

City of Dearborn
Department of Public Works Facility

MICHIGAN DEPARTMENT OF ENVIRONMENT,
GREAT LAKES AND ENERGY

Pollution Incident Prevention Plan (PIPP)

January 2023

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Chapter 1: General Facility Information

Table 1: General Facility Information

NAME OF FACILITY:	Dearborn Department of Public Works (DPW) Facility
FACILITY ADDRESS:	2951 Greenfield Road, Dearborn, MI 48210
SPILL PREVENTION AND CONTROL COORDINATOR	
Name and Title:	Mark Gaworecki, Water and Sewer Utility Manager
Mailing Address:	2951 Greenfield Road, Dearborn, MI 48210
Telephone:	(313) 943-4093
Email:	mgaworecki@ci.dearborn.mi.us
FACILITY CONTACT SPILL PREVENTION AND CONTROL COORDINATOR	
Name and Title:	Holly Malewski, Public Services Assistant Superintendent Andy Powell, Supervisor
Telephone:	(313) 943-2107 C 313-319-0043 (313) 943-2107 C 313-701-7818
Email:	hmalewski@ci.dearborn.mi.us apowell@ci.dearborn.mi.us
24-Hour Emergency Telephone:	Police Dispatch (313) 943-2100

Chapter 2: Spill Response Team

The City of Dearborn DPW Yard has four buildings, a lean-to, covered storage, and two barns that house vehicles, equipment, and materials for road maintenance. The facility stores road salt and liquid brine in threshold management quantities that require the development of a Pollution Incident Prevention Plan (PIPP). The City of Dearborn DPW staff identified to assist in pollution incident prevention activities is as follows:

Table 2: Spill Response Team

NAME AND TITLE	RESPONSIBILITY
Mark Gaworecki, Water and Sewer Utility Manager	Spill Response Program Oversight
Holly Malewski, Highways Assistant Superintendent Andy Powell, Supervisor	Onsite spill prevention and control, Surveillance and monitoring activities

Chapter 3: Site Map

As indicated on the Site Map, the Dearborn DPW Yard consists of four buildings, a lean-to, covered parking for outdoor equipment and vehicles, a Sand Barn, a Salt Barn, a liquid brine production and filling station, areas for outdoor bulk material storage, a covered aboveground fueling station connected to underground storage tanks, three rain gardens, a bioswale, two Aqua Swirl Concentrators, and a detention pond. A description of each of these areas is as follows:

The Yard Building houses materials for residential rodent control activities and general building parts storage. Dearborn has staff that are certified pesticide applicators for the handling, mixing, and application of rodenticide materials. All chemicals are labeled and stored inside flammable cabinets with locking doors. The MSDS for these materials are stored in a binder that is located adjacent to this cabinet. The Building Department and Sign Shop also occupy space in this building where they store building supplies and parts, floor cleaning materials, paint, and equipment. All paints are well labeled and stored off the ground on shelving units or in enclosed metal cabinets to prevent spills.

The Equipment Storage Building does not have any interior floor drains. This building stores vehicles, parts, and supplies.

The Water and Sewer Storage Building does not have any interior floor drains. This building houses water and sewer equipment, parts, and supplies.

The Highway Department Building stores cold patch material, and small amounts of oil for small engine maintenance and repair. Maintenance on small engines occurs inside this building, where the interior drains lead to the sanitary sewer.

