

Appendix C

Sample PIPP for MDOT and Contract County Facility

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**POLLUTION INCIDENT PREVENTION PLAN
AND
HAZARDOUS WASTE CONTINGENCY PLAN**

for

Michigan Department of Transportation
Central Maintenance Building
6333 Old Lansing Road
Lansing, Michigan 48917
Telephone: (517) 322-3300

PRIMARY EMERGENCY COORDINATOR

Eileen Phifer
1334 Boynton Drive
(517) 323-7491 Home
(517) 373-1898 Work

ALTERNATE EMERGENCY COORDINATOR

Andre Clover
2431 Graystone Dr
(517) 529-9588 Home
(517) 322-3391 Work

MDOT EMERGENCY MANAGEMENT

Tim Jones
(810) 658-2188 Home
(517) 241-2877 Work

MDOT COMMUNICATIONS OFFICE

Benjamin Kohrman
(517) 335-3084 Work

ALTERNATE EMERGENCY MANAGEMENT

Bob Cross
(517) 323-7491 Home
(517) 322-3350 Work

Safety Coordinator

Mike Heiss
(517) 322-3342

EPA ID NO. MID 017199126

**IN CASE OF EMERGENCY CALL THE
DEQ POLLUTION EMERGENCY ALERTING
SYSTEM (PEAS) 1-800-292-4706**

DATE: July 2003

STATUTORY AUTHORITY

This Pollution Incident Prevention Plan (PIPP) has been prepared in accordance with Part 5 administrative rules pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

Copies of this plan have been placed on file with the appropriate agencies.

This plan is to be kept on file in the facility waste notebook. Its content should be familiar to each employee. The plan is to be reviewed and amended as required by changes in operations or failure of the plan in an emergency.

A formal training program on hazardous waste and polluting materials management has been developed by MDOT and MDEQ. This training will be required for all emergency coordinators, their alternates and any employee who manages polluting materials and hazardous wastes as part of day to day operations. Video tapes and handout materials, along with periodic updates, will be used to train new employees and to keep abreast of changing regulations.

An outline of this training program is on file in the Waste Management Notebook at this facility.

EMERGENCY RESPONSE AGENCIES

POLICE	State - Lansing Post	911
	County - County Sheriff Department 1025 Independence Blvd.	911
FIRE	Delta Township Fire Dept 215 Snow Road Lansing, MI 48917	(517) 886-1162 911
HOSPITAL	Sparrow Hospital 1215 E Michigan Lansing	(517) 483-2222
	St Lawrence Hospital 1210 W Saginaw Lansing	(517) 377-0304
AMBULANCE	Delta Township	911
HEALTH DEPT	Eaton County District Health Department 528 Beech Charlotte, Michigan	(517) 543-2430
MDEQ OFFICE	Region 111 Headquarters State Sec. Complex Lansing, MI	(517) 322-1300
WASTE WATER TREATMENT PLANT	Delta Township	(517) 323-8570
U.S COAST GUARD	National Response Center	1-800-424-8802

These agencies have been offered the opportunity to review this plan and to schedule a site visit to evaluate its adequacy.

Transportation Engineer

Date

POLLUTION INCIDENT RESPONSE

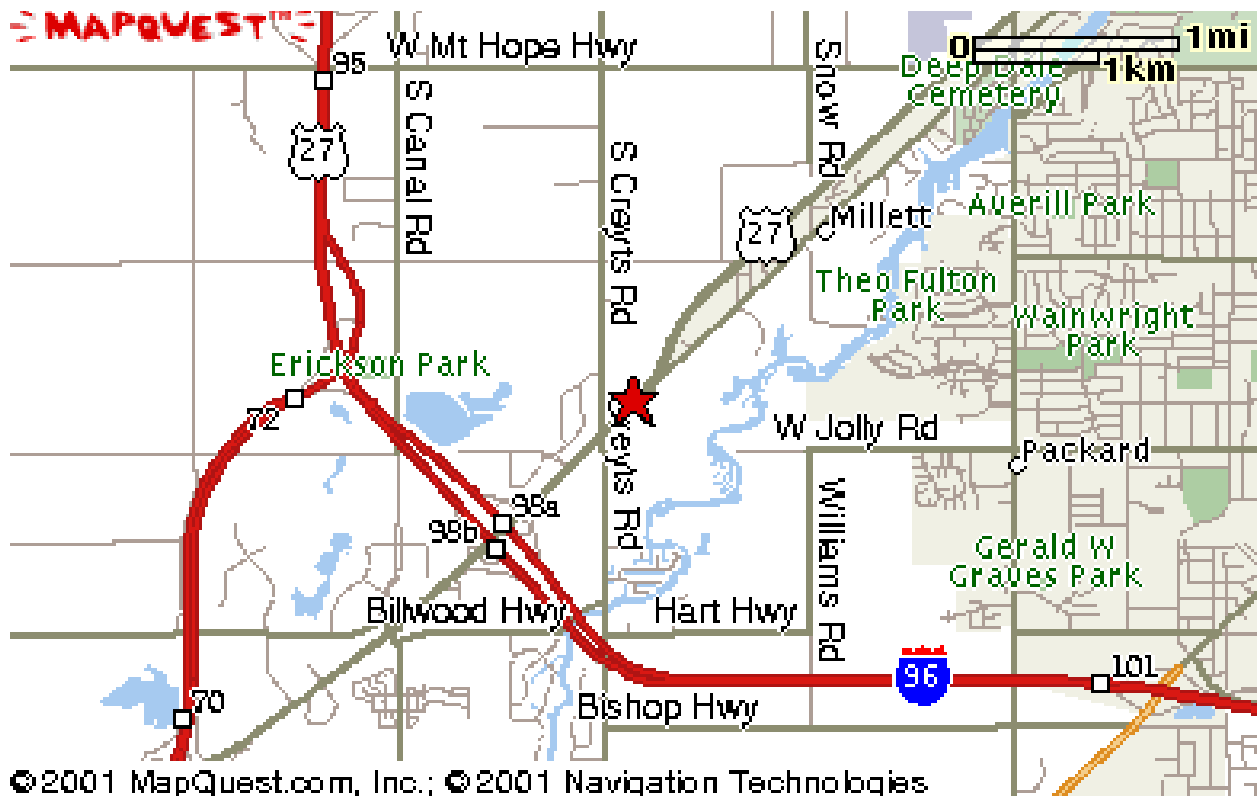
If a spill or leak of salt, oil or polluting material occurs, the Emergency Response Actions posted near the telephones are to be followed. They are given here in more detail. The emergency response coordinator and alternates should become familiar with these steps.

1. Assess the situation; follow all health and safety precautions warranted by the material and circumstances.
2. If there is reason to believe that the release of polluting material threatens the health or safety of employees or of surrounding residents or properties evacuate the facility, notify the local emergency response agencies listed in this plan and follow their instructions.
3. If there is reason to believe that the polluting material has or may reach the waters of this state via the drains, sewers, surface runoff or soils at the facility, immediately contact the DEQ Pollution Emergency Alerting System (PEAS) at the number on the front of this plan. Follow their instructions for containing or cleaning up the material.
4. If emergency response agencies, including DEQ or health departments, are contacted for assistance, then the Emergency Coordinator must also notify the MDOT Emergency Services Coordinator and/or the MDOT Office of Communications. The contact and telephone number for these offices are listed on the cover of this plan.
5. Take steps to minimize the release of polluting material to the environment. This can include but is in no way limited to the following measures:
 - a. DO NOT FLUSH WITH WATER UNLESS DIRECTED TO DO SO.
 - b. Shut off valves, plug leaks, pump tanks etc. to stop the release.
 - c. Dike or absorb the material using sand or other material.
 - d. Plug drainage inlets/outlets.
 - e. Redirect flows to a holding area.
 - f. Excavate contaminated soils.
6. Clean up all contaminated material. Clean out catch basins, tanks or basins contaminated by the material. Excavate contaminated soils or absorbent material. Follow instructions given by DEQ or MDOT environmental staff for final clean up action.
7. Properly store, label and document the wastes for disposal.
8. Notify the Regional Resource Specialist that a spill or leak has occurred. Make arrangements for disposal of waste material.
9. Clean and service all emergency equipment. Replenish supplies of absorbent material, etc. Recommend and perform maintenance on containment systems.
10. Enter into the waste notebook, a full account of the incident including date, time, volume, material and response taken.
11. If the DEQ PEAS staff has not been notified, do so within 10 days of the incident with the following information:
 - a. Facility name and location.
 - b. Description and volume of material involved.
 - c. Time and date of spill or leak.
 - d. Assessment of damage and response taken.
 - e. Remedial action planned or assistance needed.
12. Review PIPP/HWCP for changes needed to make it more effective and realistic.

GENERAL INFORMATION

The Central Maintenance Building is a highway maintenance facility owned and operated by MDOT. This PIPP is written to include the Sign Fabrication Shop, Overhead Sign Shop, the Signal shop and the central maintenance office area. These shops are operated by MDOT to fabricate, construct or maintain traffic control devices used throughout the state.

Shown here is a general location map for the facility. A detailed site plan showing drainage, storage areas, safety equipment and other site details are included in the Plan.



EMERGENCY EQUIPMENT

This facility will be maintained and operated to minimize the possibility of a fire, explosion or release of polluting materials. The following communications, fire protection, spill control and clean up equipment are available on site in case of an emergency. This equipment will be inspected and maintained as necessary to assure its proper operation if a pollution incident should occur.

	<u>Description</u>	<u>Testing/Maintenance</u>
1.	Telephone/Intercom	Test monthly
2.	Two Way Radio	Maintenance as required
3.	Portable Fire Extinguishers	Inspect annually or as needed
4.	Waterhose	
5.	Absorbent Material	Replenish supply as needed
6.	Hand Shovels	
7.	Pumping equipment	Inspect monthly as needed
9.	Eye Wash	Inspect monthly as needed
10.	Shower	Inspect monthly as needed
11.	Respirator	Inspect monthly
12.	Intercom System	Test monthly

* Numbers correspond to the site plan in the Attachments Section.

