

Spill Prevention, Control & Cleanup SC-2

Description

Spills and leaks, if not properly controlled, can adversely impact the storm drain system and receiving waters. Due to the type of work or the materials involved, many activities that occur either at a municipal facility or as a part of municipal field programs have the potential for accidental spills and leaks. Proper spill response planning and preparation can enable municipal employees to effectively respond to problems when they occur and minimize the discharge of pollutants to the environment.

Approach

- An effective Pollution Incident Prevention Plan (PIPP) should include:
 - Spill/leak prevention measures;
 - Spill response procedures;
 - Spill cleanup procedures;
 - Reporting; and
 - Training

- A well thought out and implemented plan can prevent pollutants from entering the storm drainage system and can be used as a tool for training personnel to prevent and control future spills as well.

Objectives

- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Targeted Constituents

Sediment
Nutrients ✓
Trash
Metals ✓
Bacteria
Oil and Grease ✓
Organics ✓
Oxygen Demanding ✓

Pollution Prevention

- Develop and implement a PIPP. The plan should include:
 - A description of the facility, the address, activities and materials involved
 - Identification of key spill response personnel
 - Identification of the potential spill areas or operations prone to spills/leaks
 - Identification of which areas should be or are bermed to contain spills/leaks
 - Facility map identifying the key locations of areas, activities, materials, structural BMPs, etc.
 - Material handling procedures
 - Spill response procedures including:
 - Assessment of the site and potential impacts
 - Containment of the material
 - Notification of the proper personnel and evacuation procedures
 - Clean up of the site
 - Disposal of the waste material and
 - Proper record keeping

- Product substitution – use less toxic materials (i.e. use water based paints instead of oil based paints)
- Recycle, reclaim, or reuse materials whenever possible. This will reduce the amount of materials that are brought into the facility or into the field.

Suggested Protocols

Spill/Leak Prevention Measures

- If possible, move material handling indoors, under cover, or away from storm drains or sensitive water bodies.
- Properly label all containers so that the contents are easily identifiable.
- Berm storage areas so that if a spill or leak occurs, the material is contained.
- Cover outside storage areas either with a permanent structure or with a seasonal one such as a tarp so that rain can not come into contact with the materials.
- Check containers (and any containment sumps) often for leaks and spills. Replace containers that are leaking, corroded, or otherwise deteriorating with containers in good condition. Collect all spilled liquids and properly dispose of them.
- Store, contain and transfer liquid materials in such a manner that if the container is ruptured or the contents spilled, they will not discharge, flow or be washed into the storm drainage system, surface waters, or groundwater.
- Place drip pans or absorbent materials beneath all mounted taps and at all potential drip and spill locations during the filling and unloading of containers. Any collected liquids or soiled absorbent materials should be reused/recycled or properly disposed of.
- For field programs, only transport the minimum amount of material needed for the daily activities and transfer materials between containers at a municipal yard where leaks and spill are easier to control.
- If paved, sweep and clean storage areas monthly, do not use water to hose down the area unless all of the water will be collected and disposed of properly.
- Install a spill control device (such as a tee section) in any catch basins that collect runoff from any storage areas if the materials stored are oil, gas, or other materials that separate from and float on water. This will allow for easier cleanup if a spill occurs.
- If necessary, protect catch basins while conducting field activities so that if a spill occurs, the material will be contained.

Training

- Educate employees about spill prevention, spill response and cleanup on a routine basis.
- Well-trained employees can reduce human errors that lead to accidental releases or spills:
 - The employees should have the tools and knowledge to immediately begin cleaning up a spill if one should occur.
 - Employees should be familiar with the Spill Prevention Control and Countermeasure Plan if one is available.
- Training of staff from all municipal departments should focus on recognizing and reporting potential or current spills/leaks and who they should contact.
- Employees responsible for aboveground storage tanks and liquid transfers for large bulk containers should be thoroughly familiar with the Spill Prevention Control and

Spill Response and Prevention

- Identify key spill response personnel and train employees on who they are.
- Store and maintain appropriate spill cleanup materials in a clearly marked location near storage areas; and train employees to ensure familiarity with the site's spill control plan and/or proper spill cleanup procedures.
- Locate spill cleanup materials, such as absorbents, where they will be readily accessible (e.g. near storage and maintenance areas, on field trucks).
- Follow the PIPP if one is available.
- If a spill occurs, notify the key spill response personnel immediately. If the material is unknown or hazardous, the local fire department may also need to be contacted.
- If safe to do so, attempt to contain the material and block the nearby storm drains so that the area impacted is minimized. If the material is unknown or hazardous wait for properly trained personnel to contain the materials.
- Perform an assessment of the area where the spill occurred and the downstream area that it could impact. Relay this information to the key spill response and clean up personnel.

