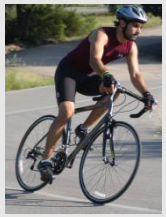

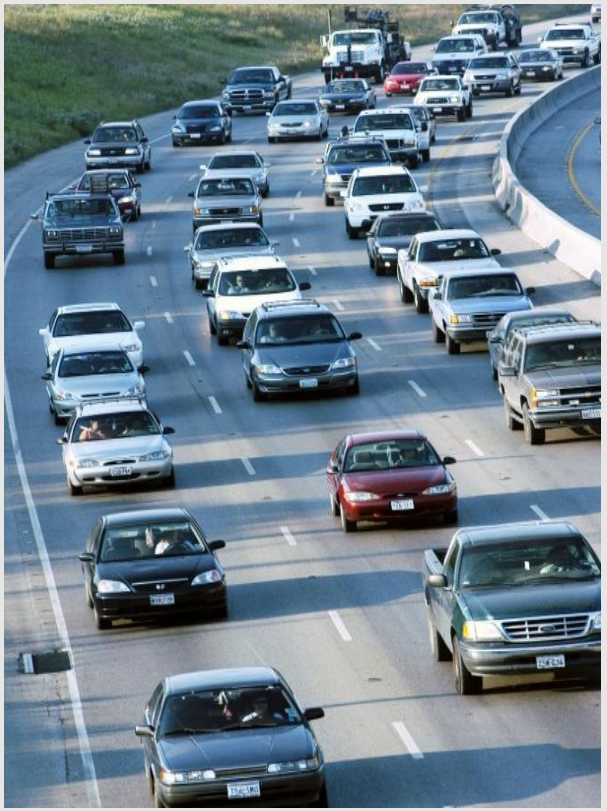

NEW ISA- VERSION 5

PPA-HMM, ENV

September 2017

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New ISA Form: Training

- This training is meant to introduce the new ISA Report Form and we will not review how to perform an ISA for a project.
- If you need assistance in performing ISAs for projects:
  - ENV114 – Hazardous Materials Management
    - And/or
  - eLearning Courses (all 9 courses are equivalent to ENV114)
    - ENV415, ENV416, ENV417, ENV418, ENV419, ENV420, ENV421, ENV422, ENV423
  - Contact You ENV-HMM SME

Administrative Issue- Viewing the Toolkit Files

- Are you having trouble viewing the latest version of documents uploaded to the ENV Toolkit webpage?
- You may need to delete temporary internet files from your browser. This can be done by hitting the F5 key and/or, by carrying out the following steps:
  - 1. Open your web browser
  - 2. While on your homepage, press Ctrl+Shift+Delete
  - 3. Check the box to delete temporary internet files (also called cache or cached images/files in some browsers)
  - 4. Ensure that "Preserve Favorites website data" is NOT checked (IE only).
  - 5. Click delete (or clear, depending on the browser)

New ISA – Reason for Update

- Previous version (June 2016) of the Initial Site Assessment (ISA)
  - Designed for mainly internal use and for those who had access to ECOS
  - Did not allow for the resolution of potential issues within the ISA form
  - Sometimes difficult to record findings within the form itself
  - Was “clunky” to use at times

- New ISA Posting:
  - The new ISA has been posted to the toolkit site (April 10, 2017) and is ready for use. The new ISA is not retroactive.

New ISA – Reason for Update

- An ISA Revision team was assembled:
  - Representatives from small, medium, and large districts,
  - PR Staff, and
  - ENV- HMM staff
- Main Goals of the ISA Revision Team:
  - Streamline the ISA process
  - Allow for the resolution of potential issues in the ISA process
  - Make the ISA form easier to use

New ISA: What Has Changed (Cover Sheet)

Report Version 5

Hazardous Materials Initial Site Assessment (ISA)

