



Hazardous Materials Project Development

Scheduling Considerations, Internal/External
Coordination and Recommended Practices for
Resolving Hazmat Issues

Standard Procedures
Scheduling Considerations, Internal/ External Coordination and Recommended Practices for Resolving Hazmat Issues
Hazardous Material Management for Project Development
 July 2008

Hazardous Material Issue	Project Actions Associated with Hazardous Materials Issue	Recommended Practices for Hazardous Material Management. ¹	Estimated Time Needed ²	Level of Internal TxDOT Staff Coordination Required ³	Regulatory Notification and/or Approval Required ⁵	Level of Regulatory Coordination Required ⁴	Recommended Hazardous Material Management Practice should be initiated and completed during the highlighted project phases shown below					Applicable Major Regulatory Reference
							Preliminary Design	PS&E Development	ROW & Utilities	Letting	Construction	
Asbestos Containing Materials (ACM)	Demolition or Renovation of ROW Structures	Structures may contain ACM. Conduct ACM inspection and document findings. Acquire and monitor asbestos inspection services.	Medium	Low to Medium	No	Low						40 CFR 61.145 Asbestos NESHAP Demolition & Renovation Standard
		Structure Contains ACM. Develop ACM abatement plan using DSHS licensed consultant. Determine timing for ACM removal. If necessary develop specification for ACM removal and include in demolition spec. Note: abatement usually done in conjunction w/ demolition contract. Acquire and monitor abatement/demolition services.	Medium	Medium to High	No	Low						
		Prior to the structure demolition or ACM abatement (if required) submit notification to the TX Department of State Health Services (DSHS) 10 working days prior to the demolition/ abatement start date. For demolition only projects, notification is still required regardless if ACM is present or not. Pay the DSHS notification fee when invoiced. Notification usually done by abatement/demo contractor. As owner, TxDOT is responsible for paying notification fee.	Short	Low	Yes	Low	Notification must be completed 10 working days prior to the project actual demolition start date. Pay DSHS notification fee					40 CFR 51.145 (b) Notification Requirements
	Bridge Demolition or Renovation	The bridge(s) may contain ACM. Conduct ACM inspection and document findings. Acquire and monitor asbestos inspection services	Medium	Low to Medium	No	Low						40 CFR 61.145 - Asbestos NESHAP Demolition & Renovation Standard
		Bridge(s) contains ACM. Develop ACM abatement plan using DSHS licensed consultant. If necessary, develop specification for ACM removal and acquire abatement services. Remove asbestos prior to project letting, if practical. Acquire and monitor abatement/demolition services	Long	Medium to High	No	Low						
		Prior to the bridge demolition or ACM abatement (if required) submit notification to the DSHS 10 working days prior to the demolition/ abatement start date. For demolition only projects notification is still required regardless if ACM is present or not. Pay the DSHS notification fee when invoiced. As owner, TxDOT is responsible for paying notification fee.	Short	Low	Yes	Low	Notification must be completed 10 working days prior to the project actual demolition start date. Pay DSHS notification fee.					40 CFR 51.145 (b) Notification Requirements

Notes:

