



Job Aid

Hazardous Materials Initial Site Assessment (ISA)

Purpose:

This document is a job aid to assist in completing the Hazardous Materials Initial Site Assessment (ISA) form. Do not include this job aid with the completed ISA form in the project documentation. Additionally, this is a job aid. As such, project specific conditions may warrant the use of good professional judgment that requires some deviations from this document to properly inform decision makers about the hazardous material risks associated with the project.

ISA Form Administrative Details:

This ISA complies with the FHWA's policy dealing with hazardous materials discussed in FHWA's *Supplemental Hazardous Waste Guidance* (January 16, 1997). A copy of this document can be found within the [Hazardous Materials Toolkit](#) (*FHWA Supplemental Hazardous Waste Guidance (1997) document*).

FHWA's policy emphasizes three objectives: 1) identify and assess potentially contaminated sites early in project development, 2) coordinate early with federal/ state/ local agencies to assess the contamination and the cleanup needed; and 3) determine and implement measures early to avoid or minimize involvement with substantially contaminated properties.

Completing the ISA will aid in identifying hazardous material issues early, avoiding construction delays, and reducing the Department's liability associated with the purchase of contaminated right-of-way.

Additionally, the ISA is modeled after the ASTM E1527 Standard Practice for Environmental Site Assessment (ESAs) but is tailored for linear construction projects that may affect multiple parcels.

Maintain a copy of the completed ISA report with all applicable attachments in the project file.

For additional information, refer to TxDOT's online manual: Hazardous Materials in Project Development and the [Hazardous Materials Toolkit Site](#).

ISA Form Instructions

The following instructions are separated into the individual ISA sections.

Project Information:

Include relative information for the project in this section.

- CSJs – Include all project CSJs.
- City(ies) – Include all cities/towns that the project lies within or adjacent to
- Zip Code(s) – Include all zip codes the project lies within.
- County(ies) – Include all counties the project lies within. It isn't necessary to include the word "County" after the county name (example: Dallas County) since this box is already designated for the county.
- HWY(s) – This should be what TxDOT/TxDOTCONNECT shows under this designation.
- Limits per CSJ – Include the limits for every CSJ identified for the project. The limits as shown on TxDOTCONNECT or the project schematic/PS&E.

Note: *If the project is a re-evaluation, the ISA should focus on the re-evaluation area(s) and not the full extent of the original ISA that was prepared.*

Section 1: Identify Previously Completed Environmental Site Assessments, Known Hazmat Conditions, Preliminary Project Design, and Right-of-Way (ROW) Requirements

Section 1 is designed to assist the preparer in identifying helpful documents that can be used in preparing the ISA.

- **Are there previous environmental assessments, testing, or studies performed within the proposed project area related to contamination issues (should include Phase I ESAs)?**

Some project areas might have had hazardous materials studies performed outside of the ISA. Reviewing previous studies performed around the project location may help identify potential hazmat risks to the project.

Select “Yes” if there are previous environmental assessments, testing, or studies performed within the proposed project area related to contamination issues. Otherwise, select “No”.

If the ISA preparer is a consultant, contact the district environmental coordinator for the project to identify if there are previous environmental assessments within or adjoining the current project.

- **ISA Predecessor: The project schematics and/or plan-profile sheets* (if available) should be reviewed. Look for substantial excavations (including utilities and storm sewer designs), new ROW and easements, and bridge demolitions or renovations.**

Performing a proper ISA requires a review of identified hazardous materials issues against the project design requirements. The preparer should know if substantial excavations are planned, the potential right-of-way, and bridge work, if any, for the project to complete the ISA. It is advisable to obtain and review a project schematic and/or plan/profile sheets before completing the ISA process.

If the project design changes after the ISA has been completed, perform a review of the previous ISA to determine if hazardous materials sites may impact the project design change areas.

Section 2: Demolition and Renovation Information Related to Asbestos and Lead-Containing-Paint

This section helps determine whether asbestos and lead-containing paint may be present on project structures based on actions proposed for the project (demolitions or renovation of bridges or buildings). TxDOT has internal processes outside of the environmental project development process that manages this mitigation. The specific TxDOT processes are identified in the “Note” for this section on the ISA form.

- Are there proposed bridges or building demolitions or renovations for this project?

Select “Yes” if existing bridges will be renovated or demolished as part of the project. Additionally, select “Yes” if right-of-way will displace structures that may need to be demolished.

Select “No” if these actions will not occur on the project. Whether “Yes” or “No” is selected for this section, there is no additional work required for Section 2.

Section 3: Project Screening

To assist the ISA preparer, project screening criteria were included in the ISA to help reduce the amount of work required. Not all projects require the same level of investigation, and this section will assist the preparer in narrowing down the number of projects that require completing all the sections within the ISA.

Section 3.1 is designed to screen out a project from further investigation due to a lower risk of encountering hazardous materials in a rural setting.