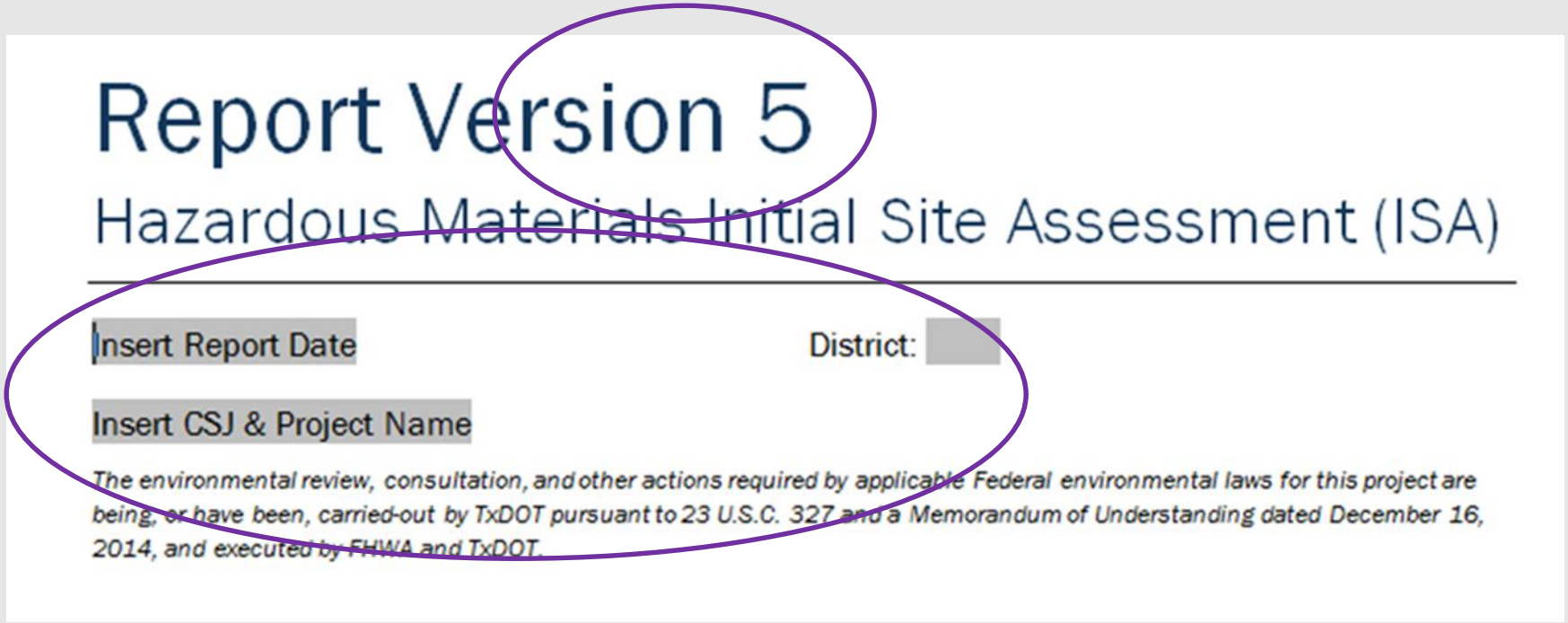
Insert Report Date

District:

Insert CSJ & Project Name

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried-out by TxDOT pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated December 16, 2014, and executed by FHWA and TxDOT.

New ISA: What Has Changed (Cover Sheet)



Report Version 5

Hazardous Materials Initial Site Assessment (ISA)

Insert Report Date

District:

Insert CSJ & Project Name

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried-out by TxDOT pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated December 16, 2014, and executed by FHWA and TxDOT.

New ISA: What Has Changed (Section 1)

Section 1: Identify Previously Completed Environmental Site Assessments, Known Hazmat Conditions, Preliminary Project Design, and Right-of-Way Requirements	
Note: Obtain information/comments from design, right of way, and/or environmental staff. Attach maps and/or details as appropriate.	
☐ Yes ☐ No ☐ Unknown	Are there any previous environmental assessments, testing or studies performed within the proposed project area related to contamination issues (to include Phase I ESAs)? If yes, explain here if there are any concerns to the proposed project:
☐ Yes ☐ No	**Have the project schematics and/or plan-profile sheets (if available) been reviewed?*** Look for substantial excavations (including utilities and storm sewer designs), ROW and easements, and bridge demolitions or renovations.

* For consultants: this information will be supplied by TxDOT.

- Combined the initial two questions into one question, both had to do with previous studies in the project area.
- Reworded the project review question to target the review of pertinent project information.