1. Refer to the *Hazardous Materials in Project Development Manual* for more details regarding hazardous material issue resolution.
2. Estimated Time. Short - Less than 1 month. Medium – 1 month to 3 months. Long - 3 months to a 6 months. Extensive – Greater than 6 months.
3. Coordination Effort: Low - Coordination among district staff only. Medium – Coordination required among district and ENV. High- Coordination required among district and multiple division/office staff.
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5. RCRA – The Resource Conservation Recovery Act (RCRA) created stringent standards for the development of landfills in the US. A post-RCRA landfill means that the standards of RCRA are in-place and the landfill is designed with impermeable layers, leachate control systems, methane control systems, etc. A pre-RCRA landfill has none of the afore mentioned items.
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	Relocation or disturbance of Transite (asbestos cement) piping. Note: also applicable for disturbance of coated or insulated pipes	The piping may contain ACM and should be inspected to verify the presence or absence of ACM. Buried transite piping may be assumed to contain asbestos. Acquire and monitor asbestos inspection services.	Medium	Low to Medium	No	Low						29 CFR 1926.1101 OSHA Asbestos Standard for Construction; 40 CFR 61.145 Asbestos NESHAP Demolition & Renovation Standard; 40 CFR 51.145 (b) Notification Requirements
		Conduct activities in accordance with OSHA asbestos construction standard, including worker training and waste management. For projects which might result in at least 260 linear ft of "RACM" (friable ACM), submit DSHS notification at least 10 days prior to starting work, and pay the notification fees. Coordination w/ asbestos consultant / environmental staff to specify work appropriately. Abatement contractor would usually make DSHS notification. As owner, TxDOT is responsible for paying notification fee.	Short to Medium	Low to Medium	Yes	Low	Complete as required. Notification must be completed 10 working days prior to the projects actual demolition start date. Pay notification fee.					
	Enhancement Projects	Structures may contain ACM. Coordinate with project sponsor to conduct ACM inspection and document findings. Coordinate with project sponsor to assure ACM inspection conducted and documented.	Medium	Low to Medium	No	Low						25 TAC 295.31-73 – Texas Asbestos Health Protection Rules
		Structure Contains ACM. Coordinate with project sponsor to develop ACM abatement plan using DSHS licensed consultant, and determine timing for abatement. Asbestos abatement in public buildings requires DSHS notification. Project sponsor/owner responsible for notification and fee payment. Coordinate with project sponsor and monitor compliance w/ abatement/notification requirements	Long	Low to Medium	No	Medium						25 TAC 295.61 - Notifications
PST	ROW Acquisition - PST in Taking	Evaluate possible re-design of the project to avoid acquisition of the PST system	Short	Medium	No	Low						Best Management Practice
		Negotiate with Owner for the execution of a TxDOT Petroleum Storage Tank Removal Agreement prior to taking.	Short to Medium	Medium	No	Low						Best Management Practice
		Negotiate with Owner for the execution of a TxDOT Indemnity Agreement prior to taking.	Short to Medium	Medium	No	Low						Best Management Practice

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	PST Removal from Service	Prior to construction, the PST(s) will need to be properly removed from service. A TCEQ-licensed tank removal contractor must be secured to remove the system and perform the required release determination.	Short	Medium	Yes	Medium						Title 30 TAC, Chapter 334, Subchapters A, C, D, and I	
	"Ghost" PST Discovery During Construction	See <i>PST Removal from Service</i> section above.	Short	Medium	Yes	Medium						Title 30 TAC, Chapter 334, Subchapters A, C, D, and I	
LPST	Project involves excavation > 3 ft and known LPSTs are in the vicinity	If TxDOT is not the owner of the LPST site, negotiate with owner for the execution of a TxDOT Indemnity Agreement prior to taking.	Short to Medium	Medium	No	Low							
		Review the LPST files for potential impact to project; if the files indicate contamination may impact project, contact ENV to conduct a Phase II site investigation. If Phase II results indicate no impact, document findings in project file	Short to Long	Low to Medium	No (However, unique circumstance may require it)	Low							
		TxDOT is not the owner of the LPST, instruct the LPST owner to remove/ manage the contamination from the construction area prior to letting the project. Contact ENV for assistance. The time needed to resolve this issue varies significantly depending on the problem and the type of project. Early internal coordination is essential.	Medium to Extensive	Medium to High	Yes (but not always)	Medium to High							
		If the contamination will affect the project and LPST owner will not or cannot remove contamination, TxDOT will, preferably prior to letting the project, remove/ manage the contamination from the construction area using a remediation contractor. Contact ENV for assistance. The time needed to resolve this issue varies significantly depending on the problem and the type of project. Early internal coordination is essential. Coordinate with OGC for cost recovery from LPST owner for TxDOT's remediation cost.	Medium to Extensive	Medium to High	Yes (but not always)	Medium to High							
		If the LPST contamination will affect the project and removal prior to construction is not selected or is not an option, remove/ manage the contamination during construction. Prepare a SGMP for inclusion in the PS&E. Administration approval required. A separate contract may be let to manage the contamination during the construction, but this is not a preferred option. Contact ENV for assistance. The time needed to resolve this issue varies significantly depending on the problem and the type of project. Early internal coordination is essential. Coordinate with OGC for possible cost recovery from LPST owner for TxDOT's remediation cost.	Medium to Extensive	Medium to High	Yes (but not always)	Medium to High							

