

12.0 POLLUTION INCIDENT PREVENTION PLAN (PIPP)

The Pollution Incident Prevention (PIP) Plan provides a response plan as required by the State of Michigan's Part 5 Rules. This plan provides spill response procedures and is intended to provide guidance in the event of a release of polluting materials to air, soil, or surface water at the South Lyon Department of Public Works (DPW) Facility. As such, this plan has been integrated into City's SWPPP to avoid overlap and to create a single plan for staff to reference. The provisions of this plan must be carried out immediately in the event of a release of polluting materials that could threaten human health or the environment. The Part 5 Rules require facilities that receive, process, manufacture, store, or ship polluting materials above the threshold amounts to develop and implement a PIP Plan and to provide containment for potentially polluting materials.

Facility Identification, Location, and Emergency Contacts (see page 2); Facility Operations (pages 2 & 5); Facility Security (page 11); Past Pollution Incidents (page 6); Facility Inventory (page 4); Secondary Containment and Pollution Prevention Measures (pages 5-10); Facility Drainage and Prediction of Flow (Appendix A)

EMERGENCY CONTACTS

POLICE AND FIRE DEPARTMENTS – EMERGENCIES: 911

Michigan Department of Environment, Great Lakes, and Energy (EGLE) – Southeast Michigan District Office	27700 Donald Court Warren, MI 48092-2793 Phone: 586.753.3700 Fax: 586.751.4690
MDNRE 24-Hour Pollution Emergency Alert System (PEAS)	800.292.4706
Huron Valley-Sinai Hospital	248.937.3300 1 William Carls Drive Commerce, MI 48432
Oakland County Local Emergency Planning Committee	Ms. Tricia Smith 1200 N. Telegraph Road Dept. 410 Pontiac, MI 48341-0410 248.858.5371
State Emergency Response Commission	517.284.3966
National Emergency Response Center	800.424.8802
U.S. EPA Region 5 Office 24-Hour Number	800.621.8431
CHEMTREC (chemicals, spills, fires information)	800.262.8200

Statement of Compliance: This facility is currently in compliance with the Part 5 PIPP Rules.

12.1 PIPP Distribution

The Superintendent of Public Works maintains a copy of this PIP Plan. The Plan is available to all personnel who are authorized to have access to it. Copies of the Plan are available in the office of the Supervisor of Operations.

A letter certifying that the facility is in compliance with the Part 5 Rules will be sent to the MDNRE – Water Bureau within 30 days of finalizing the completion or updates to this Plan. The LEPC and the local Health Department will also be notified that the Plan is complete.

Copies of this Plan and future revised Plans will be available upon request to the list below:

1. US EPA Regional Administrator
2. South Lyon Fire Department
3. Emergency Response Contractor
4. Oakland County Local Emergency Planning Committee (LEPC)
5. Oakland County Health Department
6. State of Michigan Emergency Response Commission-MDNRE Waste Management Div.

12.2 PIPP Amendments

This Plan will be reviewed and updated as needed every three years, or when facility personnel, processes, or procedures identified in the Plan change or as otherwise necessary to maintain compliance with the Part 5 Rules. Upon completion of the updated Plan, the owner shall recertify the Plan and notify MDNRE, the local LEPC, and the local Health Department (with a letter) of compliance with the Part 5 Rules. Copies of the letter or amendments are maintained in the SWPPP log.

12.3 Emergency Response Personnel

12.3.1 Emergency Response Coordinator Responsibilities

The Emergency Response Coordinator (ERP) has a wide range of responsibilities including employee training, conducting facilities inspections, and committing city resources to respond to emergency situations. The ERC must be thoroughly familiar with facility operations and the Plan contents and must be either at the facility or on call and be able to respond to an emergency in a short period of time. Specific ERC responsibilities are outline below. The ERC may delegate these responsibilities to an alternate ERC at his/her discretion.

- A. Ensuring that emergency response equipment inspections are conducted quarterly.
- B. Activating internal facility alarms or communication systems to notify all facility personnel of an emergency situation.
- C. Assessing the nature and extent of emergency situations and committing the resources necessary for proper response.
- D. Ensuring that injured personnel are given appropriate medical attention and/or arranging transportation to a hospital when necessary.
- E. Maintaining adequate space for the movement of emergency response personnel and equipment.

Appendix N

- F. Ensuring that waste materials generated from emergency response activities are handled, stored, and disposed of in accordance with state and federal regulations.
- G. Notifying the appropriate local, state, and federal agencies of releases and emergencies.
- H. Minimizing the likelihood of an emergency situation recurring by evaluating incidents, critiquing response, and implementing improved procedures as necessary.

12.3.2 Emergency Response Coordinator

Primary Coordinator: Jeff Archey
Title: Assistant DPW Director
Telephone: (248) 437-6914

12.3.3 Spill Contractor

In case of a spill that requires a spill clean-up contractor, the City has a contract with South Lyon Fire Response.

12.4 Emergency Response Equipment

12.4.1 Spill Control and Personal Protection Equipment

South Lyon staff are trained to clean up small spills or releases in their work areas. In the event of an emergency, a spill contractor is on call to respond to spills and releases at the facility.

Table

12.1 lists the available emergency response equipment. The equipment is stored near areas of concern and is immediately available.

Table 12.1 Spill Control and Personal Protection Equipment

Equipment	Location	Intended Use
Shovels/brooms	Located in DPW Facility	Used to clean up spill absorbents and solid pollutants
First Aid Kits	Various locations	Available for use and treatment of minor medical emergencies
Fire extinguishers	Various locations	Available to assist in fire control
Spill kits/absorbents	Located in DPW Facility	Contain and clean up minor spills

12.5 Spill Prevention and Control

Material storage, spill training, and preventative maintenance practices will be the primary methods used at the DPW Facility to minimize the potential for spills of salt, oil, and other polluting materials.

