

APPENDIX C: EARLY COORDINATION



June 3, 2020

Sample Early Coordination Letter

Rickie Clark
Manager, Public Involvement
Indiana Department of Transportation
100 N. Senate Avenue Room 642
Indianapolis, IN 46204

Via Email: rclark@indot.in.gov

Re: Early Coordination Letter
Des. No. 1800226
US 41 at SR 58 Intersection Improvements
Sullivan County, Indiana

Dear Mr. Clark,

The Indiana Department of Transportation (INDOT) and Federal Highway Administration (FHWA) intend to proceed with a project involving the intersection of US 41 with State Road (SR) 58 in Sullivan County, Indiana. This letter is part of the early coordination phase of the environmental review process. We request comments from you within your area of expertise regarding any potential environmental or community effects associated with this proposed project. **Please use the above designation number and description in your reply.** We will incorporate your comments into a study of the project's environmental effects.

Project Location: This project is located at the intersection of US 41 with SR 58, in Sullivan County. More specifically, the project is located in Survey 12 and Survey 3 in Carlisle, Haddon Township, Indiana.

Existing Conditions: The intersection of US 41 with SR 58 is unsignalized, with free-flowing north-south traffic on US 41 and stop controls at the east and west approaches. A flashing beacon signals amber to the US 41 approaches and red to the SR 58 approaches. US 41 is a four-lane principal arterial. The northbound and southbound approaches to the intersection both have dedicated left-turn lanes, two through lanes, and a right-turn lane each; they are separated by a 54-foot grass median. The posted speed on US 41 is 60 mph. SR 58 is a two lane major collector, and both the eastbound and westbound approaches have a shared left-turn/through lane and a dedicated right turn-lane. The posted speed on the east approach is 30 mph, and that of the west approach is 50 mph.

Purpose and Need: The purpose of the project is to improve safety at this intersection. The need for the project is due to the high number of crashes, particularly right-angle crashes, that occur at this intersection.

Proposed Project: Proposed activities include construction of a Reduced Conflict Intersection at the intersection of US 41 and SR 58, as well as installation of new signage and installation of street lighting. U-turns will be installed at opposite ends of the intersection of US 41 and SR 58, and the converted intersection will allow left turns from US 41 only.

Right-of-Way: There will be no right-of-way acquisition for this project.

Maintenance of Traffic (MOT): During construction, traffic will be maintained with in three phases. The first phase will close the right lane in each direction along US 41 to reconstruct portions of the outside shoulder to be used as loons for over-tracking vehicles. The second phase will construct the median U-turns and portions of the new left turn lanes. Phase three will close the existing intersection to install the new center curb and pavement improvements as well as the medians on the SR 58 approaches. All left turning traffic will use the median U-turns to access SR 58 during Phase 3.

Surrounding Resources: Land use in the vicinity of the project is a mix agricultural, residential, and light commercial. The Town of Carlisle is just east of the project area. and there is a warehouse on the northwest corner with additional residential properties to the northwest. The remaining surrounding area is primarily dedicated to agricultural uses.

A waters/wetland determination will be performed and possible wetlands delineation. A Waters of the US Report will summarize the findings. All applicable permits will be obtained before construction begins. The project is not in a wellhead protection area. The project is not located within an Urbanized Area Boundary (UAB).

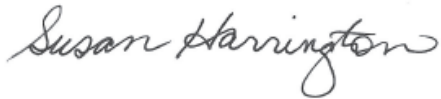
This project qualifies for the application of the United States Fish and Wildlife Service (USFWS) range-wide programmatic informal consultation for the Indiana bat and northern long-eared bat. The USFWS Information, Planning, and Consultation System (IPaC) will be utilized to determine the project's potential to affect the Indiana bat and northern long-eared bat. 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.

Comments Request: You are asked to review this information and provide any comments you may have relative to the anticipated effects of the project on areas which you have jurisdiction or special expertise. Please send your comments to Susan Harrington, of HNTB Corporation, at sharrington@hntb.com or 317-917-5233. Should we not receive your response **within thirty (30) calendar days** from the date of this letter, it will be assumed that your agency feels that there will be no adverse effects incurred as a result of the proposed project. However, should you find that an extension to the response time is necessary; a reasonable amount may be granted upon request.

If you have any questions regarding this matter, please feel free to contact Susan Harrington, HNTB, sharrington@hntb.com, 317-917-5233, or Alan Davis, INDOT Project Manager, aldavis@indot.in.gov, 812-895-7385 ext. 14661. Thank you in advance for your input.