POLLUTING MATERIALS STORED OR USED AT THIS FACILITY

Listed below are the materials currently stored or used at the Central Maintenance Facility that have the potential of causing environmental damage in the event of accidental spills or leakage. Following is a discussion of the type of material, how it is stored and pollution incident prevention measures.

Hydraulic Fluid

Solvents

Small Quantity Chemical Products

Kerosene

Phosphoric Acid

The locations of these materials are shown on the Hazardous Material Site Plan found in the Attachments Section. Complete information regarding the physical properties, chemical names and required safety precautions can be found in the Material Safety Data Sheets (MSDS) posted at this facility.

Hydraulic Fluid

The Central Maintenance Facility stores an average of one 55 gallon drum of hydraulic fluid. This product is used in vehicles and lifting equipment. Bulk hydraulic fluid is stored inside the hazardous product storage building and pumped from the drum as needed.

Pollution Incident Preventive Measures

Secondary containment is provided for the drum storage area by a curbed concrete floor of the hazardous materials storage building. Absorbent material is available in the storage and use areas. The storage and use areas are inspected weekly for signs of spills or leaking containers. In the event of the release of a large or unknown volume of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan and posted on the facility are to be followed.

Kerosene

The Central Maintenance Facility stores an average of one 55 gallon drum of kerosene. This fuel is used in portable heaters. Bulk kerosene is stored inside the hazardous product storage building and pumped from the drum as needed.

Pollution Incident Prevention Measures

Secondary containment is provided for the drum storage area by a curbed concrete floor of the hazardous materials storage building. Absorbent material is available in the storage and use areas. The storage and use areas are inspected weekly for signs of spills or leaking containers. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan and posted at the facility are to be followed.

Phosphoric Acid

The Central Maintenance Facility stores an average of one 55 gallon drum of phosphoric acid as well as the 900 gallon etching tank of phosphoric acid. The phosphoric acid is used for the cleaning of aluminum in the creation of new signs.

Pollution Incident Prevention Measures

Secondary containment is provided for the drum storage area by a curbed concrete floor of the hazardous materials storage building. Absorbent material is available in the storage and use areas. The storage and use areas are inspected weekly for signs of spills or leaking containers. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan and posted at the facility are to be followed.

Hazardous Waste

This facility is a small quantity generator of hazardous wastes and is regulated under both the Federal Resource Conservation and Recovery Act and the Michigan Hazardous Waste Management Act (Act 64).

Typical hazardous wastes generated by the Central Maintenance facility are hydrocarbon waste. Used mineral spirits are treated as hazardous waste and manifested to a licensed hauler.

Satellite barrels for accumulating wastes are located in the work areas and are managed in accordance with federal and state hazardous waste regulations. A hazardous waste management plan has been instituted at this facility. This plan includes hazardous waste training for all employees, weekly inspection and documentation of any spills or leaking hazardous waste containers, and measures to reduce the volumes of waste generated at this facility. All hazardous waste will be accumulated and manifested for disposal as required by law.

Pollution Incident Prevention Measures

Hazardous wastes will be stored away from open drains. The storage area will be blotted with absorbent material and placed in a separate, labeled container and disposed of as solid hazardous waste. In the event of the release of a large or unknown volume of material the POLLUTION INCIDENT RESPONSE STEPS presented in this plan and posted at the facility are to be followed.

Used Oil

Any used oil will be collected and disposed of properly.

Pollution Incident Prevention Measures

Used oil will be stored in a closed container. Stored away from open drains and bare grounds. In the event of the release of a large or unknown volume of material the POLLUTION INCIDENT RESPONSE STEPS presented in this plan and posted at the facility are to be followed.

POLLUTING MATERIALS STORED IN SMALL QUANTITIES - ON AN AVERAGE

The Central Maintenance Facility stores several chemical products in small quantities. Among these are:

15-W-40 Motor Oil.....	84 quarts
Permanent Anti-Freeze	12 gallons
Air Brake Anti-Freeze	2 gallons
Dry Gas.....	24 pints
Flow Master Diesel Fuel Conditioner	27 quarts
Hydraulic oil.....	5 gallon
5.5 oz bottles/bars leaks.....	3
12 oz bottles/Rust Inhibitor.....	1
Brake Fluid	2 gallons
Liquid Wrench.....	3 gallons
Thread Cutting Oil.....	3 gallons
Kilfrost.....	4 gallons
Chassis Grease	40 tubes
Gunk	5 gallons
Liquid Hand Cleaner.....	4 gallons
4 lb. Boxes/Powdered Car Wash.....	2
22 oz. Bottles/Glass Cleaner	9
Glass Cleaner.....	3 gallons
80 oz. boxes/Powered Hand Cleaner	4
16 oz. Boxes/Soilax	5
Toilet bowl cleaner	8 quarts
Wax Stripper.....	4 gallons
Germicidal Cleaner.....	3 gallons
Lemon Oil Furniture Polish.....	3 gallons
Water Soluble Cutting Oil	5 gallons
Floor Cleaner	5 gallons
Degreaser.....	15 gallons
Windshield Washer Solvent.....	20 gallons
ZAP Parts Cleaner	5 gallons
Linseed Oil	5 gallons
Sparsol Form Oil.....	10 gallons
Thoroclear Cement Sealer	1 gallon
Tar Remover.....	1 gallon
Quick Start	3 cylinders
Roofing Tar - Trowel.....	30 gallons
Roofing Coating - brush	5 gallons
Aluminum Paint.....	10 gallons
Enamel Paint.....	10 gallons
Acrylic Paint.....	4 gallons
Xylol - Paint Reducer	8 gallons
12 oz cans/LPS 1	12
12 oz cans/LPS 2	12
12 oz cans/LPS 3	12
12 oz cans/CRC	12
12 oz cans/WD-40	12
12 oz cans/Inhibisol	24
12 oz cans/Various Colors of Paint.....	72
Never Seez.....	24 tubes
Starting Fluid.....	6 pints
½ pt can/Chain Saw Oil/ gas.....	24
Chain Saw Oil - Bar lube	2 gallons
Paint Thinner	7 gallons
Acetone.....	12 quarts
Mineral Spirits	1 Gallon
Shellac	1 gallon
Paint.....	20 gallons
Turpentine.....	2 gallons
Yellow Marking Paint (spray cans)	10 cans

EVACUATION PLAN

(To be posted at the facility)

1. Employers will be given notification either verbally or by mobile radio.
2. All employees will be evacuated to an area outside the front gate.
3. An employee will be assigned to the front of the property to keep out unauthorized persons.
4. The front gate will be locked after all employees have been accounted for.
5. A sign will be placed on the front gate declaring the area contaminated.

**POLLUTION INCIDENT PREVENTION PLAN
(PIPP)**

July 2002

FOR

MENOMINEE COUNTY ROAD COMMISSION

**W5416 BELGIUMTOWN ROAD
STEPHENSON, MICHIGAN 49887
TELEPHONE; (906) 753-6914
FAX: (906) 753-4319**

Primary Emergency Coordinator
Darrell W. Moilanen, Engr./Mgr.

Alternate Emergency Coordinator
John St. Juliana, Construction Superintendent

ADOPTED : 8/13/02
EFFECTIVE : 8/13/02

TABLE OF CONTENTS

POLLUTION INCIDENT PREVENTION PLAN	1
TABLE OF CONTENT	2
PART 5 GENERAL RULES.....	3
M.C.R.C. EMERGENCY CONTACT TELEPHONE NUMBERS.....	4
EMERGENCY RESPONSE AGENCIES.....	5
M.C.R.C. EMERGENCY SERVICES.....	6
POLLUTION EMERGENCY ALERTING SYSTEM (PEAS).....	7
FACILITY ADDRESSES.....	8
EMERGENCY EQUIPMENT.....	9
INTRODUCTION AND PURPOSE.....	10
SITE MAP (STEPHENSON GARAGE).....	11
AERIAL VIEW OF STEPHENSON GARAGE AND PROPERTY.....	12
STEPHENSON FACILITY.....	13
DESCRIPTION OF OPERATION	14-15
LIST OF MATERIALS STORED.....	16-19
SITE MAP (MENOMINEE GARAGE).....	20
AERIAL VIEW OF MENOMINEE GARAGE.....	21
MENOMINEE FACILITY.....	22
DESCRIPTION OF OPERATION	23-24
LIST OF MATERIALS STORED.....	25-26
SITE MAP (POWERS GARAGE).....	27
AERIAL VIEW OF POWERS GARAGE.....	28
POWERS FACILITY.....	29
DESCRIPTION OF OPERATION.....	30-31
LIST OF MATERIALS STORED.....	32
LOADING AND UNLOADING OF MATERIALS.....	33
EVACUATION PLAN.....	34
SECONDARY CONTAINMENT.....	35
MATERIAL SAFETY DATA SHEETS.....	

This Pollution Incident Prevention Plan has been prepared by the Menominee County Road Commission in accordance with Part 5 of the General Rules established by the Water Resources Commission under the authority of Section 5 of Act 245 of the Public Acts of 1929 as amended.

The Menominee County Road Commission has three district garages. Each district garage also has a Salt, Sand/Salt storage facility. All locations will be governed under the same PIPP.

This plan is kept on file in the Engineer Manager's Office, the Construction Superintendent's office, and the office of each District Foreman. Each employee should become familiar with it, and be able to follow the instructions posted at each facility in the unlikely event of an emergency. This plan will be reviewed and/or amended as required by facility and/or operational changes.

