

Appendix D

Sample PIPP and Weekly Facility Environmental Inspection for MDOT Maintenance Facility

MDOT EMERGENCY SERVICES

EMERGENCY MANAGEMENT COORDINATOR

Eileen Phifer

Work: (517) 373-1898
Home: (517) 323-7491
Cell: (517) 719-0505

Alternate Contact:

Connie Vallier

Work: (517) 241-2877
Home: (517) 647-2225
Cell: (517) 243-5609

REVISED: August 27, 2014
(MDL)

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

Michigan Department of Transportation
St. Ignace Maintenance Garage
500 Ferry Lane
St. Ignace, Michigan 49781
(906) 643-8700

Primary Emergency Coordinator

Douglas K. Noble
MDOT St. Ignace Maintenance Garage
500 Ferry Lane
St. Ignace, Michigan 49781
Work: (906) 643-8700
Home: (906) 643-9542
Cell: (906) 630-5498

Alternate Emergency Coordinator

Scott Matson
MDOT St. Ignace Maintenance Garage
500 Ferry Lane
St. Ignace, Michigan 49781
Work: (906) 643-8700
Home: (906) 643-0030
Cell: 906) 630-5600

MDOT Emergency Services

Eileen Phifer
MDOT VanWagoner Building
425 W. Ottawa
P.O. Box 30050
Lansing, Michigan 48933
Work: (517) 373-1989
Home: (517) 323-7491

Alternate

Connie Vallier
MDOT VanWagoner Building
425 W. Ottawa
P.O. Box 30050
Lansing, Michigan 48933
Work: (517) 241-2877
Home: (517) 647-2225

MDOT Communications Office

Daniel Weingarten
MDOT Ishpeming TSC
100 S. Westood Drive
Ishpeming, Michigan 49849
Work: (906) 485-4270

EPA ID NUMBER: MID980992333

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

EMERGENCY RESPONSE ACTIONS

To be posted near telephone and in material storage areas.

1. Quickly assess the situation.
2. Call emergency response agencies and/or evacuate if necessary.
3. Notify the facility emergency coordinator:

Douglas Noble
Work: (906) 643-8700
Home: (906) 643-9542
4. Notify the DEQ PEAS if a polluting material does or may reach water resources through sewers, ditches, or soil.

PEAS: 1-800-292-4706

5. Contact MDOT Emergency Services Coordinator and the Office of Communications if outside response agencies are called upon to control the situation:

Emergency Services Coordinator:

Eileen Phifer
Work: (517) 373-1898
Home: (517) 323-7491
Cell: (517) 719-0505

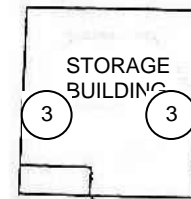
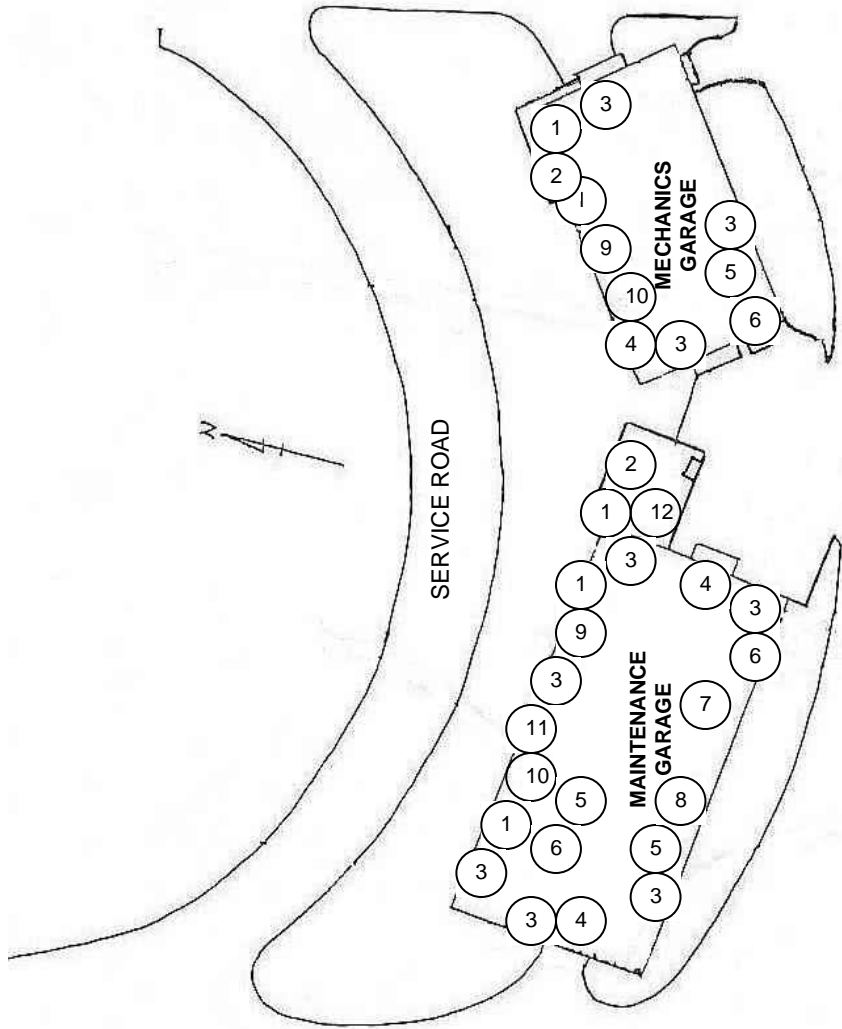
Alternate:

Connie Vallier
Work: (517) 241-2877
Home: (517) 647-2225
Cell: (517) 243-5609

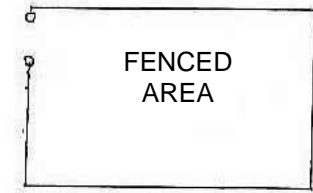
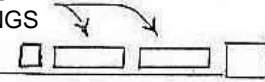
6. Minimize the damage.
 - Take reasonable actions to control fire or limit the damage.
 - DO NOT FLUSH HAZARDOUS MATERIAL WITH WATER UNLESS DIRECTED TO DO SO BY AN AGENCY REPRESENTATIVE.
 - Shut off valves, pump tanks, plug inlets/outlets.
 - Dike or redirect flows to a holding area.
 - Absorb with sand or other material.
 - Excavate contaminated soils.
 - Clean out oil skimmer catch basins.
7. Clean up and properly dispose of all recovered or contaminated material.
8. Notify the Region Resource Specialist:

Dan Hamlin
Work: (906) 786-1800
Home: (906) 553-4132
9. Make full report to DEQ PEAS within 10 days.
10. Evaluate the Plan and response actions for adequacy.

- KEY**
1. TELEPHONE/INTERCOM
 2. TWO WAY RADIO
 3. PORTABLE FIRE EXTINGUISHERS
 4. WATERHOSE
 5. ABSORBENT MATERIAL
 6. HAND SHOVELS
 7. FRONT END LOADER
 8. PUMPING EQUIPMENT
 9. EYE WASH
 10. SHOWERS
 11. RESPIRATOR
 12. AED FIRST AID