Sincerely,

HNTB CORPORATION



Susan Harrington
Scientist III

Attachments were removed to avoid duplication. Graphics can be found in Appendix B.

Attachments: Figure 1: Project Location Map
Figure 2: Project Aerial Map
Figure 3: USGS 7.5 Minute Topographic Quad Map
Figure 4: Photo Location Map
Project Location Photographs

Cc: Alan Davis, INDOT Project Manager
Richard Connolly, HNTB
Joshua Cook, HNTB
Cheryl Waterman, Sullivan County Surveyor
Clark Cottom, Sullivan County Sheriff
Jerry Netherlain, Sullivan County Engineer & Floodplain Administrator
Carlisle-Haddon Township Volunteer Fire Department
Robert Davis, Sullivan County Board of Commissioners
Jerry Mize, Town Marshall & Street Superintendent, Town of Carlisle
Chris Stitzle, Superintendent, Southwest School Corporation
Rickie Clark, INDOT Office of Public Involvement
Indiana Department of Environmental Management, via webform
Indiana Geological Survey, via webform
Rick Neilsen, State Conservationist, National Resources Conservation Service
Christie Stanifer, Indiana Department of Natural Resources
Erica Tait, Federal Highway Administration
Robin McWilliams-Munson, US Fish and Wildlife Service
Ryan Falls, INDOT Vincennes District

Sharon Anton

From: Falls, Ryan G <RFalls@indot.IN.gov>
Sent: Wednesday, June 3, 2020 2:18 PM
To: Sharon Anton
Cc: Richard Connolly; adavis@indot.in.gov
Subject: RE: Vincennes Early Coordination Response - US 41 at SR 58 Intersection Improvement Project (Des 1800226)

Sharon Anton,

At this time, our office has no comment on this project. Thank you for the opportunity to respond to early coordination.

Ryan Falls

Capital Program Management-Senior Environmental Manager Supervisor

Indiana Department of Transportation

3650 South US Highway 41

Vincennes, IN 47591

Office: 812-895-7326

Cell: 812-582-1387

Email: rfalls@indot.IN.gov



From: Sharon Anton <santon@HNTB.com>
Sent: Wednesday, June 3, 2020 9:40 AM
To: Falls, Ryan G <RFalls@indot.IN.gov>
Cc: Richard Connolly <rconnolly@HNTB.com>; adavis@indot.in.gov
Subject: Early Coordination Letter - US 41 at SR 58 Intersection Improvement Project (Des 1800226)

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Dear Mr. Falls,

Please see the attached early coordination letter and supporting graphics for the US 41 at SR 58 Intersection Improvement Project (Des 1800226).

If you have any questions regarding this project, please feel free to contact me by phone or email.

Best regards,

Sharon Anton

Scientist I

Environmental Planning

Tel (317) 917-5275 Email santon@hntb.com

HNTB CORPORATION

111 Monument Circle, Suite 1200, Indianapolis, Indiana 46204 | hntb.com

Sharon Anton

From: McWilliams, Robin <robin_mcwilliams@fws.gov>
Sent: Wednesday, June 3, 2020 11:23 AM
To: Sharon Anton
Subject: Re: [EXTERNAL] Early Coordination Letter - US 41 at SR 58 Intersection Improvement Project (Des 1800226)

Dear Ms. Anton,

This responds to your recent letter requesting our comments on the aforementioned project.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, and the U. S. Fish and Wildlife Service's Mitigation Policy.

The project is within the range of the Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) and should follow the new Indiana bat/northern long-eared bat programmatic consultation process, if applicable (i.e. a federal transportation nexus is established). The Service has 14 days after a "Not Likely to Adversely Affect" determination letter is generated to review the project and provide additional comments or request additional information; if you do not receive a response from us within 14 days, we have no additional comments.

Based on a review of the information you provided, the U.S. Fish and Wildlife Service has no other comments on the project as currently proposed. However, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinitiate consultation. Standard recommendations are provided below.

We appreciate the opportunity to comment at this early stage of project planning. If you have any questions about our recommendations, please call (812) 334-4261 x. 207.