MENOMINEE COUNTY ROAD COMMISSION EMERGENCY CONTACT TELEPHONE NUMBERS

Menominee District Garage

1. Gary Olson / District Foreman
wk (906) 863-5100 hm (906) 863-4716
2. Gerald Beattie
wk (906) 863-5100 hm (906) 863-8398
3. Roger Leyo
wk (906) 863-5100 hm (906) 863-5275
4. Darrell W. Moilanen, Engineer-Mgr.
wk(906) 863-5100 hm (906) 864-2669
5. John St. Juliana, Const. Supt.
wk (906) 863-5100 hm (906) 753-4762

Stephenson District Garage

1. Duane Schultz/District Foreman
wk (906) 753-6914 hm (906) 753-2159
2. Robert Hanson
wk (906) 753-6914 hm (906) 753-2767
3. Leonard Kosewski
wk (906) 753-6914 hm (906) 863-9782
4. Darrell W. Moilanen, Engr.-Mgr.
wk(906) 753-6914 hm (906) 864-2669
5. John St. Juliana, Const. Supt.
wk (906) 863-5100 hm (906) 753-4762

Powers District Garage

1. Raymond Betters/District Foreman
wk (906) 497-5234 hm (906) 497-5835
2. Mike Arnold
wk (906) 497-5234 hm (906) 497-5760
3. Randy Poupore
wk (906) 497-5234 hm (906) 497-5010
4. Darrell W. Moilanen, Engr.-Mgr.
wk (906) 753-6914 hm (906) 864-2669
5. John St. Juliana, Const. Supt.
wk (906) 863-5100 hm (906) 753-4762

EMERGENCY RESPONSE AGENCIES

POLICE

STATE Stephenson Post 911- (906) 753-2275
Stephenson, Michigan -49887

MENOMINEE COUNTY SHERIFF 911- (906) 863-4441
831 10th Avenue
Menominee, Michigan -49858

FIRE

Menominee 911- (906) 863-5511
Stephenson 911
Powers 911

AMBULANCE

Hermansville Rescue 911
W468 1st St.
Hermansville MI 49847

Faithorn Rescue 911

Mid County Rescue 911
P.O. Box 468
Stephenson MI 49887

Emergency Rescue Squad 911
P.O. Box 547
Marinette WI 54143

HOSPITAL

Bay Area Medical Center (715) 735-6621
3100 Shore Drive
Marinette WI -54143

HEALTH DEPARTMENT

Delta Menominee District (906) 863-4451
909 10th Ave.
Menominee MI 49858

MDNR/DEQ

Department of Environmental Quality District Office (906) 228-6568
Waste Management Division
Marquette, Michigan 49855

Pollution Emergency Alerting System (PEAS) 1-800-292-4706

EMERGENCY COORDINATOR

Debra Wormwood (906) 863-6614
2509 10th St.
Menominee MI 49858

DEPARTMENT OF EMERGENCY MANAGEMENT

Marge Braumschreiber (906) 863-9817

DEPARTMENT OF ENVIRONMENTAL HEALTH

(906) 863-4451

These agencies have been offered the opportunity to review this plan and to schedule an onsite visit to evaluate its adequacy

MENOMINEE COUNTY ROAD COMMISSION EMERGENCY SERVICES

CONSULTING ENVIRONMENTAL ENGINEER

Wilcox Professional Services, LLC
3500 Ludington St., Suite 310
Escanaba, Michigan 49829
(906) 789-7800

Bittner Engineering Inc.
113 So. 10th Street
Escanaba, Michigan 49829
(906) 789-1511

MENOMINEE COUNTY ROAD COMMISSIONERS

William Anderson, Chairman
Judy A. Nerat, Vice Chairman
Donald LeBeau, Member

ENVIRONMENTAL CLEAN UP SERVICES

U.P. Environmental Services
Bark River, Michigan
(906) 466-9900

*** IN CASE OF EMERGENCY CALL ***

Pollution Emergency Alerting System (PEAS)

1-800-292-4706

OR

DEPARTMENT OF ENVIRONMENTAL QUALITY
DEQ ENVIRONMENTAL RESPONSE
WASTE MANAGEMENT DIVISION
1990 U.S. HWY 41 SOUTH
MARQUETTE, MICHIGAN 49855
(906) 228-6568

POLLUTION INCIDENT RESPONSE

Should a spill or leak of salt, oil or other polluting material occur, the following EMERGENCY RESPONSE PROCEDURES (ERP) are to be followed. These procedures are to be posted at Menominee, Stephenson and Powers facilities.

1. Notify the appropriate Supervisor.
2. Assess the situation; (utilizing Hazardous Placards, Material Safety Data Sheets, etc.) follow all health and safety precautions warranted by the material and conditions of the situation.
3. Should there be any reason to believe that the polluting material threatens the safety or health of employees, or surrounding residents, evacuate the area, notify emergency response personnel and follow their instructions.
4. Should there be any reason to believe the polluting material may reach the waters of surrounding streams, rivers, or lakes notify the POLLUTION EMERGENCY ALERTING SYSTEM AT
1-800-292-4706
5. Take steps to minimize the release of polluting material to the environment:
DO NOT FLUSH WITH WATER UNLESS DIRECTED TO DO SO.
 - a.) Shut off valves, plug leaks, pump tanks, use any step to stop the release of material.
 - b.) Dike or absorb the material using sand or other product designed for that specific material.
 - c.) Plug all drain inlets and outlets.
 - d.) Redirect flows to a holding area.
6. Notify the MDEQ District Office (906-228-6568) of the spill or leak, and make arrangements with the Consulting Environmental Engineer for proper clean-up and disposal of contaminated material.
7. Clean and service all emergency equipment used. Replenish absorbent material. Perform maintenance on all contaminated systems.
8. Make full record of incident including date, time, amount and type of material, and response taken.
9. If the MDEQ Pollution Emergency Alerting System staff has not been notified, do so within 10 days of incident with the following information:
 - a.) facility name and location
 - b.) description and quantity of material involved
 - c.) time and date of incident
 - d.) assessment of damage and response taken
 - e.) remedial action planned if necessary
10. Review PIPP/HWCP for necessary changes to improve it's effectiveness.

FACILITY ADDRESSES

A. FACILITIES OF THE MENOMINEE COUNTY ROAD COMMISSION

Menominee Facility
3224 10th St.
Menominee MI 49858

Stephenson Facility
W5416 Belgiumtown Rd.
Stephenson MI 49887

Powers Facility
W3850 US 2/41
Powers MI 49874

B. FACILITY DESCRIPTION AND OPERATIONS

The Menominee County Road Commission is a maintenance/construction operation with one main garage (Stephenson) and two outlying garages (Menominee and Powers). The Road Commission is responsible for the annual maintenance and construction programs for a 1,173 mile system (Primary Roads = 442 miles, Local Roads = 731 miles). To properly implement our programs, it is necessary to use and store a certain amount of hazardous chemicals. These facilities are all small quantity generators of hazardous waste.

EMERGENCY EQUIPMENT

The Powers, Stephenson and Menominee facilities will be maintained and operated to minimize the possibility of a fire, explosion or the release of polluting materials. The following communications, fire protection, spill control and clean up equipment is available on site in case of an emergency. This equipment will be inspected and maintained as necessary; to assure its proper operation if a pollution incident should occur.

	<u>Description</u>	<u>Testing / Maintenance</u>
1.	Telephone	Used Daily
2.	Two Way Radio	Maintenance as required
3.	Portable Fire Extinguishers	Inspected monthly
4.	Absorbent Material	Replenish as needed
5.	Hand Shovels	Repair or replace as needed
6.	Squeegees and Brooms	Repair or replace as needed
7.	Front End Loader	Service and/or repair as needed
8.	Eye Wash	Inspected monthly
9.	First Aid Kit	Replenish as needed
10.	Fuel Monitoring System (Stephenson & Powers)	Inspected monthly
11.	Stephenson District floor drain 1,000 gallon tank	Pump as needed

INTRODUCTION AND PURPOSE

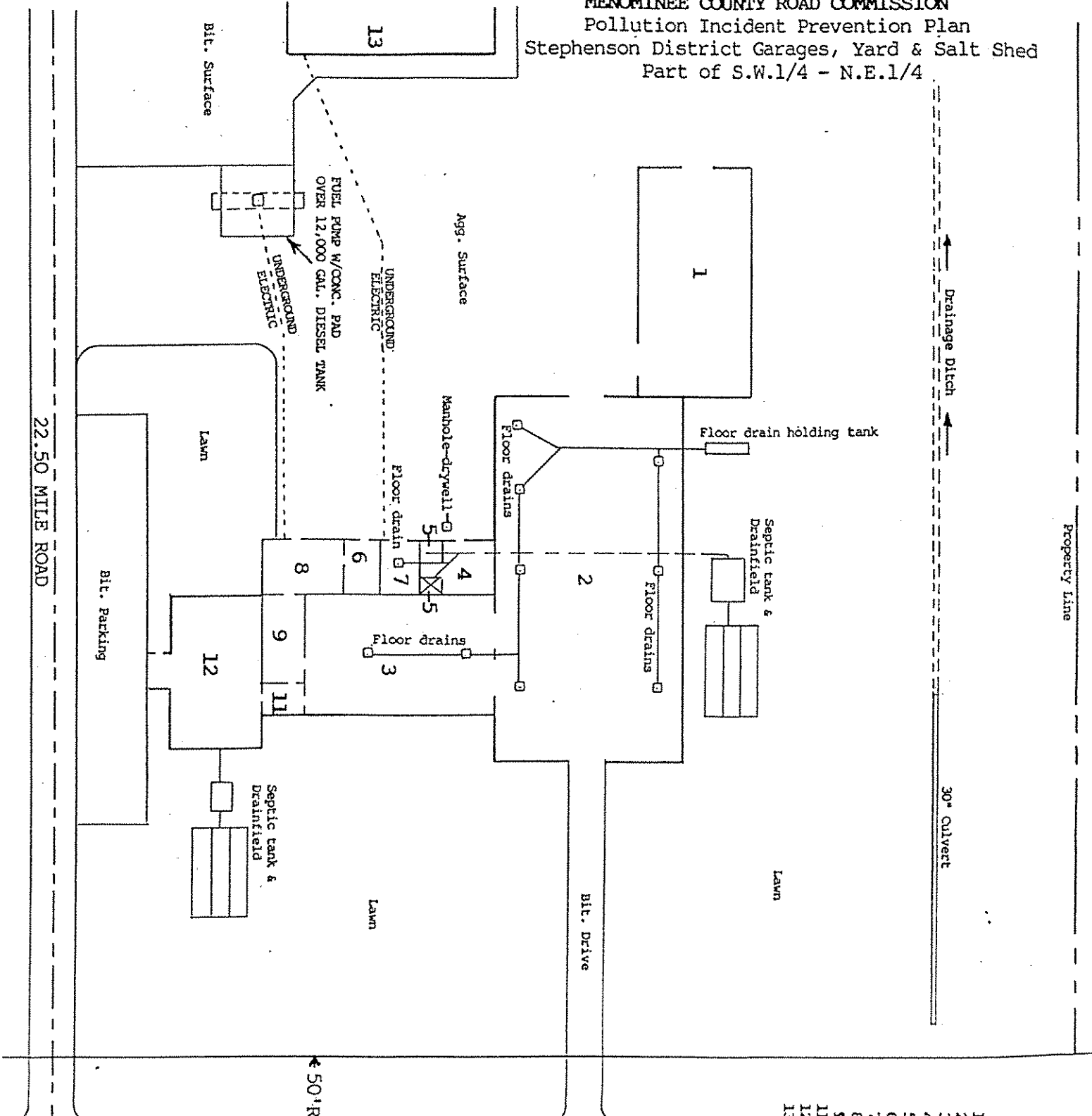
The intent of this Plan is to prevent accidental spills of any and all polluting materials that the Road Commission utilizes that are known to be a source of contamination when reaching the air, land, or waters of the State and may endanger public health or wildlife.