Note: If there is available historical information that indicates hazardous materials may impact the project area, proceed to Section 3.2. Also, this screening process is only for NEPA Categorical Excluded (CE) projects. Environmental Assessments (EA) and Environmental Impact Statements (EIS) must continue with the ISA.

- 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) mile of the proposed project limits and the surrounding land use is historically agricultural, forest, or ranch lands?

Select “No” if the project is classified as an EA or EIS project. For a project classified as a CE, select “No” if any portion of the project is located within a developed area or the project is located within a designated MS4 boundary. MS4 boundaries were selected since they are typically located within a higher population area and are easy to identify. Given the MS4 boundary locations, the risk of encountering historic contamination is higher. Otherwise, select “Yes”.

A “historically undeveloped area” is defined as an area where the surrounding land use currently is and has historically been agricultural, forest, or ranch lands with no commercial buildings present within one-half (0.5) mile from the proposed project limits. Commercial buildings can be buildings, other than residential homes.

Section 3.2 is an additional screening tool that will allow the preparer to end the ISA process. The activities listed in Section 3.2 have the highest potential to encounter subsurface contamination. If “No” is selected for all the questions, the ISA is complete. If “Yes” is selected for any question, then the ISA preparer must continue to Section 4 and complete the ISA.

- **ROW and Easements:** Are there acquisitions of new ROW, easements, temporary construction easements planned for the project?

Select “Yes” if the project will acquire any amount of additional property (through acquisition or easements). Otherwise, select “No”.

Additionally, some projects with areas that have shared use agreements, existing or new, with other entities such as public transit or municipalities, these areas can be considered “ROW/easements” for the purpose of the ISA.

- **Project Excavations:** Will the work consist of substantial excavation operations. Substantial excavation includes, but is not necessarily limited to: Underpass construction, Storm sewer installations, and trenching or tunneling that would require temporary or permanent shoring associated with substantial excavations.

Select “Yes” if the project will involve substantial excavations. Otherwise, select “No”.

Certain project activities are deemed as substantial excavations (underpass construction, storm sewer installations, and trenching or tunneling that would require temporary or permanent shoring, lowering roadway grades, retaining walls); however, the ISA preparer may use their own judgment or seek an engineer’s opinion as to whether other types of project excavations have a similar scope and scale to the examples listed.

- **Encroachments:** Are there known or potential encroachments into the project area? Encroachments include soil and groundwater contamination, dump sites, landfills, tanks, and other issues in the ROW.

Encroachment in real estate is defined as one property owner violating their neighbor's rights by building or extending some feature and crossing onto their neighbor's property lines. Hazardous Materials encroachments are potential hazardous materials issues that have been built or extend some feature across the right-of-way. Contamination can migrate through the subsurface and can move onto the right-of-way, normally through the groundwater system. Tanks, dumpsites, landfills, or other physical items can be built across property lines and trespass onto the right-of-way. These sites are difficult to identify when completing the ISA unless the ISA developer has knowledge of the encroachment issue.

Select "Yes" if there is a known hazardous materials issue that has encroached onto TxDOT right-of-way. Otherwise, select "No".

Section 3.3 is an instruction block, which assists the preparer in completing the screening process (Section 3).

If "Yes" is selected for one or more questions in Section 3.2, then the ISA preparer shall continue with the ISA (move on to Section 4)

If "No" is selected for all questions in Section 3.2, then the ISA preparer shall perform a site survey (Section 6) to determine if there is anything unusual or unexpected (related to hazardous materials issues) in or around the project. This is a final review to ensure that there is a low potential to encounter contamination during the construction of the project.

Section 4: Current and Past Land Use Information

Section 4 has eight different review topics. This section is designed to identify features or businesses that may or may not be present any longer, but their prior existence could have the potential to impact the project. As an example, it is possible to identify properties that may have a risk of having residual contamination based on their land use, current or historic. The resources identified in this section are tools that should be used to investigate the current and past uses of properties in and around the proposed project.

The following information includes tips and suggestions for completing Section 4.1 through 4.8. These tips and suggestions are recommendations and are not required. Verification of adherence to these suggestions also are not required to be include in the comment fields.

For each topic in Section 4, select the box for Reviewed, Not Reviewed, Not Available, or Not Applicable. Select "Reviewed" if the resource was available and reviewed. Select "Not Reviewed" if the resource was available but not reviewed. Select "Not Available" if the resource was not available during the investigation or select "Not Applicable" if the resource does not exist or does not apply to the project (example: 4.5 Review of TxDOT As-Built Plans would be "Not Applicable" if the project is on new location).

- **Section 4.1 USGS 7.5 Minute Topographic Maps**

The scale of the topographic map (7.5-minute 1:24000), is important. This scale shows features that could pose impacts to the project. Features such as gravel pits, quarries, aboveground tanks, industrial/manufacturing sites, railroad yards, etc. Map scales that are smaller, 15-minute, 1:50000, 1:100000, etc., typically do not include the map features described above. Map creation dates are also important. The USGS 7.5-minute maps produced in the 2010s and later, do not show features, such as the examples above, that are important for preparing an ISA and only show roads and contours. Unless the project is in an area that was historically undeveloped and is now undergoing new development, review of maps from the 2010s and later is not necessary. For developing areas,

these later maps can be used to state that the project area is shown with new roads and/or new housing development(s).