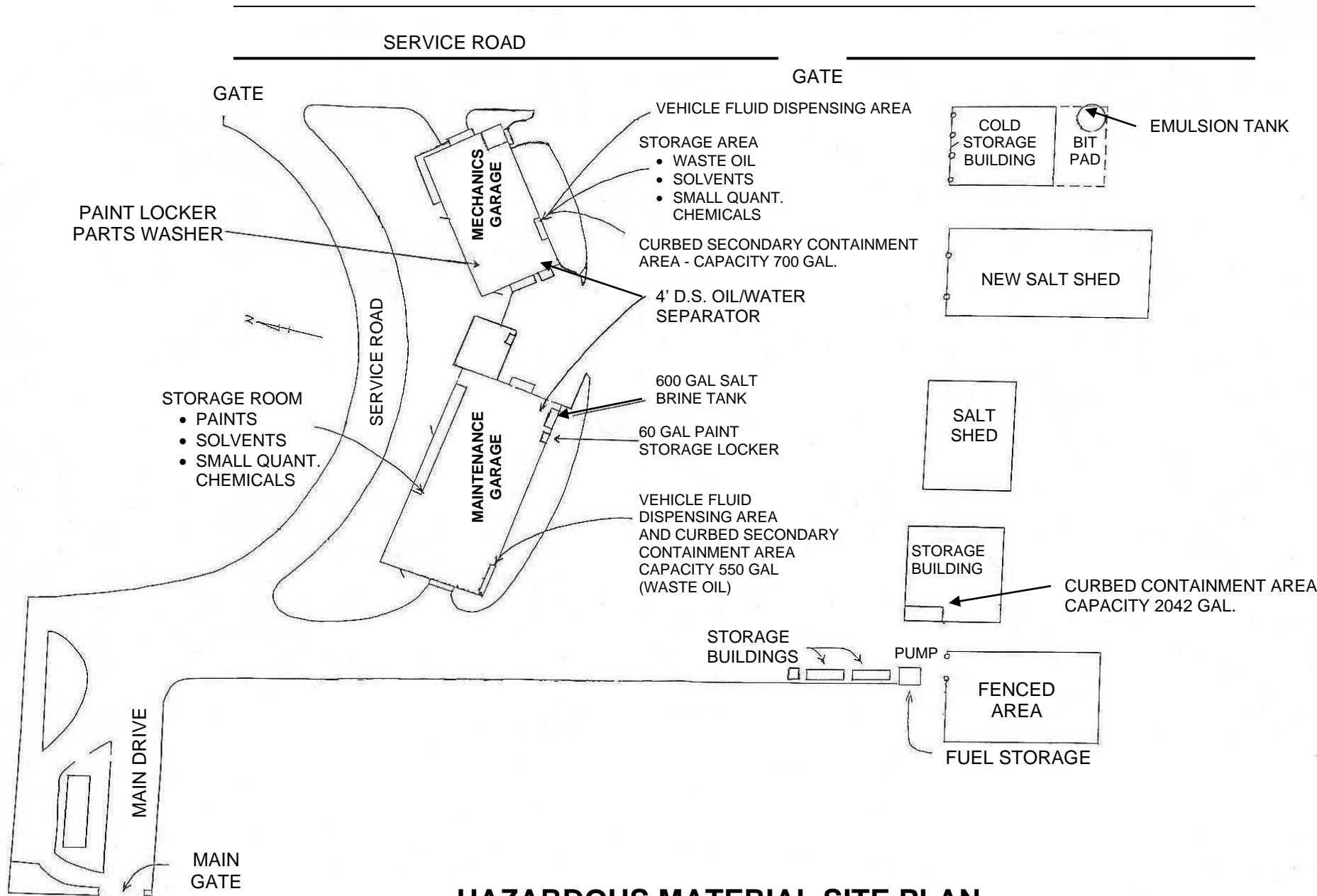


STORAGE BUILDINGS

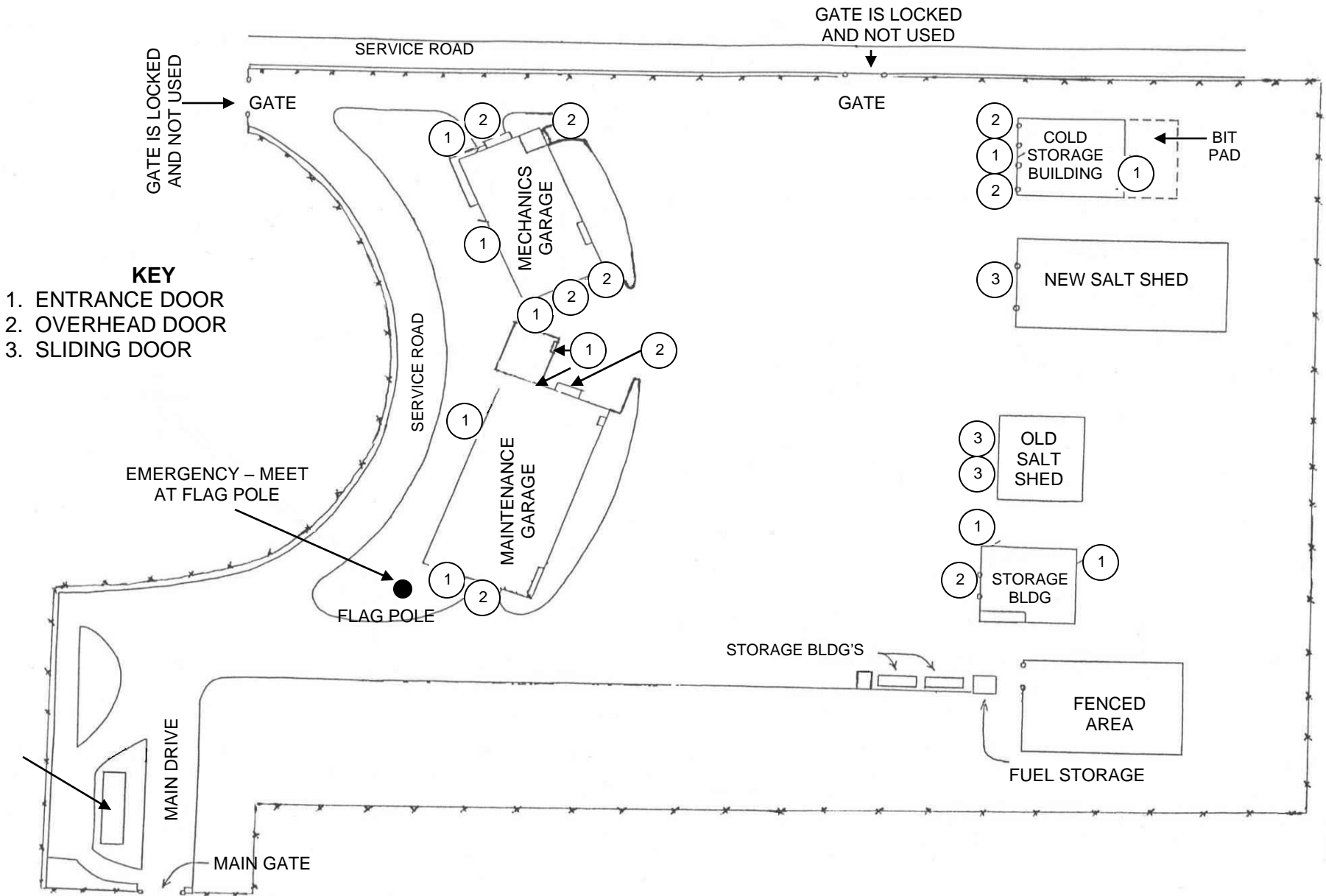


FUEL STORAGE

