

STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

SPILL RESPONSE

2650 GREENFIELD RD, MOTOR TRANSPORT GARAGE

Prepared For:

The City of Dearborn



DPW

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable to prevent or reduce the discharge of pollutants from municipal facilities and operations. The following standard operating procedure is intended for the 2650 Greenfield Rd, Motor Transport, which has been deemed as a priority based on the operations that are conducted at the site.

SECTION B – FACILITY ASSESSMENT AND PRIORITIZATION

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a standard operating procedure (SOP) for identifying the structural and non-structural stormwater controls implemented and maintained to prevent or reduce pollutant runoff at each facility with the high potential for pollutant runoff. Motor Transport Complex was assessed for its potential to discharge pollutants to the waters of the state and as deemed a priority based on the following applicable criteria:

- Number of urban pollutants stored at the site (i.e., sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants)
- Potential for polluting activities to be conducted outside (i.e., vehicle washing)

Based on these criteria, the Motor Transport Complex has been deemed a high priority site which has prompted the need for a site specific standard operating procedure to prevent or minimize the potential for pollutants from entering surface waters of the state as outlined in the NPDES permit application. Biweekly maintenance and inspection of site storm water management and control devices will be conducted by DPW staff to prevent and reduce pollutant runoff.

SECTION C – INVENTORY AND ASSESSMENT

To identify potential sources of significant activities and materials that may be identified as polluting materials under Part 5 at the City of Dearborn Motor Transportation Facility. The MSDS for all materials are located inside the Motor Transportation Facility Parts Crib.

The following is an inventory and assessment of stormwater controls (i.e., catch basins, detention basins, etc.) and facility operations that occur on site.

- 10,000-gal Unleaded UGST (1)
- 8,000-gal Diesel UGST (1)
- 8 Yard Dumpster (1)
- 55-gal drums of oil (18)
- 500 Gallon used oil double wall storage tank (1)
- 20-50 pounds of floor dry
- Brooms (6)
- Shovels (4)
- Absorbent Booms (5)
- Absorbent Pads (20)
- Caution Tape Rolls (4)

➤ Catch Basins (13)

Oil Storage Description

Maintenance Garage

There are five 55-gallon drums of oil-based materials stored in a designated area inside the Facility for vehicle and equipment maintenance. The drums are stored against the Facility wall to avoid hazards and spills. Each drum is labeled with a clear, readable label and is connected directly to hydraulic hoses that lead into the ceiling where the material is pumped by mechanics through overhead nozzles. This approach minimizes spills and leaks throughout the Facility.

Oil filters are drained and crushed with an onsite crusher. Used oil filters are then bagged and properly disposed of in the trash.

Cold Storage Shed

Approximately thirteen new 55-gallon drums of oil are temporarily stored inside one of the cold storage sheds until they are needed inside the Facility. Oil drums are labeled and neatly stored inside the shed to minimize hazards. Each drum is also topped with a secondary containment cap to protect against leaks or spills during storage or transport.

Used Oil Storage

The used oil generated onsite from vehicle and equipment maintenance is collected and stored in a 500-gallon metal storage tank. The used oil is poured into an indoor port that is hydraulically pumped through the Facility wall directly into the storage tank located just outside the facility. The storage tank is in a metal secondary containment unit that has the ability to store 100% of the tank's capacity. It is also covered with an impervious cover to prevent stormwater from accumulating in the secondary containment unit. The tank level is monitored by staff through a visible sight gauge on at least a weekly basis. When the tank reads $\frac{3}{4}$ full, a contractor is called to pump the oil and haul it for proper disposal.

Inventory and Description of Materials and Activities

The 2650 Greenfield Rd. DPW Motor Transport Garage consists of two (2) storage sheds, vehicle maintenance, and general storage. Municipal activities that occur at the facility include the following:

- Fuel Storage and Fueling
- Maintenance and Cleaning of Vehicles and Equipment

SECTION E – FUEL STORAGE AND FUELING

The DPW Motor Transport Garage currently has one (1) 10,000-gal UGST for unleaded fuel and one (1) 8,000- gal UGST for diesel fuel. Part 5 Rules indicate that fuel storage areas “shall be designed, constructed, maintained, and operated to prevent the release of polluting materials through sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwater’s of this state.” The City has met this requirement through the proper storage and pollution prevention methods currently in place. These include the following:

- The unleaded and diesel fuel tanks are 10,000-gallon tanks that are comprised of fiberglass and are doubled walled.
- All bulk liquid tanker delivery vehicles will only be allowed on site after contact has been made with city personnel and it has been confirmed that these personnel will be present at the delivery point.
- A spill kit will be stationed in close proximity to the storage tanks at all times.