In this section, briefly describe significant features observed that are within, adjacent to, or near the project location for each of the map time periods reviewed. It is not necessary to describe features that would have a low probability to affect the project.

- **Section 4.2 Aerial Photos**

Aerial photos can be reviewed from various sources. Aerial photo packages produced by the regulatory database companies are one of the best resources for aerials as they will include multiple-year coverage for the project area. These companies can also customize the scale of the photos for project needs. Aerial imagery may also be viewed online, for free, from a few online-sites:

- Google Maps includes recent aerial images when “Satellite” layer is selected on the map.
- Google Earth often will have historical ariel photograph coverage back to the mid-1990s and in some locations aerial photographs from much earlier years may be available.

If aerial photographs are ordered from a database search company, specify a large scale, such as 1” = 600’ or 1” = 500’, where features would be discernable on the photos. If smaller scales are selected, such as 1” = 1500’, features will not be discernable on the photos.

In this section, briefly describe the project location and significant features observed that are within, adjacent to, or near the project location for the aerial photograph time periods reviewed. It is not necessary to describe features that are far from the project. It is also not necessary to describe each specific year separately when describing your project or features in the “observed features of concern” comment field.

- **Section 4.3 ROW Maps**

Right-of-way maps are maps that show property ownership for each parcel adjacent to the project. Right-of-way maps are produced by TxDOT ROW Division staff or their consultants. Right-of-way maps are not the same as the layout sheets in the design schematic or the Project Specifications and Estimates (PS&E).

In this section, describe features observed on the right-of-way maps that could have the potential to impact the project.

- **Section 4.4 Sanborn Maps**

These are hand drawn maps that were produced between the 1890s and 1970s that illustrate the downtown areas of cities and even smaller towns. These maps were developed to assist fire insurance agents in determining the degree of hazard associated with a particular property and therefore show the size, shape, and construction of dwellings, commercial buildings, and factories. These maps are very detailed and show features such as gas station locations and underground fuel tank locations, aboveground fuel storage tanks (railroads used these and some other industrial businesses), printing businesses, manufacturing, railroad yards, etc.

In this section, describe features observed on the maps that could have the potential to impact the project.

- **Section 4.5 As-builts**

These are 100% complete PS&E plans for prior projects. As-builts would be provided to consultants by TxDOT, upon request. As-builts are for existing roads, sidewalks/trails, bridges.

In this section, describe features observed on the As-built plans that could have the potential to impact the project. Also look for callout notes that might be significant, for example: an area that has an SGMP (Soil & Groundwater Management Plan). If As-built plans were reviewed, provide the CSJ in this section.

If the project is a new location roadway, a rail-to-trail, or safe routes to school sidewalk where there was no sidewalk previously, “Not Applicable” should be selected in this section.

- **Section 4.6 Geotech Borings**

Geotechnical borings are temporary borings that are routinely installed for a construction project used to collect and evaluate subsurface geologic data for engineering purposes. These might be provided within some design schematics or PS&E plans. Review the logs for notes regarding shallow groundwater (less than 10 feet deep), petroleum odors, unusual staining, buried debris, etc.

In this section, describe concerns observed on the geotechnical boring logs that could have the potential to impact the project. Examples of things to look for on the logs are shallow groundwater encountered, odors noted, sheen or other discoloration of soil, trash/debris noted, etc.

- **Section 4.7 Use Agreements**

Use Agreements are generally prepared when TxDOT is authorizing right-of-way use to another entity or if TxDOT is sharing right-of-way with another entity. For example, TxDOT grants a use agreement with a city to use TxDOT right-of-way as a city park or as a parking lot. For shared use, TxDOT will typically have a shared use agreement with a transit authority such as Dallas Area Rapid Transit (DART) where their rail and the TxDOT roadway or other right-of-way overlap.

Other use agreements might allow neighboring properties to access existing right-of-way to perform some work, such as installation of groundwater monitoring wells to delineate a contamination plume. These agreements are not too common and would usually be issued by TxDOT district area offices.

For consultants, Use Agreements would be provided by TxDOT.

In this section, specify concerns identified within the Use Agreement(s) that could have the potential to impact the project.

- **Section 4.8 Contamination Notification**

Contamination notifications are notifications that are sent by regulatory agencies or private entities to TxDOT to inform us that our right-of-way may have been impacted by migrating contamination. This information is not common. For consultants, this information would be provided by TxDOT.

In this section, specify any issues identified within the Contamination Notifications provided to TxDOT from adjoining properties and any concerns identified that could have the potential to impact the project.