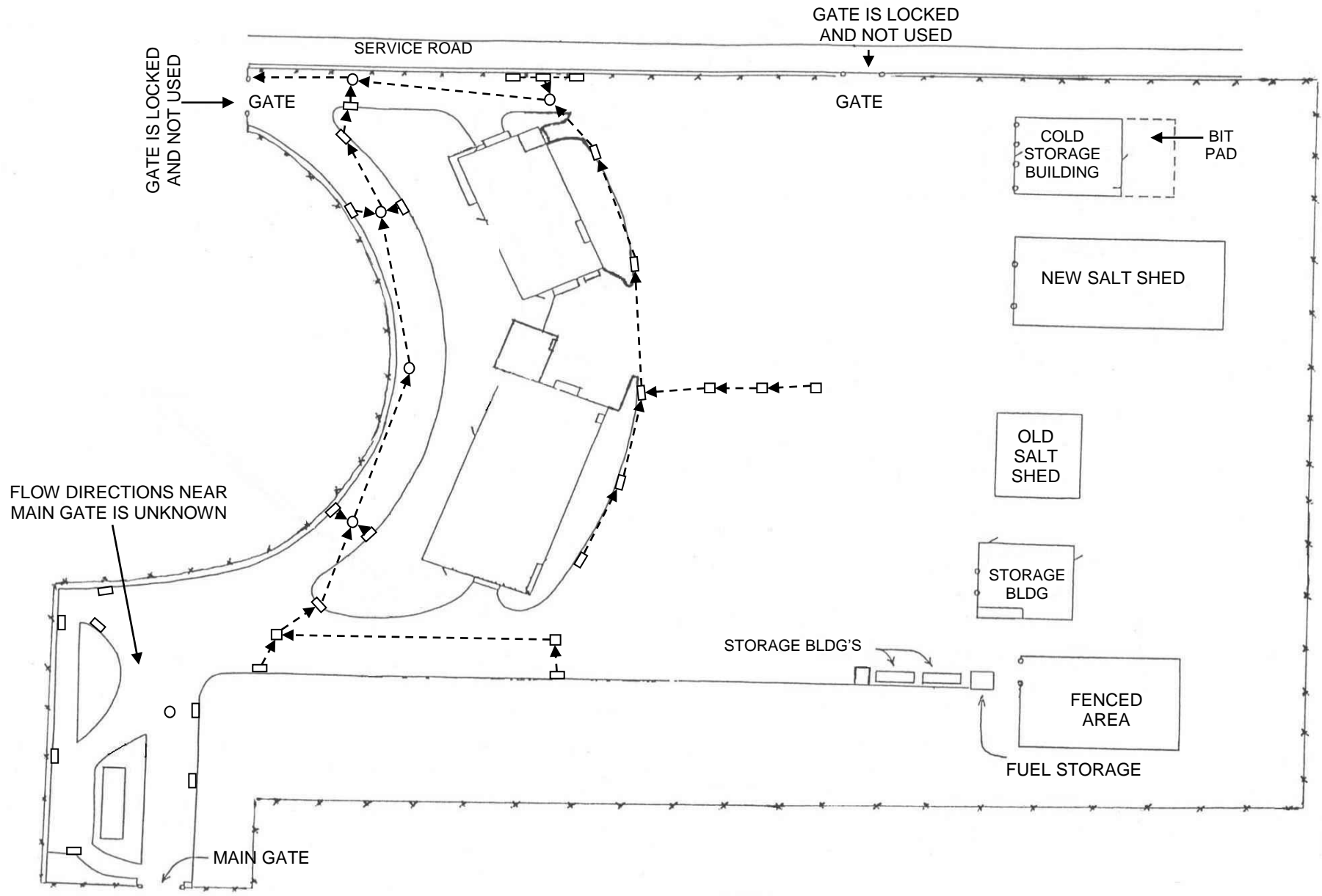
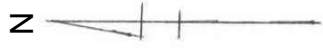
**EMERGENCY EQUIPMENT
ST. IGNACE MAINTENANCE GARAGE**