The purpose of this Plan is to identify the potential polluting materials and to provide procedures which must be followed if accidental spills of these polluting materials occur.

All Road Commission supervisory personnel will be familiar with the Plan. All employees should have a basic knowledge of the Plan and what action is to be taken.

This Plan is in compliance with Part V of the General Rules of the Water Resources Commission, which became effective March 21, 1973, and the Federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980.

MENOMINEE COUNTY ROAD COMMISSION
 Pollution Incident Prevention Plan
 Stephenson District Garages, Yard & Salt Shed
 Part of S.W.1/4 - N.E.1/4



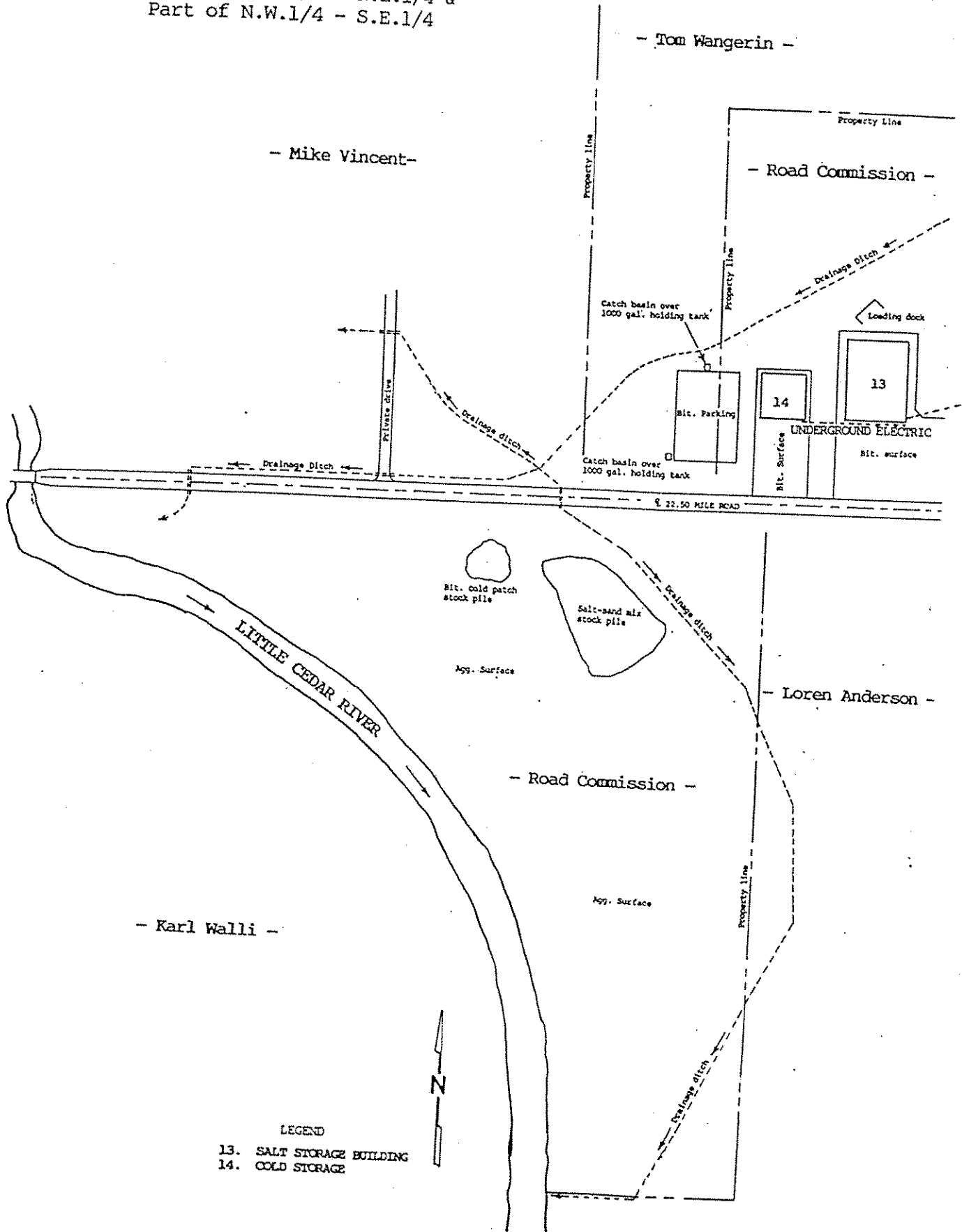
22.50 MILE ROAD

50' R/W ← → 50' R/W →

U.S. 41

- LEGEND
- 1. COLD STORAGE
 - 2. HEATED GARAGE
 - 3. HEATED SHOP
 - 4. LUNCH ROOM
 - 5. TOILET & SHOWER
 - 6. OIL ROOM
 - 7. BOILER ROOM
 - 8. SIGN SHOP
 - 9. STOCK ROOM
 - 11. OFFICE
 - 12. OFFICE
 - 13. SALT STORAGE BUILDING

MENOMINEE COUNTY ROAD COMMISSION
 Pollution Incident Prevention Plan
 Stephenson District Garages, Yard & Salt Shed
 Part of S.W.1/4 - N.E.1/4 &
 Part of N.W.1/4 - S.E.1/4



- LEGEND
- 13. SALT STORAGE BUILDING
 - 14. COLD STORAGE

STEPHENSON FACILITY

Located on Highway US-41 approximately 1.5 miles north of Stephenson, Michigan, the facility consists of the main business offices for the Road Commission, the Engineering Department, a Repair facility for County Road Commission vehicles, a Sign shop and a vehicle storage garage area to service the central portion of Menominee County. Located west of the garage facility there is a bulk salt storage facility. South of the salt storage facility is an exterior area for the mixing and stockpiling of 3,000 CY of sand/salt (volume varies, seasonal).

All wastewater, storm-water and sanitary sewage from the repair facility, offices and garages are drained into the appropriate storm and sanitary sewer facilities. The floor drains are drained into a 1,875 gallon holding tank which is pumped out as needed.

The salt storage facility was constructed in 1998 and is 70' x 90' concrete/wood structure designed to contain 1500 tons of bulk salt. All material handling is done inside the storage building.

DESCRIPTIONS OF OPERATIONS AT THE FACILITY

The Stephenson District offers a full service garage capable of complete heavy equipment overhauls. Mostly minor and light repairs are done at the other districts. In general, the equipment listed below is what is maintained at the Stephenson Garage. Much of the equipment listed is shared with the Menominee and Powers Districts, depending on their needs and equipment stored at their own facility.