Sincerely,
Robin McWilliams Munson

Standard Recommendations:

1. Do not clear trees or understory vegetation outside the construction zone boundaries. **(This restriction is not related to the "tree clearing" restriction for potential Indiana Bat habitat.)**
2. Restrict below low-water work in streams to placement of culverts, piers, pilings and/or footings, shaping of the spill slopes around the bridge abutments, and placement of riprap. Culverts should span the active stream channel, should be either embedded or a 3-sided or open-arch culvert, and be installed where practicable on an essentially flat slope. When an open-bottom culvert or arch is used in a stream, which has a good natural bottom substrate, such as gravel, cobbles and boulders, the existing substrate should be left undisturbed beneath the culvert to provide natural habitat for the aquatic community.
3. Restrict channel work and vegetation clearing to the minimum necessary for installation of the stream crossing structure.

4. Minimize the extent of hard armor (riprap) in bank stabilization by using bioengineering techniques whenever possible. If riprap is utilized for bank stabilization, extend it below low-water elevation to provide aquatic habitat.
5. Implement temporary erosion and sediment control methods within areas of disturbed soil. All disturbed soil areas upon project completion will be vegetated following INDOT's standard specifications.
6. Avoid all work within the inundated part of the stream channel (in perennial streams and larger intermittent streams) during the fish spawning season (April 1 through June 30), except for work within sealed structures such as caissons or cofferdams that were installed prior to the spawning season. No equipment shall be operated below Ordinary High Water Mark during this time unless the machinery is within the caissons or on the cofferdams.
7. Evaluate wildlife crossings under bridge/culverts projects in appropriate situations. Suitable crossings include flat areas below bridge abutments with suitable ground cover, high water shelves in culverts, amphibian tunnels and diversion fencing
8. Direct temporary lighting away from suitable habitat during the active season

Robin McWilliams Munson
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
620 South Walker Street
Bloomington, IN 46142
812-334-4261

Mon-Tues 8-3:30p
Wed-Thurs 8:30-3p Telework

From: Sharon Anton <santon@HNTB.com>
Sent: Wednesday, June 3, 2020 9:37 AM
To: McWilliams, Robin <robin_mcwilliams@fws.gov>
Subject: [EXTERNAL] Early Coordination Letter - US 41 at SR 58 Intersection Improvement Project (Des 1800226)

Dear Ms. McWilliams-Munson,

Please see the attached early coordination letter and supporting graphics for the US 41 at SR 58 Intersection Improvement Project (Des 1800226).

If you have any questions regarding this project, please feel free to contact me by phone or email.

Best regards,

Sharon Anton
Scientist I
Environmental Planning
Tel (317) 917-5275 Email santon@hntb.com

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Organization and Project Information

Project ID:
Des. ID: 1800226
Project Title: US 42 at SR 58 Intersection Improvement
Name of Organization: HNTB Indiana
Requested by: Sharon Anton

Environmental Assessment Report

1. Geological Hazards:
 - Potential Mine Subsidence ([CMIS](#))
 - Moderate liquefaction potential
2. Mineral Resources:
 - Bedrock Resource: Low Potential
 - Sand and Gravel Resource: None documented in the area
3. Active or abandoned mineral resources extraction sites:
 - Petroleum Exploration Wells
 - Underground Coal Mines

*All map layers from Indiana Map (maps.indiana.edu)

DISCLAIMER:

This document was compiled by Indiana University, Indiana Geological Survey, using data believed to be accurate; however, a degree of error is inherent in all data. This product is distributed "AS-IS" without warranties of any kind, either expressed or implied, including but not limited to warranties of suitability to a particular purpose or use. No attempt has been made in either the design or production of these data and document to define the limits or jurisdiction of any federal, state, or local government. The data used to assemble this document are intended for use only at the published scale of the source data or smaller (see the metadata links below) and are for reference purposes only. They are not to be construed as a legal document or survey instrument. A detailed on-the-ground survey and historical analysis of a single site may differ from these data and this document.