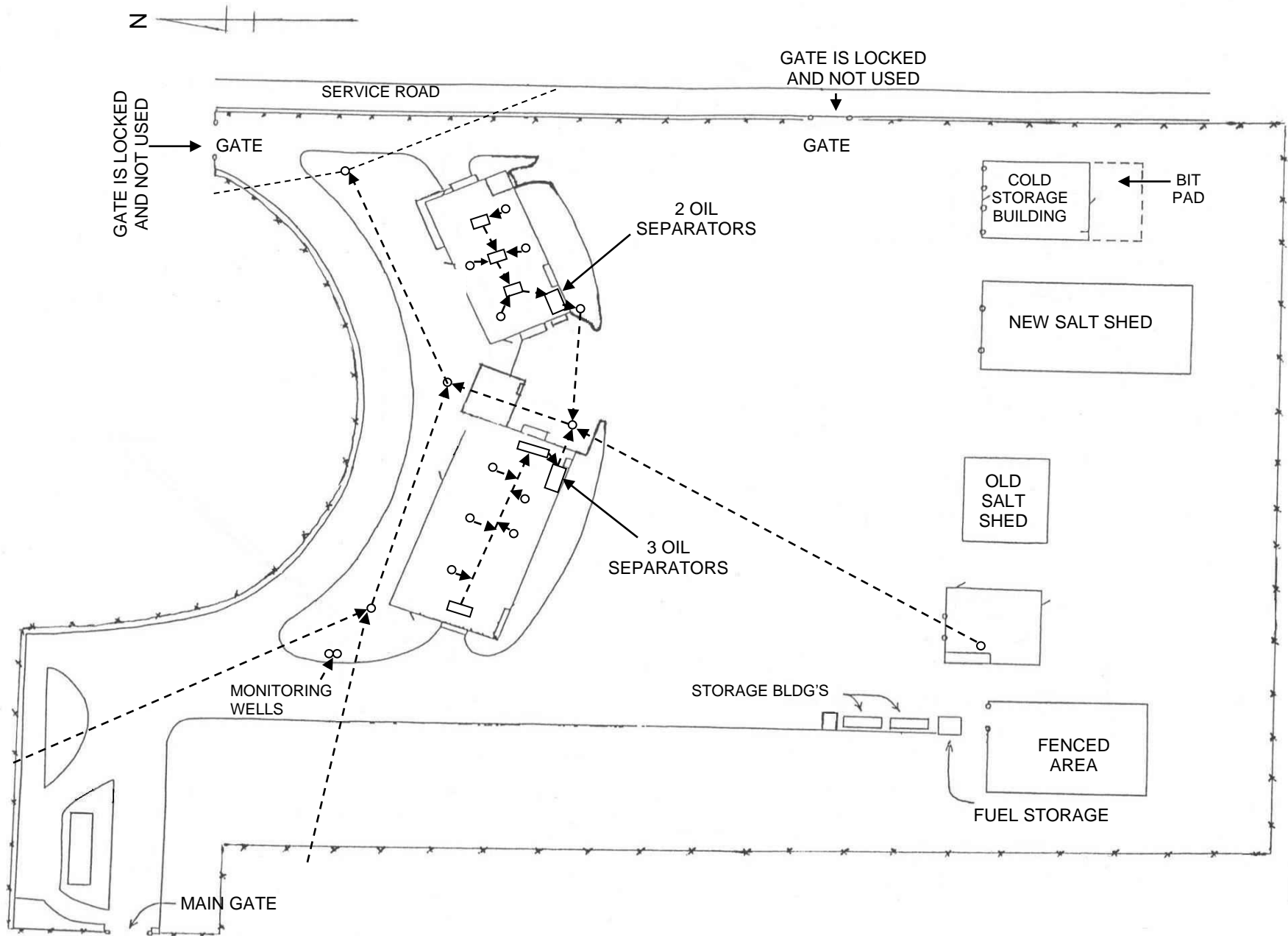
**HAZARDOUS MATERIAL SITE PLAN
ST. IGNACE MAINTENANCE GARAGE**



EMERGENCY EVACUATION ST. IGNACE MAINTENANCE GARAGE



**STORM SEWER
ST. IGNACE MAINTENANCE GARAGE**



**SANITARY SEWER
ST. IGNACE MAINTENANCE GARAGE**

STATUTORY AUTHORITY

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

This facility is a generator of hazardous wastes and is therefore required to maintain and follow a hazardous waste contingency plan. This PIPP has been amended to incorporate hazardous waste management provisions sufficient to comply with the Resource Conservation and Recovery Act (40 CFR 265 Subpart D) and the Michigan Hazardous Waste Management Act (Act 64). Copies of the 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.

NOTE – Although the statute and rules refer to the Part 5 of the General Rules of the Water Resource Commission, promulgated pursuant to Act 245 P.A. 1929 as amended (Act 245), and to the Water Resources Commission (WRC), the decision making authority formerly held by the WRC was delegated to the DEQ through Executive Orders signed by the governor. In addition, Act 245 has been incorporated as Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act 1994 P.A. 451, as amended (Act 451) MCL 324.3101 et seq. **Please be aware that these rules are currently under revision.**

EMERGENCY RESPONSE AGENCIES

POLICE

State	Michigan State Police 901 Graham Ave. St. Ignace, MI	(906) 643-8383
County	Mackinac County Sheriff 100 South Marley Street St. Ignace, MI	(906) 643-1911 or (906) 643-8811
City	St. Ignace City Police 396 N. State St. St. Ignace, MI	(906) 643-6077 or 911

FIRE

St. Ignace Fire Dept. 396 N. State St. St. Ignace, MI	(906) 643-8754 or 911
---	--------------------------

HOSPITAL

Mackinac Straits Hospital 220 Burdette Street St. Ignace, MI	(906) 643-8585
--	----------------

AMBULANCE

Allied Ambulance Service 210 Burdette Street St. Ignace, MI	(906) 643-6538 or 911
---	--------------------------

HEALTH DEPT.

LMAS District Health Dept. 117 Ferry Lane St. Ignace, MI	(906) 643-1100
--	----------------

MDEQ OFFICE

Environmental Response Division Newberry Field Office Newberry, MI	(906) 293-5131
--	----------------

WASTE WATER

St. Ignace Waste Water Treatment Les Therrian St. Ignace, MI	(906) 643-9277
--	----------------

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

Emergency Coordinator

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. These 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.

