

# Arizona Department of Transportation

## Environmental Planning Pre-approved Mitigation Measures

### Construction Partnering

Responsibility	Mitigation Measure	When Used
<ul style="list-style-type: none"><li>- ADOT District</li><li>- LPA</li></ul>	<ul style="list-style-type: none"><li>▪ The Engineer will contact the Arizona Department of Transportation (<i>archaeologist, hazardous materials coordinator, biologist, etc.</i>) (project lead phone number) or the Environmental Commitments Coordinator (520.449.1985) to schedule the (<i>preconstruction meeting or partnering meeting</i>) on a mutually agreeable date to ensure a qualified Environmental Planning representative will be available to attend the meeting.</li></ul>	Only as needed for flagging/monitoring or as determined by the Technical Specialist or Planner.

### Avoidance Areas

Responsibility	Mitigation Measure	When Used
<ul style="list-style-type: none"><li>- Contractor</li></ul>	<ul style="list-style-type: none"><li>▪ The contractor shall avoid all flagged and/or otherwise designated sensitive cultural, biological or water resource areas within or adjacent to the project area.</li></ul>	Flagging or avoidance needed
<ul style="list-style-type: none"><li>- Contractor</li></ul>	<ul style="list-style-type: none"><li>▪ All project activities, vehicles and construction equipment, within the project area shall be limited to the existing pavement, pullouts and side roads.</li></ul>	Certain Pavement preservation, pavement marking projects
<ul style="list-style-type: none"><li>- Contractor</li></ul>	<ul style="list-style-type: none"><li>▪ The contractor will contact the Arizona Department of Transportation Environmental Planning (602.712.7767) at least ten (10) working days prior to the commencement of work to ensure compliance with avoidance areas.</li></ul>	All avoidance areas

## Clean Water Act

– Contractor	<ul style="list-style-type: none"> <li>The contractor shall develop a containment plan for debris and construction materials to avoid contamination of [<i>wash, river, creek name</i>]. The containment plan shall be approved by the Engineer prior to construction.</li> </ul>	Work will occur over (e.g., bridge) but not in the Waters of the United States in lieu of Section 404 permit.
– Contractor	<ul style="list-style-type: none"> <li>The contractor shall comply with all terms and conditions of the attached Clean Water Act Section 404/401 permit and certification.</li> </ul>	To be used <b>only</b> if there is a 404/401 permit/certification associated with the project.
– Contractor	<ul style="list-style-type: none"> <li>No activities shall occur within Waters of the United States until the appropriate Clean Water Act Section 404 Permit and 401 Water Quality Certification have been obtained/issued.</li> </ul>	404 permit is outstanding at the time of the environmental clearance

## Historic Preservation

Responsibility	Mitigation Measure	When Used
– Contractor	<ul style="list-style-type: none"> <li>The contractor shall contact the ADOT Environmental Planning Historic Preservation Team project lead or the Environmental Commitments Coordinator (520.449.1985) at least 10 (ten) business days prior to the start of ground-disturbing activities to arrange for a qualified archaeologist to flag avoidance areas.</li> </ul>	Flagging needed
– Contractor	<ul style="list-style-type: none"> <li>The contractor shall contact the ADOT Environmental Planning Historic Preservation Team (project lead phone number) or the Environmental Commitments Coordinator (520.449.1985) at least 10 (ten) business days prior to the start of ground-disturbing activities to arrange for qualified personnel to monitor and be present during construction. ADOT’s Environmental Planning - Historic Preservation Team will provide contact information on the qualified archaeological consultant to the Contractor for their records. ADOT’s Environmental Planning - Historic Preservation Team will contact the qualified archaeological consultant regarding the project start date and provide Contractor information.</li> </ul>	Monitoring needed
– Contractor	<ul style="list-style-type: none"> <li>The Contractor shall coordinate via email or phone with the qualified archaeological consultant and</li> </ul>	Monitoring needed

	communicate the construction schedule for the duration of ground disturbing work in those areas where monitoring is needed.	
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## Hazardous Materials

### Lead-Based Paint

Responsibility	Mitigation Measure	When Used
– Contractor	<ul style="list-style-type: none"> <li>▪ For [<i>pavement striping obliteration, bridge work, guardrail work, etc.</i>]:               <ul style="list-style-type: none"> <li>▪ Prior to beginning any work, an approved contractor shall develop and implement a Lead-Based Paint Removal and Abatement Plan for the removal of the lead-based paint, Toxicity Characteristic Leaching Procedure testing of the generated waste stream, and proper disposal of the waste stream derived from the removal of the [<i>state where the lead-based paint is found, such as yellow pavement striping, white pavement striping, pavement striping, paint on bridge rail</i>] within the project limits. The contractor shall select a lead abatement contractor that meets the qualification requirements specified within the special provisions and as approval by the Engineer. The contractor shall follow all applicable federal, state, and local codes and regulations, including <i>Arizona Department of Transportation Standard Specifications for Road and Bridge Construction (2021 Edition)</i>, related to the treatment and handling of lead-based paint. The contractor shall submit the Lead-Based Paint Removal and Abatement Plan to the Engineer and the ADOT Environmental Planning Hazardous Materials Coordinator (602.920.3882 or 602.712.7767) for review and approval at least 10 (ten) working days prior to beginning the work [<i>state the activity that will disturb the paint, such as: milling activities, bridge work</i>].</li> <li>▪ Visible fugitive dust emissions from paint removal shall be controlled through wet or dry (e.g., vacuum) means during the removal process. If the liquid waste stream generated by a water-blasting obliteration method passes the Toxicity Characteristic Leaching Process analysis, it may be used as a dust palliative or for compaction on the project. If the water is not used on the project, it shall be properly disposed of in accordance with all applicable federal, state, and local regulations.</li> </ul> </li> </ul>	Lead-based paint (at or greater than 0.5%) present and paint striping being obliterated or paint being removed from bridge or guardrail

