ARIZONA DEPARTMENT OF TRANSPORTATION
INTERMODAL TRANSPORTATION DIVISION
STATE ENGINEER'S OFFICE, 102A

MEMORANDUM

June 11, 2004

TO: **ALL DISTRICT ENGINEERS**
John Harper, Flagstaff, F500
Rick Powers, Globe, G300
Dave Sikes, Holbrook, H700
Sam Elters, Kingman, K600
Tom Foster, Prescott, P800
Ron Casper, Safford, S400
Dennis Alvarez, Tucson, T100
Bill Alfier, Yuma, Y200
Perry Powell, Phoenix Construction, E700
John Hauskins, Phoenix Maintenance, PM00

FROM: Doug Forstie, Deputy State Engineer, Operations
Dan Lance, Deputy State Engineer, Valley Transportation
Sam Maroufkhani, Deputy State Engineer, Development

RE: Asbestos

Earlier this year the State Engineer's Office sent a letter to the Environmental Protection Agency (EPA) requesting clarification of the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) regarding certain concrete components; specifically, sign foundation concrete, concrete box culverts, concrete catch basins, concrete sidewalks, and concrete roadways.

The EPA's response contained the following determinations:

1. Materials such as cinder blocks, mortar, brick and/or cement foundation do not typically contain asbestos and would not normally be sampled.

2. Sign foundation concrete, concrete box culverts, concrete sidewalks, and concrete roadways would all fall under components that would not require an Asbestos NESHAP demolition notification when removed or disturbed.

Concrete structures sometimes include components that are known to contain asbestos, such as transite pipe, expansion joint material, and asphaltic products. These asbestos-containing components are typically associated with bridges; therefore, any modification or demolition of a bridge structure will require an asbestos survey. Please contact ADOT's Hazardous Materials Coordinator, Ed Green at 602-712-7768 for bridge asbestos surveys or if you encounter a component associated with a concrete structure that you suspect may contain asbestos.

Please note that buildings containing concrete fall under a different category with regard to Asbestos NESHAP notification. Please contact Bob Harris at 602-712-7829 prior to the modification or demolition of any building owned or leased as a facility by ADOT or Bob Patoni at 602-712-6568 prior to the demolition of any building within ADOT-owned property acquired for highway purposes but not yet in use as such, or property designated as ADOT excess land.