New ISA: What Has Changed (Section 2)

Section 2: Demolition and Renovation Information Related to Asbestos and Lead-Containing-Paint	
☐ Yes ☐ No	Are there proposed bridges or building demolitions or renovations for this project?
Note: If "Yes" is selected, buildings or structures being acquired through the acquisition process are assessed and mitigated for asbestos, as needed, within the ROW process according to the TxDOT ROW Manual ROW Vol. 6 Miscellaneous -Chapter 1 Section 5. Bridge structures being demolished or renovated are assessed and mitigated for asbestos and lead-containing-paint, as needed, within the construction process according to Standard Specification Item 6.10 (and applicable Provisions), and the TxDOT guidance document: Guidance for Handling Asbestos in Construction Projects, dated January 26, 2007.	

- Recording how Asbestos and Lead-in-Paint issues are managed for a project has changed.

New ISA: What Has Changed (Section 2)

- The new ISA acknowledges that either ACM or Lead-in-Paint might be present on the proposed project and that the inspections (and possible abatements) will be handled through established programs within the project development or construction process.
  - Right-of-Way (ROW) demolitions (for ACM) have an established process through the ROW division and outlined through the ROW Manual
  - Bridge renovations and demolitions (for ACM and lead-in-paint) are handled through specifications and guidance.
- TxDOT has established process for these issues and are handled outside of the Environmental Process.
- Selecting “Yes” for this section does not require an IIR to be created.

New ISA: What Has Changed (Section 3)

- Look Familiar?

New ISA: What Has Changed (Section 3)

- New Screening Tool – Section 3.1

Section 3: Project Screening	
Note: Section 3.1 is only applicable for Categorically Excluded (CE) projects. If you are uncertain of the project type, select "No" and continue to Section 3.2. **Section 3.1** Determine if the proposed project has a low potential to encounter contamination. Refer to the preliminary schematics for project limits and internet-based maps for surrounding land use.	
☐ Yes ☐ No or an EA or EIS Project	Are the limits of the proposed project within a historically undeveloped area and outside the boundaries of a designated MS4 permitted area? Historically undeveloped areas are locations where no commercial buildings are located within one-half (0.5) miles of the proposed project limits and the surrounding land use is historically agricultural, forest, or ranch lands.
If "Yes" is selected, the ISA is complete. The proposed project has a low potential to encounter contamination. Complete Sections 9 and 10 of this ISA and maintain a copy and all applicable attachments in the project file. If "No" is selected, proceed to Section 3.2 of this ISA.	

New ISA: What Has Changed (Section 3.1) Cont.

- The purpose of the new screening tool is to remove the ISA requirements for projects where the risk of encountering Hazmat issues are extremely low.

- Reviewing internet based maps for surrounding land use is appropriate.

- Important to note:
  - For CE type projects only (managing programmatic risk statewide)
  - Not within a designated MS4 Boundary (again, managing risk)
  - Meets the definition of a historically undeveloped area
  - Additional ROW, significant excavations, or bridge work **do not negate** this screening tool.

New ISA: What Has Changed (Section 3.1) Cont.

- If your project meets the conditions in 3.1, then the ISA is complete.

- **Note:** Even though an ISA may not be required based on the conditions in 3.1, you may continue with the ISA process if your professional judgment warrants continued work.

New ISA: What Has Changed (Section 3.2)

- Section 3.2 remains the same as in the previous version (Section 3: Identify Project Activities).

- **As a reminder**, this section is another screening tool that will allow the professional to stop the ISA process early if all the conditions are meet.

New ISA: What Has Changed (Section 4)

- **Section 4: Current and Past Land Use Information** section has not changed, except for minor format and word changes, since the last iteration.

New ISA: What Has Changed (Section 5)

Section 5.1 Standard Database Sources of Environmental Information from Government Agency Records	
Findings	Regulatory Record
☐ **Sites Identified** ☐ **No Sites Identified**	**Federal Active NPL or Not NPL list (CERCLIS or SEMS sites)*** https://cumulis.epa.gov/supercpad/CurSites/srchsites.cfm; and/or https://www.epa.gov/cleanups/cleanups-my-community (1 mile minimum search distance from project limits)
Comments for Sites Identified:	
☐ **Sites Identified** ☐ **No Sites Identified**	**Federal Archived NPL or Not NPL list (CERCLIS or SEMS sites)*** https://cumulis.epa.gov/supercpad/CurSites/srchsites.cfm (0.5 mile minimum search distance from project limits)
Comments for Sites Identified:	

New ISA: What Has Changed (Section 5)

- **Section 5: Complete a Regulatory Records Review (Database Search)** section has changed, but only slightly:
  - Formatting: The comment field has been moved to below the database record to give more room to input results (reads easier). Additionally, the formatting for the database has changed, but the content remains the same.
  - The reviewed selection box has been replaced with a more descriptive response. Instead of just a “Yes”, “No” response, you will be asked to select either “Sites identified”, “No Sites Identified”, or “Not Reviewed”.