This information was furnished by Indiana Geological Survey

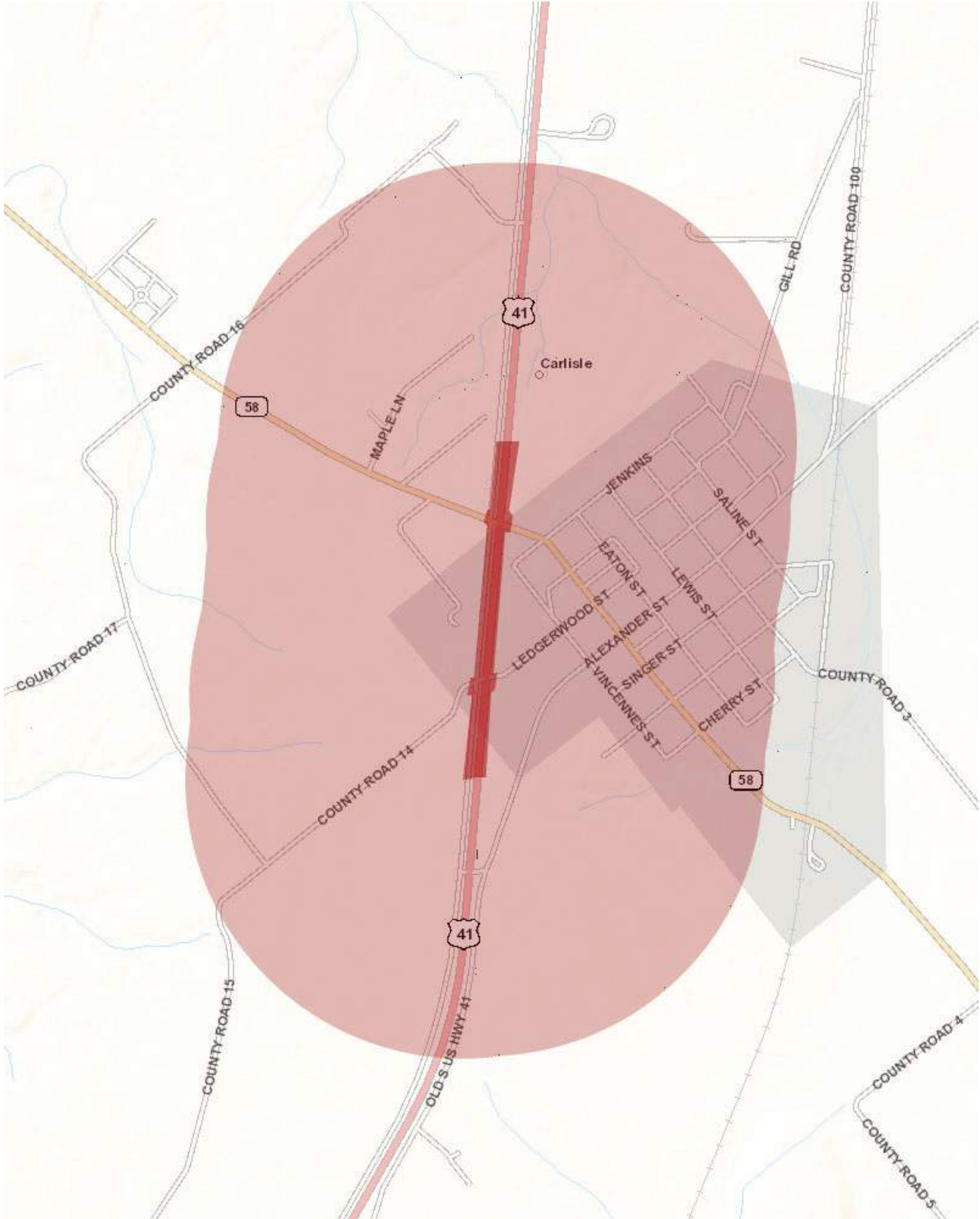
Address: 420 N. Walnut St., Bloomington, IN 47404

Email: IGSEnvir@indiana.edu

Phone: 812 855-7428

Date: August 05, 2020







Metadata:

- https://maps.indiana.edu/metadata/Geology/Petroleum_Wells.html
- https://maps.indiana.edu/metadata/Geology/Coal_Mines_Underground.html
- https://maps.indiana.edu/metadata/Geology/Seismic_Earthquake_Liquefaction_Potential.html
- https://maps.indiana.edu/metadata/Geology/Bedrock_Geology.html



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 North Senate Avenue - Indianapolis, IN 46204
(800) 451-6027 - (317) 232-8603 - www.idem.IN.gov

INDOT

3650 S US 41
Vincennes , IN 47591

HNTB

Sharon Anton
111 Monument Circle
Suite 1200
Indianapolis , IN 46204

Date

To Engineers and Consultants Proposing Roadway Construction Projects:

RE: The Indiana Department of Transportation (INDOT) and the Federal Highway Administration (FHWA) intend to proceed with a project involving improvements to the intersection of US 41 and State Road (SR) 58, and to the intersection of US 41 and S County Road (CR) 14 SW/Ledgerwood Street in Sullivan County. More specifically, the project is located in Survey 12 and Survey 3, Carlisle, Haddon Township, Indiana. Project activities shall include the restriction of the left turn movement at the US 41 and SR 58 intersection and the construction of two median U-turns approximately 1000 feet north and south of the US 41 at SR 58 intersection. Approximately 100 feet of shoulder will be reconstructed at each median U-turn to allow for truck turning. In the area between the proposed median U-turns, the median ditch will be re-graded. Additional project activities include installation of new signage, installation of street lighting, and reduction of the US 41 southbound left-turn lane approaching the US 41 at CR 14 SW/Ledgerwood Street intersection.

