

Chapter 3

Environmental Issues

3.0 Introduction

The term “environment” refers to our natural surroundings including water, air, plant and animal life and cultural resources. Maintenance activities are to be conducted in such a manner as to minimize damage to the environment. MDT Maintenance is committed to that goal, and the MDT Maintenance Environmental Best Management Practices Manual, included in its entirety in Section E, outlines our commitment and identifies BMP’s for accomplishing maintenance activities. This chapter will include information on the following:

- Water quality
- Air quality
- Hazardous Waste Management
- Noxious Weed Control
- Removal and disposal of dead animals
- Cultural and archeological concerns

Maintenance employees are responsible to be aware of, and utilize BMP’s to minimize environmental effects of activities.

3.1 Water Quality

Maintenance activities commonly associated with water quality concerns are:

- Culvert cleaning and repair
- Bridge cleaning and repair
- Sweeping and cleaning of pavements
- Winter maintenance
- Guardrail repair
- Vegetation management
- Stockpiling aggregates

For activity specific guidelines reference the MDT Maintenance Environmental Best Management Practices Manual or the specific activity identified in Section C. Permits are often required for activities in close proximity to streams. Permits are secured through the District Biologist in the Environmental Bureau. Information about permits can be found in A Guide to Stream Permitting in Montana, or at www.dnrc.state.mt.us/permit.html

3.2 Air Quality

The Clean Air Act establishes maximum allowable levels of air particulate (PM 10). Some maintenance activities can have impacts on the particulate levels such as:

- Application of nonskid aggregates

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- Sweeping activities
- Aggregate handling
- Maintenance of unpaved roadway surfaces

When particulate levels approach or exceed maximums established in the Clean Air Act, a community becomes either a high risk or a non-attainment area. A number of communities across Montana currently are identified as either high risk or non-attainment areas. Maintenance activities within these areas must be modified to lessen negative impacts on air quality.

3.3 Hazardous Waste Management

Waste is often generated during the completion of maintenance activities, in some cases the waste may be classified as hazardous. The following are some activities that may generate hazardous waste.

- Wooden bridge repair
- Guardrail repair
- Sign post repair
- Equipment repairs
- Vegetation management
- Debris removal (various containers or materials left within the right-of-way)
- Facility repairs

MDT's Environmental Bureau assists Maintenance with disposal of hazardous waste. Employees must wear appropriate personal protective equipment when handling hazardous waste, as identified by the MSDS for the product.

MDT has trained employees for hazard materials handling (hazwopper). Employees are responsible to be aware of the proper handling and disposal requirements of any waste generated through accomplishment of maintenance activities.

Material Safety Data Sheets (MSDS) are provided for all products commonly used, and can be found at each Maintenance Section and Equipment shop or on the Internet at www.maxcomonline.com

3.4 Noxious Weed Control

MDT is responsible under Montana law for control of noxious weeds on property owned by MDT such as:

- Roadway rights-of-way
- Stockpile sites
- Rest areas
- Facility compounds.

Each County Weed District, in cooperation with MDT, establishes a six-year weed control plan, which is revisited regularly. Noxious weed control is best handled through an integrated weed management plan, components of which are:

- Mechanical (mowing)
- Biological (introduction of organisms)
- Cultural (seeding)
- Chemical (pesticides)
- “Hands Off” approach (a decision not to act and allow natural plant succession to take place)

MDT can address its integrated weed management responsibilities through contracting or use of Maintenance forces and equipment.

3.5 Dead Animal Disposal

MDT Maintenance has the responsibility for removal of dead animals on the roadway and shares the responsibility for disposal of dead animals with other state agencies. Disposal of road-killed animals raises several issues including:

- Domestic animals (pets) – If identification is found on the animal, an attempt should be made to notify the owner
- Domestic animals (farm animals) – Owners should be notified, as well as a Montana Livestock Inspector
- Endangered species – (Grizzly Bears, Bald Eagles, Lynx, etc.) A Montana Fish Wildlife and Parks (MFWP) warden must be notified immediately for disposal instructions. Taking of body parts from these animals is against the law.
- Large game animals – (Black bears, Elk, Moose, Bighorn sheep, etc.) A MFWP warden should be notified for disposal instructions. Taking of game parts (horns, antlers, teeth, etc.) from these animals is against the law.
- Deer, antelope and smaller animals may be disposed of without notification of an MFWP warden

3.6 Cultural and Archeological Concerns

Cultural and archeological concerns may be encountered when accomplishing maintenance activities. Montana has a multitude of historic sites, archeological sites and species classified under the federal threatened and Endangered Species Act. Because MDT is a public agency, maintenance performance and work operations are closely scrutinized. Additionally, Federal and State Laws have very serious and costly legal ramifications for disturbing cultural resource sites, or threatened or endangered species and their habitat.

Maintenance operations should have very little effect on these resources, as long as activities are within existing disturbed areas on MDT rights-of-way. Even some previously disturbed areas are now considered historical sites and require clearance. As a precaution, any timework is planned in undisturbed areas; the Environmental Unit should be contacted.

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