New ISA: What Has Changed (Section 6)

Section 6: Complete a Project Site Survey

Note: Do not document site survey concerns that were previously identified by the regulatory list search, by the Current and Past Land Use review, or both. In Section 6.1, describe the location and size of the concern. Attach site maps and photographs, as appropriate. If a Phase I ESA has been prepared for this project, you may use the applicable site survey information from the Phase I ESA and updated current site conditions, as needed.

Possible Site Survey Concerns: The following items are to be used as a guide to help identify potential hazardous material issues during a site survey.

- underground storage tanks
- aboveground storage tanks
- injection wells, cisterns, sumps, dry wells
- floor drains, walls stained by substances other than water or emitting foul odors
- stockpiling, storage of material
- surface dumping of trash, garbage, refuse, rubbish, debris half exposed/buried, etc.
- stained, discolored, barren, exposed or foreign (fill) soil
- oil sheen or film on surface water, seeps, lagoons, ponds, or drainage basins
- changes in drainage patterns from possible fill areas
- Dead animals (fish, birds, etc.)
- vent pipes, fill pipes, or access ways indicating a fill pipe protruding from the ground
- electrical and transformer equipment storage or evidence of release
- groundwater monitoring wells and groundwater treatment systems
- vats, 55-gallon drums (labeled/unlabeled), canisters, barrels, bottles, etc.
- evidence of liquid spills
- damaged or discarded automotive or industrial batteries
- dead, damaged, or stressed vegetation
- pits, ponds, or lagoons associated with waste treatment or waste disposal
- security fencing, protected areas, placards, warning signs

New ISA: What Has Changed (Section 6) Cont.

- You only need to insert the date of the site survey
- Describe what was identified during the site survey
  - Additionally, this is specific to items that can only be found during a site visit. We do not want to restate all the database findings and the current and past land use findings.

Site Survey Date(s):
6.1 Describe Concerns Observed During the Site Survey. **Do not** include concerns previously identified during the regulatory list search, the current and past land use review or both. Indicate if the concern is associated with existing ROW, proposed ROW, adjacent property, or easements. Provide address location (or relative location) and any additional information about the evidence identified; include photographs as an attachment to the ISA. Comments or Concerns Identified:

New ISA: What Has Changed (Section 7)

- Section 7: Interviews section has not changed.

New ISA: What Has Changed (Section 8)

- Section 8 has been modified to allow the resolution to hazmat issues in the ISA process itself. You are no longer required to prepare an IIR (Issues Identification and Resolution) form to closeout a potential issue that can be resolved while preparing the ISA.

- Unresolved HMM Issues: It is important to note that any issues that cannot be resolved during the preparation of the ISA form, are still required to prepare an IIR from in ECOS.

New ISA: What Has Changed (Section 8) Cont.

Resolution	Type of Concern
☐ Unresolved ☐ Resolved ☐ No Issue	**Current or Past Land Use Concerns:** These concerns are associated with hazardous material issues identified in Section 4 that were not discovered during the database search in Section 5.1 or during the Site Survey in Section 6.1. Note: *For ECOS IIR development, the Available Contaminated Media would be "Other".*
Explain Unresolved or Resolved Issues:	