This letter from the Indiana Department of Environmental Management (IDEM) serves as a standardized response to enquiries inviting IDEM comments on roadway construction, reconstruction, or other improvement projects within existing roadway corridors when the proposed scope of the project is beneath the threshold requiring a formal National Environmental Policy Act-mandated Environmental Assessment or Environmental Impact Statement. As the letter attempts to address all roadway-related environmental topics of potential concern, it is possible that not every topic addressed in the letter will be applicable to your particular roadway project.

For additional information on specific roadway-related topics of interest, please visit the appropriate Web pages cited below, many of which provide contact information for persons within the various program areas who can answer questions not fully addressed in this letter. Also please be mindful that some environmental requirements may be subject to change and so each person intending to include a copy of this letter in their project documentation packet is advised to download the most recently revised version of the letter; found at: <http://www.in.gov/idem/5283.htm> (<http://www.in.gov/idem/5283.htm>).

To ensure that all environmentally-related issues are adequately addressed, IDEM recommends that you read this letter in its entirety, and consider each of the following issues as you move forward with the planning of your proposed roadway construction, reconstruction, or improvement project:

WATER AND BIOTIC QUALITY

1. Section 404 of the Clean Water Act requires that you obtain a permit from the U.S. Army Corps of Engineers (USACE) before discharging dredged or fill materials into any wetlands or other waters, such as rivers, lakes, streams, and ditches. Other activities regulated include the relocation, channelization, widening, or other such alteration of a stream, and the mechanical clearing (use of heavy construction equipment) of wetlands. Thus, as a project owner or sponsor, it is your responsibility to ensure that no wetlands are disturbed without the proper permit. Although you may initially refer to the U.S. Fish and Wildlife Service National Wetland Inventory maps as a means of identifying potential areas of concern, please be mindful that those maps do not depict jurisdictional wetlands regulated by the USACE or the Department of Environmental Management. A valid jurisdictional wetlands determination can only be made by the USACE, using the 1987 Wetland Delineation Manual.

USACE recommends that you have a consultant check to determine whether your project will abut, or lie within, a wetland area. To view a list of consultants that have requested to be included on a list posted by the USACE on their Web site, see USACE Permits and Public Notices (<http://www.lrl.usace.army.mil/orf/default.asp>) (<http://www.lrl.usace.army.mil/orf/default.asp>) and then click on "Information" from the menu on the right-hand side of that page. Their "Consultant List" is the fourth entry down on the "Information" page. Please note that the USACE posts all consultants that request to appear on the list, and that inclusion of any particular consultant on the list does not represent an endorsement of that consultant by the USACE, or by IDEM.

Much of northern Indiana (Newton, Lake, Porter, LaPorte, St. Joseph, Elkhart, LaGrange, Steuben, and Dekalb counties; large portions of Jasper, Starke, Marshall, Noble, Allen, and Adams counties; and lesser portions of Benton, White, Pulaski, Kosciusko, and Wells counties) is served by the USACE District Office in Detroit (313-226-6812). The central and southern portions of the state (large portions of Benton, White, Pulaski, Kosciusko, and Wells counties; smaller portions of Jasper, Starke, Marshall, Noble, Allen, and Adams counties; and all other Indiana counties located in north-central, central, and southern Indiana) are served by the USACE Louisville District Office (502-315-6733).

Additional information on contacting these U.S. Army Corps of Engineers (USACE) District Offices, government agencies with jurisdiction over wetlands, and other water quality issues, can be found at <http://www.in.gov/idem/4396.htm> (<http://www.in.gov/idem/4396.htm>). IDEM recommends that impacts to wetlands and other water resources be avoided to the fullest extent.