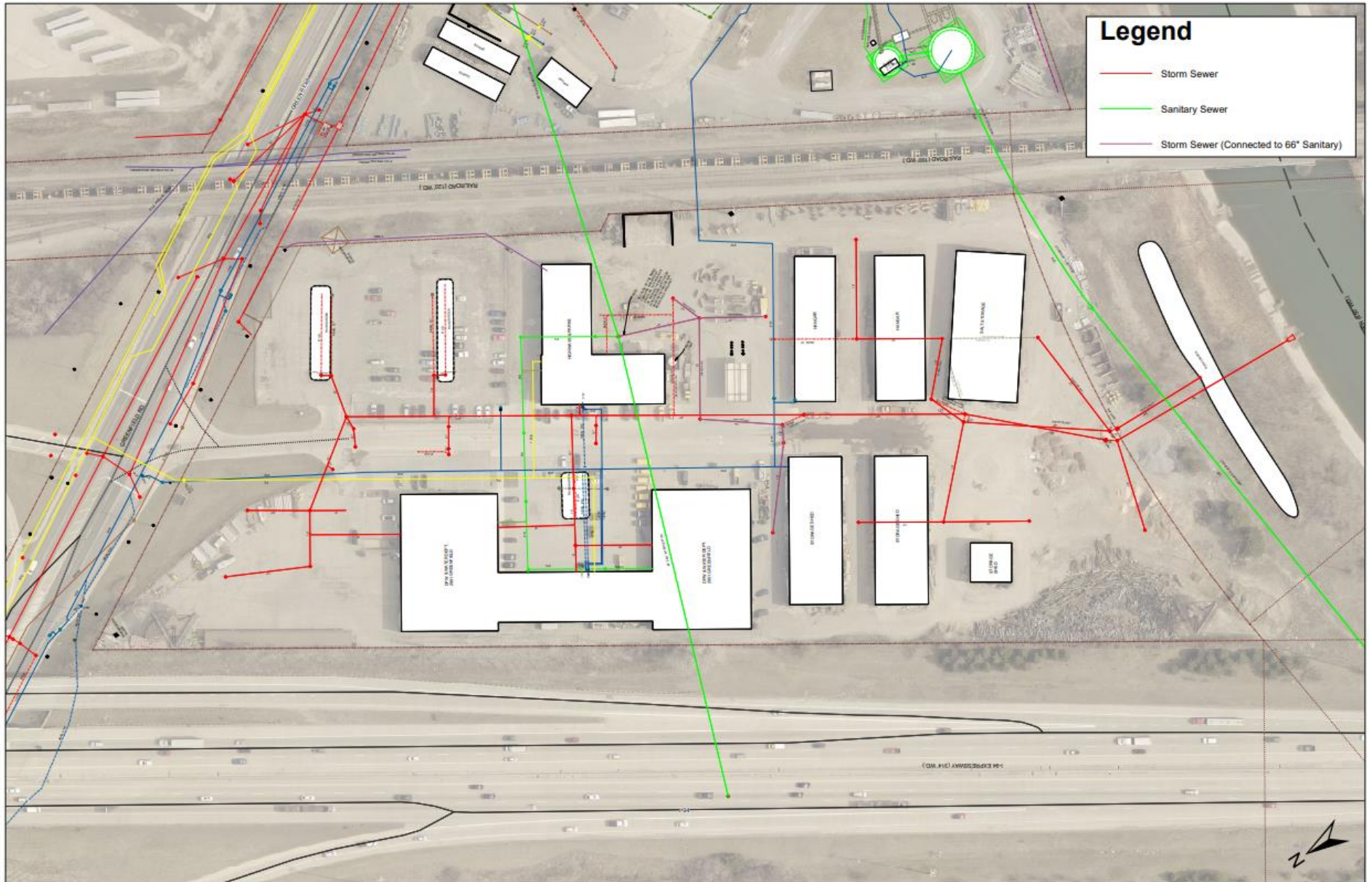
There is a covered fueling station with four pumps and two underground storage tanks of diesel and gasoline. A small room has been built within the fueling station that houses a 55-gallon drum of oil for vehicle and equipment operators to service their own engines when necessary. The room is completely enclosed with a door. No floor drains are present in this room. The dispensers and fill ports also have spill wells located beneath them to capture any spills or leaks. The spill wells are pumped out as needed and emptied into one of two 55-gallon metal drums adjacent to the pumps (one for diesel, one for gasoline). This metal drums are secured and locked with chains and are pumped out by a contractor as needed.

There are two covered storage areas that cover all outdoor storage of vehicle and equipment. If vehicles or equipment have leaks as detected by the operators, drip pans are used to capture these leaks prior to being taken for maintenance at the Motor Transportation Facility.

A Sand Barn is located towards the rear of the property that encloses all sand used for road, water and sewer repairs. The barn is constructed of wood and has an asphalt floor. The closest storm drain in this area is curbed for visibility and has an inverted trap to allow for sediment to settle to the bottom of the sump, which is regularly inspected and vactored out by DPW staff.

Other aggregate materials, such as woodchips, slag, and stone, are stored in the rear of the yard on a gravel surface. No storm drains are located in this area.

The DPW Yard also boasts several stormwater management devices including three rain gardens, a bioswale, two Aqua Swirl Concentrators, and a detention pond. The rain gardens and bioswale filter stormwater from the main parking areas of the DPW yard. These vegetated areas have curb cut inlets to allow stormwater to flow from the impervious areas into the vegetated areas for filtration. They each have six-inch underdrains to allow for overflows of stormwater to enter into the stormwater system. All stormwater flows from the DPW site to one of the two swirl concentrators, which, after treatment, then enters the detention pond. In the case of severe wet weather events, the detention pond has a six-inch underdrain which allows for stormwater to outlet to the Rouge River in extreme events.