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Oil & Gas	Identification of Oil & Gas Wells	A visual survey of the project area has revealed wells in the vicinity of the ROW. Search the Texas Rail Road Commission (RRC) GIS database for any information concerning dry holes, plugged and abandoned, shut in and operating oil, gas, brine disposal and water wells in the ROW.	Short	Low	No	Low						Texas Administrative Code (TAC), Title 16, Part 1, Chapters 3 and 4
		If wells are identified in the proposed alignment, discuss redesign or realignment with Design.	Short	Low	No	Low						Best Management Practice
		If the owner of the well is identified, attempt to negotiate with the owner a plugging and abandonment or indemnification agreement.	Medium to Long	Medium	Low	Low						Best Management Practice
		Well sites may include gas treating equipment, oil-water separators, tank batteries, above and underground piping, drilling mud pits, water well(s) drilled to provide water during drilling and NORM waste/contaminated piping and equipment. Obtain copies of well information and pit closure reports that are on file at the RRC field office for TxDOT District.	Short	Low	No	Low						Texas Administrative Code (TAC), Title 16, Part 1, Chapters 3 and 4
		If the owner of the well is identified attempt to negotiate with the owner an investigation/remediation or indemnification agreement.	Medium to Long	Medium	No	Low						Best Management Practice
	Well Acquisitions	Contact ENV. ENV will perform a Phase II Site Assessment to identify and quantify releases from drilling and production.	Medium to Long	Medium	No	Low						Railroad Commission Regulations for Environmental Protection; Texas Administrative Code (TAC), Title 16, Part 1, Chapter 4; Texas Department of State Health Services (DSHS) for NORM; 25 TAC §289.259

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		If the Phase II confirms the presence of a release, see recommended practices for Non-LPST Source Contaminated Soil and/or groundwater soil.	Medium to Extensive	Medium to High	Yes (but not always)	Low to Medium						Railroad Commission Regulations for Environmental Protection; Texas Administrative Code (TAC), Title 16, Part 1, Chapters 3 and 4; Texas Department of State Health Services (DSHS) for NORM; 25 TAC §289.259
		Wells identified on ROW to be acquired. Search RRC GIS database to determine ownership of the well and other well information.	Short	Low	No	Low						Texas Administrative Code (TAC), Title 16, Part 1, Chapters 3 and 4
		If wells are identified in the proposed alignment, discuss redesign or realignment with Design.	Short	Low	No	Low						Best Management Practice
		If the owner of the well is identified, attempt to negotiate with the owner a plugging and abandonment or indemnification agreement.	Medium to Long	Medium	Low	Low						Best Management Practice
		Contact ENV. ENV will develop plugging and abandonment plan for review and approval of RRC of Texas. ENV will also contract with a contractor to implement plugging and abandonment of well. The contractor will document plugging and abandonment activities.	Short to Medium	Medium	Yes	Medium						Railroad Commission Regulations for Environmental Protection; Texas Administrative Code (TAC), Title 16, Part 1, Chapter 4; Texas Department of State Health Services (DSHS) for NORM, 25 TAC 289.259

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		If review of RRC of Texas indicates the presence of closed mud pits, potentially NORM contaminated piping/equipment or the visual survey indicates surface releases, a Phase 2 Site Assessment may be required to identify and quantify releases from drilling and production. If the owner of the well is identified attempt to negotiate owner investigation/remediation or indemnification agreement.	Medium	Medium	No	Yes							
		If the owner is unknown or declines to perform, contact ENV. ENV will perform a Phase II Site Assessment to identify and quantify releases from drilling and production.	Medium to Long	Medium	No	Low						Railroad Commission Regulations for Environmental Protection; Texas Administrative Code (TAC), Title 16, Part 1, Chapter 4; Texas Department of State Health Services (DSHS) for NORM; 25 TAC §289.259	
		If the Phase II confirms the presence of a release, see recommended practices for Non-LPST Source Contaminated Soil and/or groundwater.	Medium to Extensive	Medium to High	Yes (but not always)	Low to Medium						Railroad Commission Regulations for Environmental Protection; Texas Administrative Code (TAC), Title 16, Part 1, Chapters 3 and 4; Texas Department of State Health Services (DSHS) for NORM; 25 TAC §289.259	
Pipelines	Managing Active Pipelines	Numerous active pipelines identified in project area. Determine number of pipelines that need to be moved or deepened and contact ROW to assess additional costs to project. Based on the cost analysis, determine if project re-design is feasible.	Short	Medium	No	Low						Best Management Practice	
		Active pipelines identified in project area. Verify pipeline locations during the site survey and note any potential indications of a release along the pipeline route through and adjacent to the project area.	Short	Low	No	Low							
		Site survey shows potential environmental concerns. Contact the TCEQ, TRC, and/or pipeline owner to request information on known historical releases in the project area.	Medium	Medium	No	Low							RRC Statewide Rules 8, 20, 91 and Rule 3.91 TCEQ 30 TAC Chapter 350
		If no historical releases identified, negotiate with pipeline owner to have owner conduct a Phase II Investigation.	Medium - Long	Medium	No	Low							RRC Statewide Rules 8, 20, 91 and Rule 3.91 TCEQ 30 TAC Chapter 350