2. In the event a Section 404 wetlands permit is required from the USACE, you also must obtain a Section 401 Water Quality Certification from the IDEM Office of Water Quality Wetlands Program. To learn more about the Wetlands Program, visit: <http://www.in.gov/idem/4384.htm> (<http://www.in.gov/idem/4384.htm>).
3. If the USACE determines that a wetland or other water body is isolated and not subject to Clean Water Act regulation, it is still regulated by the state of Indiana. A State Isolated Wetland permit from IDEM's Office of Water Quality (OWQ) is required for any activity that results in the discharge of dredged or fill materials into isolated wetlands. To learn more about isolated wetlands, contact the OWQ Wetlands Program at 317-233-8488.
4. If your project will involve over a 0.5 acre of wetland impact, stream relocation, or other large-scale alterations to water bodies such as the creation of a dam or a water diversion, you should seek additional input from the OWQ Wetlands Program staff. Consult the Web at: <http://www.in.gov/idem/4384.htm> (<http://www.in.gov/idem/4384.htm>) for the appropriate staff contact to further discuss your project.
5. Work within the one-hundred year floodway of a given water body is regulated by the Department of Natural Resources, Division of Water. The Division issues permits for activities regulated under the follow statutes:

- IC 14-26-2 Lakes Preservation Act 312 IAC 11
- IC 14-26-5 Lowering of Ten Acre Lakes Act No related code
- IC 14-28-1 Flood Control Act 310 IAC 6-1
- IC 14-29-1 Navigable Waterways Act 312 IAC 6
- IC 14-29-3 Sand and Gravel Permits Act 312 IAC 6
- IC 14-29-4 Construction of Channels Act No related code

For information on these Indiana (statutory) Code and Indiana Administrative Code citations, see the DNR Web site at: <http://www.in.gov/dnr/water/9451.htm> (<http://www.in.gov/dnr/water/9451.htm>) . Contact the DNR Division of Water at 317-232-4160 for further information.

The physical disturbance of the stream and riparian vegetation, especially large trees overhanging any affected water bodies should be limited to only that which is absolutely necessary to complete the project. The shade provided by the large overhanging trees helps maintain proper stream temperatures and dissolved oxygen for aquatic life.

6. For projects involving construction activity (which includes clearing, grading, excavation and other land disturbing activities) that result in the disturbance of one (1), or more, acres of total land area, contact the Office of Water Quality – Watershed Planning Branch (317/233-1864) regarding the need for of a Rule 5 Storm Water Runoff Permit. Visit the following Web page
- <http://www.in.gov/idem/4902.htm> (<http://www.in.gov/idem/4902.htm>)

To obtain, and operate under, a Rule 5 permit you will first need to develop a Construction Plan (<http://www.in.gov/idem/4917.htm#constreq> (<http://www.in.gov/idem/4917.htm#constreq>)), and as described in 327 IAC 15-5-6.5 (<http://www.in.gov/legislative/iac/T03270/A00150> [PDF] (<http://www.in.gov/legislative/iac/T03270/A00150.PDF>), pages 16 through 19). Before you may apply for a Rule 5 Permit, or begin construction, you must submit your Construction Plan to your county Soil and Water Conservation District (SWCD) (<http://www.in.gov/isda/soil/contacts/map.html> (<http://www.in.gov/isda/soil/contacts/map.html>)).

Upon receipt of the construction plan, personnel of the SWCD or the Indiana Department of Environmental Management will review the plan to determine if it meets the requirements of 327 IAC 15-5. Plans that are deemed deficient will require re-submittal. If the plan is sufficient you will be notified and instructed to submit the verification to IDEM as part of the Rule 5 Notice of Intent (NOI) submittal. Once construction begins, staff of the SWCD or Indiana Department of Environmental Management will perform inspections of activities at the site for compliance with the regulation.

Please be mindful that approximately 149 Municipal Separate Storm Sewer System (MS4) areas are now being established by various local governmental entities throughout the state as part of the implementation of Phase II federal storm water requirements. All of these MS4 areas will eventually take responsibility for Construction Plan review, inspection, and enforcement. As these MS4 areas obtain program approval from IDEM, they will be added to a list of MS4 areas posted on the IDEM Website at: <http://www.in.gov/idem/4900.htm> (<http://www.in.gov/idem/4900.htm>).

If your project is located in an IDEM-approved MS4 area, please contact the local MS4 program about meeting their storm water requirements. Once the MS4 approves the plan, the NOI can be submitted to IDEM.

Regardless of the size of your project, or which agency you work with to meet storm water requirements, IDEM recommends that appropriate structures and techniques be utilized both during the construction phase, and after completion of the project, to minimize the impacts associated with storm water runoff. The

use of appropriate planning and site development and appropriate storm water quality measures are recommended to prevent soil from leaving the construction site during active land disturbance and for post construction water quality concerns. Information and assistance regarding storm water related to construction activities are available from the Soil and Water Conservation District (SWCD) offices in each county or from IDEM.

