

# Regulated Materials / Waste Management

## Demolition/Rehabilitation of Bridges & Buildings Steel Structure Painting & Paint Removal

### Contacts

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- District 2

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**Building & Bridge Demolition/Relocation/Rehabilitation**

**<http://www.dot.state.mn.us/environment/buildingbridge/index.html>**

**Paint Removal from Steel Structures**

**<http://www.dot.state.mn.us/environment/regulatedmaterials/paintremoval.html>**

### Purpose

The purpose of this program is to ensure that regulated material/waste are handled and disposed of in accordance with applicable federal and state regulations and in a manner that reduces department liability.

### Contacting Environmental Stewardship

In order for the Regulated Materials Management Team (RMMT) in the Office of Environmental Stewardship to have sufficient time to review a project and provide meaningful comment to the project manager, it is essential that the project manager contact RMMT approximately 12-18 months prior to the project letting date.

## Threshold Criteria

MnDOT projects may generate and require management of regulated material/waste such as lead-based paint, asbestos-containing material, PCB containing material, mercury containing material, treated wood, hazardous waste and other forms of regulated waste.

RMMT can assist in determining if regulated material/wastes are likely to be encountered during the project and how they should be managed. Any project that includes building demolition/relocation or bridge demolition/rehabilitation must have an assessment performed of the structure and surrounding area to determine the presence of any regulated material/waste.

Any regulated material identified during the assessment must be described in project documentation, as well as the need for appropriate special provisions detailing proper handling and/or disposal in the project contract. Following is a list of project activities that require evaluation for potential issues related to regulated material/waste identification, documentation and disposal:

### 1. Building Demolition or Relocation

MnDOT is legally responsible for properly handling and disposal of all regulated materials associated with the demolition or relocation of a structure when MnDOT becomes owner of the building. This includes identifying and properly disposing of all regulated material/waste that are part of the building structure (such as asbestos and treated wood), materials left inside the building (such as fluorescent bulbs, mercury thermostats, and household chemicals) or outside the building (such as drums or other containers of waste).

Contact RMMT to manage regulated materials prior to demolition. RMMT will prepare contracts for structure assessment, abatement/removal of materials and oversight of the removal procedure. The process should be initiated by District personnel by contacting RMMT 12-18 months before the construction project is let. Typically this contact is provided by the District submitting an Early Notification Memo for the project to RMMT.

### 2. Bridge Demolition or Rehabilitation

Contact RMMT to manage regulated material/wastes associated with demolition or rehabilitation of a bridge. RMMT will prepare contracts for structure assessment, abatement/removal of materials and oversight of removal procedure. If the bridge contains asbestos, lead-based paint or other regulated materials, the materials must be properly handled and disposed of just prior to or during demolition or rehabilitation. RMMT will hire an oversight contractor if asbestos-containing material (ACM) and/or PCB-

containing material (such as caulk or bituminous felt) are present, to oversee removal during bridge demolition.

### 3. Bridge or Steel Structure Painting and Paint Removal

For Bridges:

- Contact the District Bridge Office. The Bridge Office will prepare contract language to ensure work will comply with environmental regulations and MnDOT policy.

For other steel structures (electrical boxes, etc.):

- Contact RMMT. RMMT will prepare contract language to ensure work will comply with environmental regulations and MnDOT policy.

Recyclable steel grit will be used to remove paint from steel structures. Waste materials generated when paint is removed from a bridge or other steel structure, such as spent abrasives, paint chips and waste paint solvents, must be properly contained, managed and documented for disposal or recycling. Any unusable paint generated during the painting process must also be properly documented and managed for disposal or recycling.

### 4. Project may involve acquisition of right of way containing regulated material or waste.

When MnDOT encounters abandoned or buried regulated material/waste on our right of way, MnDOT generally is responsible for properly managing the material/waste.

Contact RMMT regarding the presence of any regulated material or waste observed aboveground at a property that will be acquired for a project. RMMT will prepare contract language to ensure work will comply with environmental regulations and MnDOT policy.

Please see the Subject Guidance “Contaminated Properties”

<http://www.dot.state.mn.us/environment/contaminatedmaterials/hpdp.html>

for guidance on buried waste or soil/ground waste contamination on properties.

## Prepared Statements

The following prepared statements should be used in the project environmental document.

- For projects without regulated material/waste: "The project will not require management of regulated material/waste."

- For projects with bridge removal or rehabilitation: "Regulated material/waste will be managed on this project in accordance with MnDOT special provisions."
- For projects with building removal or renovation: "Regulated material/waste will be managed under separate contract by RMMT."

RMMT can assist in determining if regulated material/waste are likely to be encountered during the project.

## Relationship to the HPDP

Identification of regulated material/waste associated with building demolitions/relocations and bridge demolition/rehabilitation enables RMMT to prepare contracts to manage the material/waste properly and to prepare project special provisions, as necessary.

If previously unknown regulated material/waste is discovered during construction the Contractor must stop work in the area of discovery, notify the MnDOT Project Engineer and follow RMMT management protocol.

## Agencies Involved

Agency(s)	When they are involved and why
<a href="https://www.pca.state.mn.us/">Minnesota Pollution Control Agency</a> (MPCA) <a href="https://www.pca.state.mn.us/">https://www.pca.state.mn.us/</a>	Regulate structure demolition and disposal activities. Regulate asbestos, solid and hazardous waste management and disposal activities.
<a href="https://www.health.state.mn.us/">Minnesota Department of Health</a> (MDH) <a href="https://www.health.state.mn.us/">https://www.health.state.mn.us/</a>	Regulate asbestos management, contractor licensing and permitting of asbestos abatement.
United States Department of Transportation <a href="https://www.transportation.gov/">https://www.transportation.gov/</a>	Regulate the transport of hazardous materials.