Section 5: Complete a Regulatory Records Review (Database Search)

Section 5 is the database search portion of the ISA. Databases can be reviewed individually online through their respective websites, or a database search can be obtained through a database search provider. TxDOT Environmental Affairs Division Hazardous Materials Management (ENV-HMM) recommends the use of a database search provider to obtain these searches.

A **minimum** search radius is given for each database to help limit the research conducted for each regulatory record (these are based on the ASTM E1527, Standard Practice for ESA. For each regulatory record identified in Section 5.1:

Select “Sites Identified” if sites were identified within the specified database search radius (the appropriate radius is shown in parentheses on the ISA form for each database).

Select “No Sites Identified” if no sites were identified within the specified database search radius.

Note: If the database searches are being conducted in-house and a database search will not be obtained through a database search company, the ISA preparer can limit their searches to the bolded and starred (*) databases in Section 5.1 of the ISA. However, it is recommended that all regulatory records are searched. For those regulatory records not reviewed, then the ISA preparer must select “Not Reviewed”.

If sites are identified, then comments must be placed in the comment field. The comments must identify the total number of listings found for that database within the minimum search distances identified for that regulatory record. Assessment of sites close to the project and their potential impacts to the project will not need to be performed here. These assessments will be completed later in the ISA (Section 8).

- **Federal Active NPL or Not NPL list (CERCLIS or SEMS sites) ***

This database identifies the most contaminated known sites in the nation. These sites are actively being investigated or are undergoing remediation by the Environmental Protection Agency (EPA). There are not a significant number of these sites in Texas, but if one is identified within one mile of the project limits, then it will need to be identified and assessed for potential impacts to the proposed project. These sites are commonly known as federal Superfund sites.

These sites have a few acronyms that are used to identify them, and the ISA preparer might see one or more of the following (these are all still federal Superfund sites and will need to be identified within one mile of the project limits):

- NPL (National Priorities List) – Superfund sites are assessed and ranked based on their potential impacts and this list is the nation’s highest priorities and are usually the most contaminated sites requiring federal oversight and/or funds for immediate action. Emerging sites can be assessed and determined that they do not need immediate attention and can be lowered to Not NPL, but these sites can still have contamination associated with them, but they just do not rank high enough over the current priorities.
- SEMS (Superfund Enterprise Management System) – The ISA Preparer might find databases called SEMS sites, but this is just a data management system used by EPA. These are still federal Superfund sites.
- CERCLIS (Comprehensive Environmental Response, Compensation and Liability Information System) – This is an older name for the EPA data management system (now called SEMS), but some database searches still show this list.

- **Federal Archived NPL or Not NPL list (CERCLIS NFRAP or SEMSArch sites) ***

This database identifies sites that were investigated and/or considered for the Superfund program (CERCLIS or SEMS sites) but are not in active status. This could mean that the site went through a remediation process already or EPA determined that no additional oversight was required by the agency. These sites still have the potential to be highly contaminated.

- **US EPA Brownfield Properties**

Brownfields are real properties where the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or

contaminant. These can be properties that have been used in the past for businesses or public works, etc., which could have left possible historic contamination at the site. Not much is known about the properties and are subsequently left undeveloped due to their perceived risk. To assist communities in redeveloping these areas, EPA's Brownfields program provides funding for environmental assessment to determine if the properties are contaminated or not. Not all assessed brownfield sites are determined to be contaminated.

- **Federal RCRA Corrective Action (CORRACTS)**

Federal Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984 regulate the handling, storing, and disposal of hazardous wastes and other like materials produced in the US. If a facility regulated by RCRA suffers a contamination release, then EPA and State environmental agencies under the RCRA Corrective Action Program will oversee the cleanup.

- **Federal RCRA non-CORRACTS Treatment Storage Disposal (TSD) facilities**

This database includes Non-Corrective Action sites listed as treatment, storage and/or disposal facilities of hazardous waste as defined by RCRA. These are normally sites that are not contaminated, but are sites that are authorized to treat, store, and/or dispose of hazardous wastes within the RCRA program. These sites are not routinely found on databases.

- **Federal RCRA Generators**

A hazardous waste generator is any person or site whose processes and actions create hazardous waste. Even though these sites produce hazardous wastes, they usually do not have a contamination issue. They follow strict regulations on how to store, treat, and dispose of the produced material. If a RCRA site did suffer a release, then the ISA preparer would find the site on another database (Federal or State remediation program).

Generators will be shown as large quantity (LQG), small quantity (SQG), very small quantity (VSQG) or conditionally exempt small quantity (CESQG).

- **Federal ERNS (or Responses)**

This database identifies oil and/or hazardous substances spill reports controlled by the National Response Center (NRC). The primary function of the NRC is to serve as the sole national point of contact for reporting oil, chemical, radiological, biological, and etiological discharges into the environment anywhere in the United States and its territories. Normally these are larger releases/spills and are highly managed at the time of the release.

