

Bridge Field Services Advisory

BFS 2012-01
March 14, 2012

From Mark Geib, Engineer of Operations Field Services Division

MDOT
Operations Field
Services Division
6333 Old Lansing Rd.
Lansing, MI 48917

Questions regarding this advisory or to request assistance in setting up your program should be directed to:

Matt Chynoweth,
Bridge Field Services
Engineer

517-322-3322
chynowethm@
michigan.gov

Corey Rogers,
Bridge Construction
Engineer

517-322-3320
rogersc5@
michigan.gov



Structural Steel Cleaning and Coating

This Bridge Field Services advisory serves to remind project offices of the provisions of section 715 of the Standard Specifications for Construction relating to Cleaning and Coating of Existing Structural Steel, and the Bureau of Highways Instructional Memorandum 2005-13: Bridge Painting Inspection and Lead Exposure in Construction.

As a result of MDEQ visits to MDOT and local agency bridge painting projects in the 2010 and 2011 construction seasons, MDOT is now under a Consent Order whereby the MDEQ alleges MDOT managed hazardous waste sites in violation of the Natural Resources and Environmental Protection Act.

This was mainly due to the following violations:

- Inadequate characterization of spent blast materials
- Incorrect generator status indicated on form EQP5150
- Spent blast materials not being stored properly
- Storage containers not maintained or inspected
- Storage containers not properly labeled
- Training records, contingency plans and manifests not on site
- Manifests and disposal records not retained in project files

Provisions for the activities subject to the alleged violations are all covered in section 715 of the Standard Specifications for Construction, and all Construction Field Offices administering bridge painting projects should be enforcing these requirements.

As part of the Consent Order, the MDEQ requires MDOT to achieve compliance with the following requirements:

1. MDOT shall require contractors engaged in the construction and maintenance of bridges under MDOT's jurisdiction to submit hazardous waste manifests and land disposal records generated during bridge work. As part of the project files, MDOT is required to retain copies of those manifests, land disposal records, including a copy of all notices, certifications, demonstrations, waste analysis data, and other documents relating to land disposal restricted waste for a minimum of 3 years. Copies of manifests must be sent to:

DEQ Waste and Hazardous Materials Division
PO BOX 30038
Lansing, MI 48909-7538

The on-site records requirements are listed in the MDOT Standard Specifications for Construction, subsection

715.03.A.6. These records must remain on site and available until all blast cleaning is complete, and spent materials are removed from the job. Part of the requirement is also to maintain a copy of all waste manifests, land disposal records, waste determination analyses, and any other project documentation relating to the disposal of the spent blast materials within the project files for at least 3 years.

2. MDOT shall inspect, or cause to be inspected hazardous waste satellite accumulation areas (gondolas, roll-off boxes and barrels) associated with its bridge construction and maintenance contracts to which MDOT is a party on a weekly basis for leaks, defects, and proper management, and document those inspections in a written log.

The weekly inspection log requirements, and condition and inspection requirements for Gondolas, Roll-off Boxes and Barrels are listed in the MDOT Standard Specifications for Construction, subsections 715.03.A.4 and 715.03.A.7, respectively

3. Within 180 days after the effective date of the Consent Order, MDOT shall provide hazardous waste training to all MDOT employees involved with the oversight, supervision, or management of hazardous waste with respect to MDOT bridge construction and maintenance projects.

This essential information is covered as part of the Bridge Paint School training provided by MDOT Bridge Field Services. All project offices administering bridge painting contracts should send key staff for training. Bridge Paint School binders are also available. Contact Corey Rogers, for more information.

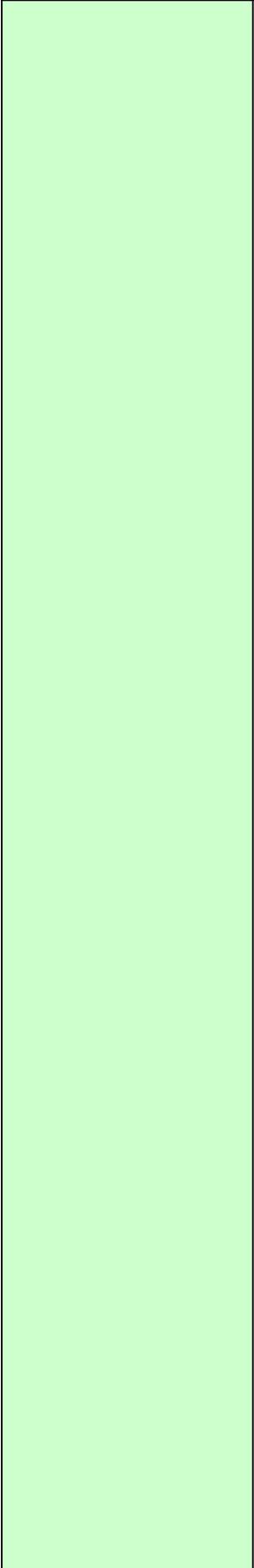
4. MDOT shall notify the MDEQ when there is a release of hazardous waste, or hazardous waste constituents.

The Contractor shall develop and submit a hazardous waste contingency plan for generating, handling, and storing hazardous waste, addressing containment and clean-up of accidental spills or releases into the environment. They are also required to list an emergency coordinator. These requirements are listed in the MDOT Standard Specifications for Construction, subsection 715.03.A.3

5. MDOT shall ensure that hazardous waste manifests, with respect to its bridge construction and maintenance project comply with MDEQ administrative rules, and the Code of Federal Regulations.

A sample manifest form, EPA forms 8700-22 and 8700-22A, and the DEQ flow chart are attached to this advisory.

Reporting requirements were also dictated to MDOT as part of the Consent Order. MDOT Bridge Field Services shall compile all relevant information and documentation for a statewide response to MDEQ.