Responsibility	Mitigation Measure	When Used
– Contractor (LPA-only projects)	<ul style="list-style-type: none"> <li>No pavement marking obliterations shall occur until the existing pavement markings are tested for lead-based paint, and if present, a Lead-Based Paint Removal and Abatement Plan is approved by the Arizona Department of Transportation Environmental Planning hazardous materials coordinator and implemented.</li> </ul>	Marking obliteration will occur, but no lead-based testing is done prior to bid.
– Contractor	<ul style="list-style-type: none"> <li>The contractor shall not utilize any abrasive tools or methods for the removal of the cattle guards that would disturb the lead-based paint. This includes, but is not limited to, sawing, grinding, sanding, or heating. Woven straps (not linked chains) may be used to lift the cattle guard grate from the frame.</li> </ul>	Cattle guard or drainage grates that contain lead-based paint will be removed.
– Contractor	<ul style="list-style-type: none"> <li>For milling activities, the roadway surface preceding the milling machine shall be kept sufficiently wet so as to prevent the generation of any visible fugitive dust particles, but not so wet as to cause excess runoff from the roadway surface onto the roadway shoulder.</li> </ul>	All milling projects

## NESHAP

Responsibility	Mitigation Measure	When Used
– Contractor	<ul style="list-style-type: none"> <li>The contractor shall complete a National Standards for Hazardous Air Pollutants (NESHAP) notification for the work associated with (<i>what triggered the NESHAP notification</i>) and submit to the Engineer, who shall submit it to the Arizona Department of Transportation environmental planning hazardous material coordinator (602.920.3882 or 602.712.7767) for a five (5) working day review and approval. Upon approval, the contractor shall file the notification with (<i>identify the regulatory agency[ies]</i>) at least ten (10) working days prior to the commencement of work.</li> </ul>	<p>If load-bearing structure to be affected, regardless of whether asbestos is found.</p> <p>If “NESHAP notification is required insert the appropriate agency if located in Pinal, Pima, or Maricopa; If not located in those counties insert ADEQ. If on tribal land; insert EPA. If on Navajo Nation or Tohono O’odham insert EPA and NN or TON.</p>

## Asbestos

Responsibility	Mitigation Measure	When Used
<ul style="list-style-type: none"> <li>- Contractor or LPA Certification Acceptance Agency (CAA)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Contractor in coordination with the Engineer shall contact the Environmental Planning Hazardous Material Coordinator at 602 920-3883 (General mailbox: 602 712-7767) at least 10 days prior to the commencement of any construction activity to ensure that an asbestos survey has been conducted within the 60 months prior to the start of construction (Maricopa County Rule 370) or if there is a need for additional site assessment.</li> </ul>	<p>All ADOT and LPA projects within Maricopa County with an asbestos report when the initial survey during project development is conducted more than 60 months in advance of the anticipated start of construction.</p>
<ul style="list-style-type: none"> <li>- LPA Certification Acceptance Agency (CAA)</li> </ul>	<ul style="list-style-type: none"> <li>▪ The LPA CAA shall ensure that an asbestos survey has been conducted within the 60 months prior to the start of construction (Maricopa County Rule 370) or if there is a need for additional site assessment.</li> </ul>	<p>All LPA CAA projects within Maricopa County with an asbestos report when the initial survey during project development is conducted more than 60 months in advance of the anticipated start of construction.</p>

Responsibility	Mitigation Measure	When Used
<ul style="list-style-type: none"> <li>- Contractor</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prior to beginning any work, an approved contractor shall develop and implement an Asbestos Removal and Disposal Plan for the removal of the asbestos or asbestos-containing material from the <i>[state the activity that will disturb the asbestos or asbestos-containing material that is being done to trigger this notification]</i>. The plan shall be submitted to the ADOT Hazardous Materials Coordinator (602.920.3882 or 602.712.7767) and Engineer for review and approval at least 10 (ten) working days prior to beginning the work. The contractor shall select an asbestos abatement contractor that meets the qualification requirements specified within the special provisions and as approval by the Engineer. The contractor shall follow all applicable federal, state, and local codes and regulations, including <i>Arizona Department of Transportation Standard Specifications for Road and Bridge Construction (2021 Edition)</i>, related to the treatment, handling, and disposal of asbestos.</li> </ul>	<p>Asbestos present</p>
<ul style="list-style-type: none"> <li>- Contractor</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prior to the removal of the bridge expansion joint(s) for (Structure Name)(s #----), the contractor</li> </ul>	<p>When project will</p>

	shall collect the waste (e.g., dirt, paint, debris, etc.) from the bridge expansion joint(s) areas using a HEPA vacuum and sample it for asbestos-containing material (ACM >1%) and lead contamination (lead >HUD/EPA).	remove the expansion joints. Potential for Lead and asbestos in the debris.
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