



INDIANA DEPARTMENT OF TRANSPORTATION

Driving Indiana's Economic Growth

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Michael R. Pence, Governor
Brandye Hendrickson, Commissioner

Date: (month, day, year)

To: Hazardous Materials Unit
 Environmental Services
 Indiana Department of Transportation
 100 N Senate Avenue, Room N642
 Indianapolis, IN 46204

From: (Requestor's Name)
 (District)
 (Address)
 (City, State)
 (e-mail)

Black text = template
 Blue text = suggested language
 Red text = guidance material
 Green text = fill in information

Re: RED FLAG INVESTIGATION
 DES #, State or Local Project
 Project description
 Road (and bridge #, if applicable)
 (City, County), Indiana

NARRATIVE

Provide a brief description of the project, proposed right of way (temporary and permanent), type of excavation, maintenance of traffic, work in waterway, and any other factors influencing recommendations. Please state in the description if this is an LPA or state project.

SUMMARY

Infrastructure			
Indicate the number of items of concern found within 0.5 mile and an explanation why each item within the 0.5 mile search radius will/will not impact the project. If there are no items, please indicate N/A:			
Religious Facilities		Recreational Facilities	
Airports		Pipelines	
Cemeteries		Railroads	
Hospitals		Trails	
Schools		Managed Lands	

Explanation: Please provide a separate paragraph for each item. If resources are found in the 0.5 mile search radius, please include the number of resources. If there is no impact, state how close the nearest resource is (hundredths of a mile i.e. 0.43 mile) and the direction from the project area – see the statement for religious facilities.

Religious Facilities: # religious facilities are located within the 0.5 mile search radius. The nearest facility is (distance and direction) of the project area. No impacted is expected. OR

religious facilities are located within the 0.5 mile search radius. The nearest facility, (name), is adjacent to the project area. Traffic will be maintained through the use of a detour. Coordination with (name) will occur. OR

religious facilities are located within the 0.5 mile search radius. The nearest facility, (name), is adjacent to the project area. Traffic will be maintained throughout construction using lane closures, allowing for continued access. No impact is expected; however, coordination with (name) will occur.

Recreational Facilities: See religious facilities. Also – see comments on Managed Lands.

Airports: One (1) airport is located within the 0.5 mile search radius. This airport, _____, is a public airport; therefore, early coordination with INDOT Aviation should occur.

If a project is within 20,000 feet (3.8 miles) of an airport, INDOT Aviation would like to see early coordination letters. While not always easy to notice outside the 0.5 mile search radius, please make a best effort to include public airports. INDOT Aviation does not want to be notified about private airports. Coordination directly with private airports within the 0.5 mile search radius of the project area should be done.

Pipelines: # pipelines are located within the 0.5 mile search radius. # pipeline(s) crosses (or is adjacent to) the project area. Coordination with INDOT Utilities and Railroads should occur.

Cemeteries: # cemeteries are located within the 0.5 mile search radius. _____ Cemetery is adjacent to the project area. A Cemetery Development Plan may be required since this project is within 100 feet of the cemetery. Coordination with INDOT Cultural Resources is recommended.

For MOT, see religious facilities.

Railroads: # railroads are located within the 0.5 mile search radius. One (1) railroad is located within the project area. Coordination with INDOT Utilities and Railroads should occur.

Hospitals: The _____ Hospital is located within the 0.5 mile search radius. No impact is expected by the proposed project as traffic will be maintained with lane closures throughout construction; however, coordination with the hospital will occur to identify any potential issues arising with emergency services.

Trails: # trails are located within the 0.5 mile search radius. One (1) trail (or planned or potential trail) is located in the project area. Coordination with (the agency managing the trail) will occur.

Schools: For MOT, see religious facilities.

Managed Lands: # Managed Lands are located within the 0.5 mile search radius. _____ is within (or adjacent to) the project area. Coordination with (agency managing the managed land) is recommended.

Check for Section 4(f) or 6(f) coordination that might be necessary.