MDOT is also required to report any violations, or anticipated violations to the Consent Order.

In summary, Construction Field Offices administering bridge painting projects should be familiar with, and enforce the applicable provisions of section 715 of the Standard Specifications for Construction. Any questions regarding these requirements should be directed to Matt Chynoweth or Corey Rogers.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
------------------------	--------------	-----------------------------	-----------------------------

5. Generator's Name and Mailing Address _____ Generator's Site Address (if different than mailing address) _____

Generator's Phone: _____

6. Transporter 1 Company Name _____ U.S. EPA ID Number _____

7. Transporter 2 Company Name _____ U.S. EPA ID Number _____

8. Designated Facility Name and Site Address _____ U.S. EPA ID Number _____

Facility's Phone: _____

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes			
		No.	Type						
1.									
2.									
3.									
4.									

14. Special Handling Instructions and Additional Information _____

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

16. International Shipments Import to U.S. Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____

Transporter signature (for exports only): _____

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

18. Discrepancy

18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection

Manifest Reference Number: _____

18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____

Facility's Phone: _____

18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. _____ 2. _____ 3. _____ 4. _____

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____

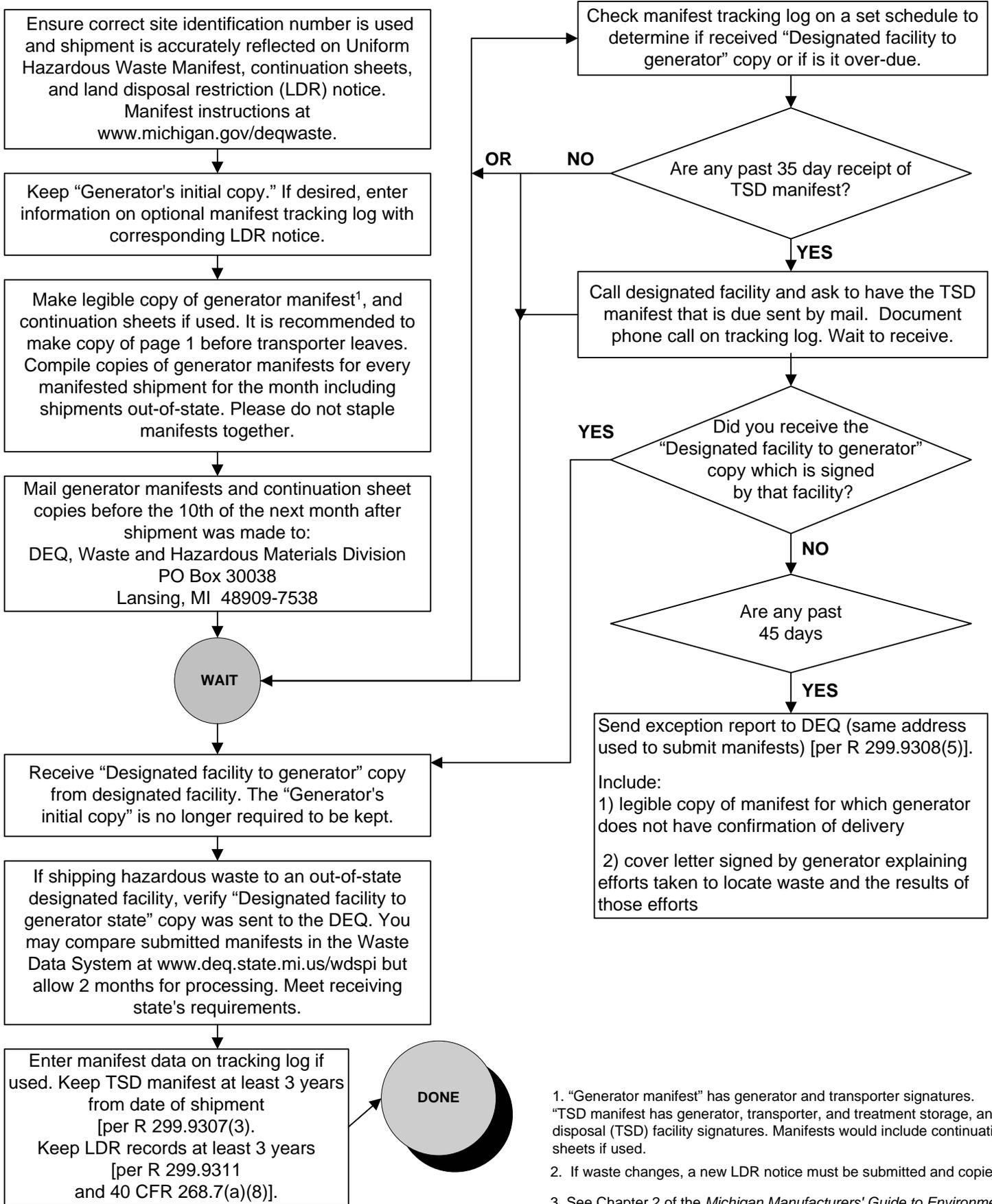
GENERATOR

TRANSPORTER INT'L

DESIGNATED FACILITY

LARGE QUANTITY GENERATOR'S TRACKING SYSTEM FOR HAZARDOUS WASTE MANIFESTS

For hazardous waste shipments via permitted and registered transporters per PART 111, R 299.9304. Shipments by water and rail have different requirements.



1. "Generator manifest" has generator and transporter signatures. "TSD manifest has generator, transporter, and treatment storage, and disposal (TSD) facility signatures. Manifests would include continuation sheets if used.

2. If waste changes, a new LDR notice must be submitted and copies kept.

3. See Chapter 2 of the *Michigan Manufacturers' Guide to Environmental, Safety, and Health Regulations* for more information.