1. Storage of Maintenance and Construction Equipment

QTY	EQUIPMENT	QTY	EQUIPMENT
a. 5	Salt/Sand/Plow Trucks - Stephenson	x. 1	Backhoe Cat 235
b. 4	Graders	y. 1	Wheeled Backhoe Cat M318
c. 4	Front End Wheeled Loaders	z. 1	Cement Mixer (Portable)
d. 6	Pickup Trucks & Van	aa. 1	Portable Generator
e. 1	1 Ton Single Axle Dump Truck w/Broom & Salter	ab. 1	John Deere Lawn Mower LX176
f. 2	Mowing Tractors	ac. 1	Rubber Belted Gravel Stacker
g. 6	Track Dozers	ad. 1	Gravel Crusher
h. 2	Distributer Trucks	ae. 1	3/4 Ton Welding Truck
I. 1	Rubber Tire Roller	af. 1	Boom Truck (2 Ton)
j. 5	Tractor - Trucks	ag. 1	Pressure Washer
k. 2	Dump Trailers	ah. 1	Wrecker Truck
l. 2	Bottom Dump Trailers	ai. 1	Fuel Lube Truck
m. 1	2 Ton Sign Post Installation Truck	aj. 1	Chevy Tahoe S.U.V.
n. 1	2 Axle Boiler Truck	ak. 2	4 Door Cars
o. 2	Water Tank Trailers	al. 1	12' Jon Boat
p. 2	Low-Boy Trailer	am. 1	Crusher Power Plant
q. 4	Water Pumps	an. 1	8' X 16' Storage Wagon
r. 2	Fork Lift	ao. 1	36' 5th Wheel Storage Trailers
s. 1	5 Ton Crane	ap. 1	Crusher Operator Booth
t. 1	1 Ton Single Axle Parts Truck	aq. 3	Arrow Warning Sign Board
u. 1	Chip Spreader	ar. 1	280 Michigan Wheeled Loader
v. 1	Mulch Machine	as. 1	Single Axle Salt Truck
w. 1	Brush Chipper	at. 1	40' 5th Wheel Tool Trailer
		au. 1	Iron Mule Skidder

MENOMINEE COUNTY ROAD COMMISSION - Stephenson Facility
Pollution Incident Prevention Plan
July 2002

2. Storage of Maintenance Materials

- | | | | |
|----|--|-----|--|
| a. | Grader and plow blades, shoes, bolts, etc. | o. | Tires, tubes, tire chains and rims |
| b. | Small tools (shovels, rakes, power saws, etc.) | p. | Salt and Chloride Sand |
| c. | Gasoline, diesel fuel, liquid propane | q. | Paint Cans |
| d. | Lubricating products (oils, greases, hydraulic fluids) | r. | Oxygen and acetylene |
| e. | Gravel and bituminous cold patch material | s. | Culverts, road signs, wood and metal post, guardrail |
| f. | C-23 Crack Filler | t. | Type II and Type III Barricades |
| g. | Survey stakes (Wood) | u. | Cement |
| h. | Silt Fence | v. | Orange safety fence |
| I. | Woven wire fence | w. | Barbed wire |
| j. | Anti freeze | x. | Cable |
| k. | Guardrail hardware | y. | Crusher screens |
| l. | Dump box lumber | z. | Assorted spools hydraulic hose |
| m. | Nuts, bolts, and washers | aa. | Oil, fuel, and hydraulic filters |
| n. | Sign fabricating materials | ab. | Brake drums |

3. Refueling of Equipment

- a. Service station type electric pumps

4. Repair and Servicing of Equipment

- a. Engine, transmission, differential, clutch, brake, tire changing, repair, etc.
B. Lubrication, oil, filter
c. Pumps, motors
d. Metal fabrication
e. Sign fabrication
f. Electrical and hydraulic parts
g. Cutting and welding

5. Washing and Cleaning Equipment and Parts

- a. Power spraying method

LIST OF MATERIALS STORED AT THE FACILITY

The following materials are stored at the facility see the location map on pages 12a and 12b for the exact area where materials are stored.

1. Diesel fuel stored in one underground tank, monitored by the Auto Stik, JR-4 System, and keyed by the Petro Vend System.
 - a. 12,000 Gallons
2. Oils and Grease
 - a. 4 275 Gallon Tanks - Area #6
(1 each: 85/140 grease, THP Trans. Oil, 15/40 motor oil, Hydraulic oil)
 - b. 5 55 Gallon Barrels - Area #6
(1 each: 75/90 gear lube, S.A.E. 50 Syn. Trans. Lube, #46 Hyd. Oil, TD 4 Trans. Fluid, ATF Oil)
 - c. 1 120# Barrel XHP Grease - Area #6
 - d. 3 2 ½ Gallon Jugs Winter Diesel Treatment - Area #6
 - e. 1 120# Barrel 85/140 Grease - Area #3
 - f. 1 120# Barrel Rycotac Grease - Area #3
 - g. 1 55 Gallon Barrel 15/40 Oil - Area #2
 - h. 1 55 Gallon Barrel THP Trans. Oil - Area #2
 - I. 1 55 Gallon Barrel ATF Hyd. Oil - Area #2
 - j. 1 55 Gallon TD 4 Trans. Fluid - Area #2
3. Bio Act (Asphalt Stripping Agent) -
 - a. 1 55 Gallon Barrel - Area #6
 - b. 1 5 Gallon Jug - Area #8
4. Brake Fluid
 - a. 1 one Gallon Can - Area #3
 - b. 2 one Gallon Cans - Area #9
5. Herbicide
 - a. 1 One Gallon Jug - Area #6
6. Toilet Cleaner
 - a. 1 Five Gallon Can - Area #6
7. Anchoring Cement
 - a. 1 Five Gallon Can - Area #6
8. C-23 Crack Filler
 - a. 24 55 Gallon Barrels - Area #1

MENOMINEE COUNTY ROAD COMMISSION - Stephenson Facility
Pollution Incident Prevention Plan
July 2002

9. Paint
 - a. 10 One Gallon Cans - Area #6
 - b. 12 One Gallon Cans - Area #9
10. Anti-Freeze
 - a. 1 55 Gallon Barrel - Area #2
11. Calcium Chloride (Dust control - Spring and Summer only)
 - a. 14,000 Gallons in 5th wheel trailer - Area #2
12. Calcium Chloride (Dust Control, Spring and Summer only)
 - a. +/- 300 Gallons in each of two distributor trucks.
13. Ice Control Salt - Stored in a 70' X 90' concrete building with a 3" Bituminous Floor.
 - a. +/- 2,500 tons
14. Salt/Sand mixture for ice control - Stored across the 22.50 mile Road and west of the Garage
On an aggregate pad.
 - a. +/- 2,000 cyds
15. Bituminous Cold Patch Material - Stored across the 22.50 Mile Road and west of the Garage
On a Aggregate Pad.
 - a. +/- 75 Ton
16. Chain Saw Gasoline and Chain Bar Oil - Stored in marked 3' w X 6' h X 1' d Cabinet - Area #2
 - a. +/- 20 Gallons Gasoline
 - b. 3 Gallons Chain Bar Oil
17. Propane
 - a. 3 20# Propane Tanks - Area #2
18. Oxygen/Acetylene Torch
 - a. One tank each - Area #3
19. Oxygen/Acetylene Tanks
 - a. Two (2) of each stored outside between Areas #1 and #2
20. Parts Washer
 - a. Holds + or - 15 gallons Mineral Spirits Solvent - Area #3
The solution and bottom material is picked up by supplier and recycled by
U.P. Environmental Service in Bark River- Telephone (906) 466-9900 or
1-800-624-6086
21. Deck Stain
 - a. 4 One gallon cans - Area #7
22. Aerosol Paint
 - a. 150 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 83 20 oz. Cans in locked 3' X 4' X 1' Cabinet - Area #9 (downstairs)

MENOMINEE COUNTY ROAD COMMISSION - Stephenson Facility
Pollution Incident Prevention Plan
July 2002

23. Aerosol Glass Cleaner
 - a. 18 20oz. Cans on shelves - Area #9 (upstairs)
 - b. 9 20 oz. Cans in locked 3' X 4' 1' Cabinet - Area #9 (downstairs)
24. Aerosol Brake Cleaner
 - a. 24 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 15 20 oz. Cans in locked 3' X 4' X 1' cabinet - Area #9 (downstairs)
25. Aerosol Dry Graphite Lube
 - a. 12 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 12 20 oz. Cans in locked cabinet - Area #9 (downstairs)
26. Aerosol Anti-Rust
 - a. 6 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 12 20 oz. Cans in locked 3, X 4' X 1' cabinet - Area #9 (downstairs)
27. Aerosol Paint and Gasket Remover
 - a. 6 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 3 20 oz. Cans in locked 3' X 4' X 1' cabinet - Area #9 (downstairs)
28. Aerosol Penetrating Lube
 - a. 24 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 12 20 oz. Cans in locked 3' X 4' X 1' cabinet - Area #9 (downstairs)
29. Aerosol Carborator and Choke Cleaner
 - a. 12 20 oz. Cans on shelves - Area #9 (upstairs)
 - b. 9 20 oz. Cans in locked 3' x 4' X 1' cabinet (downstairs)
30. Aerosol Rubberized Undercoat
 - a. 18 20 oz. Cans on shelves - Area #9 (upstairs)
31. Calcium Carbide
 - a. 25 1 pint cans in cardboard box - Area #1
32. Nuclear Asphalt Content Gage
 - a. 1 in locked steel cabinet - Area #9 (upstairs)
33. Nuclear Density Gage
 - a. 1 in locked steel cabinet - Area #9 (upstairs)
34. Waste Oil
 - a. Stored in a 500 gallon, above ground tank that is located outside on the West end of Area #2. This tank is systematically emptied by a licensed Company: U.S. Oil Company, Inc. - 425 S. Washington St., Combined Locks, Wisconsin 54113 Telephone for Waste Oil Pickup: 1-800-490-4900