Chapter 4: Polluting Material Inventory

Inventory and Description of Polluting Materials

To identify potential sources of significant materials, City staff, with the assistance of the Southeast Michigan Council of Governments (SEMCOG) conducted an inventory of municipal buildings, activities and materials that may be identified as polluting materials under Part 5 at the City of Dearborn DPW Facility. The MSDS for all materials are located inside the DPW Maintenance Office. The polluting materials stored onsite requiring a PIPP include the following:

Material Name	Quantity Stored	Location
Salt in aggregate, solid form	13,000 ton capacity	Salt Barn, west side of DPW yard.
Liquid brine	5,500 gallon capacity	Outdoor storage tank near Highway Building

Salt Storage Description

The City of Dearborn DPW Facility stores road salt inside a covered Salt Barn in the rear of the property. The Barn is constructed of wood, has a shingled roof and an asphalt floor without any floor drains. The capacity of the dome is 13,000 tons.

Salt is delivered to the Dearborn DPW Yard and is placed directly inside the barn. A staff person is present onsite during all salt deliveries to direct where and how the salt is delivered. No loads of salt are placed near storm drains or left uncovered. Employees are trained in the procedure to immediately sweep excess salt from track out or spills back into the barn to prevent stormwater runoff.

Salt is loaded into DPW trucks just outside the Salt Barn due to limited space turning inside the Barn. A loader scoops material from inside the barn and loads each vehicle as it pulls in front of the barn. Crash protection barrier posts are positioned on both sides of the Salt Barn door to protect the integrity of the structure. Any spilled salt material during loading operations is immediately swept back into the barn to prevent exposure to stormwater runoff.

There are two storm drains located near the Salt Barn, however both storm drains have restricted man hole covers to prevent solid salt from entering the storm drain. All stormwater from the DPW site flows to two swirl concentrators, and then enters a detention basin for natural filtration.

The City of Dearborn's DPW vehicles and equipment are taken to the City's Motor Transportation Facility for all maintenance needs. Daily inspections are performed on equipment by staff prior to driving each vehicle. When vehicle or equipment problems occur, the machine is taken to the Motor Transportation Facility for repairs, where all repair work is logged and maintained.

Most DPW vehicles and equipment are parked outside under the covered storage areas of the DPW yard. There are also additional storage areas for lesser-used equipment inside the Equipment Storage and Water/Sewer Storage facilities. If fluid leaks are present, drip pans are used to catch fluids to prevent spills or releases until the machinery can be repaired. DPW vehicles and equipment are washed in a

dedicated interior wash bay at the Motor Transportation Facility, where the wash water is discharged to an oil water separator which leads directly to the sanitary sewer.

The DPW Facility is completely fenced with a gate that remains locked when not in use and during non-business hours. The exterior of the facility is also lit for additional security.

The Salt Dome **is not** located within 50 feet of a lake shore, stream bank, or wetland, nor is it located in a 100-year floodplain.

Liquid Brine Storage Description

The City of Dearborn manufactures and stores 23% salt brine solution made from rock salt. The manufacturing equipment is located just outside the Highway Building and consists of a 1,200-gallon brine-making circulation tub and a 5,500-gallon polyethylene storage tank. Once mixed, the salt brine is pumped from the brine-making tub to the 5,500-gallon polyethylene storage tank, which is located within a cement secondary containment system against the wall of the Highway Building. The cement secondary containment unit is designed to capture 100% of the 5,500 gallons of brine being stored.

DPW personnel are present during the entire manufacturing operation and are trained in the procedure of observing the accumulated stormwater from the secondary containment unit for the presence of salt using a salinometer hydrometer (salt concentration must be less than 1% prior to it being discharged). Uncontaminated stormwater is then released via the removal of two plugs in the pvc outlet pipes, which releases the water to the nearest storm drain, which flows to the swirl concentrator and then to the detention pond for filtration. If stormwater is found to be contaminated, staff will pump the water into the brine storage tank for future use.

As indicated in the Spill Response Plan (**Appendix C**), onsite staff are trained on the proper procedure to contain any of this spilled liquid by diking with stockpiled road surface materials and absorb the liquid with stockpiled sand. The contaminated sand used in any spill response activities will be stockpiled, tarped, and treated as chloride sand to be used during the winter road maintenance activities.