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		If Phase II Investigation identifies contamination in proposed construction area, see recommended practices for Non-LPST Source Contaminated Soil and/or groundwater soil.	Medium to Extensive	Medium	Yes (but not always)	Low to Medium						RRC Statewide Rules 8, 20, 91 and Rule 3.91 TCEQ 30 TAC Chapter 350
	Managing Abandoned Pipelines	Abandoned pipelines identified in project area. Verify pipeline locations during the site survey and note any potential indications of a release along the pipeline route through and adjacent to the project area.	Short	Low	No	Low						
		Site survey shows potential environmental concerns. Contact the TCEQ, TRC, and/or pipeline owner to request information on known historical releases in the project area.	Medium	Medium	No	Low						RRC Statewide Rules 8, 20, 91 and Rule 3.91 TCEQ 30 TAC Chapter 350
		If no historical releases identified, negotiate with pipeline owner to conduct Phase II Investigation. If former pipeline owner unknown contact ENV to conduct Phase II Investigation.	Medium - Long	Medium	No	Low						RRC Statewide Rules 8, 20, 91 and Rule 3.91 TCEQ 30 TAC Chapter 350
		If Phase II Investigation identifies contamination in proposed construction area see recommended practices for Non-LPST Source Contaminated Soil and/or groundwater soil.	Medium to Extensive	Medium to High	Yes (but not always)	Low to Medium						RRC Statewide Rules 8, 20, 91 and Rule 3.91 TCEQ 30 TAC Chapter 350
		Project requires removal of abandoned pipeline from project area. Attempt to locate former owner of pipeline. If former owner can not be identified, conduct "hot tap" to determine if any fluids remain in pipeline prior to removal. Conduct NORM survey, as applicable prior to removal.	Medium	Medium	Yes (for disposal)	Low						RRC Statewide Rules 8, 20, 91 and Rule 3.91RRC Subchapter F Oil and Gas Norm; DSHS 25 TAC25 §289.259TCEQ 30 TAC Chapter 350
Landfills	ROW Acquisition - Landfill in Taking	Evaluate possible re-design of the project to avoid acquisition of the Landfill	Short	Medium	No	None						Best Management Practice
	Disturbance of Pre-RCRA Landfills ⁵	Site Investigation Plan – Prior to any sub-surface investigations of a landfill (environmental, geo-technical, etc.) approvals must be obtained from the TCEQ Municipal Solid Waste Division to penetrate the landfill cap.	Medium	Medium	Yes	Medium						TITLE 30 §330.953 Soil Test Required Before Development:
		Work Plan Development and Authorization – Prior to work commencing within a landfill, a detailed plan shall be developed which describes the methods and procedures utilized to disturb and protect the integrity of the landfill (a P.E. seal is required).	Long	High	Yes	High						TITLE 30 §330.960 Contents of Authorization Request to Disturb Final Cover Over a Closed Municipal Solid Waste Landfill for Non-enclosed Structures