Significant spills occurring at the facility property will be recorded on the *EGL E Spill or Release Report* form located in the SWPPP logbook. Section 4.3 of this Joint Plan will be updated to include this incident if a significant spill or leak occurs. In addition, the spill prevention and response procedures will be evaluated to determine if the planned response was adequate. If necessary, the spill prevention and response procedures will be modified to include additional or alternative practices to minimize future spills.

The following items outline some of the general spill prevention procedures and practices implemented at the DPW Facility:

- Preventative Maintenance Program (Section 5.1)
- Comprehensive Site Inspections (Section 5.2)
- Good Housekeeping (Section 5.3)
- Material Handling & Spill Prevention / Clean-Up Procedures (Section 5.4)
- Employee Training Program (Section 5.6)

12.6 Site-Specific Best Management Practices (BMPs)

Storage Areas – check to ensure that the salt pile is contained within the salt dome and that the doors remain closed except during loading. Do not allow materials from the salt dome or storage piles to enter the storm drains.

Fueling Areas – train employees on proper fueling procedures and keep spill kits on hand near the fueling areas.

Vehicle and Equipment Inspections – check regularly for leaking oil and fluids, use dry absorbents to clean leaks, segregate and label waste materials, and ensure proper disposal of materials.

Structural BMPs – see Section 6.0

12.7 Emergency Management Activities

12.7.1 Initial Response Procedures

In the event of a spill or the failure of a storage unit, the following steps should be immediately implemented.

- Ensure the safety of employees in the area.** If an employee is injured, immediately contact the Primary Emergency Response Coordinator or supervisor for further instructions.
- If no danger to an employee exists, **attempt to stop the spill or leak at its source.**

- C. **If possible, identify the spilled material.** It is important to identify the spilled material so that the MSDS can be used to identify health hazards, environmental warnings, and material compatibility.
- D. **Notify the Primary Emergency Coordinator** as soon as possible. The Primary Emergency Response Coordinator will contact additional Emergency Response Coordinators (see beginning of Section 12) whenever necessary.
- E. Contain the material in the smallest possible area by using the emergency response equipment provided in this plan (see Section 12.4.1). If the spill is small, use a broom or shovel to clean up the spill. Dispose of materials appropriately. Prevent spills from entering the combined sewer system.
- F. **Begin the Notification Procedure.** The Emergency Response Coordinator has authority to determine if outside contractors are needed to help clean a spill and will coordinate with management if agency reporting is required. If the Reportable Quantity of a particular material is released, agency notification must begin as soon as practicable (within 30 minutes of discovery of the incident).
- G. **Recover or cleanup the spilled material.** Remove the spilled material through the use of a shovel or front end loader. As much material as possible should be recovered and reused where appropriate.
- H. After the spill has been cleaned, the Emergency Response Coordinator will complete a report summarizing the details of the incident. This report shall be retained in the SWPPP/PIP logbook. A copy of the form is in Section 18.
- I. Evaluate the PIP Plan and amend if necessary. Determine the cause of the incident and evaluate the emergency response procedures. Correct any deficiencies and amend the plan accordingly.

12.7.2 Emergency Notifications

This subsection is intended to help the Emergency Response Coordinator to determine whether a spill needs to be reported and to whom the reports must be made. **NOTE: Prior to notifying state or federal authorities, the Emergency Response Coordinator must try to make contact with management.**

PIPP (Michigan Part 5 Rules) Emergency Notifications – These Rules require immediate notification be made to PEAS, the SERC, 911, and the LEPC if oil, salt, or a Polluting Material (see attachment) has reached or has the potential to reach surface or ground waters of the State. This includes indirect discharges through storm or sanitary sewer systems. Note that the discharge of limited concentrations of oil, salt, or Polluting Materials to the waters of the State or to a sanitary sewer may be allowed if the MNDRE or local ordinance has approved the discharge and issued a permit.

If the Emergency Response Coordinator determines that a Polluting material has reached or has the potential to reach surface or groundwaters of the State, verbal notice shall be given as soon as practicable after detection of the release to the **MDNRE 24-Hour Pollution Emergency Alert System (PEAS) at (800) 292-4706 and to 911.**

Appendix N

Within ten (10) days of the incident, the Emergency Response Coordinator must file a written report with the **MDNRE Southeast Michigan District Office** and the local Health Department. The written report shall outline the cause of the incident, its discovery, and any procedures taken to remove the oil, salt, or Polluting Material(s) from the waters of the State.

Additional External Emergency Notifications:

Fire Department, Police Department, Ambulance Services – If a spill incident results in injuries to South Lyon staff, emergency medical services will be contacted immediately. If a spill is the result of vandalism or if police assistance is needed, the South Lyon Police Department will be contacted. If the spill results in a fire, explosion, or threat thereof, the South Lyon Fire Department will be immediately notified. The Emergency Response Coordinator shall determine if the outside contractor is needed to help clean up a spill. If the facility has knowledge of any release of a hazardous substance in a quantity equal to or exceeding the reportable Quantity, the National Response Center, the SERC, and the LEPC shall be notified immediately.

Oakland County Local Emergency Planning Committee **248.858.5371**

State Emergency Response Commission **517.284.3966**

National Response Center (NRC) **800.424.8802**

Internal Notifications:

The following City personnel shall be contacted in the event of a spill incident that requires state or federal agency notification or cleanup assistance from an outside contractor. This contact should normally be made after a spill incident has occurred and the appropriate response has taken place, but before outside agencies are notified. Note that requirements to contact outside agencies are time critical. The agency calls must be made quickly even if management cannot be reached.

Jeff Archey **248.437.6914**