State of Texas Regulatory Listings

- **TCEQ Industrial Hazardous Waste Corrective Action (IHWCA) sites only***

This database identifies sites that are regulated by the Texas Commission on Environmental Quality (TCEQ) to cleanup contamination from industrial and municipal hazardous and industrial nonhazardous wastes. This should not be confused with Industrial Hazardous Waste (IHW, IHW Receiver, IHW Transport, IHW Generator) sites where the TCEQ gives permits or authorizations to facilities to receive, on a commercial basis, and manage hazardous waste, industrial nonhazardous waste, or both. Normally, IHWCA sites have some level of contaminated media.

- **TCEQ Superfund sites***

This is a list of sites identified or evaluated by the TCEQ which may constitute an imminent and substantial endangerment to public health and safety or to the environment due to a release or threatened release of hazardous substances into the environment. The TCEQ updates the state

Superfund sites list in accordance with the Texas Health and Safety Code (THSC). This database is state equivalent of the Federal NPL (Superfund).

- **TCEQ Voluntary Cleanup Program (VCP) sites***

This is a list of sites which have participated or are currently participating in the Voluntary Cleanup Program (VCP) administered by the TCEQ. The VCP provides administrative, technical, and legal incentives to encourage the cleanup of contaminated sites in Texas. VCP sites are often large, contaminated sites.

- TCEQ Innocent Owner/ Operator (IOP) sites

A list of sites in the Innocent Owner/Operator Program (IOP) made available by TCEQ. IOP provides certificates to innocent owners or operators who own properties that are contaminated because of a release or migration of contaminants from a source, or sources not located on the property (they did not cause or contribute to the source or sources of contamination). Normally, IOP sites are adjacent to contaminated properties and can assist in determining that there is an issue in the area.

- **TCEQ registered petroleum storage tank lists (PST)***

The TCEQ maintains a database of all registered Petroleum Storage Tanks (aboveground (AST) or underground (UST)). This list is an identification that PSTs are or were present on a parcel and does not indicate if the PSTs have suffered a release. With this database, TxDOT is concerned with the acquisition and/or displacement of an existing PST system.

Note: Tank registration requirements began in 1987. Some historic facilities (gas stations, industrial facilities, etc.) which began and ended operation prior to registration regulations could be considered suspect for still having USTs since they were not required to remove tanks upon business termination or moving locations.

- **TCEQ leaking petroleum storage tank remediation lists (LPST)***

This is a TCEQ database that identifies known cleanup sites where contamination was caused by spills, leaks, or other releases of petroleum or hazardous substances from underground and/or aboveground storage tanks regulated by the TCEQ.

- **TCEQ Dry Cleaners Remediation Only Database***

The Dry-Cleaning Facility Release Fund was established by the Texas Legislature in 2003. It created the Dry Cleaner Remediation Program (DCRP) for state lead cleanup of dry cleaner related contaminated sites. It also established dry cleaner facility registration requirements, fees, performance standards, distributor registration, and revenue disbursement. For ISA purposes, TxDOT is only concerned with the dry-cleaning facilities that are currently within the remediation program. We are not concerned with the transit dry-cleaning facilities where items are stored or dropped off. Remediation facilities are shown as DCRPS or Priority Clean on the database reports.

- TCEQ Brownfield Assessment Program Properties

This database is similar to the EPA Brownfield program but is managed at the State level (see US EPA Brownfield Properties for a more detailed description).

- **Active, or Closed, and Abandoned solid waste landfill sites* (can be authorized, i.e., municipal, or unauthorized; listed as CALF, CLI, SWF/LF, or MSWLF)**

Inventory of permitted and unauthorized active, closed or abandoned municipal solid waste landfills throughout Texas compiled by the TCEQ, in collaboration with regional Councils of Government (COG).

Note: An SWF/LF or MSWLF shown on database reports are permitted landfills and do not necessarily mean that landfill is active. These listings can also be closed landfills. Review the information for the site within the database report to find if it is active or closed. The CALF or CLI listings are generally, but not always, non-permitted or unauthorized/illegal dump sites.

- **Texas Railroad Commission (TRRC) VCP sites***

List of facilities which have participated in or are currently participating in the Voluntary Cleanup Program (VCP) operated by the Railroad Commission of Texas (TRRC). The TRRC VCP provides an incentive to remediate oil and gas related pollution.

Note on pipelines: For ISA purposes, TxDOT is not concerned with the identification of pipelines that may or may not cross our proposed project. TxDOT has a separate internal process to clear utilities and pipelines that may affect our proposed project.

- **Section 5.2 List below other pertinent records reviewed such as local records and/or additional state records.**

Section 5.2 allows the ISA preparer the ability to record other suspect, or unusual listings that might appear on a database search.

Examples of some listings that would be of interest are, but not limited to, engineering controls (FED ENG or AUL) (physical barriers to contain and/or prevent exposure to contamination), refineries or bulk petroleum terminals (REFN, BULK TERMINAL), radioactive waste sites (RWS), Municipal Setting Designations (MSD) (used on areas of groundwater contamination to limit or prohibit its use), groundwater contamination cases (GWCC), and underground injection control (UIC) (typically used on significantly contaminated groundwater).