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Disturbance of Post-RCRA Landfills ⁵ (Unlikely scenario)		Pre-Disturbance Notification – This is a courtesy notification to the TCEQ Municipal Solid Waste Division describing when the work detailed within the Work Plan will commence.	Short	Medium	No	Low						Best Management Practice (BMP) and may be outlined within the approval for the Work Plan
		Completion Report – This is a final report submitted to the TCEQ Municipal Solid Waste Division detailing how the Work was performed.	Short	Medium	No	Medium						Best Management Practice (BMP) and may be outlined within the approval for the Work Plan
		Stakeholder Coordination – High level meetings with landfill owners (Active, Post-closure, etc.), TCEQ Municipal Solid Waste Division, and any other interested parties.	Extensive	High	Yes	High						Best Management Practice (BMP) and required to verify if the alignment is even feasible.
		Landfill Permit Modifications – If feasible and allowed by property owner and the TCEQ Municipal Solid Waste Division, the landfill permit and site plans might require modification based on the proposed improvements and the agreements made during the Stakeholder Coordination.	Extensive	High	Yes	High						TITLE 30 §330 Subchapter B Permit and Application Procedures; Best Management Practice (BMP) and required to verify if modifications can even be made.
		Site Investigation Plan – Prior to any sub-surface investigations of a landfill (environmental, geo-technical, etc.) approvals must be obtained from the TCEQ Municipal Solid Waste Division (might not be feasible due to potential landfill cell development).	Extensive	High	Yes	High						TITLE 30 §330 Subchapter B Permit and Application Procedures; (might require landfill permit modifications and/or variances.)
		Work Plan Development and Authorization – Prior to work commencing within a landfill, a detailed plan shall be developed which describes the methods and procedures utilized to disturb and protect the integrity of the landfill (a P.E. seal is required).	Extensive	High	Yes	High						TITLE 30 §330 Subchapter B Permit and Application Procedures; (might require landfill permit modifications and/or variances.)
		Pre-Disturbance Notification – This is a courtesy notification to the TCEQ Municipal Solid Waste Division describing when the work detailed within the Work Plan will commence.	Short	Medium	No	High						Best Management Practice (BMP) and may be outlined within the approval for the Work Plan and/or Landfill permit.

Notes:

1. Refer to the *Hazardous Materials in Project Development Manual* for more details regarding hazardous material issue resolution.
2. Estimated Time. Short - Less than 1 month. Medium – 1 month to 3 months. Long - 3 months to a 6 months. Extensive – Greater than 6 months.
3. Coordination Effort: Low - Coordination among district staff only. Medium – Coordination required among district and ENV. High- Coordination required among district and multiple division/office staff.
4. Regulatory Coordination: Low –Typically requires little to no direct coordination with regulatory agency to comply with requirement. Often regulatory contact is informational only. Medium – Usually requires some direct interaction with only one regulatory agency and agency may need to provide written response to comply with requirements. High – Requires extensive direct interaction with one or often more regulatory agencies and often involves multiples levels of agency reviews and written approvals in order to comply with requirements.
5. RCRA – The Resource Conservation Recovery Act (RCRA) created stringent standards for the development of landfills in the US. A post-RCRA landfill means that the standards of RCRA are in-place and the landfill is designed with impermeable layers, leachate control systems, methane control systems, etc. A pre-RCRA landfill has none of the afore mentioned items.
6. Regulatory approval means one or more regulatory agencies must, as a minimum, be notified that actions are being performed in accordance with a specified rule or statute and/or the regulatory agency must send written approval/ concurrence before TxDOT can take action.

Standard Procedures
Scheduling Considerations, Internal/ External Coordination and Recommended Practices for Resolving Hazmat Issues
Hazardous Material Management for Project Development