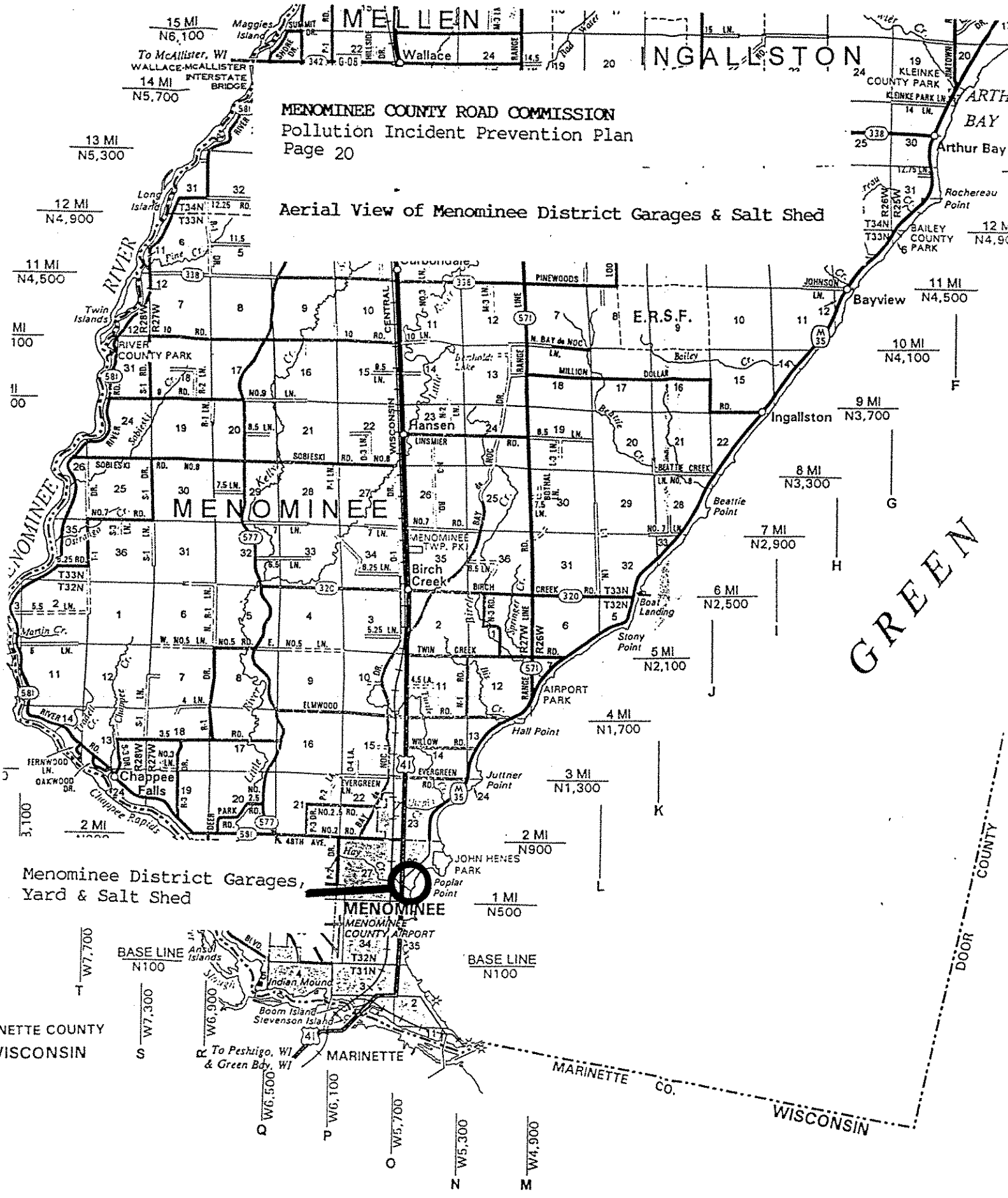
MENOMINEE COUNTY ROAD COMMISSION - Stephenson Facility
Pollution Incident Prevention Plan
July 2002

35. Floor drain concrete holding tank 1,875 gallons
 - a. Located underground, outside, on the north side of Area #2
This tank is systematically emptied by a licensed company:
Scott's Septic Tank Service- W 5196 Co. Rd. #346,
Wallace, Michigan 49893 Telephone (906) 788-4694

MENOMINEE DISTRICT

MENOMINEE COUNTY ROAD COMMISSION
Pollution Incident Prevention Plan
Page 20

Aerial View of Menominee District Garages & Salt Shed



Menominee District Garages,
Yard & Salt Shed

MENOMINEE
MENOMINEE COUNTY AIRPORT

NETTE COUNTY
/ISCONSIN

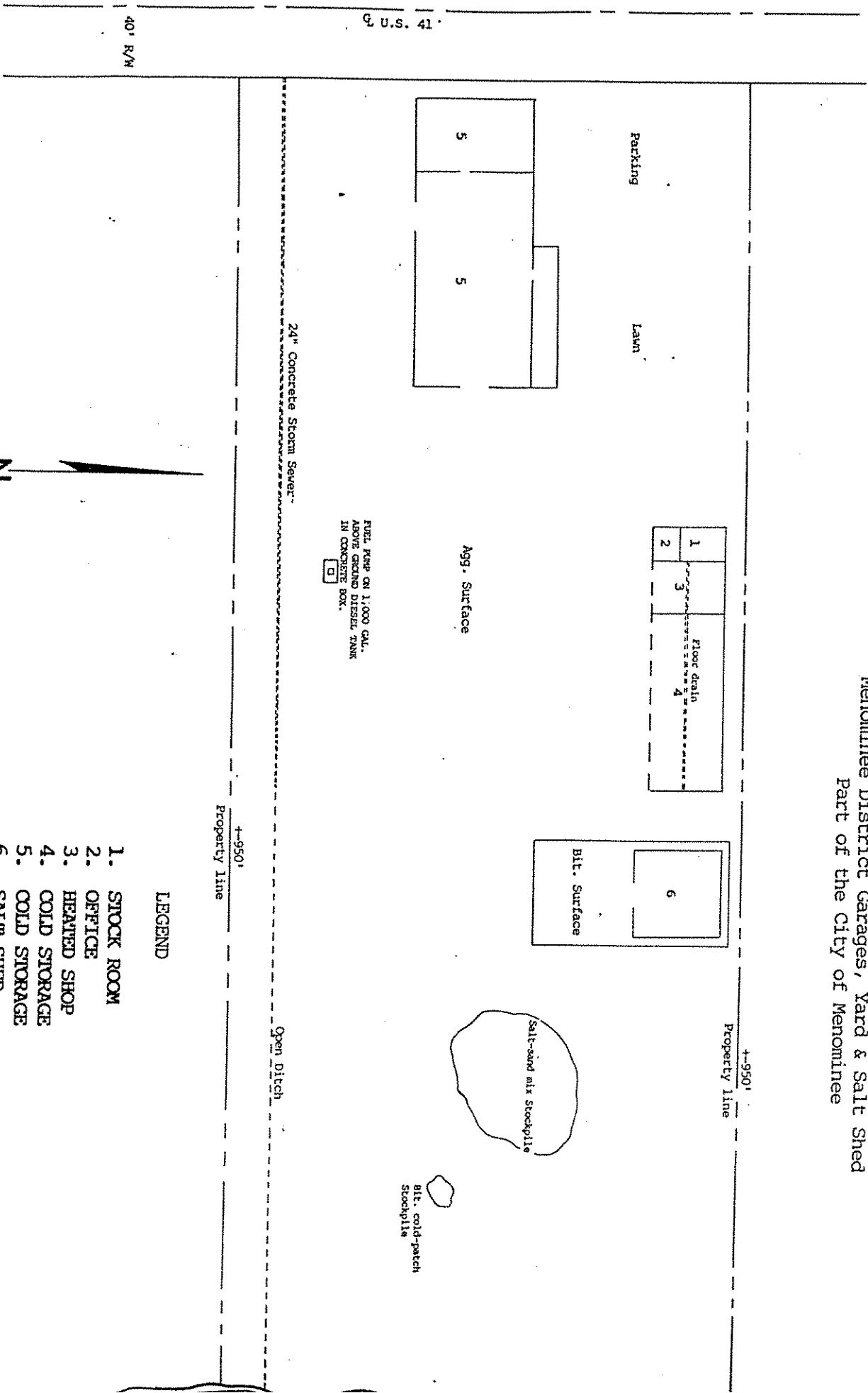
MARINETTE CO.

WISCONSIN

GREEN

DOOR COUNTY

MENOMINEE COUNTY ROAD COMMISSION
Pollution Incident Prevention Plan
Menominee District Garages, Yard & Salt Shed
Part of the City of Menominee



- LEGEND**
- 1. STOCK ROOM
 - 2. OFFICE
 - 3. HEATED SHOP
 - 4. COLD STORAGE
 - 5. COLD STORAGE
 - 6. SALT SHED

MENOMINEE FACILITY

Located off of Highway US-41 in the City of Menominee, the facility consists of a Repair facility for County Road Commission vehicles and a vehicle storage garage area to service the southern portion of Menominee County. Located east of the garage facility there is a bulk salt storage facility. South of the salt storage facility is an exterior area for the mixing and stockpiling of 3,000 CY of sand/salt (volume varies, seasonal).

All wastewater, storm-water and sanitary sewage from the repair facility is drained into the appropriate storm and sanitary sewer facilities of the City of Menominee.

The salt storage facility was constructed in 1970 and is 50' x 50' wood structure designed to contain 400 tons of bulk salt. The area outside and the storage facility is kept clean from residual salt by mechanical efforts.

DESCRIPTIONS OF OPERATIONS AT THE FACILITY

The Menominee District offers a garage capable of only minor and light repairs. In general, the equipment listed below is what is maintained at the Menominee Garage. Much of the equipment listed is shared with the Stephenson and Powers Districts, depending on their needs and equipment stored at their own facility.

1. Storage of Maintenance and Construction Equipment

	QTY	EQUIPMENT
a.	4	Salt/Sand/Plow Trucks - Menominee
b.	3	Graders
c.	1	Front End Wheeled Loaders
d.	3	Pickup Trucks
e.	1	1 Ton Single Axle Dump Truck w/Broom
f.	1	Mowing Tractors
g.	1	Single Axle Boiler Trailer
h.	1	Fork Lift
i.	1	410E John Deere Backhoe
j.	1	Pressure Washer
k.	1	Arrow Warning Sign Board
l.	1	Single Axle Salt Truck
m.	1	Culvert Trailer

MENOMINEE COUNTY ROAD COMMISSION - Menominee Facility
Pollution Incident Prevention Plan
July 2002

2. Storage of Maintenance Materials

- a. Grader and plow blades, shoes, bolts, etc.
- b. Small tools (shovels, rakes, power saws, etc.)
- c. Gasoline, diesel fuel, liquid propane
- d. Lubricating products (oils, greases, hydraulic fluids)
- e. Gravel and bituminous cold patch material
- f. Anti Freeze
- g. Guardrail Hardware
- h. Nuts, bolts, and washers
- I. Tires, tubes, tire chains and rims
- j. Salt and Chloride Sand
- k. Paint Cans
- l. Oxygen and Acetylene
- m. Culverts & Road Signs
- n. Type II and Type III Barricades
- o. Oil, fuel, and hydraulic filters
- p. Brake drums

3. Refueling of Equipment

- a. Service station type electric pumps

4. Repair and Servicing of Equipment

- a. Engine, transmission, differential, clutch, brake, tire changing, repair, etc.
- b. Lubrication, oil, filter
- c. Pumps, motors
- d. Metal fabrication
- e. Electrical and hydraulic parts
- f. Cutting and welding

5. Washing and Cleaning Equipment and Parts

- a. Power spraying method

LIST OF MATERIALS STORED AT THE FACILITY

The following materials are stored at the facility see the location map on page 21 for the exact area where materials are stored.