Section 6: Complete a Project Site Survey

Most of the investigations conducted to this point (in the ISA) have centered around potential issues identified on historical maps or on a database managed by a regulatory authority. The Site Survey allows for the identification of hazardous materials issues at or near the project site that have not already been identified in the previous ISA sections. Section 6 gives additional guidance by identifying possible site survey concerns that could be indicators of an unidentified hazardous materials concern. The list given in the ISA form is not a comprehensive list but a guide of the most common issues that may be identified.

Important Note: Always think of your safety first when performing a site survey (consultants will need to follow their company safety policies and TxDOT personnel will need to follow their district's field visit policy). Perform your site visit from an area that is protected from traffic and complies with right-of-entry restrictions/permissions. Protect yourself from environmental conditions (weather, flora, and fauna, etc.) as you would with any site survey. If possible hazardous materials concerns are identified, do not interact with the issue but just record the issue. This is a non-intrusive investigation and if additional investigations will need to be conducted, then it will be performed separately.

- **Site Survey Date(s):**

If multiple Site Surveys are performed, then record the date that each one was performed.

- **Section 6.1 Describe Concerns Observed During the Site Survey.**

If hazardous materials concerns are identified during the Site Survey and are associated with existing and/or proposed right-of-way, adjacent property, or easements, then record the issue identified and the address (or relative location). This should be a short description that includes enough information

necessary so that a decision for further investigations can be made. Attach to the ISA any photographs taken during the site visit.

The issues recorded in this section **must not** include previously identified hazardous materials issues that were already identified in the regulatory list search (Section 5) and/or the current and past land use review (Section 4).

Section 7: Interviews

Section 7 was designed to comply with ASTM E1527 Standard Practice for Environmental Site Assessments. Interviews of property owner/operator/occupant and/or government officials can be conducted by the ISA preparer to ascertain additional information about areas, parcels, or businesses within the project location. Interviews are not required to be performed for TxDOT projects. Consultants shall perform interviews only when tasked by their contracted project's Statement of Work (SOW).

- **Section 7.1 Were interviews conducted?**

Select "Yes" if interview(s) were conducted. Otherwise, select "No". Again, interviews are not required to be performed for TxDOT projects.

- **Section 7.2 Interview Summary**

If interviews are conducted, record the name and title of the individual being interviewed. Enter the entity they are with (ex: City of Ft. Worth Public Works; TCEQ; Winston Property Management; etc.). Enter the date of which they were interviewed, not the date of the ISA.

Describe concerns identified during the interview. These could be things such as environmental liens on the property, a buried tank that isn't shown on TCEQ Central Registry, past uses of a property that weren't identified in Section 4 that could be a concern, violations issued by the city for dumping at a property, etc.

Section 8: Hazardous Materials Concerns:

This section is the determination portion of the ISA and is designed to identify what hazardous materials issues will need additional investigations outside of the ISA and what issues can be resolved within the ISA.

- **Section 8.1 – Regulatory Databases Sub-Boxes**

Yes or No Questions: The sub-boxes narrow down the database sites that will be a concern to TxDOT and has a Yes/No selection for each one. If a hazardous materials site meets the qualifications given by the question, then the ISA preparer shall select "Yes" for the question.

Select "No", only if no hazardous materials sites meet the question criteria.

Examples:

Example 1 - Issue: The database search for the project identified a TCEQ Superfund site within 1-mile of the project limits.

Resolution: The ISA preparer would need to select "Yes" for this site, even if the preparer has assessed the site already and has determined that the site will not impact the proposed project. The site identified (TCEQ Superfund site) was identified within one mile of the project limits.



Non-LPST Source Contamination Concerns discovered during the database search:

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Database search identified TCEQ Superfund sites within 1-mile of project.
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Example 2 - Issue: The database search for the project identified a PST adjacent to the project, but the project will not acquire right-of-way (ROW) from the parcel.

Resolution: The ISA Preparer would need to select “No” for this site under the PST ROW acquisition sub-box, since the site did not meet the question criteria. If this parcel is also identified under the Leaking Petroleum Storage Tank (LPST) database for this project, then the ISA preparer would capture this site and potential issue within the LPST question and make a determination of potential impacts under that item.

Note: PSTs and LPSTs are considered two separate issues. PST issues are concerned with the acquisition of a PST system (system removals and responsible party issues) and LPST issues are concerned with the potential for soil, groundwater, and atmospheric contamination.

Petroleum Storage Tanks (PSTs) Concerns discovered during the database search:

<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	ROW acquisition or partial acquisition of a parcel with one or more PSTs.
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Example 3 - Issue: The database search for the project identified the same parcel as a PST and LPST adjacent to the project and will acquire right-of-way (ROW) from the parcel.