7. For projects involving impacts to fish and botanical resources, contact the Department of Natural Resources - Division of Fish and Wildlife (317/232-4080) for addition project input.
8. For projects involving water main construction, water main extensions, and new public water supplies, contact the Office of Water Quality - Drinking Water Branch (317-308-3299) regarding the need for permits.
9. For projects involving effluent discharges to waters of the State of Indiana , contact the Office of Water Quality - Permits Branch (317-233-0468) regarding the need for a National Pollutant Discharge Elimination System (NPDES) permit.
10. For projects involving the construction of wastewater facilities and sewer lines, contact the Office of Water Quality - Permits Branch (317-232-8675) regarding the need for permits.

AIR QUALITY

The above-noted project should be designed to minimize any impact on ambient air quality in, or near, the project area. The project must comply with all federal and state air pollution regulations. Consideration should be given to the following:

1. Regarding open burning, and disposing of organic debris generated by land clearing activities; some types of open burning are allowed (<http://www.in.gov/idem/4148.htm> (<http://www.in.gov/idem/4148.htm>)) under specific conditions. You also can seek an open burning variance from IDEM.

However, IDEM generally recommends that you take vegetative wastes to a registered yard waste composting facility or that the waste be chipped or shredded with composting on site (you must register with IDEM if more than 2,000 pounds is to be composted; contact 317/232-0066). The finished compost can then be used as a mulch or soil amendment. You also may bury any vegetative wastes (such as leaves, twigs, branches, limbs, tree trunks and stumps) onsite, although burying large quantities of such material can lead to subsidence problems, later on.

Reasonable precautions must be taken to minimize fugitive dust emissions from construction and demolition activities. For example, wetting the area with water, constructing wind barriers, or treating dusty areas with chemical stabilizers (such as calcium chloride or several other commercial products). Dirt tracked onto paved roads from unpaved areas should be minimized.

Additionally, if construction or demolition is conducted in a wooded area where blackbirds have roosted or abandoned buildings or building sections in which pigeons or bats have roosted for 3-5 years precautionary measures should be taken to avoid an outbreak of histoplasmosis. This disease is caused by the fungus *Histoplasma capsulatum*, which stems from bird or bat droppings that have accumulated in one area for 3-5 years. The spores from this fungus become airborne when the area is disturbed and can cause infections over an entire community downwind of the site. The area should be wetted down prior to cleanup or demolition of the project site. For more detailed information on histoplasmosis prevention and control, please contact the Acute Disease Control Division of the Indiana State Department of Health at (317) 233-7272.

2. The U.S. EPA and the Surgeon General recommend that people not have long-term exposure to radon at levels above 4 pCi/L. (For a county-by-county map of predicted radon levels in Indiana, visit: <http://www.in.gov/idem/4145.htm> (<http://www.in.gov/idem/4145.htm>).

The U.S. EPA further recommends that all homes (and apartments within three stories of ground level) be tested for radon. If in-home radon levels are determined to be 4 pCi/L, or higher, EPA recommends a follow-up test. If the second test confirms that radon levels are 4 pCi/L, or higher, EPA recommends the installation of radon-reduction measures. (For a list of qualified radon testers and radon mitigation (or reduction) specialists visit: http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon_testers_mitigators_list.pdf (http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon_testers_mitigators_list.pdf)). It also is recommended that radon reduction measures be built into all new homes, particularly in areas like Indiana that have moderate to high predicted radon levels.

To learn more about radon, radon risks, and ways to reduce exposure visit:

<http://www.in.gov/isdh/regsvcs/radhealth/radon.htm> (<http://www.in.gov/isdh/regsvcs/radhealth/radon.htm>), <http://www.in.gov/idem/4145.htm> (<http://www.in.gov/idem/4145.htm>), or <http://www.epa.gov/radon/index.html> (<http://www.epa.gov/radon/index.html>).

3. With respect to asbestos removal: all facilities slated for renovation or demolition (except residential buildings that have (4) four or fewer dwelling units and which will not be used for commercial purposes) must be inspected by an Indiana-licensed asbestos inspector prior to the commencement of any renovation or demolition activities. If regulated asbestos-containing material (RACM) that may become airborne is found, any subsequent demolition, renovation, or asbestos removal activities must be performed in accordance with the proper notification and emission control requirements.