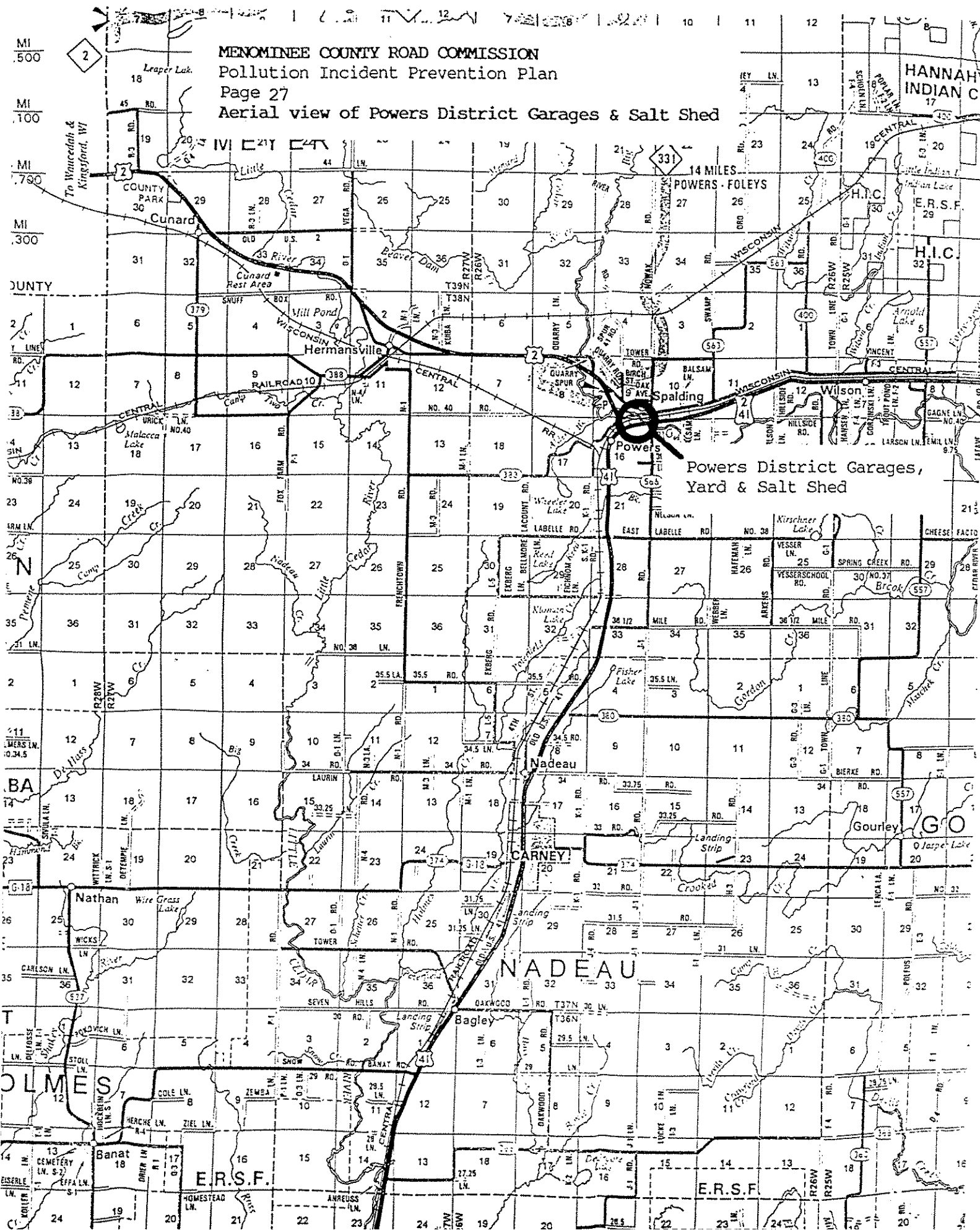
1. Diesel fuel is stored in one above ground tank, and keyed by the Petro Vend System.
 - a. 1,000 Gallons
2. Oils and Grease
 - a. 1 275 Gallon Tank Hyd. Oil - Area #4
 - b. 1 275 Gallon Tank THP - Area #3
 - c. 1 275 Gallon Tank 15W40 Oil - Area #3
 - d. 1 150 Gallon Tank, Waste Oil - Area #4
 - e. 1 55 Gallon Barrel 10W30 Oil - Area #4
 - f. 1 55 Gallon Barrel ATF Hyd. Oil - Area #2
3. Anti Freeze
 - a. 1 55 Gallon Barrel - Area #4
4. Oxygen/Acetylene Torch
 - a. One tank each - Area #3
5. Oxygen/Acetylene Tanks
 - a. One of each stored outside Area #2 under lock
6. Paint
 - a. 10 One Gallon Cans in 4'X4'X18" steel cabinet - Area #1
7. Chain Saw Gasoline
 - a. 2 Ten Gallon Cans in 4'X4'X18" steel cabinet - Area #1
8. Ice Control Salt- Stored in a 50' X 50' wood building with a 3" Bituminous floor.
 - a. + or - 500 tons
9. Salt/Sand mixture for ice control - stored on Aggregate Pad.
 - a. + or - 1,500 cyds
10. Bituminous Cold patch material - Stored on an aggregate Pad.
 - a. + or - 50 tons
11. Parts Washer
 - a. Holds + or - 15 gallons Mineral Spirits Solvent - Area #3
The solution and bottom material is picked up by supplier and recycled by U.P. Environmental Service in Bark River- Telephone (906) 466-9900 or 1-800-624-6086

MENOMINEE COUNTY ROAD COMMISSION - Menominee Facility
Pollution Incident Prevention Plan
July 2002

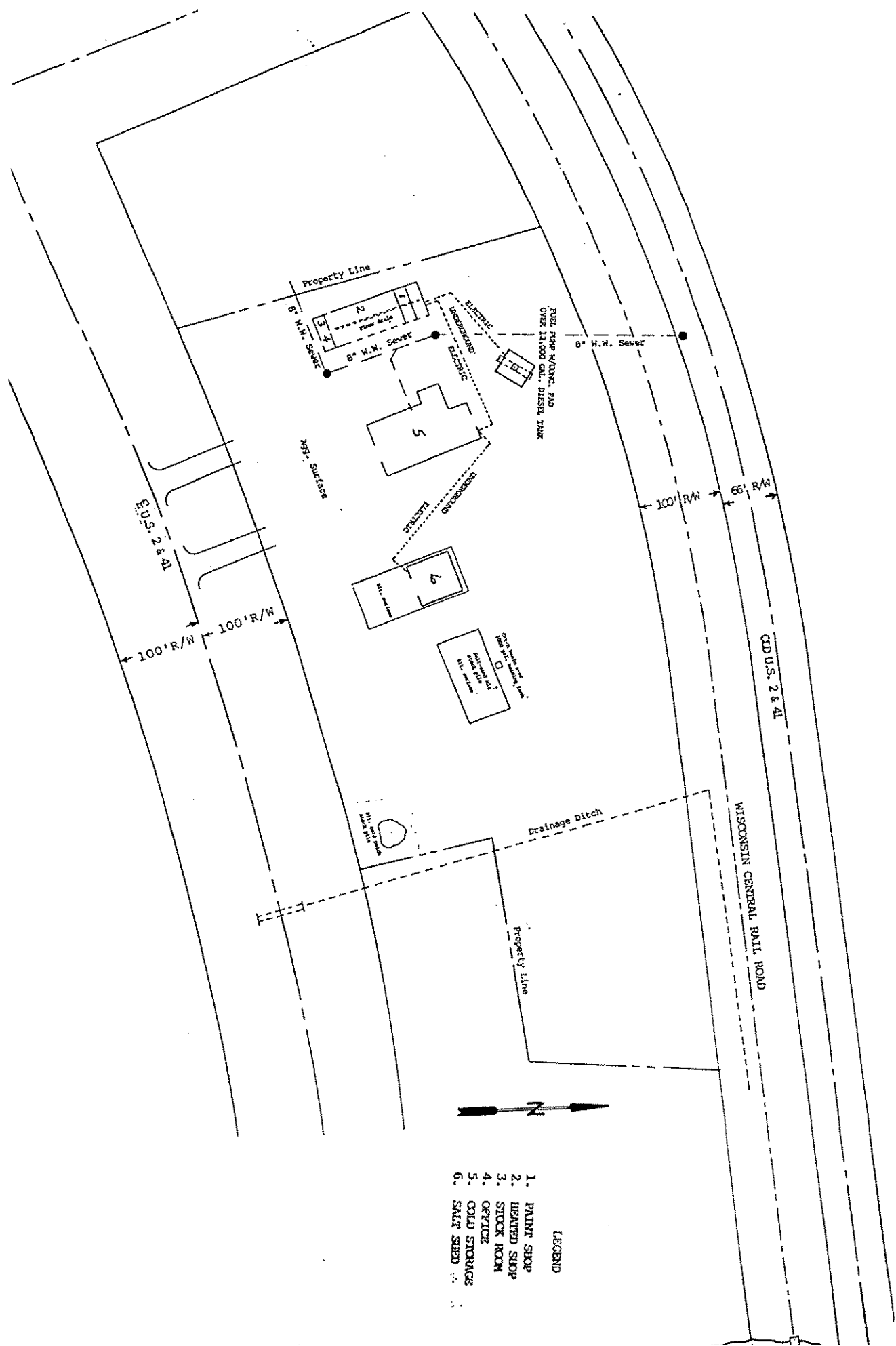
12. Aerosol Paint
 - a. 6 20 oz. Cans on shelf - Area #1
13. Aerosol Glass Cleaner
 - a. 5 20 oz. Cans on shelf - Area #1
14. Aerosol Carb. Cleaner
 - a. 10 20 oz. Cans on shelf - Area #1
15. Aerosol Brake Cleaner
 - a. 2 20 oz. Cans on shelf - Area #1
16. Aerosol Penetrating Lube
 - a. 4 20 oz. Cans on shelf - Area #1
17. Aerosol Graphite Lube
 - a. 5 20 oz. Cans on shelf - Area #1
18. Waste Oil
 - a. Stored in a 150 gallon, above ground tank that is located inside - Area #4
This tank is systematically emptied by a licensed Company: U.S. Oil Company, Inc
. 425 S. Washington St., Combined Locks,
Wisconsin 54113 Telephone for Waste Oil Pickup: 1-800-490-4900