Spill Response Procedures and Equipment

If salt or brine is released to the environment in the following quantities, the *City of Dearborn DPW Facility Spill Response Plan – Salt or Liquid Brine* shall be followed (**Appendix C**):

To The Ground:		To Waters of the State:		To Sanitary Sewer (<i>contact WWTP only</i>):	
Salt	50 pounds	Salt	Any quantity that causes visible sheens, oil films, unnatural turbidity, foams or deposits in water body	Salt	Any quantity not currently authorized by receiving WWTP
Liquid Brine	50 gallons	Liquid Brine		Liquid Brine	

The details for cleaning up a spill are indicated in the *City of Dearborn DPW Facility Spill Response Plan – Salt or Liquid Brine* which also indicates that a report shall be created and sent to the following agencies, should a release occur:

During Regular Business Hours:

SE Michigan District Office
27700 Donald Court
Warren MI 48092-2793
(586) 753-3700

During Non-Business Hours:

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

Chapter 5: Surveillance

The Part 5 Rules indicate that “adequate surveillance” of the manufacturing process, treatment system, and storage areas for salt and liquid brine shall be conducted to detect any material loss in a timely manner and implement procedures to prevent materials from reaching waters of the state.

To assist in surveillance activities, a Routine Inspection Form has been created for the City of Dearborn DPW staff and is located in **Appendix A**. The Routine Inspection Form will be used by facility staff during site walk-throughs that will be conducted on a **monthly** basis to observe the salt storage area and liquid brine processing and storage area, as required by Part 5 Rules. The purpose of these inspections is to identify and prevent conditions that could lead to the release of salt or liquid brine to sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwater’s of this state. A log of the routine inspections and any needed corrective actions shall be maintained on file and shall be retained for three years.

Chapter 6: Three-Year Plan Review

The completed PIPP requires that City of Dearborn will notify the DEQ Water Bureau District Office within 30 days at:

SE Michigan District Office
27700 Donald Court
Warren MI 48092-2793
(586) 753-3700

City of Dearborn will also notify the following agencies that the PIPP requirements have been completed:

1. Wayne County Health Department
Michelle Varran
Septage/Sewage Manager
33030 Van Born Rd.
Wayne, MI 48184
Phone:734-727-7448
2. Local Emergency Planning Committee:
Brian Herman, Wayne County
Information Coordinator
Phone: 734-728-3711

Part 5 requires that the PIPP be evaluated every three years and after any release requiring implementation of the Plan. The Plan will also be updated if any facility personnel, processes, materials, or procedures that were included in the plan change (See **Appendix B** for PIPP Review Form).

Based on the three-year review, the City of Dearborn DPW staff will amend the PIPP as needed to ensure continued compliance with the terms and conditions of Part 5. Recertification and re-notification of updates need to be sent to the EGLE District Office, the Wayne County Health Department, and the Local Emergency Planning Committee.

The City of Dearborn DPW staff will maintain records of all PIPP-related inspections and activities, including Routine Inspections, Three-Year Review, and Spill Reports. All such records will be retained for three years.

Appendix A: PIPP Routine Inspection Form

Date:	Facility Name:
Inspector Name:	
Routine Inspection Schedule: Monthly	

Salt Storage Area

Check Box	Method	Comment/Action Taken
<input type="checkbox"/>	Inspect roof of Salt Barn for holes and loose shingles. <i>(If defects are detected, schedule roof for necessary repairs.)</i>	
<input type="checkbox"/>	Inspect the outside perimeter of the Salt Barn to look for seepage of salt outside of the structure. Inspect joints between the floor and the walls, the roof and the walls, and all areas of the ground. <i>(If material is detected, clean up salt immediately and schedule necessary repairs.)</i>	
<input type="checkbox"/>	During salt deliveries, ensure staff is present to prevent salt from entering storm drains and to immediately load salt into bays. <i>Do not allow deliveries to stand outside uncovered.</i>	
<input type="checkbox"/>	Inspect loading area for presence of salt. Ensure the approach area is swept regularly to contain trackout, and salt is returned for reuse <i>(don't hose down the area)</i>	
<input type="checkbox"/>	Perform an inspection of the loading equipment. Check for leaks, loose connections, and proper operation.	
<input type="checkbox"/>	Ensure equipment and vehicles are washed in designated inside bay where the water discharges to the sanitary sewer.	

Brine Storage Area

Check Box	Method	Comment/Action Taken
<input type="checkbox"/>	Inspect brine making tank, piping, pumps, and fittings. <i>(If defects are detected, schedule necessary repairs/replacement).</i>	
<input type="checkbox"/>	Inspect brine storage tank, piping, and fittings. <i>(If defects are detected, schedule necessary repairs/replacement).</i>	
<input type="checkbox"/>	Inspect secondary containment unit for liquid <i>(test the liquid for salinity to determine if there is a tank leak or the liquid is the result of precipitation, then remove liquid and decant to vegetated area).</i>	
<input type="checkbox"/>	Inspect secondary containment unit for cracks or defects <i>(If defects are detected, schedule necessary repairs/replacement).</i>	
<input type="checkbox"/>	During material transfer, ensure staff is present to immediately contain leaks and spills.	
<input type="checkbox"/>	Check loading/unloading equipment for leaks, through a vehicle/equipment inspection	
<input type="checkbox"/>	Wash equipment and vehicles in designated inside bay where the water goes to the sanitary sewer.	