If no asbestos is found where a renovation activity will occur, or if the renovation involves removal of less than 260 linear feet of RACM off of pipes, less than 160 square feet of RACM off of other facility components, or less than 35 cubic feet of RACM off of all facility components, the owner or operator of the project does not need to notify IDEM before beginning the renovation activity.

For questions on asbestos demolition and renovation activities, you can also call IDEM's Lead/Asbestos section at 1-888-574-8150.

However, in all cases where a demolition activity will occur (even if no asbestos is found), the owner or operator must still notify IDEM 10 working days prior to the demolition, using the form found at <http://www.in.gov/icpr/webfile/formsdiv/44593.pdf> (<http://www.in.gov/icpr/webfile/formsdiv/44593.pdf>).

Anyone submitting a renovation/demolition notification form will be billed a notification fee based upon the amount of friable asbestos containing material to be removed or demolished. Projects that involve the removal of more than 2,600 linear feet of friable asbestos containing materials on pipes, or 1,600 square feet or 400 cubic feet of friable asbestos containing material on other facility components, will be billed a fee of \$150 per project; projects below these amounts will be billed a fee of \$50 per project. All notification remitters will be billed on a quarterly basis.

For more information about IDEM policy regarding asbestos removal and disposal, visit:

<http://www.in.gov/idem/4983.htm> (<http://www.in.gov/idem/4983.htm>).

4. With respect to lead-based paint removal: IDEM encourages all efforts to minimize human exposure to lead-based paint chips and dust. IDEM is particularly concerned that young children exposed to lead can suffer from learning disabilities. Although lead-based paint abatement efforts are not mandatory, any abatement that is conducted within housing built before January 1, 1978, or a child-occupied facility is required to

comply with all lead-based paint work practice standards, licensing and notification requirements. For more information about lead-based paint removal visit: <http://www.in.gov/isdh/19131.htm> (<http://www.in.gov/isdh/19131.htm>).

5. Ensure that asphalt paving plants are permitted and operate properly. The use of cutback asphalt, or asphalt emulsion containing more than seven percent (7%) oil distillate, is prohibited during the months April through October. See 326 IAC 8-5-2 , Asphalt Paving Rule (<http://www.ai.org/legislative/iac/T03260/A00080.PDF> (<http://www.ai.org/legislative/iac/T03260/A00080.PDF>)).
6. If your project involves the construction of a new source of air emissions or the modification of an existing source of air emissions or air pollution control equipment, it will need to be reviewed by the IDEM Office of Air Quality (OAQ). A registration or permit may be required under 326 IAC 2 (View at: www.ai.org/legislative/iac/t03260/a00020.pdf (<http://www.ai.org/legislative/iac/t03260/a00020.pdf>)). New sources that use or emit hazardous air pollutants may be subject to Section 112 of the Clean Air Act and corresponding state air regulations governing hazardous air pollutants.
7. For more information on air permits visit: <http://www.in.gov/idem/4223.htm> (<http://www.in.gov/idem/4223.htm>), or to initiate the IDEM air permitting process, please contact the Office of Air Quality Permit Reviewer of the Day at (317) 233-0178 or OAMPROD atdem.state.in.us.

LAND QUALITY

In order to maintain compliance with all applicable laws regarding contamination and/or proper waste disposal, IDEM recommends that:

1. If the site is found to contain any areas used to dispose of solid or hazardous waste, you need to contact the Office of Land Quality (OLQ) at 317-308-3103.
2. All solid wastes generated by the project, or removed from the project site, need to be taken to a properly permitted solid waste processing or disposal facility. For more information, visit <http://www.in.gov/idem/4998.htm> (<http://www.in.gov/idem/4998.htm>).
3. If any contaminated soils are discovered during this project, they may be subject to disposal as hazardous waste. Please contact the OLQ at 317-308-3103 to obtain information on proper disposal procedures.
4. If PCBs are found at this site, please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding management of any PCB wastes from this site.
5. If there are any asbestos disposal issues related to this site, please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding the management of asbestos wastes (Asbestos removal is addressed above, under Air Quality).
6. If the project involves the installation or removal of an underground storage tank, or involves contamination from an underground storage tank, you must contact the IDEM Underground Storage Tank program at 317/308-3039. See: <http://www.in.gov/idem/4999.htm> (<http://www.in.gov/idem/4999.htm>).

FINAL REMARKS

Should you need to obtain any environmental permits in association with this proposed project, please be mindful that IC 13-15-8 requires that you notify all adjoining property owners and/or occupants within ten days your submittal of each permit application. However, if you are seeking multiple permits, you can still meet the