MENOMINEE COUNTY ROAD COMMISSION
Pollution Incident Prevention Plan
Page 27

Aerial view of Powers District Garages & Salt Shed



MENOMINEE COUNTY ROAD COMMISSION
 Pollution Incident Prevention Plan
 Powers District Garages, Yard & Salt Shed
 Part of N.E.1/4 - N.E.1/4



- LEGEND
1. PAINT SHOP
 2. HEATED SHOP
 3. STOCK ROOM
 4. OFFICE
 5. COLD STORAGE
 6. SALT SHED

POWERS FACILITY

Located off of Highway US-2/41 near Powers, Michigan, the facility consists of a Repair facility for County Road Commission vehicles and a vehicle storage garage area to service the northern portion of Menominee County. Located east of the garage facility there is a bulk salt storage facility. East of the salt storage facility is an exterior area for the mixing and stockpiling of 3,000 CY of sand/salt (volume varies, seasonal).

All wastewater, storm-water and sanitary sewage from the repair facility is drained into the appropriate storm and sanitary sewer facilities of the Village of Powers.

The salt storage facility was constructed in 1970 and is 50' x 50' wood structure designed to contain 400 tons of bulk salt. The area outside and the storage facility is kept clean from residual salt by mechanical efforts.

DESCRIPTIONS OF OPERATIONS AT THE FACILITY

The Powers District offers a full service garage capable of complete heavy equipment overhauls. In general, the equipment listed below is what is maintained at the Powers Garage. Much of the equipment listed is shared with the Menominee and Stephenson Districts, depending on their needs and equipment stored at their own facility.

1. Storage of Maintenance and Construction Equipment

	QTY	EQUIPMENT
a.	7	Salt/Sand/Plow Trucks - Menominee
b.	2	Graders
c.	1	Michigan 75 Front End Wheeled Loaders
d.	3	Pickup Trucks
e.	1	1 Ton Single Axle Dump Truck w/Broom
f.	1	Mowing Tractors
g.	1	2 ton 1 axle Boiler Truck
h.	1	Fork Lift
I.	1	410E John Deere Backhoe
j.	1	Pressure Washer
k.	1	Single Axle Salt Truck
l.	1	Culvert Trailer
m.	1	Sand/Blaster Air compressor
n.	1	Tandem Axle Sander Truck
o.	1	2 Ton Single Axle Dump Salt Truck
p.	1	Truck-Tractor/5th wheel
q.	2	Tandem Axle 4 wd Sander Truck
r.	1	Bottom Dump 5th Wheel
s.	2	Push Lawn Mowers

MENOMINEE COUNTY ROAD COMMISSION - Powers Facility
Pollution Incident Prevention Plan
July 2002

2. Storage of Maintenance Materials

- a. Grader and plow blades, shoes, bolts, etc.
- b. Small tools (shovels, rakes, power saws, etc.)
- c. Gasoline, diesel fuel, liquid propane
- d. Lubricating products (oils, greases, hydraulic fluids)
- e. Gravel and bituminous cold patch material
- f. Anti Freeze
- g. Orange Safety Fence
- h. Nuts, bolts, and washers
- I. Tires, tubes, tire chains and rims
- j. Salt and Chloride Sand
- k. Paint Cans
- l. Oxygen and Acetylene
- m. Culverts & Road Signs
- n. Type II and Type III Barricades
- o. Oil, fuel, and hydraulic filters
- p. Cable
- q. Sand Blasting Sand

3. Refueling of Equipment

- a. Service station type electric pumps

4. Repair and Servicing of Equipment

- a. Engine, transmission, differential, clutch, brake, tire changing, repair, etc.
- b. Lubrication, oil, filter
- c. Pumps, motors
- d. Metal fabrication
- e. Electrical and hydraulic parts
- f. Cutting and welding

5. Washing and Cleaning Equipment and Parts

- a. Power spraying method

LIST OF MATERIALS STORED AT THE FACILITY

The following materials are stored at the facility see the location map on page 28 for the exact area where materials are stored.

1. Diesel fuel stored in one underground tank, monitored by the Auto Stik, JR-4 System, and keyed by the Petro Vend System.
 - a. 12,000 Gallons
2. Oils and Grease
 - a. 3 275 Gallon Tanks - Area #2
(1 each: THP Trans. Oil, 15/40 motor oil, Hydraulic oil)
 - b. 4 55 Gallon Barrels - Area #2
(1 each: 10/30 Oil, 80/40 Grease, Steamer Fuel, ATF Oil)
 - c. 1 120# Barrel XHP 222 Special Grease - Area #2
3. Anti Freeze
 - a. 1 55 Gallon Barrel - Area #1
4. Oxygen/Acetylene Torch
 - a. One tank each - Area #2
5. Oxygen/Acetylene Tanks
 - a. Two of each stored outside Area #1 under lock
6. Thinner
 - a. 4 Five Gallon Cans - Area #1
7. Sand Blasting Sand
 - a. 54 100# Bags - Area #5
8. Ice Control Salt- Stored in a 50' X 50' wood building with a 3" Bituminous floor.
 - a. + or - 500 tons
9. Salt/Sand mixture for ice control - stored on Aggregate Pad.
 - a. + or - 1,000 cyds
10. Bituminous Cold patch material - Stored on an aggregate Pad.
 - a. + or - 50 tons
11. Parts Washer
 - a. Holds + or - 15 gallons Mineral Spirits Solvent - Area #3
The solution and bottom material is picked up by supplier and recycled by U.P. Environmental Service in Bark River- Telephone (906) 466-9900 or 1-800-624-6086
12. Paint
 - a. 6 Five Gallon Cans - Area #1

LOADING AND UNLOADING OF MATERIALS

All materials are received by truck in liquid or solid form.

1. Liquid fuels are pumped from bulk wagon delivery trucks directly into underground tanks through filler pipes.
2. Grease and gear lube barrels are unloaded from semi-trucks to storage buildings.
 - a. Hydraulic and motor oils are pumped directly from a delivery truck to oil containers mounted in a stacked arrangement.
3. Salt is delivered in covered trailers, dumped onto the hard-surfaced pad in front of the salt shed and pushed and carried into the buildings with front end loaders.
 - a. The salt is removed from the buildings and loaded into spreader trucks for use.
The entire loading operation is conducted on the hard-surfaced pads.
4. The chlorided-sand is mixed in place on the hard-surfaced pads.
5. The bituminous aggregate cold-patch material is mixed off-site, delivered in trucks and dumped on an aggregate-surface area.

EVACUATION PLAN

1. Employees will be given notification either verbally, by intercom or by mobile radio.
2. All employees will be evacuated to an area outside the perimeter of the Road Commission property.
3. Employees will be assigned to the perimeter of the property to keep out unauthorized persons.
4. The area will be secured after all employees have been accounted for.
5. Signs will be placed around the site declaring the area contaminated.

SECONDARY CONTAINMENT

The Menominee County Road Commission has equipment that could be used, if necessary, to dike sand. Along with spill pads, floor dry is kept on hand in the Shop areas, which is adequate for absorbing spills.

The Menominee County Road Commission utilizes Wilcox Professional Services, LLC for professional environmental consulting and technical services to support spill response efforts. The benefits of developing a relationship with an environmental consultant include their familiarity with our sites, product usage and storage and methods of operation and mitigation. Environmental consultants may also act as first responders in the event that an incident does occur.

CLEAN UP EQUIPMENT AND SERVICES

The Road Commission has equipment [See EMERGENCY EQUIPMENT section] which could be utilized in a spill of any solid polluting material. If a spill of any polluting material occurred, proper equipment, clean up and disposal and any mitigation efforts would be taken by the Road Commission in conjunction with an environmental contractor and/or consultant if necessary. This would be done in a manner to properly take care of the problem with trained personnel and the proper equipment and assure that OSHA requirements are met.

WASTE HANDLING OF MATERIAL

In our opinion, there is no waste connected with the stocking and use of salt, diesel fuel, chloride sand, nor bituminous cold-patch materials. However, due to the servicing of equipment, the Road Commission does accumulate used motor oil, hydraulic fluid and gear lubrication.

These products are placed in the respective waste oil tanks located at each of the Road Commission facilities. Licensed waste haulers remove the material collected in the tanks in order to prevent the accumulation of waste materials.

Due to mechanical work conducted at each Road Commission facility, a parts washer is utilized. The spent chemical agents along with the bottom sludge are removed by the same company that supplies the recharge material.