Resolution: The ISA preparer would need to select “Yes” for this issue under the PST and LPST ROW acquisition sub-boxes, since the issue did meet the question’s criteria.

Petroleum Storage Tanks (PSTs) Concerns discovered during the database search:

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ROW acquisition or partial acquisition of a parcel with one or more PSTs.
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Leaking Petroleum Storage Tanks (LPSTs) Concerns discovered during the database search:

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ROW acquisition or partial acquisition of a parcel with one or more LPSTs.
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• **Section 8.1 – Unresolved, Resolved, No Issues, N/A Selections:**

If a “Yes” is selected for any question in a sub-box, then the ISA preparer must select either “Unresolved” or “Resolved” or both.

If “Resolved” or “Unresolved” is selected, then explain why the issue is considered “Resolved” or “Unresolved”.

If more than one issue identified in this section will require explanation, then separate the “Resolved” from the “Unresolved” issues for clarification within the comment field.

Examples:

Example 1 - Issue: The database search identified a TRRC VCP Site within 0.5-mile of the limits of the project, but after a review the ISA preparer determined that the site will not impact the proposed project. No other oil and gas activity concerns were identified.

Resolution: Select “Yes” for this site (TRRC VCP Site within 0.5-mile of the project). This site met the question criteria. Since “Yes” is selected, the ISA preparer must then select either “Resolved” or “Unresolved”. In this case the ISA preparer resolved this site as a potential issue during the ISA and will select “Resolved”.



Additionally, since “Resolved” is selected, the ISA preparer will need to explain in the field provided for this section why this site was determined to be a resolved issue.

<input type="checkbox"/> Unresolved <input checked="" type="checkbox"/> Resolved <input type="checkbox"/> No Issue	Oil and Gas Activity Concerns: TxDOT is concerned with the acquisition of oil and gas wells (and ancillary equipment) such as process, piping, production equipment, pipelines, etc. Select below all that apply.	
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Database search identified TRRC VCP Site within 0.5-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Oil/ Gas Wells within proposed ROW.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Spills or other Contamination Issues associated with ancillary equipment or pipelines.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other- If yes, describe:
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Uncertain of impacts or need more information. Request assistance from ENV.
Explain Unresolved or Resolved Issues: Resolved: Map ID#2 El Paso Oilfield Processing Facility, 1234 Wild Ride Lane, El Paso, Texas 79835. The TRRP VCP site is a soil only issue and 500 feet from the proposed project. This site will not impact the proposed project.		

Example 2 - Issue: The database search identified multiple (10) LPST sites within 0.25-mile of the project. Eight of the LPST sites can be resolved during the ISA process, but two will require further investigations.

Resolution: The ISA preparer would need to select “Yes” for this issue (One or more LPSTs are located within 0.25-mile of the project), given that the sites meet the question criteria. Since “Yes” is selected for this section, then the ISA preparer will need to select “Resolved” and/or “Unresolved”. In this case the ISA preparer is resolving eight of the LPST sites (Resolved) and not resolving two of the sites (Unresolved). The ISA preparer would select both “Resolved” and “Unresolved”.

Additionally, since “Resolved” and “Unresolved” are both selected the ISA preparer will need to explain why the preparer decided to resolve some sites and why some remain unresolved. This information will need to be placed in the explain field for this section.

<input checked="" type="checkbox"/> Unresolved <input checked="" type="checkbox"/> Resolved <input type="checkbox"/> 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.	
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	ROW acquisition or partial acquisition of a parcel with one or more LPSTs.
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	One or more LPSTs are located within 0.25-mile of the project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other- If yes, describe:
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Uncertain of impacts from one or more LPST sites or need more information. Request assistance from ENV.
Explain Unresolved or Resolved Issues: Unresolved: Two of the LPSTs identified (Map ID#3 and Map ID#4) are adjacent to the project. Map ID#3- Billy Bob's Gas Station, 635 William Cannon Street, Austin, Texas 78749, LPST#111332. This gas station has suffered a substantial		



groundwater release and is currently within active remediation. Additional investigations into potential construction impacts required.

Map ID#4- John's Icehouse, 655 William Cannon Street, Austin, Texas 78749, LPST#112244. This gas station is currently being investigated (Phase II ESA) and potential impacts are not known. Additional investigations into potential construction impacts required.

Resolved: Eight of the LPST sites identified have been resolved (Map ID#1, 2, 5, 6, 7, 8, 9, and 10). Each LPST was assessed for potential impacts against the proposed project and are a low risk to the project. Map ID#1, 5, 6, 7, 8, and 9 are down gradient and over 200 feet distance from the project. Map ID#2 and 10, although adjacent to the project, are soil only issues and no right-of-way will be acquired for the project.

Example 3 - Issue: The database did not identify sites that would trigger a “Yes” response to any of the question criteria.

Resolution: The ISA preparer selects “No” for all the sub-box questions and selects “No Issue”.