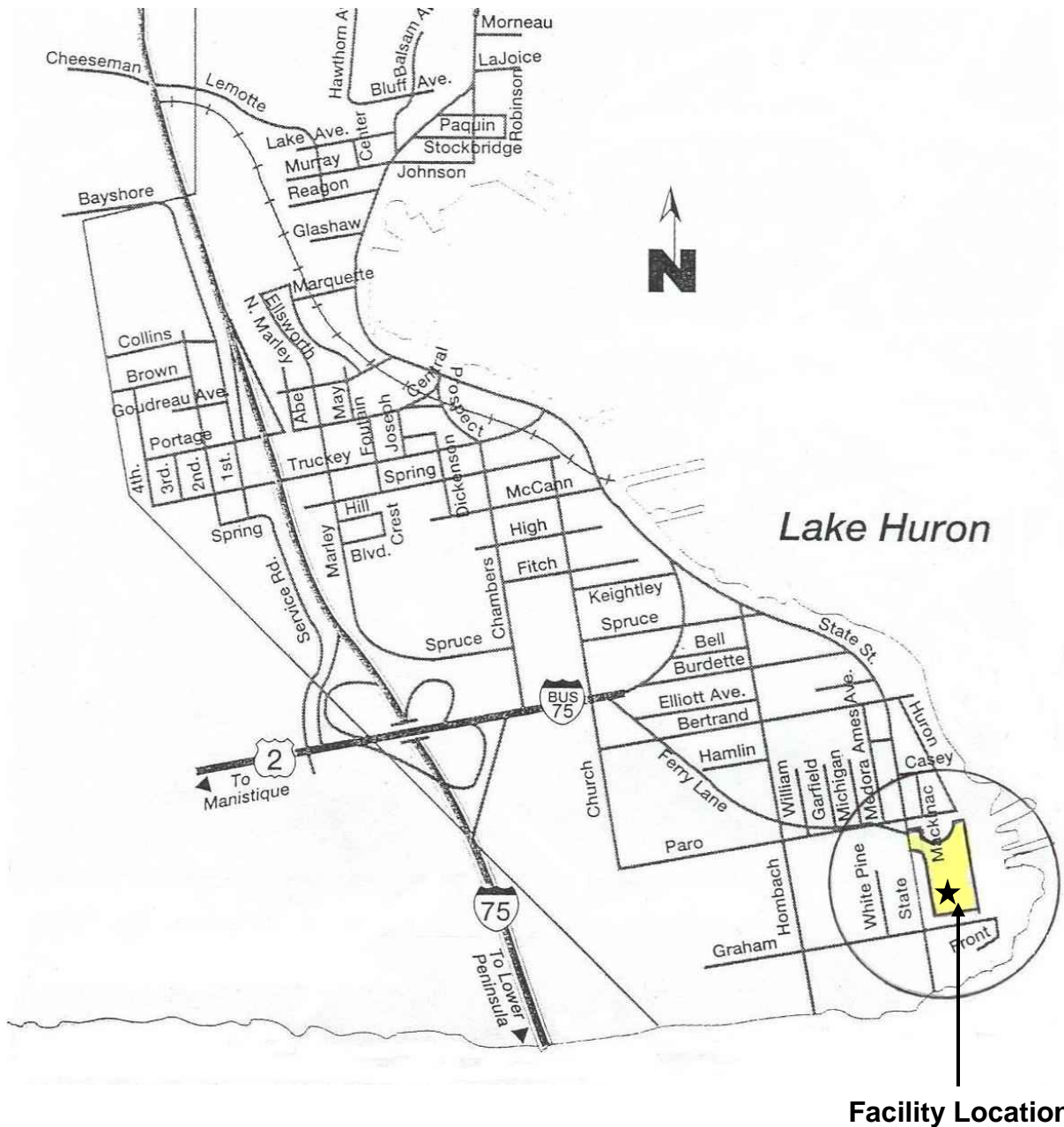
7. Properly store, label and document the wastes for disposal.
8. Notify the Region Resource Specialist that a spill or leak has occurred. Make arrangements for disposal of waste material.
9. Clean and service all emergency equipment. Replenish supplies of absorbent material, etc. Recommend and perform maintenance on containment systems.
10. Enter a full account of the incident, including date, time, volume, material, and response taken, into the waste notebook.
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 St. Ignace Maintenance Garage is a highway maintenance facility owned and operated by MDOT. From this location, just off the business loop I-75 in the city of St. Ignace, state forces perform specialized maintenance in seven eastern counties of the Upper Peninsula.

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 also included in the Attachments Section.

ST. IGNACE FACILITY SITE PLAN



PHYSICAL DESCRIPTION OF THE FACILITY

The maintenance garage at this site was opened in 1958. The structures and containment systems for the storage of polluting materials include:

80' x 206'	Maintenance Garage and Office
60' x 120'	Mechanics Garage
60' x 60'	Storage Building #1 – Prisoners Building
61' x 79'	Storage Building #2 – Blue Cold Storage Building
56' x 64'	Covered Sand Shed
73' x 179'	Covered Salt Shed
4,000 gallon	Elevated Emulsion Tank with containment
1,000 gallon	Above Ground Emergency Diesel Fuel Tank

This facility uses city water as a fresh water source and is also connected to the city sanitary and storm sewer system. Floor drains with sumps and oil separators flow into the city sanitary sewer. Roof and surface drainage flow into the enclosed storm drain system which empties into the Straits of Mackinac.

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 800 Mhz 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. Front End Loader/Tractor w/Bucket	Mechanical maintenance as needed
8. Pumping Equipment	Inspect monthly as needed
9. Eye Wash	Inspect monthly as needed
10. Shower	Inspect monthly as needed
11. Respirator	Inspect 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 St. Ignace Maintenance Garage 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.