Water Resources			
Indicate the number of items of concern found within 0.5 mile and an explanation why each item within the 0.5 mile search radius will/will not impact the project. If there are no items, please indicate N/A:			
NWI - Points		NWI - Wetlands	
Karst Springs		IDEM 303d Listed Lakes	
Canal Structures – Historic		Lakes	
NWI - Lines		Floodplain - DFIRM	
IDEM 303d Listed Rivers and Streams (Impaired)		Cave Entrance Density	
Rivers and Streams		Sinkhole Areas	
Canal Routes - Historic		Sinking-Stream Basins	
Urbanized Area Boundary (UAB)			

Explanation: Please provide a separate paragraph for each item. If there is no impact, state how close the nearest resource is and the direction from the project area – see the statement for religious facilities. If a water feature is within or adjacent to a project area and there is a potential impact, the following statement should suffice.

Water Feature Name: # (water feature name(s)) are located within the 0.5 mile search radius. Two (2) (water feature name(s)) are located within the project area. A Waters of the US Report will be prepared and coordination with INDOT ES Ecology and Waterway Permitting will occur.

If the project is in an Urbanized Area Boundary (UAB), please use the following statement and include this statement in the recommendations.

UAB: This project lies within the (Name) UAB. Post construction Storm Water Quality Best Management Practices (BMPs) may need to be considered. An early coordination letter with topographic and aerial maps showing the project area should be sent to the (Name) MS4 Coordinator at (addresses will soon be added to the attribute table).

EXCEPTIONS:

IDEM 303d Listed Rivers and Streams: # 303d Listed Rivers and Streams are located within the 0.5 mile search radius. (Name of water body) is located within (or adjacent to) the project area. (Name of water body) is listed as impaired for _____.

The following are just a few recommended statements for impairments.

(Name) is listed for Impaired Biotic Communities (IBC). Coordination with INDOT ES Ecology and Waterway Permitting should occur. If sediment and/or soils along the bank are being disturbed by construction, additional investigation may be necessary.

(Name) is listed for E. coli. Workers who are working in or near water with E. coli should take care to wear appropriate PPE, observe proper hygiene procedures, including regular hand washing, and limit personal exposure.

(Name) is impaired for PCBs (and/or mercury) in fish tissue. Exposure to PCBs (and/or mercury) in fish tissue is considered low, assuming workers are not eating biota surrounding or associated with the water body. At this point, the statement can be No impact is expected OR If there will be sediment and/or soils disturbed by construction, additional investigation may be necessary. Coordination with INDOT ES will occur.

Canal Routes/Canal Structures – Historic – These features, if impacted, may require coordination with INDOT ES Cultural Resources.

If an impacted river is identified on the GIS maps as being on the National Rivers Inventory (NRI), coordination with National Park Service and US Department of Agriculture will be necessary.

Mining/Mineral Exploration			
Indicate the number of items of concern found within 0.5 mile and an explanation why each item within the 0.5 mile search radius will/will not impact the project. If there are no items, please indicate N/A:			
Petroleum Wells		Petroleum Fields	
Mines – Surface		Mines – Underground	

Explanation: Please provide a separate paragraph for each item. If there is no impact, state how close the nearest resource is and the direction from the project area – see the statement for religious facilities. Petroleum fields will very rarely impact a project. If the RFI is for a large project, coordination with IDNR Oil and Gas is recommended.

Petroleum Wells: # petroleum wells are located within the 0.5 mile search radius. # wells are located within or adjacent to the project area. Coordination with IDNR Oil and Gas Division will occur.

Mines – Surface and Mines – Underground: # (surface or underground) mines are located within the 0.5 mile search radius. # (surface or underground) mines are located within or adjacent to the project area. Coordination with IDNR Reclamation Division will occur.