Additionally, no comments are required. It is important to select “No” for all the sub-box questions to indicate that these questions were reviewed and to show that a determination was made.

<input type="checkbox"/> Unresolved <input type="checkbox"/> Resolved <input checked="" type="checkbox"/> No Issue	Non-LPST Source Contamination Concerns discovered during the database search: These are sites or locations that have a potential for soil and groundwater contamination and are not associated with LPST sites. Select below all that apply.	
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified Active SEMS, NPL or Not NPL site(s) within 1-mile of the project. This may be identified on a database search as a CERCLIS or NPL site.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified Archived SEMS, NPL or Not NPL site(s) within 0.5-mile of the project. This may be identified on a database search as a CERCLIS NFRAP.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified US Brownfields within 0.5-miles of the project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified RCRA CORRACTS site within 1-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified RCRA TSD facilities within 0.5-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified TCEQ IHWCA sites within 1-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified TCEQ Superfund sites within 1-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified TCEQ VCP sites within 0.5-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified TCEQ IOP sites within 0.5-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Database search identified TCEQ DCR Remediation sites within 0.5-mile of project.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Other- Describe:
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Uncertain of impacts from one or more Non-LPST sites or need more information. Request assistance from ENV.
Explain Unresolved or Resolved Issues:		

Explain Unresolved or Resolved Issues: As mentioned above, the ISA preparer will only need to add information to this comment field if either “Resolved” or “Unresolved” have been selected. If “No Issues” or “N/A” have been selected, then no comments are required in the explain field for this section.

If explanations are required, then the following information should be given.

- For “Resolved” issues, give enough information so that each specific issue being resolved can be easily identified. Give a brief reason why this issue is considered resolved. The ISA preparer can combine resolved issues if the assessments are the same.

Example: “Resolved- Eight of the LPST sites identified have been resolved (Map ID#1, 2, 5, 6, 7, 8, 9, and 10). Each LPST was assessed for potential impacts against the proposed project and are a low risk to the project. Map ID#1, 5, 6, 7, 8, and 9 are down gradient and over 200 feet distance from the project. Map ID#2 and 10, although adjacent to the project, are soil only issues and no right-of-way will be acquired for the project.”

- Since an “Unresolved” issue will require another reviewer to resolve the issue later in the process, the more information provided about the site in the ISA will make resolving this issue easier. Not all the following information may be known, but the ISA preparer should supply as much information as possible. For “Unresolved” issues provide as much of the following information as possible in the explanation field.
 - Site Name, Address, and Parcel Number (if available)
 - Map ID number as shown on a regulatory database report.
 - Database or ISA discovery tool (example: LPST, PST, Site Survey, Current and Past Land use, Acquired Parcel etc.)
 - Regulatory Identifier (if applicable) - The regulatory number or identifier used by the regulatory agency. Examples: LPST #112233, VCP #345
 - Potential ROW requirements from affected parcels (if applicable),
 - Description of site, current and past (if the historic site caused the hazmat issue) and any potential hazardous materials concerns on the affected parcel.
 - Potential project impacts related to the hazardous materials concern. Examples: Are there roadway excavations at or adjacent to the site; is a culvert being installed by the site; etc.?

Section 9: ISA Attachments (attach selected reference materials used to prepare the ISA).

Section 9 is used to identify what reference materials were utilized to perform the ISA. Attaching the reference materials will validate the results of the ISA and allow a reviewer to assess the determinations made. The reference materials must be attached to the ISA unless the reference material can be found in TxDOT’s Environmental Compliance Oversight System (ECOS) documentation. It is not necessary to attach the reference materials if they can be found somewhere in the ECOS documentation.

Consultant prepared ISAs shall follow their negotiated contracted SOW.



Section 10: ISA Preparer

After completing the ISA, the preparer shall complete this section to identify who performed the ISA. Additionally, this will identify when the ISA was completed and what company or TxDOT district was responsible for its production. If questions or issues are identified, then a reviewer can contact the preparer directly.

This is the end of the ISA Job Aid.



Abbreviations and Acronyms

CALF	Closed and Abandoned Landfill
CE	Categorical Exclusion
CERCLIS	Comprehensive Environmental Response Compensation and Liability Information System
EA	Environmental Assessment
EIS	Environmental Impact Statement
ECOS	Environmental Compliance Oversight System
ENV	TxDOT Environmental Affairs Division
ERNS	Emergency Response Notification System
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
HAZMAT	Hazardous Materials
MS4	Municipal Separate Storm Sewer System
MSWLF	Municipal Solid Waste Landfill
NEPA	National Environmental Policy Act
NPL	National Priorities List
RCRA	Resource Conservation and Recovery Act
ROW	Right of Way
SEMS	Superfund Enterprise Management System
SOW	Statement of Work
TCEQ	Texas Commission on Environmental Quality
TRRC	Texas Railroad Commission
US	United States
USGS	United States Geological Survey
VCP	Voluntary Cleanup Program