Salt and Salt-Sand Mixture

Salt Brine

Fuel Products

Vehicle Fluids

Emulsions

Waste Oil

Parts Washer Fluids

Small Quantity Pesticides/Fertilizers

Small Quantity Chemical Products

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

Salt and Salt-Sand Mixture

The salt shed at the St. Ignace Maintenance Garage is situated on a bituminous pad and has a capacity of 5,000 tons. The facility has inside loading and unloading of bulk material.

A salt-sand mixture is stored inside the new salt shed. The mixture consists of a 1:3 ratio of sodium chloride to sand.

Salt spreading equipment is washed inside the maintenance garage and flows into floor drains with sumps and water/oil separators and into the city sanitary sewer system. Occasionally bulk rock salt and salt-sand mixture will be contained in the hopper boxes of the snow removal trucks housed in this facility.

POLLUTION INCIDENT PREVENTION MEASURES

All unloading of bulk shipments as well as loading of salt spreading equipment is done in the enclosed salt shed. The unloading and loading of the salt-sand mixture is done on the bituminous pad. The area outside the shed will be kept relatively free of salt and sand by routine housekeeping practices. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Salt Brine

Salt brine for winter pre-wetting operations is manufactured in a 600 gallon double walled tank using water and bulk rock salt. The brine manufacturing tank is located in the main shop area. Individual 150 gallon brine storage tanks are installed on the snow removal trucks assigned to this maintenance facility.

POLLUTION INCIDENT PREVENTION MEASURES

Absorbent material is available in the storage and use area for cleaning up small spills. Care will be taken to avoid spills and to clean up small spills which may occur. Any of the bulk materials that are spilled will be shoveled and swept as soon as possible.

The main shop area will be kept as clean as possible. The brine manufacturing tank area will be inspected regularly for signs of spills, leaks, and irregularities. The individual brine storage tanks on the snow removal trucks will receive both pre-trip and post-trip inspections for leaks and irregularities. In the event of the release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Fuel Products

An above ground 1,000 gallon emergency diesel tank is located on concrete surface and is protected from collisions by steel posts.

POLLUTION INCIDENT PREVENTION MEASURES

Care will be taken when dispensing fuels to prevent and clean up small spills. When a bulk shipment arrives, a maintenance facility worker will be in attendance as the tank is filled. Leakage from the tank can be detected by comparing the day to day dispensing inventory with actual measurement of the fuel in the tank. Fuel is ordered only when both the day to day inventory and the actual measurement of fuel in the tank indicate that there is sufficient capacity to hold a shipment. Small spills will be cleaned up by blotting with absorbent material. In the event of the release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Vehicle Fluids

The St. Ignace Maintenance Garage, including the Mechanics Garage, uses varying quantities of lubricating oil, gear oil, automatic transmission fluid, hydraulic fluid, brake fluid, and antifreeze. Bulk vehicle fluids are stored inside the garage in such a way that a spill could not reach the drainage system should one occur. A pump type reservoir is used to dispense motor oil and hydraulic oil, which are stored in containment areas in both buildings.

POLLUTION INCIDENT PREVENTION MEASURES

Bulk vehicle fluids will be stored in such a way that a spill could not reach the drainage system should one occur. The oil dispensing area is located in the area of the garage away from open drains. Absorbent material is available in the storage and use areas for cleaning up small spills. Care will be taken to avoid and clean up small spills which may occur.

The vehicle fluid storage and dispensing areas will be inspected regularly 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 or posted at the facility are to be followed.

Emulsions

The St. Ignace Maintenance Garage uses emulsion in its surface maintenance seal patching operations. The emulsion is stored in a 4,000 gallon elevated storage tank. The storage tank is located on a concrete pad south of Storage Building #2, within a 5,000 gallon secondary containment system. The emulsion is gravity fed from the tank into the seal patch machines. The drain hose is placed on an empty 55 gallon drum when not in use.

POLLUTION INCIDENT PREVENTION MEASURES

Emulsion is stored in such a way that a spill could not reach the drainage system should one occur. The emulsion dispensing area is located in a contained area away from open drains. The storage and containment area will be monitored regularly. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Waste Oil

Waste oil at the St. Ignace Maintenance Garage is poured into a 120 gallon plastic storage tank and stored in a containment area in the southwest corner of the Maintenance Garage. In the Mechanics Garage, waste oil is poured into fifty-five (55) gallon drums and stored inside the containment area. The full drums of waste oil are stored inside the containment area of Storage Building #1. When the tank and drums are full, a licensed hauler under contract with MDOT will pump out the tank and drums and dispose of the waste oil. In the event that substances other than oil are deposited into the tank or drums, the contents are analyzed to determine if they are to be treated as hazardous material.

POLLUTION INCIDENT PREVENTION MEASURES

Only oil will be deposited into the tank. The area around the tank is checked weekly for irregularities. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Parts Washer Fluids

The St. Ignace Maintenance Garage uses parts washer stations in the Maintenance and the Mechanics buildings to clean parts. Both parts washer stations are under a licensed service contract to service and replace dirty fluid with clean fluid.

