Nebraska Department of Roads

Planning and Project Development

Hazardous Materials Memorandum

Date: November 4, 2015

To: Carmen Pellish, 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 McCook to Indianola (C.N. 70879).

Overview

A hazardous materials review (HMR) was completed by Olsson Associates for the McCook to Indianola project and approved by NDOR on November 4, 2015. 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.

Hazardous Material Sites and Impacts

The HMR identified several facilities where past releases have occurred within the hazardous materials study area. Within the town of Indianola several petroleum and fertilizer releases were documented in associated with the Ag Valley Coop properties and the Former Cambridge Coop Filling station between 4th St. and 5th St (see attached site location map). The contamination has impacted both groundwater and soils. Remediation is ongoing at both sites. Contamination from the largest release (30,000 gallons leaded gasoline) associated with the Ag Valley Coop is present South of 'C' St. and near the railroad track and not adjacent to construction.

The other releases originated from underground storage tanks at both the Ag Valley Coop and Cambridge Coop Filling Station. Soil excavation occurred at the Cambridge Coop Filling Station adjacent to the Highway 6. An investigation conducted in 1993 included completion of several soil borings on or very near the project alignment. The boring logs do not show any significant evidence of petroleum contamination in the shallow soils near the project alignment. Construction activities within Indianola include milling and resurfacing, ADA work and adjusting manholes to grade Groundwater is typically greater than 40 feet below ground surface and will not be encountered during construction. ADA work is not occurring adjacent to either facility. Based on the limited scope of work and the lack of contamination found in shallow soils near the

project alignment, there is a low potential of encountering contamination in this area during construction.

The Roads Department McCook Yard and the Michael Packard acreage were both identified as having leaking underground storage tanks at the properties. However, based on the distance from the release to construction activities and the minimal excavation adjacent to these locations, there is a low potential of encountering contamination during construction.

There is one active Superfund site located within the hazardous materials study area. The TRW site is located about ¼ of a mile north of the beginning of the project east of McCook (see attached site location map). A release of TCE occurred in 1986 and has impacted groundwater in the area. Remediation has been ongoing since the time of the release. The groundwater plume extends under Highway 6. However, groundwater will not be encountered during construction. Based on the distance from the source of the release to construction and the minimal depths of excavation in this area, there is a low potential of encountering contamination originating from this site during construction (see attached NDEQ correspondence).

Asbestos

Bridge structures S006 09205 and S006 09761 were tested for asbestos containing material (ACM). No ACM was found in any of the suspect material. No contractor commitments are required. NDOR shall submit the NESHAP notification to NDEQ.

Lead Commitments

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, Rules and Regulation Governing Hazardous Waste Management in Nebraska. 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 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 system. (Contractor)

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

11/4/15

Name

Date

Will Packard, Highway Environmental Specialist
Planning and Project Development
NDOR

Attachments:

Site Location Map

TRW Superfund Site – NDEQ Correspondence

Data Source: 2012 NAIP Aerial, Red Willow County

Legend

- NDOR Mile Marker
- Project Alignment
- 1/10 Mile Radius
- Environmental Facility

N

200 0 200

1 inch = 500 feet

McCook - Indianola
Olsson Project # 013-0723
Red Willow County, Nebraska
Environmental Facilities Map
Figure 2A

F:\Projects\013-0723\GEOHY\70879 McCook - Indianola\GIS\Maps.mxd User: charms

Data Source: 2012 NAIP Aerial, Red Willow County

Legend

- NDOR Mile Marker
- Project Alignment
- 1/10 Mile Radius
- Environmental Facility

N

140 0 140

1 inch = 300 feet

McCook - Indianola
Olsson Project # 013-0723
Red Willow County, Nebraska
Environmental Facilities Map
Figure 2D

F:\Projects\013-0723\GEOHY\70879 McCook - Indianola\GIS\Maps.mxd User: charms

Carl Harms

From: Gottula, Jeff <jeff.gottula@nebraska.gov>
Sent: Tuesday, July 15, 2014 6:29 AM
To: Carl Harms
Cc: Miesbach, David
Subject: RE: McCook TRW site information

You did a fine job of assessing the risk of the TRW plume and NDOR plans in the area. There may be a small risk of TCE vapors if you have an enclosed space as any part of the project which does not seem likely.

From: Carl Harms [mailto:charms@olssonassociates.com]
Sent: Monday, July 14, 2014 5:35 PM
To: Gottula, Jeff
Subject: McCook TRW site information

Hi Mr. Gottula,

I received your voicemail today regarding the Northrop Grumman TRW site. Sorry that I couldn't respond to your call. I am in a fairly bad cell signal area. I figure that it will just be better to email you regarding this.

I am working on an NDOR project doing the hazardous materials environmental review for NEPA documentation. The project is for US-6 from the west end of McCook going east toward Indianola. During my review, I identified the Northrop Grumman TRW site. I was able to review several files from the NDEQ IMS website, so I believe that I have a decent understanding of the status of the TRW project. NDOR and FHWA typically like us to contact NDEQ on the larger, more involved environmental contamination/cleanup sites.

The NDOR project will primarily involve resurfacing the existing roadway and shoulders. There is also a provision for work on the culverts and guardrail. There aren't engineering plans for that work yet, but it typically doesn't involve excavations below 4 feet. Based on the scope of work for this project, no construction activities should occur outside of current right-of-way near the TRW site.

Based on my review of the files for the Northrop Grumman TRW site, my understanding is as follows: The source area of contamination is the former TRW building located on the west side of Airport Road approximately one-quarter mile north of US-6. There is a TCE contamination plume going southeast from the source area and crossing underneath US-6.

I believe that the likelihood of construction workers encountering contamination from the Northrop Grumman TRW site is low. That conclusion is based on the following reasons: 1) The off-site contamination near US-6 is limited to groundwater and there is no shallow soil contamination. 2) Construction activities will involve shallow excavations only that will not be remotely close to the water table (which is in the range of 50 feet bgs). 3) A soil vapor assessment conducted for the TRW site in 2011 showed that there was not a significant vapor intrusion issue in nearby homes.

If you are able to comment on my assessment of the TRW site, please let me know if you do or do not concur. I am aware that some NDEQ groups are not able/willing to make assessments of potential impacts to NDOR projects. Also, please let me know if there are any possible impacts that the NDOR project could have on the TRW site (i.e. working around monitoring wells, affecting remediation equipment, etc.).

Thank you very much.

Carl Harms | Environmental | Olsson Associates
2111 South 67th Street, Suite 200 | Omaha, NE 68106 | charms@olssonassociates.com

TEL 402.341.1116 | CELL 402.321.8907 | FAX 402.341.5895

Please consider the environment before printing this email.