Hazardous Material Concerns			
Indicate the number of items of concern found within 0.5 mile and an explanation why each item within the 0.5 mile search radius will/will not impact the project. If there are no items, please indicate N/A:			
Brownfield Sites		Restricted Waste Sites	
Corrective Action Sites (RCRA)		Septage Waste Sites	
Confined Feeding Operations		Solid Waste Landfills	
Construction Demolition Waste		State Cleanup Sites	
RCRA Generators		Tire Waste Sites	
Infectious/Medical Waste Sites		Waste Transfer Stations	
Lagoon/Surface Impoundments		RCRA Waste Treatment, Storage, and Disposal Sites (TSDs)	
Leaking Underground Storage Tanks (LUSTs)		Underground Storage Tanks (USTs)	
Manufactured Gas Plant Sites		Voluntary Remediation Program	
NPDES Facilities		Superfund	

NPDES Pipe Locations		Institutional Control Sites	
Open Dump Sites			

Explanation: Each site is unique. There is no good formula for determining next steps. The following information is general in nature, and not to be taken as a template, even though these statements are often applicable. A word of caution, don't be fooled by the location of the symbol on the GIS map, especially for large facilities. Some of the facility symbols are incorrectly located, or the facility covers several acres.

If search radius has several sites (usually identified in a site visit) with unknown past uses, or that look like old gas stations or factories, a Phase I Environmental Site Assessment (ESA) is appropriate. If the use of facilities is known and records are available in IDEM's Virtual File Cabinet (VFC), a Phase I is not needed.

IDEM's VFC can be found at the following link: <http://vfc.idem.in.gov/>. The easiest way to find documents associated with a site is to check the GIS attribute table for the Agency Interest ID. Go to the VFC, "Search by Document", select Additional Fields, select AI Id #, select Add, and input the Agency Interest ID from the attribute table. The page listing documents associated with the site will appear. Find the most recent document and select.

Brownfield, State Cleanup, LUST, UST, Voluntary Remediation Program, and Institutional Control Sites have the most impact to construction projects. If there is a Site Closure or Institutional Control document, those documents are the most informative. For active remediation sites, monitoring reports usually contain most of the information we need. Be aware that some sites can have ground water contamination that extends beyond the 0.5 mile search radius. Depending on the situation, statements similar to the following can be used.

- (Facility name, address) was formerly the site of a gas station. According to the No Further Action (NFA) Determination Pursuant to Risk Integrated System of Closure (RISC) issued by IDEM on (month, day, year), contamination remains in the area surrounding the site and exists in the ROW. If excavation occurs in this area, proper removal and disposal of soil and/or ground water will be necessary.
- (Facility name, address) was formerly the site of a gas station. According to the IDEM Virtual File Cabinet (VFC) _____ operated a gas station at the site from approximately 1960 to 1976. The UST (it says there was only one) was filled with sand, and no further investigation has ever been done. In addition to petroleum contamination, it is likely that lead would be in the soil/ground water. If excavation occurs in this area, it is likely that petroleum contamination will be encountered. Before proper removal and disposal of soil and/or ground water, analysis for lead will be necessary.
- (Facility name, address). IDEM issued a No Further Action Approval Determination Pursuant to Remediation Closure Guide on (month, day, year). Low levels of soil and ground water contamination remain on the site. An Environmental Restrictive Covenant (ERC) was placed on the property on (month, day, year). The ERC specifically prohibits the use of ground water, but not soil. If excavation occurs in this area, it is likely that petroleum contamination will be encountered. Proper removal and disposal of soil and/or ground water may be necessary. Coordination will be conducted with IDEM before further site activities occur.
- According to the _____ report, a _____ was formerly located on the _____ corner of the intersection. The report states that the _____ representative made the case that ground water contamination was coming from the former _____ onto the _____ site. No other investigation has ever been conducted on this property. A Phase II Environmental Site Assessment is recommended.

For UST and RCRA Generator Waste sites, it is often a matter of finding the most recent inspection and noting that the date and results of the inspection (site was/was not in compliance).

Solid waste facilities and some remediation sites have flammable vapor/gas conditions that can be hazardous. Landfills, active and closed, often have methane gas pockets that can migrate off-site.

As stated before, each site is unique, and an in-depth discussion would go far beyond the scope of this guidance. If you have questions, please don't hesitate to contact INDOT ES Hazardous Materials Section.