July 2008

Hazardous Material Issue	Project Actions Associated with Hazardous Materials Issue	Recommended Practices for Hazardous Material Management. ¹	Estimated Time Needed ²	Level of Internal TxDOT Staff Coordination Required ³	Regulatory Notification and/or Approval Required ⁶	Level of Regulatory Coordination Required ⁴	Recommended Hazardous Material Management Practice should be initiated and completed during the highlighted project phases shown below					Applicable Major Regulatory Reference
							Preliminary Design	PS&E Development	ROW & Utilities	Letting	Construction	
		Completion Report – This is a final report submitted to the TCEQ Municipal Soil Waste Division detailing how the Work Plan was performed.	Short	Medium	No	High						Best Management Practice (BMP) and may be outlined within the approval for the Work Plan and/or Landfill permit.
Lead Based Paint (LBP)	Bridge Demolition Cutting/Torching Painted Steel Spans/Girders	Test for LBP when painted steel structures require cutting/torching. District coordinates w/ CST M&P or private lab for testing.	Short to Medium	Low	No	Low						OSHA 1926.62 – Lead in Construction; 30 TAC 335.262 – Universal Waste; 30 TAC 335 – Industrial & Haz Waste (general) or 30 TAC 330 (Municipal Solid Waste)
		Consult with BRG/GSD regarding possible specs to address worker safety, material recycling and proper management of any paint related wastes, if required. District coordinates contracting/PS&E.	Medium to Long	Low	No	Low						
	Enhancement Projects (Building Renovation)	Identify whether paint removal is required. Test for LBP in areas where paint which may have been applied prior to 1978 will be removed. District communicates requirements to project sponsor.	Short to Medium	Medium	No	Low						OSHA 1926.62 – Lead in Construction; 30 TAC 335.262 – Universal Waste; 30 TAC 335 – Industrial & Haz Waste (general) or 30 TAC 330 (Municipal Solid Waste); 30 TAC 335 – Industrial & Haz Waste (general) or 30 TAC 330 (Municipal Solid Waste)
		Consider worker safety and waste disposal requirements when specifying lead paint removal. District communicates requirements to project sponsor.	Medium to Long	Medium	No	Low						
	Bridge Cleaning and Painting Projects (Cleaning and Painting Steel) Requiring Paint Removal	Use Standard Specification Item 446 or appropriate Special Specification(s) Coordinate with designers/BRG to assure proper specifications.	Short	Medium	No	Low						30 TAC 106.263 (Air PBR – Routine Maintenance); 30 TAC 335.262 – Universal Waste; 30 TAC 335 - Industrial Solid Waste & Municipal Hazardous Waste or 30 TAC 330 (Municipal Solid Waste)

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Standard Procedures
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Hazardous Material Management for Project Development

July 2008

Hazardous Material Issue	Project Actions Associated with Hazardous Materials Issue	Recommended Practices for Hazardous Material Management. ¹	Estimated Time Needed ²	Level of Internal TxDOT Staff Coordination Required ³	Regulatory Notification and/or Approval Required ⁶	Level of Regulatory Coordination Required ⁴	Recommended Hazardous Material Management Practice should be initiated and completed during the highlighted project phases shown below					Applicable Major Regulatory Reference
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Non-LPST Source Contaminated Soil and/ or Groundwater	Trenching, drilled shafts or other excavations exceeding three feet that may potentially disturb contaminated soil and or groundwater.	If project activities will potentially disturb contaminated soil and or groundwater, review existing historical data and regulatory data and conduct a PH 2 soil and/or groundwater investigation to determine the nature and extent of the contamination in the project area. Contact ENV for assistance.	Short to Medium	High	Yes (but not always)	Medium to High						30 TAC 350 Texas Risk Reduction Rules, 30 TAC 335 – Industrial Solid Waste & Municipal Hazardous Waste or Best Management Practice,
		Evaluate possible re-design of the project to avoid acquisition of the contamination.	Short	Low to Medium	No	Low						
		If the contamination will affect the project and TxDOT is not the Responsible Party (RP), instruct the RP to remove/ manage the contamination from the construction area prior to letting the project. Contact ENV for assistance. The time needed to resolve this issue varies significantly depending on the problem and the type of project. Early internal coordination is essential.	Medium to Extensive	High	Yes (but not always)	Medium to High						
		If the contamination will affect the project and RP will not or cannot remove contamination, TxDOT will, preferably prior to letting the project, remove/ manage the contamination from the construction area using a remediation contractor. Contact ENV for assistance. The time needed to resolve this issue varies significantly depending on the problem and the type of project. Early internal coordination is essential. Coordinate with OGC for cost recovery from RP for TxDOT's remediation cost.	Medium to Extensive	Medium to High	Yes (but not always)	Medium to High						
		If the contamination will affect the project and removal prior to construction is not selected or is not an option, remove/ manage the contamination during construction. Prepare a SGMP for inclusion in the PS&E. Administration approval required. A separate contract may be let to manage the contamination during the construction, but this is not a preferred option. Contact ENV for assistance. The time needed to resolve this issue varies significantly depending on the problem and the type of project. Early internal coordination is essential. Coordinate with OGC for possible cost recovery from LPST owner for TxDOT's remediation cost.	Medium to Extensive	Medium to High	Yes (but not always)	Medium to High						

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Scheduling Considerations, Internal/External Coordination and Recommended Practices for Resolving Hazmat Issues

Appendix A

The following table shows the revision history for this guidance document.

Revision History	
Effective Date Month, Year	Reason for and Description of Change