentrations before disposal. If the excavated soil has lead concentrations greater than 400 ppm, the landfill may require a Toxicity Characteristic Leaking Potential (TCLP) test prior to disposal.

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 8/4/16

Name Date

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