A fueling log is maintained to track and record the volume of fuel dispersed for City vehicles and equipment. Completion of these logs is mandatory and used as secondary control to track the volume of fuel stored in the tanks.

All other vehicle fluids are stored indoors. Floor drains within the DPW building are connected to the sanitary sewer. Vehicle maintenance activities, including washing, are conducted indoors.

SECTION F – ON SITE WASTE DISPOSAL

A total of one (1) 8-yard dumpster are kept on site for office trash and construction refuse. The dumpsters are not used for the disposing of hazardous materials. The lids of the dumpsters are to be closed at all times.

F.1 Household Hazardous Waste

The city relies on the services of the Green for Life, USA (GFL) for collaborative household hazardous waste recycling events <https://gflusa.com/>

SECTION G – VEHICLE WASHING AND MAINTENANCE

Vehicle maintenance activities are conducted by DPW staff for the City of Dearborn's entire vehicle fleet, but no vehicles in use by the police and fire departments. Maintenance activities conducted by DPW staff include, but are not limited to, oil changes and other vehicle fluids, brakes, tune ups, and general repair tasks. A maintenance log is maintained by DPW staff to document all vehicle maintenance and repair activities. Vehicle washing activities is conducted indoors in a designated area inside the main DPW building. The area is sloped inward to contain wash water to prevent wash water from flowing outside of the designated washing area. Wash water is collected by a catch basin located within the vehicle washing area and is connected to the sanitary sewer. Used oil is stored in 500-gal above ground tank. When full our Oil Company is contacted to pump down the tank and dispose of properly.

SECTION H: Spill Response Procedures and Equipment

If oil is released to the environment in the following quantities, the *City of Dearborn Motor Transportation Facility Spill Response Plan – Oil* shall be followed (**Appendix B**):

To The Ground:		To Waters of the State:		To Sanitary Sewer (<i>contact WWTP only</i>):	
Oil	7 gallons	Oil	Any quantity that causes visible sheens, oil films, unnatural turbidity, foams or deposits in water body	Oil	Any quantity not currently authorized by receiving WWTP

The details for cleaning up a spill are indicated in the *City of Dearborn Motor Transportation Facility Spill Response Plan – Oil* 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 CT
 Warren MI 48092-2793
 (586) 753-3700

During Non-Business Hours:

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

SECTION J: Surveillance

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

The new oil drums stored inside the Cold Storage Shed are monitored when a new oil drum is needed inside the Facility. Drums are inspected for potential leaks on the floor or movement within the shed.

The oil drums stored inside the Facility are in active use and monitored daily for leaks, spills, or potential hazards. There are six porter staff assigned to the Facility to ensure its cleanly appearance and organization and help to minimize potential hazards that could cause a spill. In addition, the maintenance staff are well organized at each of their stations and daily inspect their areas, and the vehicle maintenance fluid storage area, for leaks or spills.

The used oil storage area is monitored at least weekly by the porter staff for the presence of oil in the secondary containment unit and the level of used oil in the tank. The area surrounding the used oil tank and filling port are monitored for leaks and spills.

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 Environmental Quality (DEQ)	
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]	
Inland Water Pollution Control Inc. 4086 Michigan Avenue Detroit, MI. 48210 Walter Rozycki	1-877-478-3205 1-313-899-3014 1-313-841-5800
Waste Water Treatment Plant	
For spills into the sanitary system, contact the local WWTP Plant Operations	DWSD System Control 1-313-267-6000 1-313-297-0275

SPILL RESPONSE PLAN – Oil

(Greater than 7 gallons)

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 Nick Watts at 734-812-5357 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:

Inland Water Pollution Control Inc.	1-877-478-3205
Walter Rozycki	1-313-841-5800

5. For both outdoor and indoor spills, protect nearby drains from oil by blocking with absorbent pads, booms, etc. Clean oil with absorbent material (do not flush with water). Properly dispose of clean-up materials.
6. A call to the DEQ or PEAS will be made to report the release:
During Regular Business Hours:
SE Michigan District Office
27700 Donald CT
Warren MI 48092-2793
(586) 753-3700

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

During Non-Business Hours:

7. A written report **MUST** be submitted within 10 days after the release to:
MDEQ Water Bureau Chief
525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909-7973

Wayne County Health Department
Carol Austerberry, Director of
Environmental Health
33030 Van Born Rd.
Wayne, MI 48184
Phone: 734-727-7000

AVAILABLE SPILL RESPONSE EQUIPMENT

- 20-50 lb floor dry
- 2 - Brooms
- 2 – Shovels
- Caution Tape
- 5– Absorbent Booms
- 20 – Absorbent Pads

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:	