

**Guidance for Tribal and Local Public Agencies and/or  
Contracted Environmental Professionals  
Submitting Hazardous Material Assessments  
to the NMDOT Environmental Geology Section**

As part of the environmental process, tribal and local public agencies (T/LPAs) receiving state and/or federal funds for their road improvement projects are required to perform a hazardous material assessment of the corridor. These assessments reduce the risk posed by unexpected encounters during construction with contaminated media (soil, water, etc.).

Our primary review criterion is adherence to the All Appropriate Inquiry (AAI) rule promulgated by the USEPA into the...uses of the target property “in accordance with generally accepted good commercial and customary standards and practices”. What constitutes an AAI for transportation projects depends on the project scope and past and present development on the surrounding properties.

Note that the EGS does not perform hazardous material assessments for the T/LPAs. Rather, we provide assessment guidance and review/accept the final deliverable. Our review is limited to our assessment for reasonableness of your conclusions and recommendations given the scope of the project as you describe and based on any accompanying supporting information. We do not perform a detailed review but may delve deeper if the contents, conclusions, and/or recommendations appear incongruent.

The EGS is motivated to facilitate the assessment process and offers the following guidance:

1. **Contact us.** EGS staff is available to clarify standard requirements and to discuss any ambiguities and/or complications. Our office also has an extensive library of previously completed reports and other informational sources that may help you with your assessment. The EGS’s contact information is on our website.
2. **Consult EGS’s online and industry resources.** The NMDOT Hazardous Material Assessment Handbook ([HMAH](#)) (EGS, 2010) and ASTM International’s standard practice for environmental site assessments thoroughly details the standard processes and reporting requirements.
3. **Follow the report format presented in the [HMAH](#).** This format promotes the inclusion of all required report elements. Also, use of the standardized format expedites the EGS review process.
4. **Access NMDOT Aerial Photographs.** NMDOT has a large collection of high-resolution, low altitude aerial photographs of state and federal highways. These photos have proven to be an invaluable tool in the identification of historic property uses. Contact the NMDOT Aerial Photography Unit at 505-827-5618.
5. **Include the NMDOT project control number (CN) on all deliverables.** Inclusion of the project control number helps the EGS accurately file and manage your documents and expedites the review process.