POLLUTION INCIDENT PREVENTION MEASURES

The storage area and parts washer stations will be checked weekly for any spillage or leakage. Care will be taken to avoid and clean up spills which may occur. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Small Quantity Pesticides/Fertilizers

The St. Ignace Maintenance Garage stores varying small quantities of pesticides and fertilizers. These chemicals are in the form of liquids, wettable powders, beads, granules or flakes. All application of these pesticides and fertilizers is done either by Region maintenance personnel or by a contractor under the supervision of Region Office personnel. The application programs are developed and reviewed annually by the MDOT and supervised by the Regional Resource Specialist under the provisions of Act 171; PA 1976.

POLLUTION INCIDENT PREVENTION MEASURES

All of these chemicals are stored in a containment area in their original containers in such a way that a spill will not reach the drainage system, soil, or water. The storage area and containers will be checked weekly for any spillage or leakage. During the course of handling these chemicals, care will be taken to avoid any spills either onto the ground or equipment and to mix only the amount necessary to complete the job. At the end of the spraying season, the holding tank and equipment will be rinsed with clean water and the resulting solution will be sprayed onto the target area.

The storage area will be inspected regularly. Small spills of hazardous wastes will be blotted with absorbent materials and placed in a separate, labeled container and disposed of as a solid hazardous waste. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

Small Quantity Chemical Products

The St. Ignace Maintenance Garage, including the Mechanics Garage, stores small quantities of several chemical products. Among these are tar removers, cleaners, spray paints, sign paint, paint thinners, equipment paint, and spray oils. These are stored in their original containers in a designated storage area away from open drains. Each product's label and Material Safety Data Sheet (MSDS) will be consulted for proper use and disposal.

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 St. Ignace Maintenance Garage include an asphalt-fuel mixture (fuel used to clean asphalt emulsion from road patching equipment) and contaminated solvents. Satellite barrels for accumulating wastes, if used, will be located in the work areas and managed in accordance with federal and state hazardous waste regulations. These wastes are stored for disposal in containers in a containment area in Storage Building #1. 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

Secondary containment is provided by the curbed area in Storage Building #1. The storage area will be inspected regularly. Small spills of hazardous wastes will be blotted with absorbent material and placed in a separate, labeled container and disposed of as a solid hazardous waste. In the event of a release of a large or unknown quantity of material, the POLLUTION INCIDENT RESPONSE STEPS presented in this plan or posted at the facility are to be followed.

EVACUATION PLAN

(To be posted at the facility)

1. A continuous blast will be sounded on the equipment horn, and/or use the "Page" button on the phone to announce an evacuation.
 - Employee using the "Page" button should also call 911 once they have announced the evacuation.
2. All employees will be evacuated to an area of safety, and meet at the flag pole. While evacuating:
 - Employees will check for others in their immediate area as they evacuate.
3. All employees will be accounted for.
4. An employee will be assigned to the front of the property to keep unauthorized people from entering.
5. A sign will be placed on the front gate declaring the area contaminated.
6. A Fire Drill will be performed on a regular basis to ensure employees are aware of the current evacuation plan.

FACILITY ENVIRONMENTAL INSPECTION/WALKAROUND CHECKLIST

MDOT FACILITY NAME: _____

EMPLOYEE NAME: _____

MONTH: _____

YEAR: _____

INSTRUCTIONS: Assigned employee shall inspect/check each of the items described below* weekly for environmental compliance and record applicable notes of issues found and corrective actions taken. Employee shall date and initial form weekly when completed. Maintain this checklist in the Environmental Manual for the facility for a period of 5 years.

DESCRIPTION	WEEK 1		WEEK 2		WEEK 3		WEEK 4		WEEK 5	
	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS
ADEQUATE SPILL CONTROL MATERIALS AND SHOVELS										
BUILDING CLEANLINESS (OVERALL)										
FLAMMABLE MATERIALS PROPERLY STORED IN FLAMMABLE CABINET										
FLAMMABLE CABINET(S) IN GOOD REPAIR										
MATERIALS PROPERLY LABELED, INCLUDING SECONDARY CONTAINERS										
CONTAINERS CLOSED AND FREE FROM DENTS OR LEAKS										
HAZARDOUS WASTE SEALED AND PROPERLY LABELED										
UNIVERSAL WASTE PROPERLY STORED AND LABELED										
SPILLED MATERIALS, LEAKS OR STAINING FROM SPILLED MATERIALS										
COMPRESSED GAS PROPERLY STORED AND LABELED										
PESTICIDE STORAGE SEPARATE AND SECURE FROM OTHER MATERIALS										
INDOOR CHEMICAL STORAGE AREA (HOUSEKEEPING/SPILLS)										
CHECK FOR IMPROPERLY STACKED ITEMS ON SHELVING UNITS										
EMPTY DRUMS PROPERLY/NECESSARILY STORED										
SIGNS OF DEAD VEGETATION AROUND BUILDINGS, TANKS, ETC.										
SHEEN ON ANY SURFACE WATER/DRAIN/DITCH										
NOTES OF ISSUES FOUND AND CORRECTIVE ACTIONS TAKEN										

*Also periodically review/update Pollution Incident Prevention Plan, aka PIPP