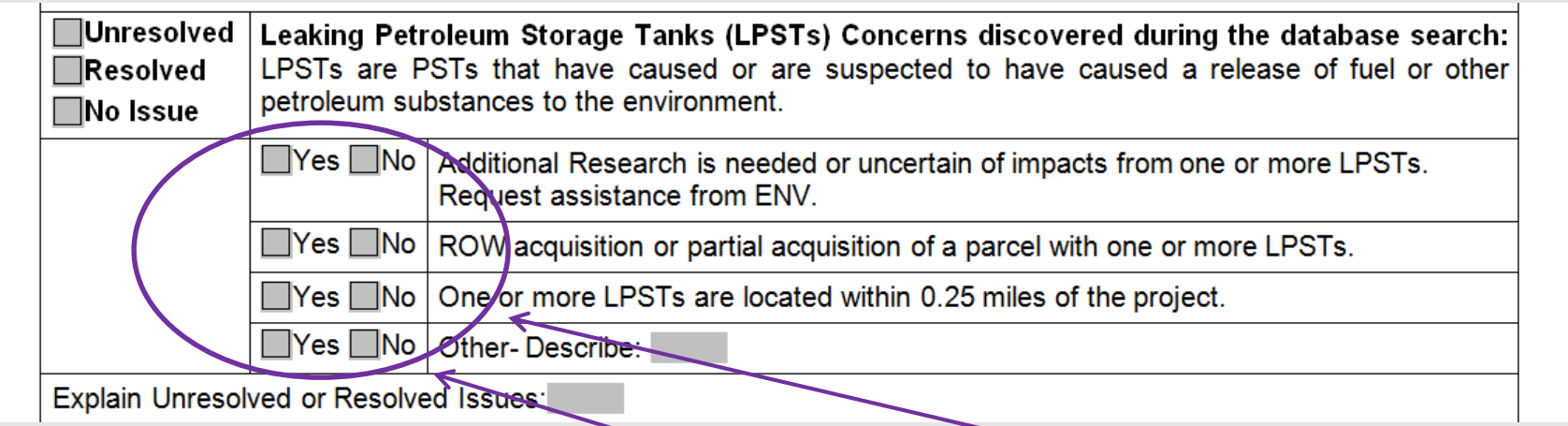
- The first column has changed from "Concern Identified" to "Resolution". This is to clarify the intent of this section.
  - The "Yes", "No" selections have been replaced with "Unresolved", "Resolved", and "No Issues"

New ISA: What Has Changed (Section 8) Cont.

Resolution	Type of Concern
☐ **Unresolved** ☐ **Resolved** ☐ **No Issue**	**Current or Past Land Use Concerns:** These concerns are associated with hazardous material issues identified in Section 4 that were not discovered during the database search in Section 5.1 or during the Site Survey in Section 6.1. Note: *For ECOS IIR development, the Available Contaminated Media would be "Other".*
Explain Unresolved or Resolved Issues:	

- If you selected either "Unresolved" or "Resolved", then you are required explain the resolution of the issue or what additional investigations or research is required.
- You can select more than one resolution type if you have multiple issues.

New ISA: What Has Changed (Section 8) Cont.



☐Unresolved ☐Resolved ☐No Issue	**Leaking Petroleum Storage Tanks (LPSTs) Concerns discovered during the database search:** LPSTs are PSTs that have caused or are suspected to have caused a release of fuel or other petroleum substances to the environment.	
	☐Yes ☐No	Additional Research is needed or uncertain of impacts from one or more LPSTs. Request assistance from ENV.
	☐Yes ☐No	ROW acquisition or partial acquisition of a parcel with one or more LPSTs.
	☐Yes ☐No	One or more LPSTs are located within 0.25 miles of the project.
	☐Yes ☐No	Other- Describe:
Explain Unresolved or Resolved Issues:		

- If you select a “Yes” for any of the conditions in this column, then you must select either “Resolve” or “Unresolved” and describe the issue in the explanation field.
- “No Issues” should only be selected when all the conditions in the sub-field are selected as “No”.

New ISA: What Has Changed (Sections 9 and 10)

- Section 9 and Section 10: The Reference Materials Utilized Section and the Contact/Completed by Section have not changed.

New ISA: Further Training

- Training session at the Environmental Coordinators Conference in September

- Each HMM SME (at ENV) will provide hands-on training related to the new ISA (either at your district or through a webinar- the choice is yours).

  - The training will be a question and answer related training

  - We encourage the districts to invite their current (and interested) consultants to the training events

ENV-HMM Contacts

- Douglass Mack – (512) 416-2634
- Terry Dempsey – (512) 416-3010
- Jeff Richardson – (512) 416-2697
- Mark Norman- (512) 416-2851
- Jay Carsten – (512) 416-2474
- David Morley – (512) 416-2607