Spill Cleanup Procedures

- Small non-hazardous spills
 - Use a rag, damp cloth or absorbent materials for general clean up of liquids
 - Use brooms or shovels for the general clean up of dry materials
 - If water is used, it must be collected and properly disposed of. The wash water can not be allowed to enter the storm drain.
 - Dispose of any waste materials properly
 - Clean or dispose of any equipment used to clean up the spill properly

- Large non-hazardous spills
 - Use absorbent materials for general clean up of liquids
 - Use brooms, shovels or street sweepers for the general clean up of dry materials
 - If water is used, it must be collected and properly disposed of. The wash water can not be allowed to enter the storm drain.
 - Dispose of any waste materials properly
 - Clean or dispose of any equipment used to clean up the spill properly

- For hazardous or very large spills, a private cleanup company or Hazmat team may need to be contacted to assess the situation and conduct the cleanup and disposal of the materials.

- Chemical cleanups of material can be achieved with the use of absorbents, gels, and foams. Remove the adsorbent materials promptly and dispose of according to regulations.

- If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.

Reporting

- Report any spills immediately to the identified key municipal spill response personnel.

- Report spills in accordance with applicable reporting laws. Spills that pose an immediate threat to human health or the environment must be reported immediately to 911, the Pollution Emergency Alerting System (PEAS) at 800-292-4706 and the National Response Center (NRC) at 800-424-8802.

- Spills that pose an immediate threat to human health or the environment may also need to be reported within 24 hours to the Local Emergency Planning Committee (LEPC), State Emergency Response Center (SERC), Michigan Department of Agriculture (MDA), various divisions of Michigan Department of Environmental Quality (MDEQ), and the Department of Labor and Economic Growth (DLEG).

- Federal regulations require that any oil spill into a water body or onto an adjoining shoreline be reported to the National Response Center (NRC) at 800-424-8802 (24 hour).
- After the spill has been contained and cleaned up, a detailed report about the incident should be generated and kept on file (see the section on Reporting below). The incident may also be used in briefing staff about proper procedures.

Other Considerations

A PIPP is required for facilities that are subject to the oil pollution regulations specified in Part 112 of Title 40 of the Code of Federal Regulations.

State Regulations also exist for the storage of hazardous materials (PIPP rules), including the preparation of PIPPs for emergency response to the releases or threatened releases.

Requirements

Costs

- Will vary depending on the size of the facility and the necessary controls.
- Prevention of leaks and spills is inexpensive. Treatment and/or disposal of wastes, contaminated soil and water is very expensive.

Maintenance

- This BMP has no major administrative or staffing requirements. However, extra time is needed to properly handle and dispose of spills, which results in increased labor costs.

Supplemental Information

Further Detail of the BMP

Reporting

Record keeping and internal reporting represent good operating practices because they can increase the efficiency of the response and containment of a spill. A good record keeping system helps the municipality minimize incident recurrence, correctly respond with appropriate containment and cleanup activities, and comply with legal requirements.

A record keeping and reporting system should be set up for documenting spills, leaks, and other discharges, including discharges of hazardous substances in reportable quantities. Incident records describe the quality and quantity of non-stormwater discharges to the storm drain.

These records should contain the following information:

- Date and time of the incident
- Weather conditions
- Duration of the spill/leak/discharge
- Cause of the spill/leak/discharge
- Response procedures implemented
- Persons notified
- Environmental problems associated with the spill/leak/discharge

Separate record keeping systems should be established to document housekeeping and preventive maintenance inspections, and training activities. All housekeeping and preventive maintenance inspections should be documented. Inspection documentation should contain the following information:

- The date and time the inspection was performed
- Name of the inspector
- Items inspected
- Problems noted
- Corrective action required
- Date corrective action was taken

Other means to document and record inspection results are field notes, timed and dated photographs, videotapes, and drawings and maps.

Examples

The City of Palo Alto includes spill prevention and control as a major element of its highly effective program for municipal vehicle maintenance shops.

References and Resources

Michigan Department of Environmental Quality, Emergency Response to Spills over Water,

<http://michigan.gov/deq/0,1607,7-1353313-23420---,00.html>

King County Stormwater Pollution Control Manual -

<http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Orange County Stormwater Program

http://www.ocwatersheds.com/stormwater/swp_introduction.asp

San Diego Stormwater Co-permittees Jurisdictional Urban Runoff Management Program (URMP)

<http://www.projectcleanwater.org/pdf/Model%20Program%20Municipal%20Facilities.pdf>

12/18/07

