

SOP 4: Spill Response and Cleanup

Introduction

Municipalities are responsible for any contaminant spill or release that occurs on property that they own or operate. Particular areas of concern include any facilities that use or store chemicals, fuel oil, or hazardous waste, including schools, garages, and landfills. Implementation of proper spill response and cleanup procedures can help to mitigate the effects of a contaminant release. The goal of this written Standard Operating Procedure (SOP) is to provide guidance to municipal employees to help reduce the discharge of pollutants from the MS4 as a result of spills or releases.

The Town of Rowley undertakes various precautions with spill response and cleanup procedures.

Instructions: Spill response materials are available at all facilities that store or use hazardous materials. In addition, all Highway Department and Rowley Light Plant commercial work vehicles carry spill containment equipment. Spill response training is conducted annually. Reporting is managed by the Fire Department.

Procedures

The Town of Rowley will implement the following spill response and cleanup procedures to reduce the discharge of pollutants from the MS4:

Responding to a Spill

Employees should be trained in proper spill response specific to the materials used at their site and appropriate personal protective equipment (PPE). In the event of a spill, follow these spill response and cleanup procedures:

- If the facility has a Stormwater Pollution Prevention Plan (SWPPP), notify a member of the facility's Pollution Prevention Team, the facility supervisor, and/or the facility safety officer (fill out the attached spill response contact list). If not, continue to follow the procedures outlined below.
- Assess the contaminant release site for potential safety issues and for direction of flow.
- Complete the following:
 - Stop the contaminant release.
 - Contain the contaminant release through the use of spill containment berms or absorbents.
 - Protect all drains and/or catch basins with the use of absorbents, booms, berms or drain covers.
 - Clean up the spill.
 - Dispose of all contaminated products in accordance with applicable federal, state and local regulations.
 - i. Soil contaminated with petroleum should be handled and disposed of as described in MassDEP policy WCS-94-400, Interim Remediation Waste Management Policy for Petroleum Contaminated Soils (<https://www.mass.gov/files/documents/2016/08/mq/94-400.pdf>).
 - ii. Products saturated with petroleum products or other hazardous chemicals require special handling and disposal by licensed transporters. Licensed transporters will



pick up spill contaminated materials for recycling or disposal. Save the shipping records for at least three years.

- iii. Waste oil contaminated industrial wipes and sorptive minerals:
 1. Perform the “one drop” test to ensure absorbents do not contain enough oil to be considered hazardous, as described in the MassDEP Waste Oil Management Guide
(<https://www.mass.gov/files/documents/2018/12/18/oilwiper.pdf>).
 2. Wring absorbents through a paint filter. If doing so does not generate one drop of oil, the materials are not hazardous.
 3. If absorbents pass the “one drop” test they may be discarded in the trash unless contaminated with another hazardous waste.
 - a. It is acceptable to mix the following fluids and handle them as waste oil:
 - i. Waste motor oil
 - ii. Hydraulic fluid
 - iii. Power steering fluid
 - iv. Transmission fluid
 - v. Brake fluid
 - vi. Gear oil
 - b. **Do not mix** the following materials with waste oil. Store each separately:
 - i. Gasoline
 - ii. Antifreeze
 - iii. Brake and carburetor cleaners
 - iv. Cleaning solvents
 - v. Other hazardous wastes
 4. If absorbents do not pass the “one drop” test they should be placed in separate metal containers with tight fitting lids, labeled “Oily Waste Absorbents Only.”
- If you need assistance containing and/or cleaning up the spill, or preventing it from discharging to a surface water (or an engineered storm drain system), contact your local fire department using the number listed below. **In the case of an emergency call 911.**
 - TOWN OF ROWLEY FIRE DEPARTMENT: (978) 948-3812
- Contact the MassDEP 24-hour spill reporting notification line, toll-free at **(888)-304-1133**;
 - The following scenarios **are exempt** from MassDEP reporting requirements (see the MassDEP factsheet on oil and hazardous materials handling for more information: <https://www.mass.gov/files/documents/2016/08/xm/spillmgm.pdf>).
 - i. Spills that are less than 10 gallons of petroleum and do not impact a water body
 - ii. Spills that are less than one pound of hazardous chemicals and do not present an imminent health or safety hazard
 - iii. Fuel spills from passenger vehicle accidents
 - iv. Spills within a vault or building with a watertight floor and walls that completely contain all released chemicals

Reporting a Spill



When contacting emergency response personnel or a regulatory agency, or when reporting the contaminant release, be prepared to provide the following information:

1. Your name and the phone number you are calling from.
2. The exact address and location of the contaminant release.
3. Specifics of release, including:
 - a. What was released;
 - b. How much was released, which may include:
 - i. Pounds
 - ii. Gallons
 - iii. Number of containers
4. Where was the release sent/what was contaminated, addressing:
 - a. Pavement
 - b. Soil
 - c. Drains
 - d. Catch basins
 - e. Water bodies
 - f. Public streets
 - g. Public sidewalks
5. The concentration of the released contaminant.
6. What/who caused the release.
7. Is the release being contained and/or cleaned up or is the response complete.
8. Type and amount of petroleum stored on site, if any.
9. Characteristics of contaminant container, including:
 - a. Tanks
 - b. Pipes
 - c. Valves

Maintenance and Prevention Guidance

Prevention of spills is preferable to even the best response and cleanup. To mitigate the effects of a contaminant release, provide proper maintenance and inspection at each facility. To protect against contaminant release adhere to the following guidance:

- Ensure all employees are properly trained to respond in the case of a spill, understand the nature and properties of the contaminant, and understand the spill control materials and personnel safety equipment. Maintain training records of current personnel on site and retain training records of former personnel for at least three years from the date last worked at the facility.
- Provide yearly maintenance and inspection at all municipal facilities, paying particular attention to underground storage tanks. Maintain maintenance and inspection records on site.
- Implement good management practices where chemicals and hazardous wastes are stored:
 - a. Ensure storage in closed containers inside a building and on an impervious surface wherever possible.
 - b. If storage cannot be provided inside, ensure secondary containment for 110 percent of the maximum volume of the storage container.
 - c. Locate storage areas near maintenance areas to decrease the distance required for transfer.
 - d. Provide accurate labels, Material Safety Data Sheets (MSDS) information, and warnings for all stored materials.



- e. Regularly inspect storage areas for leaks.
- f. Ensure secure storage locations, preventing access by untrained or unauthorized persons.
- g. Maintain accurate records of stored materials.
- Replace traditional hazardous materials such as pesticides and cleansers with non-hazardous products such as bio-lubricants which can reduce response costs in the case of a spill.

Maintain appropriately stocked spill response kits at each facilities and locations where oil, chemicals, or other hazardous materials are handled and stored.

Employee Training

- Employees who perform work with potential stormwater pollutants are trained annually on proper spill procedures.
- Employees are also trained on stormwater pollution prevention and illicit discharge detection and elimination (IDDE) procedures.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.

Attachments

1. Spill Response and Cleanup Contact List



Spill Response and Cleanup Contact List

Contact	Phone Number	Date and Time Contacted
Facility Supervisor: Patrick Snow, Highway	(978) 948-2441	
Facility Supervisor: Matt Brown, Light Plant	(978) 948-3992	
Facility Supervisor: Bob Gray, Water Department	978-948-2640	
Fire Department: James Broderick, Fire Chief	(978) 948-3812	
MassDEP 24-Hour Spill Reporting	(888) 304-1133	
MassDEP Regional Offices:		
Northeast Regional Office	(978) 694-3200	
Hazardous Waste Compliance Assistance Line	(617) 292-5898	
Household Hazardous Products Hotline	(800) 343-3420	
Massachusetts Department of Fire Services	(978) 567-3100 or (413) 587-3181	
Licensed Site Professionals Association (Wakefield, MA)	(781) 876-8915 (617) 556-1091	
Licensed Site Professionals Board		



SOP 7: Fuel and Oil Handling

Introduction

Spills, leaks, and overfilling can occur during handling of fuels and petroleum-based materials, representing a potential source of stormwater pollution, even in small volumes. The goal of this written Standard Operating Procedure (SOP) is to provide guidance to municipal employees on a variety of ways by which fuels and petroleum-based materials can be delivered, as well as steps to be taken when petroleum products (such as waste oil) are loaded onto vehicles for offsite disposal or recycling. Delivery, unloading, and loading of waste oils are hereafter referred to as “handling.” Attached is a fuel delivery form checklist.

The Town of Rowley undertakes various procedures and precautions in handling fuel and oil.

Summary: The town contracts with a private company for delivery of fuel oil for buildings and diesel for the Public Safety generator. Vehicles are fueled at a commercial gas station. Fueling of small equipment is conducted at various sites and at the Highway Department Garage and Municipal Light Plant. Spill kits are kept at these facilities and in department vehicles. Fuel is stored in a fire rated cabinet at both facilities. The Rowley Light Plant contracts with TSI out of New York to test and dispose of oil for all transformers. TSI keeps all records associated with this work. The Highway Department also collects waste oil from town operations and stores it in covered 55-gallon drums for recycling until it is picked up for re-use in a neighboring town’s waste oil burner. Drums are stored on secondary containment.

Procedures

The Town of Rowley will implement the following fuel and oil handling procedures to help reduce the discharge of pollutants from the MS4:

General Guidelines

For all manners of fuel and oil handling described below, a member of the facility’s Pollution Prevention Team (if the facility has a SWPPP) or another knowledgeable person familiar with the facility should be present during handling procedures. This person should ensure that the following are observed:

- There is no smoking while fuel handling is in process or underway.
- Sources of flame are kept away while fuel handling is being completed. This includes smoking, lighting matches, carrying any flame, or carrying a lighted cigar, pipe, or cigarette.
- The delivery vehicle’s hand brake is set and wheels are chocked while the activity is being completed.
- Catch basins and drain manholes are adequately protected.
- No tools are to be used that could damage fuel or oil containers or the delivery vehicle.
- No flammable liquid should be unloaded from any motor vehicle while the engine is operating, unless the engine of the motor vehicle is required to be used for the operation of a pump.
- Ensure that local traffic does not interfere with fuel transfer operations. If it does, make appropriate accommodations.
- The attending persons should watch for any leaks or spills:



- Any small leaks or spills should be immediately stopped, and spilled materials absorbed and disposed of properly. Follow the procedures in SOP 4: Spill Response and Cleanup.
- In the event of a large spill or one that discharges to surface waters or an engineered storm drain system, the facility representative should activate the facility's Stormwater Pollution Prevention Plan (SWPPP) and report the incident as specified in the document.

Delivery by Bulk (Tanker) Truck

Procedures for the delivery of bulk fuel should include the following:

- The truck driver should check in with the facility upon arrival.
- The facility representative should ensure that the appropriate spill cleanup and response equipment and personal protective equipment are readily available and easily accessible. Refer to SOP 4: Spill Response and Cleanup for examples of spill cleanup and response materials.
- The facility representative should check to ensure that the amount of delivery does not exceed the available capacity of the tank.
 - A level gauge can be used to verify the level in the tank.
 - If a level gauge is not functioning or is not present on the tank, the tank should be stick tested prior to filling.
- The truck driver and the facility representative should both remain with the vehicle during the delivery process.
- The truck driver and the facility representative should inspect all visible lines, connections, and valves for leaks.
- When delivery is complete and the hoses are removed, buckets should be placed underneath connection points to catch drippings.
- The delivery vehicle should be inspected prior to departure to ensure that the hose is disconnected from the tank.
- The facility representative should inspect the fuel tank to verify that no leaks have occurred, or that any leaked or spilled material has been cleaned and disposed of properly.
- The facility representative should gauge tank levels to ensure that the proper amount of fuel is delivered, and collect a receipt from the truck driver.

Delivery of Drummed Materials

Drummed materials may include motor oil, hydraulic fluid, transmission fluid, or waste oil from another facility (as approved). Procedures for the delivery of drummed materials should include the following:

- The truck driver should check in with the facility upon arrival.
- The facility representative should ensure that the appropriate spill cleanup and response equipment and personal protective equipment are readily available and easily accessible. Refer to SOP 4: Spill Response and Cleanup for examples of spill cleanup and response materials. The facility representative should closely examine the shipment for damaged drums.
 - If damaged drums are found, they should be closely inspected for leaks or punctures.
 - Breached drums should be removed to a dry, well-ventilated area and the contents transferred to other suitable containers.
 - Drums should be disposed of in accordance with all applicable regulations.



- Drummed materials should not be unloaded outdoors during wet weather events.
- The truck driver and the facility representative should both remain with the vehicle during the delivery process.
- Drums should be handled and unloaded carefully to prevent damage.
- Upon completion of unloading, the facility representative should inspect the unloading point and the drums to verify that no leaks have occurred, that any leaked or spilled material has been cleaned up and disposed of properly, and that the unloaded drums are not leaking.
- The facility representative should check to ensure that the proper amount of fuel or other material is delivered, and collect a receipt from the truck driver.

Removal of Waste Oil from the Facility

When waste oil or similar oil products need to be removed from the premises, only haulers certified to transport waste oil should be utilized. Procedures should include the following:

- The disposal truck driver should check in with the facility upon arrival.
- The facility representative should ensure that the appropriate spill cleanup and response equipment and personal protective equipment are readily available and easily accessible. Refer to SOP 4: Spill Response and Cleanup for examples of spill cleanup and response materials. The truck driver and the facility representative should both remain with the vehicle during the tank draining process.
- When draining is complete and the hoses are removed, buckets should be placed underneath connection points to catch drippings.
- The facility representative should inspect the loading point and the tank to verify that no leaks have occurred, or that any leaked or spilled material has been cleaned up and disposed of properly.
- The facility representative should collect a receipt from the truck driver.
- When draining bulk oil tanks:
 - The facility representative should verify that the volume of waste oil in the tank does not exceed the available capacity of the disposal hauler's vehicle.
 - The disposal hauler vehicle should be inspected prior to departure to ensure that the hose is disconnected from the tank.

Employee Training

- Employees who handle or deliver fuel and/or oil are trained ##NUMBER times per year on proper procedures.
- Employees are also trained on stormwater pollution prevention, illicit discharge detection and elimination (IDDE) procedures, and spill and response procedures.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.

Attachments

1. Fuel Delivery Checklist

Related Standard Operating Procedures

- SOP 4: Spill Response and Cleanup



FUEL DELIVERY FORM**TOWN OF Rowley****Date:** _____**Time of Arrival:** _____**Time of Departure:** _____**Truck Number:** _____**Name of Truck Driver:** _____**Name of Town Employee:** _____**BEFORE UNLOADING:**

Is all spill response equipment and personal protective equipment in place?

Yes ☐ No ☐

In the case of bulk fuel delivery, does tank capacity exceed the amount of delivery?

Yes ☐ No ☐ N/A ☐

In the case of drum fuel delivery, are all drums free of leaks and punctures?

Yes ☐ No ☐ N/A ☐**COMMENCE UNLOADING. REMAIN WITH VEHICLE AT ALL TIMES.****AFTER UNLOADING IS COMPLETE:**

Have all fuel containers, including the vehicle, been inspected for leaks?

Yes ☐ No ☐

Has the ground at the unloading point been inspected for evidence of leaks?

Yes ☐ No ☐

If there are any leaks or spills, has the material been properly cleaned?

Yes ☐ No ☐

Has the correct amount of fuel been delivered?

Yes ☐ No ☐

Has a receipt been collected?

Yes ☐ No ☐**DELIVERY IS COMPLETE.**

SOP 12: Storage and Use of Pesticides and Fertilizer

Introduction

The use and improper storage of pesticides, herbicides, and fertilizers can contribute to the discharge of nutrients and toxic compounds to the municipal storm drainage system and surface waters. The goal of this Standard Operating Procedure (SOP) is to provide guidance on municipal employees on proper handling and storage of pesticides, herbicides, and fertilizers to prevent the discharge of pollutants from the MS4.

Summary: The Town of Rowley does not use herbicides or pesticides on its properties. Fertilizer is applied by an outside contractor at select sites. No fertilizers are stored at municipal buildings.

Procedures

Below are procedures for the storage and use of fertilizers, pesticides, and herbicides by municipal employees. In this section, the term “pesticide” include products used as herbicides. Refer to SOP 4: Spill Response and Cleanup and SOP 17: Hazardous Materials Storage and Handling for information on and handling spills and hazardous materials.

Storage

The Town does not store any pesticides, herbicides or fertilizers.

Use and Application of Fertilizers – The Town of Rowley contracts for fertilizer application and will provide said contractor with these procedures:

- All fertilizer products manufactured or distributed in the State of Massachusetts must be registered with the Department of Agricultural Resources.
- Perform soil testing before choosing a fertilizer. The quantity of available nutrients already present in the soil will determine the type and amount of fertilizer that is recommended. The soil test will also determine the soil pH, humic matter, texture, and exchangeable acidity, which will indicate whether pH adjustment is required for fertilizer to work efficiently. A soil test should be completed at each facility, as soil type can vary widely within a single community.
 - Soil tests are recommended every 3-4 years for turf and plantings (more frequently for problem or newly planted areas) and every year for soil where phosphorus-containing fertilizers are used. Soil pH tests should be conducted every year for all sites.
 - When collecting soil samples, take multiple samples for each target area at a four-inch depth; mix the samples together in a container and properly label the sample with property information and site use type. Separately sample areas that have discoloration, abnormal plant growth, or other problems. Take the sample at approximately the same time every year. If the area has been fertilized, wait eight weeks after fertilizing to test the soil to ensure nutrients have been absorbed.
- When selecting the optimal type of fertilizer to use on an area, consider the soil test results, type of turf, and type of turf use. Slow-use fertilizer should be used for turf grass.
- Calibrate application equipment regularly to ensure proper application and loading rates.
- Mix fertilizers using clean application equipment under cover in an area where accidental spills will not enter surface water or groundwater and will not contaminate the soil.



- Fertilizers should only be applied by properly trained personnel.
- Never apply fertilizers in quantities exceeding the manufacturer's instructions. Instead, apply small amounts throughout the growing season.
- Time fertilizer application methods for maximum plant uptake, usually in the fall and spring (e.g., between April 15 and October 15). When applying at the beginning and end of planting season, take into consideration the slower uptake rate of fertilizer by plants and adjust the fertilizer application accordingly.
- Never apply fertilizer during a drought, when the soil is dry or frozen, when it is raining, or immediately before expected rain.
- Fertilizer should be applied when the ground temperature is above 55° F.
- Apply fertilizers in amounts appropriate for the type of vegetation to minimize losses to surface water and groundwater. Use the results of the soil test to determine optimal fertilizer timing and application rates.
- Where applicable, till fertilizers into the soil rather than dumping or broadcasting (proper application techniques will depend on the type of soil and vegetation).
- Do not hose down paved areas after fertilizer application if drainage will enter into an engineered storm drain system or drainage ditch.
- Limit irrigation after fertilizer application to prevent runoff (approximately 1/2 inch of water per application for a week following application).
- Turn off irrigation systems during periods of adequate rainfall.
- Do not over-apply fertilizer in late fall to "use it up" before winter. The effectiveness of fertilizer does not reduce when stored.
- If phosphorus fertilizer is used when re-seeding, mix the phosphorus into the root zone. Do not apply directly to the soil surface.
- Avoid combined products such as "weed and feed," which do not target specific problems at the appropriate time.

Use and Application of Pesticides and Herbicides

The Town of Rowley does not utilize pesticides or herbicides on Town owned property.

Employee Training

- Employees do not handle pesticides, fertilizers, and herbicides.
- Employees are also trained on stormwater pollution prevention, illicit discharge detection and elimination (IDDE) procedures, and spill and response procedures.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.

Related Standard Operating Procedures

- SOP 4: Spill Response and Cleanup
- SOP 17: Hazardous Materials Storage and Handling



SOP 16: Streets and Parking Lots

Introduction

Regular sweeping of streets and municipally-owned parking lots is important for maintaining clean and safe roadways. It also plays a vital role in keeping pollutants like sand, trash, and leaves out of the MS4. The goal of this written Standard Operating Procedure (SOP) is to provide guidance to municipal employees on street and parking lot sweeping procedures and frequencies to reduce the discharge of pollutants to the storm drainage system and receiving waters. If sweeping services are contracted, this SOP should be provided to the contractor. The contract should specify that the contractor is responsible for compliance with all applicable laws.

Summary: Streets and municipally owned parking lots are swept annually by an outside contractor. Rowley is responsible for proper disposal of the material in accordance with Mass DEP Policies and Regulations.

Procedures

The Town of Rowley will implement the following street and parking lot sweeping procedures to reduce the discharge of pollutants from the MS4:

Sweeping Frequency

- All streets should be swept and/or cleaned a minimum of once per year in the spring (with the exception of rural uncurbed roads with no catch basins or high speed limited access highways).
- Sweep as soon as possible after snow melt and following winter activities such as sanding to capture sand and debris before it is washed into the storm drainage system.
- Consider more frequent sweeping for targeted areas based on pollutant load reduction potential, inspections, pollutant loads, catch basin cleaning or inspection results, land use, impaired waters, or other factors.

Instructions: Review all information the municipality has on its street sweeping, including sweeping records or employee knowledge related to trends/patterns in the frequency of street sweeping. Identify areas where there are high amounts of debris accumulation (e.g., where large amounts of sand are used in winter, downward-sloping areas where debris and sand may accumulate, streets with considerable leaf fall, or high-traffic areas). Based on this information, identify streets and parking lots that may need more frequent street sweeping. After these streets and parking lots have been identified, create an initial schedule ("targeted sweeping plan") for the prioritized sweeping of streets and parking lots with high levels of accumulation. Also identify roads with no catch basins or limited access highways. This information and the targeted sweeping plan should be included in the municipality's annual report and incorporated into the bullet point below.

- For rural uncurbed roadways with no catch basins and limited access highways, the Town of Rowley will either meet the minimum frequencies above, or develop and implement an inspection, documentation, and targeted sweeping plan outlining reduced frequencies within two (2) years of the effective date of the MS4 Permit, and submit such plan with its year one annual report.

Sweeping Practices

- Street sweeping should be conducted in dry weather. Sweeping should not be conducted during or immediately after rain storms.
- Dry cleaning methods should be used whenever possible, with the exception of very fine water spray for dust control. Avoid wet cleaning or flushing of the pavement.
- When necessary, enact parking bans to facilitate sweeping on busy streets.
- Sweep in a manner that avoids depositing debris into storm drains.
- Sweeping equipment (mechanical, regenerative air, vacuum filter, tandem sweeping) should be selected depending on the level of debris. Brush alignment, sweeper speed, rotation rate, and sweeping pattern should be set to optimal levels to manage debris.
- Routinely inspect and perform maintenance on sweeping equipment to reduce the potential for leaks. See SOP 21: Operations and Maintenance of Municipal Vehicles and Equipment for more information.

Sweepings Reuse and Disposal

- The reuse of sweepings is recommended by MassDEP. If street sweepings are reused (e.g., as anti-skid material or fill in parking lots), they should be properly filtered to remove solid waste, such as paper or trash, in accordance with their intended reuse. All reuse and/or disposal of street sweepings will be managed in accordance with current MassDEP policies and regulations.
- Sweepings intended for reuse can be stored for up to one year in approved temporary storage areas. Storage areas should be protected to prevent erosion and runoff and should be located away from wetland resource areas and buffer zones, surface water, or groundwater.
- Sweepings are classified as solid waste. If not reused, they should be disposed of at solid waste disposal sites.
- For additional information on approved reuses of sweepings and storage/disposal policies, refer to MassDEP policy #BAW-18-001: Reuse and Disposal of Street Sweeping (<https://www.mass.gov/files/documents/2018/05/14/street-sweepings.pdf>).
- Street sweepings will be disposed of in accordance with state and federal law by the contractor.

Documentation and Reporting

The following information should be documented and included in each annual report:

- Number of miles cleaned or the volume or mass of material removed (refer to the sweeping log in the attachments).

Employee Training

- Employees do not perform street sweeping.
- Employees are also trained on stormwater pollution prevention, illicit discharge detection and elimination (IDDE) procedures, and spill and response procedures.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.

Attachments

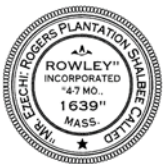
1. Street and Parking Lot Sweeping Log

Related Standard Operating Procedures

1. SOP 21: Operations and Maintenance of Municipal Vehicles and Equipment

**Street Sweeping Log
Rowley, Massachusetts**

Date	Operator	Weather Conditions	Streets/Parking Lots Swept	Number of Miles Swept	Volume/Mass of Material Removed	Corrective Action Taken/Recommended



SOP 17: Hazardous Materials Storage and Handling

Introduction

A hazardous material is any biological, chemical, or physical material with properties that make it dangerous or potentially harmful to human health or the environment. Hazardous materials can be released to the environment in a variety of ways. When hazardous materials come into contact with rain or snow, the pollutants are washed into the storm sewer system and to surface waterbodies and/or groundwater. Hazardous materials associated with municipal facilities and their operations include, but are not limited to, oil, gasoline, antifreeze, fertilizers, pesticides, and de-icing agents and additives.

Municipally owned or managed facilities where hazardous materials are commonly stored and handled include:

- Equipment storage and maintenance yards
- Materials storage yards
- Municipal buildings and facilities (e.g., schools, libraries, police and fire departments, town offices, municipal pools, and parking garages)
- Public works yards
- Vehicle storage and maintenance yards
- Water and wastewater facilities
- Municipal Light Plant

Minimizing or eliminating contact of hazardous materials with stormwater can significantly reduce pollution of receiving waters. Proper hazardous material handling and storage also contributes to employee health, an organized workplace, and efficient operations. The goal of this written Standard Operating Procedure (SOP) is to provide guidance to municipal employees to help prevent stormwater pollution resulting from the handling and storage of hazardous materials. If services are contracted, this SOP should be provided to the contractor. The contract should also specify that the contractor is responsible for compliance with all applicable laws.

The Town of Rowley undertakes various activities in regard to handling and storing hazardous materials.

Spill Response Procedures and spill kits are maintained in all areas handling hazardous materials. Spill kits are also available in vehicles used by the Highway Department, Municipal Light Department and Fire Department.

Procedures

The Town of Rowley will implement the following procedures for handling and storing hazardous materials to reduce the discharge of pollutants to the MS4:

Handling, Loading, and Unloading

- Avoid loading/unloading materials in the rain and/or provide cover.
- Retrace areas where materials have been transferred to identify spills. If spills are found, immediately



clean them up. Follow procedures in SOP 4: Spill Response and Cleanup.

- Time delivery and handling of materials during favorable weather conditions whenever possible (e.g., avoid receiving loads of sand during windy weather).
- Inspect containers for material compatibility and structural integrity prior to loading/unloading any raw or waste materials.
- Use dry cleanup methods (e.g., squeegee and dust pan, sweeping, and absorbents as last step) rather than hosing down surfaces.

Material Storage

- Confine material storage indoors whenever possible. Plug or disconnect floor drains that lead to the stormwater system.
- Confine outdoor material storage to designated areas that are covered, on impervious surfaces, away from high traffic areas, and outside of drainage pathways.
- Store containers on pallets or equivalent structures to facilitate leak inspection and to prevent contact with wet floors that can cause corrosion. This technique also reduces incidences of container damage by insects and rodents.
- Store materials and waste in materially compatible containment units.
- Keep hazardous materials in their original containers.
- If materials are not in their original containers, clearly label all storage containers with the name of the chemical, the expiration date, and handling instructions.
- Maintain an inventory of all raw and waste materials to identify leakage. Order new materials only when needed.
- Provide secondary containment for storage tanks and drums with sufficient volume to store 110 percent of the volume of the material.
- Provide sufficient aisle space to allow for routine inspections and access for spill cleanup.
- Inspect storage areas for spills or leaks and containment units for corrosion or other failures.

Waste Treatment, Disposal, and Cleanup

- Adopt a regular schedule for the pick-up and disposal of waste materials.
- Recycle leftover materials whenever possible.
- Substitute nonhazardous or less-hazardous materials for hazardous materials whenever possible.
- Protect empty containers from exposure to stormwater and dispose of them regularly to avoid contamination from container residues.

Employee Training

- Employees who handle and use hazardous materials are trained annually on these procedures.
- Employees are also trained on stormwater pollution prevention, illicit discharge detection and elimination (IDDE) procedures, and spill and response procedures.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.



Related Standard Operating Procedures

1. SOP 4: Spill Response and Cleanup



SOP 18: Winter Road Maintenance

Introduction

Winter road maintenance includes snow removal and the use of salt, sand, or deicers to ensure safe winter driving conditions. Proper maintenance procedures and use and storage of materials can help reduce the discharge of pollutants, such as sand and salt, from the MS4 and to receiving waters. The goal of this written Standard Operating Procedure (SOP) is to provide guidance to municipal employees on the use and storage of salt and sand, minimizing the use of salt, evaluating opportunities for use of alternative materials, and ensuring that snow disposal activities do not result in disposal of snow into surface waters. If services are contracted, this SOP should be provided to the contractor. The contract should specify that the contractor is responsible for compliance with all applicable laws.

The Town of Rowley performs a variety of maintenance activities to ensure safe winter driving conditions on its roads and parking lots.

Instructions: The Town of Rowley uses a salt and salt/sand mix on roads in winter. Materials are stored in an enclosed area on the Highway Department Property. Rowley Highway Department staff and private contractors conduct winter road maintenance.

Procedures

The Town of Rowley will implement the following winter maintenance procedures to reduce the discharge of pollutants from the MS4:

Equipment and Maintenance

- Calibrate equipment to reduce and optimize salt use and ensure deicing agents are being used efficiently. Provide employee training on proper calibration procedures.
- Do not overfill trucks with deicing materials as it may lead to spills.
- Encourage the use of automated application equipment like zero velocity spreaders.
- When possible, retrofit vehicles to include equipment such as on-board application regulators, temperature sensors for air and pavement, and anti-icing and pre-wetting equipment.
- Wash equipment using proper procedures to prevent pollutants from entering the stormwater system. Dry cleanup procedures should be used when possible. Vehicles dirtied from salt or sand application should be washed according to procedures in SOP 21: Operations and Maintenance of Municipal Vehicles and Equipment.
- Regularly inspect and maintain equipment to reduce the potential for leaks. See SOP 21: Operations and Maintenance of Municipal Vehicles and Equipment for more information.



Anti-icing and Deicing

- Minimize the use and optimize the application of sodium chloride and other salt¹ (while maintaining public safety) and consider opportunities for use of alternative materials.
- Optimize sand and/or chemical application rates through the use, where practicable, of automated application equipment (e.g., zero velocity spreaders), anti-icing and pre-wetting techniques, implementation of pavement management systems, and alternate chemicals.
- Remove as much snow as possible using mechanical means like plowing, blowing, or shoveling before deicing to reduce the need for road salt or other deicing chemicals.
- When possible, use anti-icing practices to prevent ice formation and reduce the need for deicers.
- Apply anti-icing agents 1-2 hours before winter weather events to ensure optimal performance (can be applied up to 24 prior).
- Only apply road salt when the pavement temperature is above 15° F.
- When using deicers, use pre-wetting agents (e.g., salt brine) to help them work more efficiently and to reduce road salt scatter and bounce.
- Salt brine solution used for anti-icing and pre-wetting can be stored for up to a year –concentration should be tested before use. If temperatures fall below 0° F, use a circulator pump to prevent the brine from freezing.
- Use alternative deicing materials instead of sodium chloride as appropriate (e.g., calcium magnesium acetate, magnesium chloride, or calcium chloride).
- **Avoid mixing road salt and sand. Doing so makes both the salt and sand work less efficiently and leads to over-application.**
- Only apply enough deicer so that plows can remove the snow and ice. Adjust the application rate of deicers based on the type of storm, type of agent used, and anti-icing and pre-wetting techniques used.
- Perform unloading/loading of trucks on impervious surfaces whenever possible. These areas should be frequently cleaned and swept to reduce the tracking and runoff of salt and to capture any spills.
- Track the amount of deicer used and maintain records of the application of sand, anti-icing and/or de-icing chemicals to document the reduction of chemicals to meet established goals.

Storage of Deicing Materials

- Prevent exposure of deicing product (salt, sand, or alternative products) storage piles to precipitation by enclosing or covering the storage piles. Implement good housekeeping, diversions, containment or other measures to minimize exposure resulting from adding to or removing materials from the pile. Store piles in such a manner as not to impact surface water resources, groundwater resources, recharge areas, and wells.
- Store materials under covered or enclosed areas and on impervious surfaces.
- Ensure that there are adequate drainage controls in storage areas to prevent runoff from entering the stormwater system.

¹ For purposes of the MS4 Permit, salt means any chloride-containing material used to treat paved surfaces for deicing, including sodium chloride, calcium chloride, magnesium chloride, and brine solutions.



- Follow appropriate loading and unloading procedures. If there are spills when loading or unloading materials, follow the protocol outlined in SOP 4: Spill Response and Cleanup.
- Frequently sweep near the storage/loading areas to reduce the amount of salt, sand, or other materials that is tracked out.
- For liquid deicing chemicals, provide secondary storage containment.
- Do not store road salt near drinking water supplies, surface water resources, groundwater resources, recharge areas, and wells. Follow proper storage guidelines from MassDEP (<https://www.mass.gov/guides/guidelines-on-road-salt-storage>).

Snow Storage and Disposal

- Snow should not be pushed or dumped into waterbodies or wetlands, into stormwater drainage swales or ditches, or on top of catch basins.
- Snow should not be stored near drinking water areas, waterbodies, or wetlands.
- Avoid storing snow in areas that are unstable, areas of potential erosion, or high points where snow may melt and collect debris as runoff before it enters the stormwater system.
- Consider sun exposure when storing snow. Snow in areas with higher sun exposure will melt faster but may require deicers if the snowmelt refreezes.
- Consider practices such as living snow fences to contain snow piles and reduce snow drifting.
- The MS4 Permit prohibits snow disposal into waters of the United States. Snow disposal and storage activities, including selection of appropriate snow disposal sites, will adhere to the MassDEP Snow Disposal Guidance, Guideline No. BWR G2015-01 (<http://www.mass.gov/eea/agencies/massdep/water/regulations/snow-disposal-guidance.html>).
- The Town of Rowley currently disposes of snow at 2 snow disposal areas in compliance with MS4 regulations.

Reporting

The Town of Rowley will document and include the following information in its annual report:

- Road miles treated
- Type and amount of deicer used
- Equipment calibration records
- Employee training dates

Employee Training

- Employees who perform winter road maintenance are trained once per year on these procedures and the proper operation of related equipment.
- Employees are also trained on stormwater pollution prevention, illicit discharge detection and elimination (IDDE) procedures, and spill and response procedures.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.

Related Standard Operating Procedures



1. SOP 4: Spill Response and Cleanup
2. SOP 21: Operations and Maintenance of Municipal Vehicles and Equipment