Ecological Information

The __ County listing of the Indiana Natural Heritage Data Center information on endangered, threatened, or rare (ETR) species and high quality natural communities is attached with ETR species highlighted. [Coordination with USFWS and IDNR will occur.](#)

If Early Coordination is completed prior to submission of the red flag for review and USFWS and/or IDNR have commented, the date and author of the letter can be referenced here and the letter(s) attached with the statement: [All recommendations will be followed.](#)

If the project falls under the USFWS Interim Policy, the following statement can be used; however, if a Waters of the US Report is prepared for the project, coordination will need to occur with IDNR at a minimum.

Due to the nature of project activities, this project will fall under the guidelines set forth under USFWS Interim Policy for the Review of Highway Transportation Projects in Indiana dated May 29, 2013. No further coordination is necessary.

INDOT ES will review a confidential database provided by USFWS to check for the presence of endangered bats in or near the project area. The generalized results of that review will be provided to the preparer of the RFI for its inclusion.

The following information should be included for all bridge and small structure projects.

A review of the USFWS database did not indicate the presence of endangered bat species in or within 0.5 mile of the project area. The (date) bridge inspection report indicates that Bridge # _____ was examined on (date) for bats by the bridge inspector, and none were found.

OR

A review of the USFWS database did not indicate the presence of endangered bat species in or within 0.5 mile of the project area. The project area is located in (description of area – i.e. rural area surrounded by farm fields). The (date) inspection report for Large Culvert/Bridge # _____ contains no information about whether bats are present or absent in the culvert/bridge. Additional investigation to confirm the presence or absence of bats on the culvert/bridge will be necessary. Preparation of the Scoping Sheet for the Indiana Bat and Northern Long-Eared Bat Range-Wide Programmatic Information Consultation will be necessary.

OR

A review of the USFWS database indicated the presence of endangered bat species in or within 0.5 mile of the project area. A review of information in the Bridge Inspection Application System (BIAS) indicates that the Bridge Inspector observed the presence of bats on Bridge # _____ on (date). Additional coordination will be required with Environmental Services and likely with USFWS during NEPA Early Coordination.

Cultural Resources

General information from County Interim Reports and/or response from the Cultural Resource Section can be included here. Detailed information is not necessary for the purposes of the RFI. The following statements may be appropriate.

Due to the scope, this project falls under MPPA Category A-#. No further coordination is necessary.

Due to the scope, this project will likely fall under MPPA Category B-#. Coordination will occur with INDOT ES Cultural Resources.

Due to the scope, full 106 coordination will be necessary. Coordination will occur with INDOT ES Cultural Resources.

RECOMMENDATIONS

Include recommendations from each section. If there are no recommendations, please indicate N/A:
Keep recommendations concise. Information provided in this section should reflect the findings from the above sections. New information should not be introduced in this section. Usually just a statement of the resource impacted, if it is in or adjacent to the project area, and next steps. For example, "One (1) railroad is located within the project area. Coordination with INDOT Utilities and Railroads should occur."

INFRASTRUCTURE:

WATER RESOURCES: In order to keep from repeating a statement several times, the following is acceptable:

The presence of following water resources will require the preparation of a Waters of the US Report and coordination with INDOT ES Ecology and Waterway Permitting:

wetlands are located adjacent to the project area.

The project area is located within a floodplain.

One (1) stream segment, _____ Creek, flows through the project area.

MINING/MINERAL EXPLORATION:

HAZMAT CONCERNS:

ECOLOGICAL INFORMATION:

CULTURAL RESOURCES:

INDOT Environmental Services concurrence: _____ (Signature)

Prepared by:
(Signature or name of preparer)
(Job Title)
(Company)

Graphics:

A map for each report section with a 0.5 mile search radius buffer around all project area(s) showing all items identified as possible items of concern is attached. If there is not a section map included, please change the YES to N/A:

GENERAL SITE MAP SHOWING PROJECT AREA: YES

INFRASTRUCTURE: YES

WATER RESOURCES: YES

MINING/MINERAL EXPLORATION: YES

HAZMAT CONCERNS: YES

DRAFT