Appendix B: Three-Year PIPP Review Form

Date of Review:

Reviewer Name	
Print:	Signature:

1) Facility general information and Spill Response Team information is current and accurate	Yes	No
2) Site map is current and accurate	Yes	No
3) Polluting material inventory is current and accurate	Yes	No
4) New exposures, processes and related controls have been documented	Yes	No
5) Spills have been recorded and reported as appropriate	Yes	No
6) Review Routine Inspections to ensure all repairs or actions have been made as necessary	Yes	No
7) Review spill reports (if applicable)	Yes	No
8) Review Spill Response Procedures and phone numbers for updates	Yes	No
9) Ensure Material Safety Data Sheets are up-to-date and accessible	Yes	No

Additional Comments:

Appendix C: City of Dearborn DPW Facility Spill Response Plan – Salt or Liquid Brine

EMERGENCY NUMBERS (to be posted at key telephones throughout facility)

Agency Name	Phone Number
Local Fire Department	
Emergency	911
Nonemergency	(313) 943-2100
Police	
Emergency	911
Nonemergency	(313) 943-2100
Wayne County Environmental Health Department	
Nonemergency	734-727-7000
U.S. Coast Guard	
National Response Center	800-424-8802
Michigan Department of Great Lakes, Environment and Energy	
8:00 a.m. – 5:00 p.m. Southeast Michigan District Office	(586) 753-3700
After Hours: PEAS Hotline	1-800-292-4706
EMERGENCY SPILL RESPONSE COMPANY	
IPR – Great Lakes 4086 Michigan Avenue Detroit, MI. 48210	1-877-478-3205 1-313-899-3014
Waste Water Treatment Plant	
GLWA System Control	1-313-267-6000
GLWA Industrial Waste Control Emergencies	1-313-297-9000

SPILL RESPONSE PLAN – Salt or Liquid Brine (Greater than 50 Gallons or 50 pounds)

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder
2. Stop source of spill (plug hole, shut off valve, etc.)
3. Call Holly Malewski (313) 943-2107 C 313-319-0043 to make them aware of the spill and potential dangers. Notify police and fire departments if necessary for possible lane closure and need for assistance.

4. IF NECESSARY, CONTACT SPILL RESPONSE SERVICES FROM:

IPR – Great Lakes	1-877-478-3205 1-313-899-3014
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5. Protect all drains from liquid brine by diking spill with stockpiled road surface materials and absorb the liquid with stockpiled sand. The contaminated sand used in any spill response activities will be stockpiled, tarped, and treated as chloride sand to be used during the winter road maintenance activities.
6. For spills of brine indoors, clean up with absorbents, oil dry, etc. (Do not flush with water).
7. Spilled salt will be swept up and either transferred to the Salt Barn, or into a truck for road application use. Industry standards will be followed regarding usage concentration and application rates using normally accepted practices.
8. Dispose of cleaned material/absorbent into secure container for proper disposal.
9. A call to the EGLE or PEAS will be made to report the release:

During Regular Business Hours:

SE Michigan District Office
27700 Donald Court
Warren MI 48092-2793
(586) 753-3700

During Non-Business Hours:

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

10. A written report **MUST** be submitted within 10 days after the release to:

EGLE Water Bureau Chief

525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909-7973

Wayne County Health Department

Melita Jordan, Director of Environmental Health
33030 Van Born Rd.
Wayne, MI 48184
Phone: 734-727-7000

AVAILABLE SPILL RESPONSE EQUIPMENT [REQUIRED TO LIST, EDIT AS NECESSARY]

- | | |
|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> ● Sand (100 tons) ● 20-50 lb floor dry ● 2 - Brooms | <ul style="list-style-type: none"> ● 2 – Shovels ● Caution Tape ● 5– Absorbent Booms ● 20 – Absorbent Pads |
|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|

Appendix D: SPILL REPORTING SHEET

Date of Incident	
Time of Incident	
Location & Cross Streets	
Type of Spill	
Estimated Quantity	
Reported To	
Time Reported	
Responsible Party	
Address	
Phone Number/Contact	
Describe materials used to clean up spill:	
Describe response measures that have been done, and the schedule for completion of other measures to be taken, or both	
Describe measures taken to prevent recurrence of similar releases	
Completed By:	

Additional Notes: