

# DEPARTMENT OF PUBLIC WORKS



## Operations and Maintenance Plan Draft



Environment

Prepared for:  
The Town of Tewksbury, MA

Prepared by:  
AECOM  
Chelmsford, MA  
60303397  
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# Operations and Maintenance Plan Draft

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Prepared By [Name]

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Reviewed By [Name]

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## List of Acronyms

AST – Above Ground Storage Tank

BMP – Best Management Practice

DEP – Department of Environmental Protection

DPW – Department of Public Works

SOP – Standard Operating Procedures

SPCC - Spill Prevention and Countermeasure

SWPPP - Stormwater Pollution Prevention Plan

NPDES – National Pollutant Discharge Elimination System

## 1.0 Purpose

The purpose of the Operation and Maintenance Plan is to minimize the impact of stormwater pollution from various operations and maintenance activities in order to comply with Draft IMS Small MS4 NPDES Permit. Specific Operations and Maintenance Procedures are included if applicable to parks and open space, buildings and facilities, and vehicles and equipment.

## 2.0 Coverage Area

The coverage area considered in this report includes the Department of Public Works (DPW) facility, which is located on Whipple Road, and includes the facility itself, the parking lot in front of the building, and the storage areas behind the facility. The specific range of the storage area behind the DPW extends to the tree line. A figure of the coverage area and the DPW facility is included in Appendix A. This figure is based on ortho imagery and includes nearby wetlands and swamps.

### 3.0 Applicable Operations

The O&M Plan covers the following DPW operations:

- All routine and preventative maintenance of the DPW's stormwater system
- Road and parking lot maintenance practices, which include deicing, snow removal, and sanding
- External building maintenance, which includes exterior cleaning, washing, painting, and other maintenance activities
- Grounds maintenance, which includes the usage of fertilizer, pesticide, herbicide, green waste disposal, trash management, and sediment and erosion control
- Material storage, which includes stockpiling of debris such as gravel, and heavy equipment storage

## 4.0 Operations and Maintenance Procedures

All DPW operations listed in Section 3.0 shall be conducted in accordance with the applicable Standard Operating Procedures included in Appendix B and summarized in Table 4-1 below.

All scheduled inspections and maintenance of the DPW stormwater system are contained in the Stormwater Management System Inspection and Maintenance Logs, attached as Appendix C.

Appendix D is the Stormwater Pollution Prevention Plan (SWPPP) for the DPW.

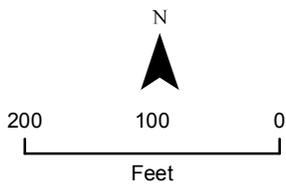
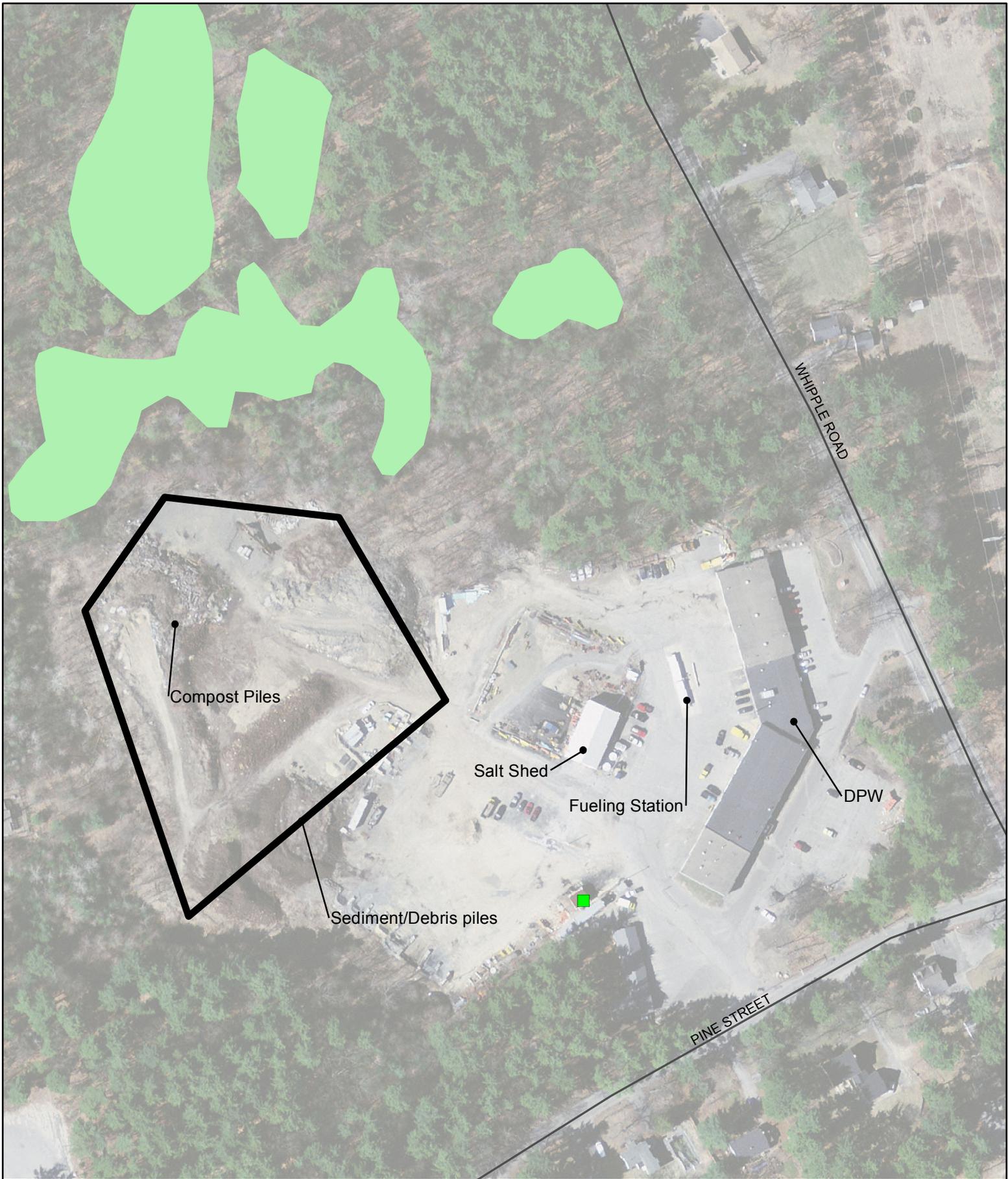
Appendix E is the 2007 Spill Prevention Control and Countermeasure (SPCC) plan for the DPW.

**Table 4-1. Summary of Standard Operating Procedures for DPW Operations and Maintenance**

<b>Standard Operating Procedures</b>	<b>Applicable Work</b>
General Good Housekeeping Procedures	All work conducted by any DPW employee
Stormwater System Maintenance	Routine and preventative work on the DPW's Stormwater System
Road & Parking Lot Maintenance	Snow plowing, winter salt, sand, or deicer application, paving or patching asphalt or concrete work, painting and striping, trash and debris removal
Vehicle Maintenance & Fueling	Vehicle and equipment maintenance, good housekeeping & waste disposal, vehicle washing, vehicle fueling, fuel spill cleanup
Building Maintenance	Janitorial practices, waste management, pressure washing & exterior surface cleaning, painting, sanding, & sandblasting, HVAC system maintenance
Grounds Maintenance	Landscape maintenance, mowing, mulching, gravel trails & parking lots, trash removal/ waste management
Fertilizer, Herbicide, & Pesticide Application	Storage, mixing, and application of fertilizers, herbicides, and pesticides
Materials Storage	Liquid materials storage, hazardous materials storage, stockpiling materials including: sand & gravel, wood products, including lumber, chips, sawdust, or hog fuel, demolition debris including asphalt and concrete, decommissioned vehicles or equipment
Incidental Spill Response & Cleanup	Limited actions taken to respond to an incidental release of potentially hazardous materials

# Appendix A

## Figure



**Department of Public Works  
Project Location Map**

NPDES O&M  
Tewksbury, MA

September 2013

**Legend**

- Dumpster
- Wetlands
- Roads



# **Appendix B**

## **Standard Operating Procedures**

### Standard Operating Procedures (SOPs)

<b>Good Housekeeping for Outdoor Operations and Maintenance</b>	
Purpose of SOP:	To prevent the discharge of pollutants to stormwater in the course of conducting all outdoor operations and maintenance work at the Department of Public Works.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### **Equipment and Materials Needed**

1. Weatherproof containment and storage materials, including containers, drums, pallets, etc.
2. Spill Kit and equipment for dry cleanup, including kitty litter, absorbent pads, brooms, etc.
3. Storm drain inlet protection, including drain covers, berms, etc.

#### **Standard Operating Procedures**

1. All employees should be familiarized with the location of all storm drains and conveyance facilities.
2. Protect stormwater facilities during all work to ensure that only rain water enters the drainage system.
3. Do not dump liquids or other materials outside.
4. Pick up trash and dispose in dumpster.
5. Keep trash receptacles closed at all times.
6. Do not put liquids in trash receptacles.
7. Do not put hazardous materials in trash receptacles.
8. Keep outside work areas clean and sweep up after projects.
9. Do not hose down outside work areas.
10. Quickly clean up and contain all solid or liquid pollutant spills. Use solid absorbents and rags for clean-up of liquid spills and leaks.
11. Sweep paved maintenance and material usage areas often as needed.
12. Promptly repair or replace leaking connections, pipes, valves, hoses, or other leaking equipment that could contaminate stormwater.
13. Report any suspected illegal connections or illegal discharges to the Department of Environmental Protection (DEP).

### **Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. Hazardous Waste materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport, call Clean Harbors at 978-683-1002.

### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Stormwater System Maintenance</b>	
Purpose of SOP:	To maintain the purpose of the stormwater management system at the Department of Public Works and to guarantee the proper disposal of waste.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### **Equipment and Materials Needed**

1. Stormwater Management System inspection and Maintenance Log.
2. Stormwater Management System Map
3. Vactor Truck

#### **Standard Operating Procedures**

1. Inspect and maintain stormwater system according to the Stormwater Management System Inspection and Maintenance Logs once in the spring and once in the fall.
2. Schedule catch basin cleaning annually based on inspection.
3. Inspect all catch basins for obstructions, structural damage, and depth of sediment every month. Clean out catch basins if they are half full of sediment.
4. Schedule street and parking lot sweeping biannually after winter snow & ice management and again in the fall after the summer dry season and before winter rains mobilize accumulated sediments and pollutants from impervious surfaces.
5. Maintain side slopes on ditches at a grade that does not cause side-slope erosion.
6. Maintain 4 to 9 inches of vegetation in ditches.
7. Remove mowed or cut vegetation from ditches and do not dispose of in adjacent waterway or storm drainage system.
8. Do not apply herbicide, pesticide, or fertilizer in ditches or on adjacent roadways.
9. Reseeding of ditches should be done in late spring or early fall. This allows vegetation to be re-established before the next wet season to minimize erosion.

#### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

Road and Parking Lot Maintenance	
Purpose of SOP:	To prevent discharge of pollutants to stormwater during DPW vehicle and maintenance activities.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### Prerequisites

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### Equipment and Materials Needed

1. Spill kit and equipment for dry cleanup including kitty litter, absorbent pads, etc.
2. Storm drain inlet protection including drain covers, berms, etc.
3. Tarps

#### Standard Operating Procedures

##### *General Maintenance*

1. Employees should be familiarized with the location of all storm drains and conveyance facilities in the work areas.
2. Collect and dispose of trash along roadsides and in parking lots when observed.

##### *Street Maintenance*

1. Protect nearby storm drains using drain covers, inserts, berms, etc. over or around inlets when doing any maintenance work within 25 feet of an inlet.
2. Sweep or vacuum wastes from all maintenance work when the project is complete and before any rain event.
3. Only schedule paving projects during dry weather.
4. Use erosion and sediment control during any earth disturbing activities.

##### *Parking Lot Maintenance*

1. Clean leaves, trash, sand, and other debris from parking lots regularly or as needed to prevent debris from reaching any storm drain inlet or storm detention area.
2. Make sure to sweep or vacuum the pavement area after the final snowmelt. Paved areas should also be vacuumed as necessary during the summer months.
3. Any automotive leaks, drips, or spills must be cleaned up with dry methods, such as

absorbents, and disposed of properly.

4. Inspect dumpsters and waste disposal areas regularly. Clean up any trash, spills or leaks and report leaking dumpsters to the disposal company.
5. Repair pavement along the parking lot, and include annual inspections.
6. Make sure catch basins are placed on areas where they will receive runoff.
7. Repair areas with significant erosion.
8. Make sure that dumpsters are not located uphill of a nearby catch basin.
9. Make sure dumpsters are located on pavement, are in good condition, and remain covered at all times.

#### *Street Sweeping*

1. Schedule street sweeping to be at least twice per year, and schedule additional sweeping after large storm events or for maintenance projects that leave debris behind.
2. Do not dispose of street sweeping debris on Department of Public Works property or reuse for other purposes. Include provisions for proper disposal of debris in any contracts. Any automotive leaks, drips, or spills must be cleaned up with dry methods (absorbents) and disposed of properly.

#### *Paving/Patching*

1. Conduct all patching, paving, or re-sealing of asphalt on dry days.
2. Stop paving during and immediately after a rainfall.
3. Pre-heat, transfer or load hot asphalt far away from any storm drain inlet.
4. Protect downstream waters and storm drain inlets from debris including grinding, sawing, or pavement demolition dust.
5. Cover and seal all storm drains before applying seal coat or slurry seal. Leave covers in place until the job is complete and all water from emulsified oil sealants has drained or evaporated. Clean up debris from inlets and dispose of properly.

#### *Concrete Pouring*

1. Do not allow slurry from saw-cutting to enter storm drains.
2. Protect nearby storm drains using drain covers, inserts, berms, etc. around or over inlets when working within 25 feet of an inlet.
3. Designate a "Wash Our Area" on the job site in a grassy or graveled area where collective water can soak into the ground. Never wash out on a street or paved area or near a storm drain.
4. If no "Wash out Area" is immediately available, wash out into a container (5-gallon bucket or wheelbarrow) and dispose of the material at the closest suitable grassy or graveled area where collective water can soak into the ground.

### *Painting and Striping*

1. Only schedule painting and striping projects during dry weather.
2. Stop painting if rain is expected.
3. Block nearby storm drain inlets (within 25 feet down gradient from work site).
4. Promptly clean up any spill of paints, cleaners or other chemicals.
5. Conduct all loading, mixing, and cleanup activities at a covered location, far away from any storm drain inlet.

### *Cleaning Sidewalks and Parking Lots*

1. Do not hose down sidewalks or parking lots unless the wash water will only enter gravel or grassy areas where the water can infiltrate into the ground.
2. If you do not use any chemicals or detergents and are only cleaning surfaces of ambient dust, then you may direct the wash water to nearby landscaping or contain it on site and allow it to evaporate. When discharging to landscaping, make sure the water is being absorbed in the ground and not running off into a storm drain or paved area.
3. Dry cleanup methods should be used prior to any pressure washing. These include using absorbents (kitty litter, rags, sand, etc.) to clean up spills, sweeping, vacuuming, and scrapping off dried debris. Use absorbents on oily spots prior to sweeping or washing. The waste material should be disposed of properly.
4. If you must pressure wash, identify all storm drains are before starting. Wash water must not be allowed to flow down gutters or enter storm drains. All wash water must be captured for proper disposal.
  - Determine where water will puddle for collection.
  - Use the following types of equipment to protect storm drains and to contain and collect wash water: vacuum pumps, booms/berms, portable containment areas, weighted storm drain covers, inflatable plumber's plugs, oil/water separators, holding tanks, portable sump pumps, hoses, absorbents.

### *Snow Plowing*

1. Avoid plowing, pushing, blowing, or storing excess snow or other debris into storm drains. Do not hose down sidewalks or parking lots except where wash water will only enter grassy or graveled areas where it can infiltrate into the ground.
2. If you do not use any chemicals or detergents and are only cleaning surfaces of ambient dust, then you may direct the wash water to nearby landscaping or contain it on site and allow it to evaporate. When discharging to landscaping, make sure the water is being absorbed in the ground and not running off into a storm drain or paved area.
3. Avoid plowing, pushing, blowing, or storing excess snow or other debris into storm drains.

### *Snow Storage and Disposal*

1. Do not dispose of snow in wetlands, ditches, open water, or directly on top of storm drains.
2. Cleanup and sweep sediment and debris from paved surfaces after snowmelt.

3. Establish snow storage areas that are:
  - On a grass or gravel surface where melt water can infiltrate.
  - Down gradient from water courses or wetlands.
  - Not located on or near storm drains.

#### *Sanding*

1. Only use clean sand for winter road maintenance.
2. Use the lowest possible application rate that will be effective.
3. Make sure to sweep roads and parking lots after winter sanding operations.

#### *Sand Loading and Storage*

1. Stockpiled sand should be stored under cover or covered with a tarp.
2. When loading sand, do not overload the truck.
3. Loading areas and yards should be swept frequently to prevent sand build up and runoff.

#### *Salt/Deicer Application*

1. Hand apply salt and/or chemical deicers only on sidewalks where required for pedestrian safety.
2. Use the lowest amount of product that will be effective.
3. Do not apply salt and/or chemical deicers near storm drains.

#### *Hazardous Waste Disposal*

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. These materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the DPW cannot safely transport, call Clean Harbors at 978-683-1002.

#### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Vehicle Maintenance &amp; Fueling</b>	
Purpose of SOP:	To prevent the discharge of pollutants to stormwater in the course of DPW vehicle and equipment maintenance, good housekeeping & waste disposal, vehicle washing, vehicle fueling, and fuel spill cleanup.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### **Equipment and Materials Needed**

1. Weather proof containers
2. Polly or plastic pallets
3. Drum covers
4. Tarps
5. Spill kit and equipment for dry cleanup (socks, absorbent pads, kitty litter, broom, and dustpan)
6. Drip pan
7. Parts washer

#### **Standard Operating Procedures**

##### *Vehicle and Equipment Maintenance*

1. Conduct all maintenance and repair work inside or under cover.
2. Only emergency maintenance or maintenance that does not involve fluids may be performed outside.
3. Move leaking vehicles or equipment indoors or under cover.
4. Use drip pans for leaking vehicles that need to be stored outside.
5. Contain leaking fluids and tag the vehicle to alert drivers that vehicle is non-operational.
6. Perform all maintenance activities involving fluids indoors only (except in emergency cases).
7. Dispose of wastewater from tire leak check to sanitary sewer, not storm drain.
8. Promptly transfer used fluids to recycling drums or hazardous waste containers.
9. Dispose of liquid waste properly.

10. Store cracked batteries in leak proof secondary containers.

#### *Vehicle & Equipment Fueling*

1. Fuel carefully to minimize drips on the ground.
2. Do not "top off" fuel tanks.
3. Remain present at the fueling station during the entire fueling operation.
4. When fueling small equipment in the field such as lawn mowers, weed whackers, etc., do so over a paved surface, at a location that is down gradient from and far away from the nearest storm drain.

#### *Clean Up of Leaks, Drips, or Spills*

1. Clean up leaks, drips, or spills thoroughly and promptly.
2. If fluids leak or have spilled on an impervious surface, such as a road or parking lot, locate nearest down gradient storm drain and dike or berm the drain to prevent fluids from entering.
3. Put absorbent on the spill area.
4. After clean up, sweep up the contaminated absorbent and remove berm or dike from the storm drain.
5. If spills occur on a pervious surface such as gravel or grass, mark the area and contact the 24-Hour Emergency Spill Response line at 888-304-1133.
6. Never hose down leaks, drips, or spills.
7. Always use dry methods for cleanup of fuel spills (gas, diesel or kerosene).
  - Spread absorbents (kitty litter or loose absorbents, sheets, pillows, pigs, or socks) on the spill.
  - Sweep up or pick up the absorbed materials.
  - Dispose of wastes properly.

#### *Vehicle & Equipment Washing*

1. Wash all vehicles and equipment in the designated wash areas of the DPW.
2. If washing cannot be conducted at the designated wash facility or a commercial wash facility, vehicle and equipment may be rinsed using water only on a pervious surface (grass or gravel) at a location where wash water will not drain to a storm drain inlet, waterway, or wetland. Do not use soap or detergent in these areas.
3. Wash all vehicles and equipment indoors.

#### **Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. Hazardous Waste materials must be removed by Clean Harbors twice a year.

3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport, call Clean Harbors at 978-683-1002.

#### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Building Maintenance</b>	
Purpose of SOP:	To prevent the discharge of pollutants to stormwater in the course of DPW building maintenance activities, including: janitorial practices, waste management, pressure washing & exterior surface cleaning, painting, sanding, & sandblasting.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### **Equipment and Materials Needed**

1. Spill kit and equipment for dry cleanup (socks, absorbent pads, kitty litter, broom, and dustpan)
2. Inlet protection (wattles, drain covers, berms, and/or filter fabric)
3. Containers for collecting paint wastes
4. Tarps or ground cloths

#### **Standard Operating Procedures**

##### *Janitorial Practices and Waste Management*

1. Never dump mop water or cleaning wastewater outside, on paved surfaces, or into storm drains. Dispose of wastewater in mop sink or other sanitary sewer drain.
2. Do not pour, transfer, or dispose of any material outdoors or near a storm drain.
3. All waste containers must be leak-tight with tight-fitting lids or covers.
4. Keep container lids closed at all times unless adding or removing material. If possible, store waste receptacles
5. Sweep around outdoor waste containers regularly.
6. When working in the field, collect all wastes in bags or other leak-proof containers and bring back to the garage for proper disposal.
7. Do not wash dumpsters with water outdoors. If a dumpster requires washing, contact the service provider and have them remove it for cleaning, or move it to the designated wash down facility at the DPW for washing to sanitary sewer.
8. Minimize waste by purchasing products that have minimal packaging. Recycle cardboard, plastics and paper products in the proper container.

9. Purchase the least toxic cleaning product possible to accomplish the job. Purchase biodegradable cleaning products where possible.

#### *Painting, Staining, Scraping, Sanding, and Sandblasting*

1. Use a ground cloth securely attached to the base on the building for any scraping or sanding of the exterior surface.
2. Use a ground cloth or oversized tub for paint mixing and tool cleaning. Properly dispose of the wastes.
3. Enclose spray-painting operations with tarps or other means, as possible, to minimize wind drift and to contain overspray.
4. Clean paintbrushes and tools used to apply water-based paints in sinks plumbed to a sanitary sewer or in portable containers that can be emptied into sanitary sewer drains.
5. Brushes and tools used for oil-based paints, finishes, thinners, solvents or other materials must be cleaned over a tub or container and the cleaning wastes disposed or recycled at an approved hazardous waste facility.
6. Never clean tools over a storm drain or outside.
7. Promptly cleanup any spills of paints, cleaners or other maintenance chemicals or supplies.
8. When sand blasting exterior surfaces, place tarps or ground cloths beneath the work area to capture sand blasting media and debris. Enclose the sand blasting area with tarps or plastic to protect from wind and to capture airborne particles (dust).
9. Stop all sand blasting operations on windy days.

#### *Pressure Washing & Exterior Surface Cleaning*

1. Prior to pressure washing, identify where all storm drains are located; wash water must not be allowed to flow down gutters or enter into storm drains.
2. Block or cover all storm drains with booms and weighted storm drain covers before pressure washing.
3. Determine where water will pool for collection. Use a wet vac to vacuum up the wastewater or allow water to evaporate.
4. Use dry cleanup methods, including sweeping, vacuuming, and scrapping off dried debris prior to pressure washing any surface.
5. Use minimal water when Pressure washing.
6. If you are not using any chemicals or detergents, the wash water can be directed to a grassy or gravel area where it can infiltrate. Verify that water is not running out of the area and encountering a paved surface.
7. If any additives are used in the wash water, the waste water must be captured for disposal to sanitary sewer.
8. Solids should be removed from the area prior to pressure washing and a filter bag or similar filtration device should be used to remove suspended solids from the wastewater.
9. A visible sheen must not be evident in the discharge. Use an absorbent pad or boom to eliminate any oil from the discharge.

10. Do not pressure wash an entire building. Spot clean, steam clean, or scrape dirty areas rather than pressure washing the entire structure.

### **Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. Hazardous Waste materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport, call Clean Harbors at 978-683-1002.

### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Grounds Maintenance</b>	
Purpose of SOP:	To prevent the discharge of pollutants to stormwater in the course of DPW grounds maintenance activities, including: landscape maintenance, mowing, mulching, gravel trails & parking lots, trash removal/ waste management
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### **Equipment and Materials Needed**

1. Dumpster covers
2. Tarps
3. Spill kit and equipment for dry cleanup (socks, absorbent pads, kitty litter, broom, and dustpan)

#### **Standard Operating Procedures**

##### *Mowing & Landscape Maintenance*

1. Mulch-mow grass. Sweep and dispose of any grass clippings on paved surfaces.
2. Do not dispose of green waste or clippings in waterways, ditches, or detention basins.
3. Maintain sprinkler systems at rates that do not exceed the infiltration rate of the soil. Observe any runoff on paved surfaces and adjust sprinkler heads to irrigate only pervious surfaces.
4. Sweep areas around landscape beds regularly and after applying new mulch to keep wood products from entering the storm drain system.

##### *Gravel Trails and Parking Lots*

1. Stockpiled gravel should be stored under cover or covered with a tarp.
2. When loading gravel, care should be taken not to overload the truck or vessel.
3. Sweep area after loading to keep gravel from entering the storm water management system.
4. Take care not to cover any storm drain inlets with gravel.

### *Non-Hazardous Waste Management and Disposal*

1. When working in the field, collect all wastes in bags or other leak-proof containers and bring back to the shop for proper disposal.
2. Minimize waste by purchasing products that have minimal packaging. Recycle cardboard, plastics and paper products in the proper container.
3. Never place hazardous materials, liquids, or liquid-containing wastes in the dumpster. If liquid wastes must be disposed of in the trash, absorb them first with kitty litter or other absorbents.
4. Non-hazardous liquid waste may be disposed of in sanitary sewer.

### **Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. Hazardous Waste materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport, call Clean Harbors at 978-683-1002.

### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Fertilizer, Herbicide, &amp; Pesticide Application</b>	
Purpose of SOP:	To prevent the discharge of pollutants to stormwater resulting from the application of fertilizer, herbicide or pesticide.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.
3. Employees should read the procedures contained in this SOP and any related references. Pesticide application must be done under the supervision of staff holding a Public Applicator's License.
4. All employees who handle or apply fertilizers, herbicides, or pesticides must be trained on the most recent Material Safety Data Sheets (MSDS).

#### **Equipment and Materials Needed**

1. ANSI approved sprayers.
2. Polly or plastic pallets and pails for secondary containment.
3. Spill kit and equipment for dry cleanup (socks, absorbent pads, kitty litter, broom, and dustpan).
4. Proper PPE (rubber gloves and eye protection).

#### **Standard Operating Procedures**

##### *General*

1. Always follow the manufacturer's recommendations for mixing, application, and disposal.
2. Use manual or mechanical methods for weed control whenever possible.
3. When chemicals are used, use the least toxic and most biodegradable product possible.

##### *Mixing*

1. Mix fertilizers, herbicides, and pesticides inside a protected area with impervious secondary containment so that spills and leaks will not contact soil or enter the storm water system.
2. Label all containers.
3. Only mix the minimum amount of product that will be needed for the immediate job.
4. If possible, use rinse water from cleaning of containers and application equipment as a

dilution for the next batch.

#### *Application*

1. Follow application guidance on the product label.
2. Time the application to concur with manufacturer's recommendation for best results. Do not spray if rain is expected.
3. Limit use of pesticides in general and do not broadcast spray pesticides.
4. Spot spray herbicides whenever possible.
5. Use herbicide only when there is vegetation to manage (do not use preventatively or more often than required).
6. Fertilizers may be broadcast sprayed, with care taken to avoid waterways or any inlet to the storm drain system.
7. Use granular materials when possible to avoid application losses.
8. Do not apply fertilizers, herbicide, or pesticides within 50 feet of any open water, drainage ditch, wetland, storm water basin or inlet to the storm drain system.
9. See Manager of Planning & Environmental Services to obtain an NPDES permit before spraying any herbicide in wetland mitigation areas for weed control.

#### *Cleanup*

1. Follow all manufacturers' recommendations for cleanup of the chemical.
2. Sweep paved areas where any granular product has fallen and direct product into grassy areas.
3. Cleanup any spills of product quickly using the methods described in SOP: Incidental Spill Response & Cleanup.
4. Dispose of excess chemicals and empty expired fertilizer, herbicide or pesticide containers according to the instructions on the label and preferably on the target vegetation or pest.
5. If possible reuse the triple rinsate from containers as dilution for the next batch.
6. Never dispose of rinsate by pouring into the storm drain system.
7. Any product that cannot be disposed of through application on the target vegetation or pest must be disposed of as Hazardous Waste.

#### *Storage*

1. Store fertilizers, herbicides, and pesticides inside a protected area with impervious secondary containment so that spills or leaks will not enter soils or the storm drain system.
2. All containers must be clearly and accurately labeled.

#### **Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.

2. Hazardous Waste materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport, call Clean Harbors at 978-683-1002.

### **References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Materials Storage</b>	
Purpose of SOP:	To prevent the discharge of pollutants to stormwater resulting from materials storage associated with DPW maintenance & operations, including liquid materials storage, hazardous materials storage, stockpiling materials including: sand & gravel, wood products such as lumber, chips, sawdust, or hog fuel, demolition debris including asphalt and concrete, decommissioned vehicles or equipment.
Location of SOP:	
Last Update:	
Administrator of SOP:	

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.

#### **Equipment and Materials Needed**

1. Weather proof containers
2. Polly or plastic pallets
3. Drum covers
4. Tarps
5. Spill kit and equipment for dry cleanup (socks, absorbent pads, kitty litter, broom, and dustpan)
6. Inlet protection (wattles, drain covers, berms, and/or filter fabric)

#### **Standard Operating Procedures**

##### *Outdoor Storage Areas*

1. If possible, store all containers indoors. If they must be stored outdoors, place them in a shed or under a roof.
2. All containers and dry materials should be covered or have secondary containment.
3. Place all containers on a plastic pallet or other device that elevates them off the ground or pavement and provides containment. This avoids contact with storm water on the ground.
4. Place containers on paved, impervious surfaces and as far from (or at lower elevation than) storm drain inlets and drainage ditches as possible.
5. Keep a spill kit near storage areas. Clean up any spills, leaks or discharges promptly.
6. Inspect all containers stored outdoors regularly.
7. If a container is found to be leaking either empty the contents into a leak-tight container or place entire leaking container inside of a larger leak-tight container. Clean up spills

promptly.

8. Make sure outdoor barrels are covered at all times, and use barrels that do not have holes in the bottom.
9. If rain water collects in a secondary containment structure, allow the water to evaporate if possible. If not possible, verify with sight & smell that the water is not contaminated with a hazardous substance and then pump to sanitary sewer for disposal. If water is suspected of containing hazardous waste (oil sheen, odor), the water must be treated as hazardous waste and be disposed of properly.

#### *Sand, Salt, Dirt or Gravel Stockpiles*

1. Cover sand/salt piles with a tarp or store inside a building or under a roof.
2. Contain stormwater runoff from dirt and gravel stockpiles by using barriers or berms.

#### *Liquid Bulk Material Storage*

1. Provide impervious secondary containment for all Above Ground Storage Tanks (ASTs), except double-walled tanks, sufficient to contain the entire contents of the largest single tank plus an additional 4 inches of rainfall.
2. Keep drain valves in secondary containment at ASTs locked in the closed position at all times. Open for draining only under supervision.
3. Make sure an adequate spill kit with sufficient equipment and supplies is located near storage areas where spills are possible. Clean up any spills, leaks or discharges immediately.
4. Make sure that inspections for petroleum storage continue once a year, unless a year pass is granted for passing the previous two years in a row.

#### *Construction & Demolition Materials*

1. Stockpile only materials that have value and a high likelihood of being reused on projects.
2. Locate stockpiled materials far from storm drains and cover any materials that could erode or leach in stormwater.
3. Treated timber, sand/gravel, and asphalt debris must be stored under cover or tarps with provisions to avoid contact with surface runoff (placed on tarp/pallet or berm).
4. Chipped or ground wood products must be stored under cover where they will not be mobilized by stormwater.
5. Dispose of all other building demolition, land clearing, pavement maintenance, or other construction debris immediately after completing the project.
6. Inspect all containers stored outdoors regularly.
7. If a container is found to be leaking either empty the contents into a leak-tight container or place entire leaking container inside of a larger leak-tight container. Clean up spills promptly.

**Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. Hazardous Waste materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport, call Clean Harbors at 978-683-1002.

**References**

1. DPW Stormwater Pollution Prevention Plan

### Standard Operating Procedures (SOPs)

<b>Incidental Spill Response &amp; Cleanup</b>	
Purpose of SOP:	To establish standard operating procedures for taking limited action in response to an incidental release of potentially hazardous materials.
Location of SOP:	
Last Update:	
Administrator of SOP:	

NOTE: This SOP applies only to incidental releases of potentially hazardous materials, which means spills that are not highly toxic. DPW personnel are not trained to respond to an uncontrolled release of potentially hazardous materials, which means any medium or large spill or small spills of extremely hazardous or dangerous materials. No DPW employee should respond to any release of a potentially hazardous material without proper training.

#### **Prerequisites**

1. Employees should attend training on Municipal Stormwater Pollution Prevention.
2. Employees should read the procedures contained in this SOP and any related references.
3. Employees should read and attend training on the Department of Public Works Emergency Spill Response Plan.
4. Any employee undertaking the actions outline in this SOP must have received training to the First Responder Operations Level as outlined in the Emergency Spill Response Plan.

#### **Equipment and Materials Needed**

1. Material Safety Data Sheets (MSDS)
2. PPE (gloves, protective clothing, respirator- only if employee is properly trained and fitted)
3. Stormwater Management System Map
4. Spill kit and equipment for dry cleanup (socks, absorbent pads, kitty litter, broom, and dustpan)
5. Inlet protection (wattles, drain covers, berms, and/or filter fabric)

#### **Standard Operating Procedures**

##### *Upland Spills*

1. Confirm that the spill is an incidental release before proceeding. If the spill is an uncontrolled release of hazardous materials as defined in the Spill Prevention Control and Countermeasure (SPCC), this SOP does not apply and the employee should initiate an emergency response by calling 911 per the SPCC.
2. Consult the MSDS sheet for the product of concern. MSDS sheets are transported with all hazardous materials and are kept in a binder at the DPW.
3. Block nearby storm drain inlets and place containment materials (boom) around the spill if it is or has the potential to become mobile.
4. Put on the appropriate PPE, as specified in the MSDS sheet. Only use a respirator if you

have been properly trained and fitted for a personal respirator, and are using the appropriate cartridge for the spilled chemical.

5. Place absorbents on the spill and sweep the dry material into a containment vessel.
6. Dispose of the material as hazardous waste.
7. Notify the Department of Environmental Protection (DEP) of the spill and cleanup as soon as practical at (888) 304-1133.

NOTE: If a spill is too large to cleanup easily with absorbent from the spill kit and a broom, it is not an incidental release and this SOP does not apply. The employee should consult the DEP and initiate a response for an uncontrolled release.

#### *In-Water Spills*

1. For small spills that can be contained with materials in the DPW spill kit, deploy containment boom and absorbent pads.
2. Contact a cleanup contractor, if needed to complete the in-water cleanup.
3. For any spill involving flammable liquid (i.e. fuel), any spill involving more than a minor and very small area of sheen, or any spill of a substance representing an immediate hazard to life or the aquatic environment, call 911 and initiate the SPCC emergency response actions.
4. Notify the Department of Environmental Protection 24-hour Spill Response & Reporting Line at (888) 304-1133.

#### **Hazardous Waste Disposal**

1. Hazardous wastes should be labeled as such and may include cleaning products, paints, fertilizers, herbicides, and pesticides, oil, fuels, acids, poisons, antifreeze, brake fluid, and solvents.
2. Hazardous Waste materials must be removed by Clean Harbors twice a year.
3. All chemicals brought to the DPW for disposal must be clearly labeled with the chemical identification and must be contained in leak proof, secure containers.
4. For removal of hazardous wastes that the Department of Public Works cannot safely transport (greater than 5 gallon containers), call Clean Harbors at 978-683-1002.

#### **References**

1. DPW Stormwater Pollution Prevention Plan
2. DPW Spill Prevention Control and Countermeasure

## **Appendix C**

# **Inspection and Maintenance Log**

**STORMWATER MANAGEMENT SYSTEM INSPECTION AND MAINTENANCE SCHEDULE**

**SPRING INSPECTION AND MAINTENANCE LOG**

(To be completed annually between February 1st and April 1st, after the last expected significant snow & ice event)

Inspection Date: \_\_\_\_\_ Property Location: \_\_\_\_\_

Inspection Conducted By: \_\_\_\_\_

Instructions: Complete inspection by answering yes/no questions and check follow-up boxes when action is complete. Make any notes necessary to document the condition of the facility and maintenance actions taken. When inspection & maintenance actions are complete, submit form to Manager of Planning & Environmental Services. When inspection and maintenance actions are complete, submit form to Manager of Planning & Environmental Services.

<p><b>Ditches</b></p> <p>Is there evidence of erosion or channeled flow? Yes:___ No:___  <input type="checkbox"/> If yes, consult Engineer and regrade</p> <p>Are there bare spots? Yes:___ No:___  <input type="checkbox"/> If yes, reseed and monitor.</p> <p>Is there sediment debris build up? Yes:___ No:___  <input type="checkbox"/> If yes, remove, correct source, and monitor.</p>	<p><b>Notes:</b></p>
<p><b>Catch Basins</b></p> <p>Has debris accumulated in the catch Basin? Yes:___ No:___  <input type="checkbox"/> If yes, clear obstructions/debris</p> <p>Has more than 1 inch of soil or 6 inches of sludge accumulated in the catch basin? Yes:___ No:___  <input type="checkbox"/> If yes, schedule vactoring.</p>	<p><b>Notes:</b></p>
<p><b>Building</b></p> <p>Is there evidence of flooding? Yes:___ No:___  <input type="checkbox"/> If yes, contact Engineer</p> <p>Is the pavement in poor condition? Yes:___ No:___  <input type="checkbox"/> If yes, repair</p> <p>Is there proper storage and labeling for all chemicals? Yes:___ No:___  <input type="checkbox"/> If yes, store and label containers properly</p>	<p><b>REPAIR</b></p>

<p><b>Vehicles and Equipment</b></p> <p>Are there any leaks or spills at the fueling areas? Yes:___ No:___  <input type="checkbox"/> If yes, make adjustments as listed in O&amp;M plans</p> <p>Are any vehicles washed outdoors? Yes:___ No:___  <input type="checkbox"/> If yes, explain why and wash vehicles indoors</p>	<p><b>Notes:</b></p>
<p><b>Other</b></p> <p>Are there any uncovered barrels or dumpsters? Yes:___ No:___  <input type="checkbox"/> If yes, obtain necessary barrels</p> <p>Are there large amounts of salt/sand or other sediment? Yes:___ No:___  <input type="checkbox"/> If yes, sweep or vacuum area</p>	<p><b>Notes:</b></p>
<p><b>Additional Spring Maintenance</b></p> <p><input type="checkbox"/> Schedule street sweeping for the DPW.  <input type="checkbox"/> Re-seed any exposed ground in the system</p>	
<p><b>Additional Notes:</b></p>	

Department of Public Works:  
 Tewksbury, MA  
 (978) 640-4440

**STORMWATER MANAGEMENT SYSTEM INSPECTION AND MAINTENANCE SCHEDULE**

**FALL INSPECTION AND MAINTENANCE LOG**

(To be completed annually between August 1st and October 15th, before the first expected significant snow & ice event)

Inspection Date: \_\_\_\_\_ Property Location: \_\_\_\_\_

Inspection Conducted By: \_\_\_\_\_

Instructions: Complete inspection by answering yes/no questions and check follow-up boxes when action is complete. Make any notes necessary to document the condition of the facility and maintenance actions taken. When inspection & maintenance actions are complete, submit form to Manager of Planning & Environmental Services. When inspection and maintenance actions are complete, submit form to Manager of Planning & Environmental Services.

<p><b>Ditches</b></p> <p>Is there evidence of erosion or channeled flow? Yes:___ No:___  <input type="checkbox"/> If yes, consult Engineer and regrade</p> <p>Are there bare spots? Yes:___ No:___  <input type="checkbox"/> If yes, reseed and monitor.</p> <p>Is there sediment debris build up? Yes:___ No:___  <input type="checkbox"/> If yes, remove, correct source, and monitor.</p>	<p><b>Notes:</b></p>
<p><b>Catch Basins</b></p> <p>Has debris accumulated in the catch Basin? Yes:___ No:___  <input type="checkbox"/> If yes, clear obstructions/debris</p> <p>Has more than 1 inch of soil or 6 inches of sludge accumulated in the catch basin? Yes:___ No:___  <input type="checkbox"/> If yes, schedule vactoring.</p>	<p><b>Notes:</b></p>
<p><b>Building</b></p> <p>Is there evidence of flooding? Yes:___ No:___  <input type="checkbox"/> If yes, contact Engineer</p> <p>Is the pavement in poor condition? Yes:___ No:___  <input type="checkbox"/> If yes, repair</p> <p>Is there proper storage and labeling for all chemicals? Yes:___ No:___  <input type="checkbox"/> If yes, store and label containers properly</p>	<p><b>REPAIR</b></p>

<p><b>Vehicles and Equipment</b></p> <p>Are there any leaks or spills at the fueling areas? Yes:___ No:___</p> <p><input type="checkbox"/> If yes, make adjustments as listed in O&amp;M plans</p> <p>Are any vehicles washed outdoors? Yes:___ No:___</p> <p><input type="checkbox"/> If yes, explain why and wash vehicles indoors</p>	<p><b>Notes:</b></p>
<p><b>Other</b></p> <p>Are there any uncovered barrels or dumpsters? Yes:___ No:___</p> <p><input type="checkbox"/> If yes, obtain necessary barrels</p> <p>Are there large amounts of salt/sand or other sediment? Yes:___ No:___</p> <p><input type="checkbox"/> If yes, sweep or vacuum area</p>	<p><b>Notes:</b></p>
<p><b>Additional Fall Maintenance</b></p> <p><input type="checkbox"/> Schedule street sweeping for the DPW.</p> <p><input type="checkbox"/> Re-seed any exposed ground in the system</p>	
<p><b>Additional Notes:</b></p>	

Department of Public Works:  
 Tewksbury, MA  
 (978) 640-4440

## **Appendix D**

# **Spill Prevention Control and Countermeasure (SPCC) Plan**



# TOWN OF TEWKSBURY

DEPARTMENT OF PUBLIC WORKS

999 WHIPPLE RD

TEWKSBURY, MASSACHUSETTS 01876

TOMA DUHANI P.E.  
SUPERINTENDENT  
(978) 640-4440  
FAX (978) 640-4445  
tduhani@town.tewksbury.ma.us

- HIGHWAY
- FORESTRY
- WATER & SEWER
- FLEET MAINTENANCE
- WATER TREATMENT PLANT

TO: Larry Gilbert  
Fleet Maintenance Supervisor

FROM: Toma Duhani  
DPW Superintendent

RE: Spill Prevention Control & Countermeasure Plan

DATE: January 26, 2007

Enclosed is an updated manual of the SPCC Plan for improving spill prevention control and a countermeasure plan for the DPW facility.

Please review and implement the recommended action plans including the implementation of routine record keeping requirements.

# **SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN**

**TEWKSURY PUBLIC WORKS FACILITY  
999 WHIPPLE ROAD**

**January 2007**

**Prepared For:**

TOWN OF TEWKSBURY  
999 WHIPPLE ROAD  
TEWKSBURY, MA 01876

**Prepared By:**

COMPREHENSIVE ENVIRONMENTAL INC.  
64 DILLA STREET  
MILFORD, MA 01757



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## 1.0 INTRODUCTION & OBJECTIVE

This plan update was prepared for the Tewksbury Department of Public Works (DPW) Facility located at 999 Whipple Road in Tewksbury, MA, to comply with Federal Regulation 40 CFR 112 and in accordance with good engineering practices. A copy of the SPCC Plan shall be maintained at the Tewksbury Public Works Facility and will be available to the Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MADEP) for on-site review and inspection during normal business hours. The SPCC Plan was originally prepared for the Tewksbury DPW in November 2002 and this revised plan has been conducted to comply with the requirements of the revised rule (40 CFR 112) that became effective August 16, 2002 and to incorporate any changes at the facility.

A 275-gallon waste oil above ground storage tank (AST) located in the southern portion of the garage building was added after the November 2002 SPCC Plan was submitted.

SPCC plans are required under the Federal Oil Pollution Prevention Regulation 40 CFR 112 for owners and operators of onshore and offshore facilities in operation that have discharged or, due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon navigable waters or adjoining shorelines of the United States. SPCC Plans are required for facilities that meet one or both of the following criteria:

- 1) Total aboveground oil storage capacity of more than 1,320 gallons; or
- 2) Total underground buried storage capacity of more than 42,000 gallons.

If one of these criteria is met, the SPCC plan must address all oil storage, above and underground, in containers equal to or greater than 55 gallons in capacity. SPCC plans establish procedures, methods, and equipment or other requirements for equipment to prevent the discharge of oils.

The EPA defines oil as oil of any kind or in any form, including, but not limited to petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil. In accordance with the EPA Oil Pollution Prevention regulations promulgated under the Federal Clean Water Act, SPCC plans shall address the following three areas:

- (1) Operating procedures that prevent oil spills;
- (2) Control measures installed to prevent a spill from reaching navigable waters; and
- (3) Countermeasures to contain, clean up, and mitigate the effects of an oil spill that reaches navigable waters.

This facility has aboveground oil storage capacity in excess of 1,320 gallons thereby meeting the first of the two Spill Prevention Control and Countermeasure (SPCC) criteria outlined above. This plan strictly applies to oil storage as defined by 40 CFR 112 and does not review other hazardous materials used and stored at the facility. This plan has been prepared to complement other existing laws, regulations, rules, standards, policies and procedures related to safety standards, and fire prevention and spill prevention rules.



## 2.0 SITE DESCRIPTION

The Tewksbury DPW Facility is located at 999 Whipple Road in Tewksbury, MA. A site locus map is provided as **Figure 1** at the end of this plan. The facility is owned by the Town of Tewksbury with Town offices located at 999 Whipple Road and at 11 Town Hall Avenue, Tewksbury, MA. The Public Works Facility consists of a building, a salt shed, a fueling station, and equipment yard. The DPW building consists of maintenance bays, vehicle storage garages, and town offices. The town offices located within the DPW building consist of the Public Works Department offices, the Building Commissioner, Community Development, Conservation Commission, Board of Health, Planning Board, Plumber and Electric Inspectors. The attached garage contains a vehicle maintenance area, vehicles, and equipment. The onsite fueling station is used to fuel all Town owned vehicles. The equipment yard consists of a fenced in storage area, a salt barn, asphalt storage shed, aggregate storage, and a composting area. The site is bordered by undeveloped forested land to the north and west. Some forested land and residential properties are located to the south. A utility corridor and residential properties are located to the east. Additionally, further west are several small unnamed ponds. Long Pond and associated wetlands are located approximately 1,500 feet west of the site. A site plan depicting pertinent site features is included as **Figure 2** at the end of this plan.

The Tewksbury DPW Facility site is relatively flat with surface runoff flowing to the west of the site toward Long Pond. Long Pond and its associated wetlands drain into Richardson Pond, which eventually discharges to the Shawsheen River. A leaching catch basin is located on the eastern side of the building in the vicinity of the backup generator. The catch basin collects runoff from the eastern portion of the site. A second catchbasin is located in the northeastern portion of the site and discharges to the adjacent woods. The Tewksbury Public Works Facility is located within a medium yield potentially productive aquifer.

During the SPCC inspection of the facility the garage area was observed to be well organized, clean of debris, and no indications of spills of oil and/or hazardous materials were indicated.

### 2.1 Facility Information

<b>Facility Name</b>	Town of Tewksbury Department of Public Works
<b>Mailing Address</b>	999 Whipple Road, Tewksbury, MA 01876
<b>Street Address</b>	Same
<b>Owner</b>	Town of Tewksbury Department of Public Works
<b>Contact Name</b>	Toma Duhani, Superintendent of Public Works (978) 640-4444
<b>Other Personnel</b>	Lou-Ann Clement, C.H.O., Director of Public Health (978) 640-4470
<b>Off-Hour Emergency Contact</b>	Tewksbury Police Department <b>911 or 978-640-4381</b>



<b>Location</b>	The facility is located in the Town of Tewksbury, Massachusetts. As shown in <b>Figure 2</b> , the facility is bound to the north by wetlands, Pine St. to the south, and open space and wetlands to the west. Whipple Road serves as the eastern boundary. UTM coordinates are 4,718,260 N and 315,797 E for the facility. Standard geodetic coordinates for the facility are 42°35'48"N latitude and 71°14'43"W longitude.
<b>Nearest Navigable Waterway</b>	Heath Brook is located approximately 0.3 miles southeast of the DPW facility; Richardson Pond is located approximately 0.2 miles south of the DPW facility, and Long Pond is located approximately 0.3 miles northwest of the DPW facility.
<b>Topographic/Hydrographic Gradient</b>	Groundwater reportedly flows in a south-westerly direction. Topography is generally level throughout the site, with a slight slope towards the west and northwestern side. The site has a mix of solid pavement, and dirt with grading for direct surface runoff toward the northwestern side of the site. There is one storm drain outfall, which discharges to nearby woods.
<b>Facility Description</b>	The complex where the Town of Tewksbury DPW is located consists of one (1) building and various sheds and storage areas utilized by the DPW. The main building is located on the eastern side of the site, which comprises the DPW operations including administrative offices for the DPW, Community Development, vehicle storage areas, mechanic's bays, and Water and Sewer Division offices. The majority of the site is asphalt paved. Primary operations performed from or at this facility include routine vehicle maintenance tasks (i.e., fluid and filter changes, brake work, etc.), limited storage of building and/or maintenance materials, and household recycling activities.
<b>Fixed Storage</b>	One (1) 10,000-gallon gasoline aboveground storage tank (AST); one (1) 10,000-gallon diesel AST; one (1) 1,000-gallon waste oil AST; one (1) 275-gallon waste oil AST; two (2) 3,000-gallon ASTs for "Ice-B-Gone".
<b>Portable Storage</b>	Ten to fifteen (10-15) 55-gallon drums of gear and lube oils, one (1) 120-lb drum of grease, one (1) 55-gallon drum of windshield washer; one to two (1-2) 55-gallon drums of antifreeze, four to five (4-5) 1-gallon containers of water/antifreeze mixture, variable amounts of 5-gallon gasoline containers, variable amounts of one (1) quart size motor oil containers.
<b>Total Oil Storage</b>	Variable – minimum volume of 20,000 gallons
<b>In-Plant Treatment</b>	There are no operational interior floor drains at the facility. Floor drains were plugged by a licensed plumber in 1999. There are two (2) catch basins at the facility, one of which discharges to nearby woodlands, the other is a leaching catch basin.
<b>Vehicles</b>	The facility serves as the maintenance garage for the entire Town of Tewksbury DPW fleet, which includes approximately 70 vehicles. The facility also provides on-site parking to all of the facility personnel working on-site.



### 3.0 MATERIALS HANDLING AND STORAGE

On-site oil storage is described in **Table 1** and discussed in more detail below.

<b>MATERIAL</b>	<b>QUANTITY<sup>1</sup></b>	<b>STORAGE CONTAINERS</b>	<b>TOTAL CAPACITY</b>	<b>LOCATION</b>
Diesel	1	10,000-gallon AST	10,000 gallons	Diesel and Gasoline AST Exterior Storage Site
Unleaded gasoline	1	10,000-gallon AST	10,000 gallons	Diesel and Gasoline AST Exterior Storage Site
Waste Oil	1	275-gallon AST	275 gallons	Inside – DPW Garage
	1	1,000-gallon AST	1,000 gallons	Inside – DPW Garage
Virgin Motor Oil	15	55-gallon drums	825 gallons	Inside – DPW Garage
	2	35-gallon drums	70 gallons	Inside – DPW Garage
Virgin Gear Oil	2	55-gallon drums	110 gallons	Inside – DPW Garage
Virgin Antifreeze	2	55-gallon drums	110 gallons	Inside – DPW Garage
Diesel Additive	2	35-gallon drums	70 gallons	Inside – DPW Garage
Diesel Generator	1	10-gallon tank	10 gallons	Outside – DPW Garage
<b>TOTAL OIL STORAGE CAPACITY<sup>2</sup></b>			<b>22,470 gallons</b>	

<sup>1</sup>The quantity presented in this table represents the number of containers at the facility during the August 8, 2006 inspection for this SPCC Plan.

<sup>2</sup>Total oil storage capacity is the sum of the maximum estimated storage of oil products (assumes all containers are full).

#### **Virgin Oil**

Virgin oil from the 55-gallon drums is dispensed through hand-operated pumps attached to the drums. When the 55-gallon drums need to be replaced, the DPW personnel notify the oil delivery company. Personnel are present when deliveries are made.

#### **Waste Oil**

Waste oil is collected and stored in two ASTs: a 1,000-gallon AST and a 275-gallon AST. Residents drop waste oil off in individual containers and town personnel pour this waste oil into the 1,000 gallon AST using a funnel. Waste oil generated by Town personnel is transferred into the 275-gallon AST with a funnel or transfer pump.

Waste oil is stored in a clearly marked area in the vehicle maintenance garage. The area is marked with white paint lines on the floor. Signs indicating “WASTE OIL” using capital letters that are one inch high are posted on the waste oil ASTs. Oil filters are completely drained into the ASTs prior to proper disposal. When the ASTs are full, the oil is removed by Clean Harbors using a pump truck and shipped under a Hazardous Waste Manifest. Recommendations for signage at the waste oil tanks is provided as Task 3 in Section 10.

#### **Fueling Station and Tanks**

The diesel and gasoline ASTs used for the fueling station are located outside on a raised concrete spill pad and protected with bollards and jersey barriers (see **Figure 3**). Two pumps, attached and piped above ground to the two 10,000-gallon ASTs, are used to



dispense fuel. Town department personnel are given keys and a user code to operate the pumps. The Veeder-Root system automatically records the fuel use of the users.



**Figure 3.** Diesel and Gasoline AST Storage and Dispensing Area

### **Diesel Generator**

The backup diesel generator is located in a fenced in area abutting the DPW garage. The small capacity generator tank is hand filled when needed. The diesel generator powers the diesel and gasoline pumps and the entire DPW building.

There are no other ASTs, underground storage tanks (USTs), or storage containers used to contain oil products at this site owned or operated by the Town of Tewksbury. However, there are two 3,000 gallon ASTs containing liquid calcium chloride (CaCl) located outside next to the salt barn, batteries located within the garage placed on a pallet, and various other combustible containers (such as spray paints, cleaners, lubricants) stored within a flame resistant cabinet in the garage storage room. The salt storage barn located in the western portion of the facility is used to store salt and protect it from rain and rain runoff. A parts washer is also present within the maintenance garage but uses non-hazardous cleaners.

## **4.0 PREVIOUS SPILL EVENTS**

The SPCC Plan must include a description of any spill events that occurred within the past twelve months, including any corrective actions taken and any plans for preventing a recurrence. As of the date of this plan, no major spills have occurred at this facility.

**Appendix A** is reserved for records related to future spill events that may occur at the facility.

## **5.0 PLAN NONCONFORMANCE (40 CFR 112.7(a))**

The contents of this plan discuss conformance with all applicable sections of 40 CFR 112.7 and 112.8 (Sections 6.0 through 10.0 of this Plan), as required by 40 CFR 112.7(a).

## **6.0 SPILL POTENTIAL (40 CFR 112.7(b)) & CONTAINMENT STRUCTURES (40 CFR 112.7(c))**

The Tewksbury DPW Facility was evaluated to determine where there is reasonable potential for equipment failure, which would result in a potential release of oil. Each location where oil products are stored was evaluated for predicted direction and rate of flow as well as the maximum quantity of oil that could be discharged as a result of each major type of failure. Additionally, under the SPCC regulation requirements, the station was evaluated for appropriate containment and diversionary structures or equipment, which can prevent discharged oil from reaching navigable watercourses. Each area identified as having a reasonable potential for a release of oil was inspected to determine if one of the following preventive systems or its equivalent was available:

- Dikes, berms or retaining walls sufficiently impervious to contain spilled oil;
- Curbing;
- Culverts, gutters or other drainage system;
- Weirs, booms or other barriers;
- Spill diversion ponds;
- Retention ponds; and
- Oil absorbent materials.

A summary of potential spill events is provided in **Table 2** with a more detailed discussion of protective measures below for each on-site area.



Table 2. Potential Spill Events					
SOURCE	SUBSTANCE STORED	FAILURE/CAUSE	DIRECTION OF SPILL	POTENTIAL RELEASE (estimated)	PROTECTIVE MEASURES
10,000-gallon AST	Diesel	Rupture or Leakage, Overfill	Release to secondary containment	Tank Rupture (up to 10,000 gal.), Tank Overfill (200-300 gal.), Line Leakage (15-100 gal.)	Double wall tank (110%+ capacity)
10,000-gallon AST	Unleaded Gasoline	Rupture or Leakage, Overfill	Release to secondary containment	Tank Rupture or Leakage (up to 10,000 gal.) Tank Overfill (200-300 gal.), Line Leakage (15-100 gal.)	Double wall tank (110%+ capacity)
275-gallon AST	Waste Oil	Rupture or Leakage, Overfill	Release to concrete floor of highway garage	Tank Rupture (up to 275 gal.), Tank Overfill (5-15 gal.)	Inside building on concrete floor serves as secondary containment
1,000-gallon AST	Waste Oil	Rupture or Leakage, Overfill	Release to concrete floor of highway garage	Tank Rupture or Leakage (up to 1,000 gal.) Tank overfill or spillage (15-25 gal.) Transfer to AST (5-10 gal.)	Inside building on concrete floor serves as secondary containment
(15) 55-gallon drums	Motor Oil	Rupture or Leakage	Release spill pallet	Tank Rupture, Leakage, or Spillage (up to 825 gal.)	Drums stored on spill pallets and in garage building
(2) 35-gallon drums	Motor Oil	Rupture or Leakage	Release spill pallet	Tank Rupture, Leakage, or Spillage (up to 70 gal.)	Drums stored on spill pallets and in garage building
(2) 55-gallon drums	Gear Oil	Rupture or Leakage	Release to spill pallet	Tank Rupture, Leakage, or Spillage (up to 110 gal.)	Drums stored on spill pallets and in garage building
(2) 55-gallon drums	Antifreeze	Rupture or Leakage	Release to spill pallet	Tank Rupture, Leakage, or Spillage (up to 110 gal.)	Drums stored on spill pallets and in garage building
(2) 35-gallon drums	Diesel Additive	Rupture or Leakage	Release to spill pallet	Tank Rupture, Leakage, Spillage (up to 70 gal.)	Drums stored on spill pallets and in garage building
(1) 10-gallon Diesel Tank	Diesel Fuel	Rupture or Leakage, Overfill	Release to Spill pad	Tank Rupture, Leakage, or Spillage (up to 10 gal)	Generator Tank stored on pad

### Diesel and Gasoline AST Storage Site

The two ASTs have the following design features:

- Solid, intact underlying concrete pad
- Tanks are cast inside reinforced steel shells designed to withstand a vehicle impact or projectile
- Protective bollards
- Double wall design to contain 110% of tank capacity
- Concrete fuel spill pad
- Audible and visual hi-level and interstitial alarms with monitoring ports
- Highly visible fuel gauges near fill ports
- Metal fuel port hatch covers with lockable lids (with padlock)



- Fill port hoppers capable of containing minor drips and leaks during filling operations with overflow drain and protection valves
- Highly visible fuel type signs posted near fill ports and on exterior of structure
- 12-feet above grade atmospheric vents

Each tank is double walled to contain 110% of the contents should a leak occur. Spills occurring from deliveries or from leaking fuel lines will be captured on the concrete spill pad or will migrate south toward an unpaved area of the yard.

### **Fueling Station**

The fuel transfer pumps can only be operated by inserting a key into a control box attached to each pump. The pumps have the following design features:

- Automatic fuel dispenser shutoff when vehicle fuel tank is full
- Pumps have a pressure loss shut off (suction-type system)
- Break away fuel line couplings
- Fire extinguishers
- Highly visible “No Smoking” signs
- Emergency shutoff at pumps
- Remote emergency shutoff switch attached to highway facility
- Protective bollards and Jersey barriers
- Above head lighting

If a small incidental spill occurred at the fueling station, such as when refueling a Town vehicle, the fuel would be contained within the spill pad. However, if the spill was greater than the capacity of the spill pad the spill would migrate south across the site. At the pump location, there were no “Do Not Leave Vehicle Unattended During Fueling” signs. However signs indicating “Do Not Top Off Fuel Tank”, “Gasoline Flammable”, “Diesel Combustible”, and “No Smoking” are posted. The remote emergency shutoff switch is located in the adjacent garage, where it may not be accessible when the building is locked. Recommendations for spill prevention measures are provided in Tasks 1, 2, 4, 5, 6, 7 and 10 in **Table 3** (see Section 10.0).

### **Oil Storage Inside Highway Garage**

The highway garage serves as secondary containment for potential oil spills from the ASTs and 55-gallon drums located inside the facility. The highway garage’s concrete slab floor is sloped such that all spills would migrate toward the center of the garage building. Drains in the garage bays have been previously decommissioned by a licensed plumber in 1999. There were no cracks or void spaces observed in the floor during the inspection. The garage floor is large enough to contain a spill from the largest AST inside the highway garage. All of the 55-gallon and 35-gallon drums are stored on spill pallets. The two ASTs are steel single walled construction. In addition, spill containment materials are provided near the ASTs and drums throughout the facility.



### **Diesel Generator**

The diesel generator is stored outside of the DPW garage building located within a wooden fenced in area. If a spill occurred during hand filling operations or if the tank leaks/ruptures, diesel fuel would spill to the asphalt paved ground and migrate toward the leaching catch-basin located approximately 10 to 15 feet downgradient of the generator. Inspection recommendations to minimize spill potential are provided in Task 4 in **Table 3** (see Section 10.0).

## **7.0 PROOF OF IMPRACTICALITY (40 CFR 112.7(d))**

According to the SPCC regulations, if the installation of structures and equipment listed in 40 CFR 112.7(c) to prevent discharged oil from reaching navigable waters is not practical, the owner and operator should clearly demonstrate such impracticality and provide additional oil spill contingency measures.

The minimal preventive systems, structures, or equipment listed under 40 CFR 112.7(c) are currently installed at the site for all areas containing oil products.

## **8.0 PREVENTION CONFORMANCE (40 CFR 112.7 & 112.8)**

In addition to the minimum prevention standards listed under 40 CFR 112.7(c) and requirements for onshore oil facilities (40 CFR 112.8); the SPCC regulations require a discussion of conformance with the following applicable guidelines, or other effective control measures:

- 1) Facility Drainage
- 2) Bulk Storage Containers
- 3) Facility Transfer Operations, Pumping and Facility Process
- 4) Facility Tank Car and Tank Truck Loading/Unloading Rack (N/A– this facility does not have a loading/unloading rack)
- 5) Inspections, Tests and Records
- 6) Brittle Fracture Evaluation Requirements
- 7) Conformance with State Requirements
- 8) Security
- 9) Personnel, Training and Discharge (Spill) Prevention Procedures

### **8.1 Facility Drainage (40 CFR 112.8(b))**

SPCC regulations require facilities to have on-site drainage systems designed to prevent a discharge into navigable waters or adjoining shorelines of the United States as described in 40 CFR 112.1(b) in the event a spill occurs due to equipment failure or human error.

In general, drainage features at the site do not increase the flow rate and likelihood for spills reaching waterways since oil products handled outside are only performed at the fueling station and the 10,000-gallon ASTs. If a small spill occurs it would be contained within the spill pad. If a larger spill occurred and it filled the spill pad then the spill would migrate across the asphalt paved surface to the flat unpaved area west of the tanks.



There are only two catchbasins located at the facility. One catchbasin is located in the northeast corner of the facility parking lot and it discharges to the nearby forested area. The second catchbasin is located on the eastern side of the facility building and is a leaching structure.

## **8.2 Bulk Storage Containers (40 CFR 112.8(c))**

SPCC regulations state that the material and construction of bulk storage containers used for oil storage must be compatible with oil products and must have some form of secondary containment should a spill occur.

In accordance with the SPCC regulation, the bulk fuel and oil storage tanks and containers are constructed with materials designed to contain oil products and are equipped with secondary containment.

## **8.3 Facility Transfer Operations, Pumping and Facility Process (40 CFR 112.8(d))**

SPCC regulations require that fuel transfer operations and piping adhere to good engineering practices that include sufficient transfer line protection and routine inspections.

### **Fuel/Oil Deliveries**

The diesel, gasoline, and virgin oil ASTs and 55-gallon drums are filled or delivered by fuel/oil delivery companies. DPW personnel monitors fuel and oil levels during daily and weekly inspections and notifies the appropriate fuel/oil delivery company when tank levels are low or drums need to be replaced. The diesel and gasoline ASTs are equipped with fuel level sensors that indicate fuel levels in the tanks. The gasoline and diesel ASTs are also monitored by a Veeder-Root system, which monitors usage, levels, and leaks. DPW personnel are always in attendance during fuel or oil deliveries. Other oils used at the facility are delivered in 55 gallon drums which are sealed during deliveries. These are not likely to result in a release during delivery. Fuel transfer recommendations are outlined in Tasks 2, 5 and 6 in **Table 3** (Section 10.0).

### **Fuel/Oil Transfer Lines**

Fuel lines leading to the fuel station from the 10,000 gallon tanks are attached to the side of the tanks and are not susceptible to potential damage.

Staff should implement the following spill prevention measures for fuel/oil deliveries:

- Check fuel/oil delivery area and remove any stored objects or foreign debris that may hinder delivery operations.
- Ensure fill ports are in good working order.
- Have spill response materials on hand and accessible near fuel transfer equipment.
- Make sure vehicle is attended during loading/unloading process.
- Inspect delivery area and fill port area for any leaks or minor spills after driver leaves the loading/unloading area and cleanup any oil found with spill absorbent materials.



#### **8.4 Facility Tank Car and Tank Truck Loading/Unloading Rack (40 CFR 112.7(h))**

This facility does not have a tank car or truck loading/unloading rack; therefore, the requirements of 40 CFR 112.7(h) do not apply.

#### **8.5 Inspections, Tests and Records (40 CFR 112.7(e))**

In accordance with SPCC regulations, each of the areas containing oil must be inspected routinely according to this plan and records must be kept on file for a minimum of three years. Visual inspections must be conducted to ensure that the oil storage areas, tanks, containers and associated transfer lines are maintained and free from hazards, spills, visible leaks, or deterioration. During these inspections, any evidence of a spill condition (i.e., leaking lines, cracks) or potential spill shall be reported and fixed immediately.

As part of routine inspections of the facility, the DPW personnel informally inspects the ASTs and fuel/oil transfer lines on a daily basis. Written inspections will be completed monthly for materials storage at the facility and weekly for the Stage II Vapor Recovery System (fuel station). Copies of inspection forms are provided in **Appendix B**. Inspection sheets shall be signed by the inspector or supervisor and will be made part of this SPCC Plan to fulfill inspection requirements. Inspection records shall be maintained for a minimum period of three years. Daily records documenting gasoline and diesel consumed and received are recorded by a Veeder-Root system. Inspection recommendations are outlined in Task 4 in **Table 3** (Section 10.0).

#### **Integrity Testing**

The SPCC regulations require that aboveground storage tanks be tested for integrity on a regular schedule using a testing technique other than visual inspection, in accordance with standard industry practices. Acceptable testing methods are outlined in the American Petroleum Institute (API) Standard 653, "Tank Inspection, Repair, Alteration and Reconstruction" and API Standard 650.

In accordance with API 653, the ASTs at the Tewksbury DPW Facility must be integrity tested every 10 years by a certified petroleum equipment specialist. This procedure includes draining and cleaning the ASTs and performing any repairs or painting once the inspection is completed. A qualified inspector must perform the integrity tests. Since, the tanks were installed in August 1998, integrity testing should occur in 2008. Integrity testing is outlined in Task 9 in **Table 3** (Section 10.0). Test records need to be maintained with the inspection sheets in Appendix B.

#### **8.6 Brittle Fracture Evaluation Requirements (40 CFR 112.7(i))**

Field-constructed ASTs or existing ASTs that undergo a repair, alteration, reconstruction or change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe events must be evaluated for such risk. The standard industry methods for brittle fracture evaluation can be found in the American Petroleum Institute (API) Standard 653, "Tank Inspection, Repair, Alteration and Reconstruction"; and API Recommended Practice 920, "Prevention of Brittle Fracture of Pressure



Vessels". The ASTs at the Tewksbury DPW Facility are manufactured tanks and have not undergone any structural changes since installation; therefore, brittle fracture evaluation is not required. The Town must ensure the requirements at 40 CFR 112.7(i) are fulfilled if tanks undergo significant repairs or alterations.

### **8.7 Conformance with State Requirements (40 CFR 112.7(j))**

The State of Massachusetts does not regulate SPCC Plans and does not have more stringent rules or guidelines for spill prevention. However, the Town is required to comply with MA Dispensing of Motor Vehicle Fuel Regulation (Stage II Vapor Recovery) 310 CMR 7.24(6) and State Board of Fire Prevention (BFP) Regulations pertaining to ASTs (CMR 527 5.00) and fuel dispensing equipment (CMR 527 9.00).

### **8.8 Security (40 CFR 112.7(g))**

The diesel and gasoline ASTs do not have any perimeter fence but the fuel ports remain locked except during filling operations and the area is lighted during off hours. The remaining ASTs and oil containers are located inside the Highway Garage, which is locked during non-business hours. The Town Police Department personnel routinely drives by the site and often uses the fueling station to re-fuel their vehicles thereby providing additional security for the site.

The police visits and security measures for these tanks provide sufficient security and equivalent environmental protection in accordance with 40 CFR 112.7(a)(2). Additionally, there is no history of security or vandalism issues at the property.

### **8.9 Personnel, Training and Discharge (Spill) Prevention Procedures (40 CFR 112.7(f))**

Employees responsible for the management and operation of the facility and property must provide training of site personnel in the operation and maintenance of equipment to prevent oil discharges; discharge procedure protocols; applicable pollution control laws, rules and regulations; general facility operations; and the contents of the facility SPCC Plan. The facility inspection checklists and standard operating procedures included in Appendix B should be incorporated into a training program.

#### **SPCC Plan Coordinators**

The following individuals are responsible for implementation of the SPCC plan, proper training of employees, and notifications.

*Toma Duhani, Superintendent of Public Works*  
*Larry Gilbert, Fleet Maintenance Division Supervisor*

#### Responsibilities of the SPCC Plan Coordinators Include:

- Maintain station with spill control equipment and materials
- Maintain station's containment equipment
- Conduct personnel training or ensure training is completed
- Ensure compliance with plan and applicable regulations



- Update plan, as required (see Section 9.0)
- Conduct or supervise visual inspections & review results
- Ensure record keeping of inspection logs
- Appoint trained personnel to supervise oil deliveries
- Notify appropriate officials of any spill events

### **Spill Management Training**

Personnel shall be trained in the following spill management procedures for oil spills that occur at the station:

- Conducting visual inspections of the facility
- Record keeping procedures
- Spill containment procedures (discussed below) and use of spill control equipment and materials
- Emergency reporting requirements
- De-briefing of any spill events or failures, malfunctioning equipment, or precautionary measures taken
- SPCC plan requirements
- Responsible management individuals and communication channels

Any spill event shall be reported to the SPCC Coordinator.

To fulfill the training requirement, the Town of Tewksbury may complete the training themselves or contract the services of a consultant or engineer familiar with SPCC requirements. The following options can be used to complete the annual training requirement in-house:

### **Spill Prevention Training**

- Purchase an interactive CD-ROM spill cleanup training course for review by Highway Department employees.
- Schedule an on-line course taken through a certified training center such as the J.J. Keller Internet Training Center ([www.keller-itc.com](http://www.keller-itc.com) - “Accidental Release Measures and Spill Cleanup Procedures”).
- Or hire a consultant to train staff on spill response.

### **SPCC Plan Training**

- Distribute and meet on the contents of the SPCC Plan. Go over site-specific equipment, operation and site features. Address reporting, recordkeeping and management requirements.
- Hire a consultant familiar with your facility and SPCC Plan to perform the training.

The training requirements for the SPCC Plan overlap the SWPPP training requirements to some degree. Therefore the SPCC and SWPPP training maybe combined into one session. Training recommendations are outlined in Task 8 in **Table 3** (Section 10.0).



### 8.10 Spill Notification & Response Procedures

As required by 40 CFR 112.7(a)(4), information and procedures for reporting a spill must be provided in the SPCC Plan to enable someone reporting a spill to provide the appropriate information. This information is provided in an easy-to-read format in **Appendix E** along with spill response procedures that can be easily followed during an emergency, as required by 40 CFR 112.7(a)(5).

### 9.0 SPCC Plan Documents

**Appendix E** provides a summary of information that certifies the completion of a SPCC Plan for the Tewksbury DPW Facility. **Appendix F** also provides documentation that a registered professional engineer certifies the SPCC Plan. Any changes to the property that require an update for the SPCC Plan must be addressed and documented in accordance with the form provided in Appendix F. Significant changes at the facility that require a P.E. review and certification include new oil containers or tanks, buildings, drainage features or site operations that affect the oil spill potential at the site. This plan must be kept on file at the facility at all times. Plan revision recommendations are outlined in Task 11 and 12 in **Table 3** (Section 10.0).

### 10.0 Task List & Schedule

As part of this SPCC plan, the tasks below will be accomplished to comply with Federal SPCC and Massachusetts Fire Prevention regulations in accordance with the following schedule. Tasks are listed in **Table 3** in the order of topics discussed in the SPCC Plan and ongoing tasks are also included to serve as a quick reference list of SPCC activities.



<b>Table 3. Task List &amp; Schedule</b>		<b>Estimated Cost<sup>1</sup></b>	<b>Scheduled Completion Date</b>
1.	Relocate the emergency pump shutoff switch outside of the garage and install an emergency pump shutoff sign several feet above the relocated switch. The sign should clearly label the switch with "Emergency Pump Shutoff" in accordance with Massachusetts Fire Prevention Regulation 527 CMR 5.07 (5). Labeling should consist of at least 2" high block letters with a contrasting background so as to be clearly visible. Sign should be placed high enough so parked vehicles don't hide the sign.	\$1,500 - \$2,000	June 2007
2.	Post a "Do Not Leave Vehicle Unattended During Fueling" sign at the fuel pumps to warn town employees when fueling trucks and vehicles.	<\$100 (sign cost)	June 2007
3.	Label waste oil ASTs with "HAZARDOUS WASTE – TOXIC". This should be in addition to the existing "WASTE OIL" sign.	Fleet Maintenance Division	June 2007
4.	Conduct formal (written) inspections for any evidence of a spill or conditions that may cause a spill in accordance with State AST and SPCC regulations. Complete monthly inspection form for fuel and virgin oil ASTs and associated storage areas/equipment (refer to <b>Appendix B</b> for inspection forms). Continue completing weekly waste oil and Stage II inspection forms. Keep completed forms on file for three years.	Fleet Maintenance Division	Continuously
5.	Ensure personnel are on-site during every fuel delivery.	Fleet Maintenance Division	During fuel deliveries
6.	Manually check fuel levels in ASTs to verify that gauge readings are accurate.	Fleet Maintenance Division	Every six months
7.	Test high-level and interstitial alarm devices for the gasoline and diesel ASTs per manufacturer's specification.	Fleet Maintenance Division	Per manufacturer specifications
8.	Conduct SPCC training.	\$1,200	Annually
9.	Conduct integrity testing (acoustical and/or hydrostatic or pressure) for the ASTs at the site.	\$600 per tank	FYI 2008 and every 10 years thereafter
10.	Provide spill response materials or spill kit in the immediate vicinity of the fuel dispensing area.	\$200	June 2007
11.	Update or amend the SPCC plan – <b>Appendix F</b> .	\$1,500 – \$2,200	As needed when facility changes
12.	Review & evaluate SPCC plan.	\$1,200	Every 5 years starting December 2011

1. The majority of ongoing SPCC tasks can be completed by the Tewksbury DPW Department, as noted above. Cost estimates are provided for budget purposes for tasks that may require contractor assistance.

## 11.0 SPCC PLAN and SWPPP Overlap

In addition to the SPCC Plan, the Tewksbury DPW has a Stormwater Pollution Prevention Plan (SWPPP) to reduce pollution of stormwater runoff and/or keep pollution from leaving the facility and entering any nearby wetlands, rivers, and/or water bodies on or in the vicinity of the DPW facility. The SPCC and SWPPP overlap in the following areas:

*Spill Prevention Control and Countermeasure Plan  
Tewksbury Public Works Facility – January 2007*



- Guidance and procedures to ensure that the appropriate actions are taken in the event of an emergency.
- Actions to take in order to prevent injury to personnel, surrounding facilities or the environment.
- Procedures to contact or assist the appropriate personnel to mitigate any spill or potential spill.
- Reporting requirements for releases of oil and/or hazardous materials.

Due to these overlaps, the inspection checklist from the SPCC and SWPPP Plans have been combined to ease inspection activities for town personnel. The combined checklist is included in Appendix B.





DPW Facility

**Figure 1: Site Locus**

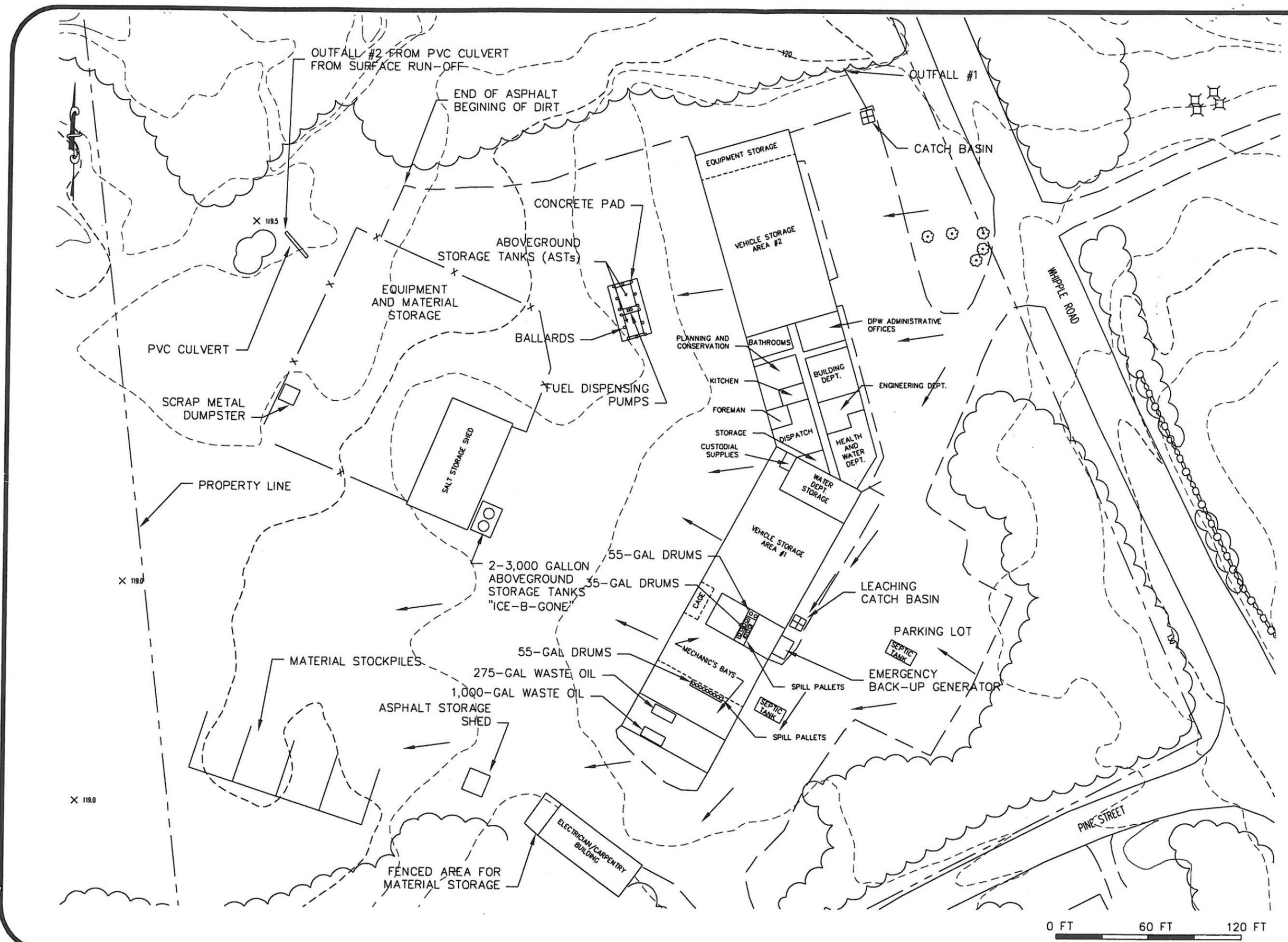
**Tewksbury DPW Facility  
Tewksbury, MA**

**Comprehensive Environmental Inc.**

0 1,500 3,000 6,000 Feet



Data Source: MassGIS, USGS



**General Notes**  
 1. DRAWINGS BASED ON SEA CONSULTANTS INC. FIGURE 2 SITE INFORMATION MAP TEWKSBURY DPW SWPP PLAN DATED JULY 11, 2002.

**LEGEND**  
 ———> FLOW ARROW  
 - - - - - EL. CONTOUR

No.	Revision/Issue	Date

**COMPREHENSIVE ENVIRONMENTAL INCORPORATED**  
 64 DILLA STREET  
 MILFORD, MA 01757

**Figure 2:**  
**Department of Public Works Facility**  
 Town of Tewksbury, Massachusetts

Project No: 230-2	Sheet
Date: December 18, 2006	1 of 1
Drawn By: JI	
Checked By: JG	
Scale: 1" = 60'	



**Appendix A**  
**Spill History Documents**

**NONE AT THIS TIME**

**Appendix B**  
**Inspection Sheets & Testing Records**

**Inspection Sheets:**

SPCC & SWPPP Plan Monthly Inspection Sheet (Monthly)  
Stage II System Maintenance Log (Weekly)  
Standard Operating Procedures

## SPCC & SWPPP PLAN MONTHLY INSPECTION SHEET

Date: \_\_\_\_\_ (Inspect locations at least on a monthly basis)

Time: \_\_\_\_\_ am/pm

Inspector: \_\_\_\_\_

Item/Condition to be Checked	Yes	No	Observation/ Deficiency	Corrective Action & Date
<b>Fuel Dispensing Area, Tanks and Containers</b>				
1. Are the tanks and secondary containment free of leaks, excessive rusting and damage? Check interstitial alarm.				
2. Are containment structures free of liquids and solids (oil, water, or debris)?				
3. Are the fuel receiving lines free of damage, cracks, deterioration, deformations?				
4. Are transfer pipes and support fixtures free of deterioration, cracks, corrosion and leaks?				
5. Is the fueling area free of spills and leaks?				
6. Are the tank structure supports and underlying concrete pad intact and free of deterioration?				
7. Are all tank observation ports closed and locked to prevent tampering?				
8. Are tank level gauges intact and operating properly?				
10. Are signs posted to inform drivers and town employees not to leave vehicles unattended during fueling and to disconnect hoses before departure?				
11. Are all tanks labeled appropriately with bold lettering?				
12. Are there adequate absorbent materials (spill kit) to contain a release (due to overflow or spillage during transfer operations)?				

13. Is fire suppression equipment up to date and in working order?				
14. Are the trench grooves within the concrete pad swept clean?				
<b>Stormwater, Sediment and Erosion Control</b>				
1. Are salt/sand piles covered and are they protected from rain runoff?				
2. Are areas of the site adequately drained to prevent pooling of surface water?				
3. Are surface water drainage structures (catch basins, outfalls) clean of debris to prevent clogging?				
4. Is the outfall on the northeastern side of the site free of debris and sediment?				
5. Are roof downspout discharges directed to storm drains and away from areas with high contamination potential?				
6. Are the Ice-B-Gone tanks free of cracks and deterioration?				
7. Is truck wash water managed to minimize release of contaminants to the environment?				
<b>Security and Safety</b>				
1. Are appropriate lighting and security measures maintained to prevent vandalism?				
<b>Spill Prevention / Spill Response</b>				
1. Are concrete or asphalt paved areas free of cracks or voids which would act as a pathway to the subsurface in the event of a release?				
2. Are daily records of oil/chemicals received and consumed, as well as quantities in storage maintained to determine potential for leaks in tank systems?				
3. Are quantities rechecked to confirm consistency with documentation after off-loading is complete?				
4. Is work performed on tanks, lines, and pumps documented?				
5. Are electrical equipment and transformers free of leaks?				
<b>Good Housekeeping</b>				
1. Are work areas clear of debris or obstructions (trip and fall hazards)?				

2. Are spill cleanup procedures understood by employees?				
3. Are containers, drums, and bags away from direct traffic routes to prevent accidental spills?				
4. Are oil and hazardous materials containers stored on pallets or similar devices to prevent corrosion?				
5. Are all containers properly and clearly labeled to show the name and type of substance, date each period of accumulation begins, health hazards, handling information, and first aid information?				
6. Are scrap metals drained of oils or hazardous materials and put into collection bin?				
7. Are wastes picked up before containers are overflowing?				
8. Are spill pallets free of standing oil?				

*Note: please indicate observation/deficiency and corrective action for any questions answered No.*

3/2/07 Dennis K. Burke overfilled Diesel Tank causes spill on platform.  
 Burke response team cleaned area.

3/22/07 Replace overfill valve on Gas tank / Fuel Management

## STANDARD OPERATING PROCEDURES

### HAZARDOUS MATERIAL HANDLING

Effective Date: \_\_\_\_\_ Issued date: \_\_\_\_\_

**Purpose:**

To ensure that oil and/or hazardous material (OHM) are managed to be consistent with Massachusetts environmental regulations and are handled to comply with standard health and safety practices.

**Responsibility:**

It is the responsibility of the Fleet Maintenance Division Supervisor to store and label all OHM in accordance with this SOP and the Material Safety Data Sheet (MSDS). It is also the supervisor's responsibility to ensure that all MSDS are readily available, and to notify the appropriate Town of Tewksbury officials if situations exist at the facility that do not comply with this SOP.

The Fleet Maintenance Division Supervisor is responsible for inspecting the facility monthly for compliance with this SOP for submitting the findings to the DPW Superintendent. The garage supervisor is responsible for providing the annual Right-to-Know to appropriate personnel.

**Policy:**

OHM containers shall be labeled with the chemical name written in bold capital letters at least one inch high on a contrasting background. NFPA labels shall be attached to containers greater than 5 gallons. All OHM containers shall be closed and sealed properly when not in use.

Flammable materials shall be stored in a fire rated cabinet when not in use and where applicable. OHM shall be stored in areas where containment measures are employed, and away from floor drains, when practical.

MSDS's shall be maintained at the facility and managed to ensure that new products are not introduced without adding the MSDS to the appropriate location. The facilities Emergency Response Plan shall be posted in appropriate locations.

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# STANDARD OPERATING PROCEDURES

## WASTE OIL MANIFESTS

Effective Date: \_\_\_\_\_ Issued Date: \_\_\_\_\_

### **Purpose:**

To ensure that waste oil generated by DPW activities and residential drop-offs is properly segregated, packaged, and manifested accurately.

### **Responsibility:**

It is the responsibility of the Fleet Maintenance Division Supervisor to store and label waste oil generated from DPW activities separate from waste oil received from residential drop-offs. The waste oil generated by DPW activities must be packaged, labeled, and stored separately from the waste oil dropped off by residents. It is the responsibility of the Fleet Maintenance Division Supervisor to notify the Superintendent of Public Works if situations exist at the facility that prevent adherence to this SOP.

The Fleet Maintenance Division Supervisor is responsible for inspecting the facility monthly for adherence to this SOP and for submitting his findings to the Superintendent of Public Works.

### **Policy:**

Waste oil generated by DPW activities is stored in 55-gallon drums. Each drum is to be labeled with "HAZARDOUS WASTE – WASTE OIL – TOXIC" and appropriate NFPA label. The accumulation start date must be marked when the first drop of waste oil is added to the drum. Waste oil drums shall be closed when not in use. A log book should be maintained to track the quantity of drums generated between each pick-up event and to track the date and approximate amount of waste oil added to each drum.

Waste oil generated by residential drop-offs is stored in the 1,000-Gallon AST located in the Mechanic's Garage. The AST shall be properly labeled with "HAZARDOUS WASTE – WASTE OIL – TOXIC" and appropriate NFPA label. The accumulation start date must be marked when the first drop of waste oil is added to the AST. A log book should be maintained to track the date and approximate quantity of waste oil added to the AST.

The logbooks will be used to track the dates so that the 90-day storage period is not exceeded.

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## STANDARD OPERATING PROCEDURES

### HANDLING AND DISPOSAL OF EMPTY OIL/CHEMICAL DRUMS

Effective: \_\_\_\_\_ Issued: \_\_\_\_\_ Approved: \_\_\_\_\_

**Purpose:**

To ensure that empty petroleum and chemical drums are handled and disposed of consistent with environmental regulations.

**Responsibility:**

It is the responsibility of the Fleet Maintenance Division Supervisor to ensure that this SOP is adhered to. It is the responsibility of the Fleet Maintenance Division Supervisor to return empty drums to the supplier within one month of emptying the container.

**Policy:**

Empty drums that previously contained petroleum or chemical products shall be returned to the hazardous materials store room within five days of being emptied. Empty drums are to be kept closed, labeled "EMPTY" and kept under cover (not outside or exposed to the elements) until removal from Town of Tewksbury DPW property. The drums delivered to the storeroom shall be returned to the supplier within one month of receipt at the storeroom.

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**Appendix C**  
**Training Records & Materials**



**Appendix D**  
**Reportable Quantities Information**  
**Emergency Contact List**  
**Emergency Spill Response Procedures**  
**Spill Reporting Information List**  
**MA DEP Spill Reporting Fact Sheet**  
**MA DEP Regulation 310 CMR 40.0300 *Notification of Releases***  
***and Threats of Release of Oil and Hazardous Material***

## REPORTABLE QUANTITIES

### MA DEP Notification\*

Diesel and Unleaded Gasoline      10 gallons

\* Reportable Quantities based on 310 CMR 40.0300 - *Notification of Releases and Threats of Release of Oil and Hazardous Materials*. Any release of oil to groundwater or surface water must be reported.

### EPA Regional Administrator and National Response Center Notification\*\*

Any Oil      1,000 gallons or if discharge violates applicable water quality standards or causes a sheen on surface water in two spill events within a 12 month period

\*\* The Agency may require a spill report within 60 days from the time of the spill. Such a spill report must include the following information:

- 1) Name of the facility;
- 2) Name(s) of the owner or operator of the facility;
- 3) Location of the facility;
- 4) Date and year of initial facility operation;
- 5) Maximum storage or handling capacity of the facility and normal daily throughput;
- 6) Description of the facility, including maps, flow diagrams, and topographical maps;
- 7) A complete copy of the SPCC Plan with any amendments;
- 8) The cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred;
- 9) The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;
- 10) Additional preventive measures taken or contemplated to minimize the possibility of recurrence;
- 11) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

## EMERGENCY SPILL RESPONSE PROCEDURES

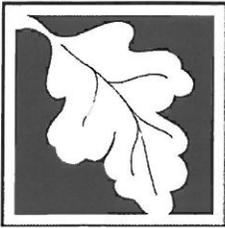
As a general guideline, all employees shall utilize the following procedures, as appropriate and feasible, in the event of a spill:

1. **Safety First** – assess the spill area for safety conditions
2. **Evaluate** the need for medical, fire safety, police, and evacuation
3. **Call for help** – notify the SPCC Coordinator and emergency contacts (as required)
4. **Stop the source of the spill** – only if you can safely
5. **Apply Absorbent Materials**, pads, booms, sand or other material to the spill area to immediately contain the oil spill –(if you can safely)
6. **Additional** pads or booms shall be placed in the direction of flow
7. **Notify** appropriate agencies of release (if necessary) using the “Spill Reporting Information List” below
8. **Document** spill for inclusion in SPCC Plan (include corrective actions taken and plans to prevent recurrence)

## SPILL REPORTING INFORMATION LIST

The following information will be needed in order to properly report a spill:

1. Spill Address – 999 Whipple Road, Tewksbury, MA
2. Site Phone Number – (978) 640-4440 (Fleet Maintenance Division)
3. Date & Time of Spill
4. Type of Material Discharged – (i.e. diesel)
5. Total Volume of Spill (estimated)
6. Source of the Spill – tank, piping, fuel pumps
7. A Description of All Affected Media – pavement, soils around tanks, adjacent forested areas, water bodies, etc.
8. Cause of the Spill
9. Any Damages or Injuries Caused by the Spill
10. Actions Being Used to Stop, Remove and Mitigate the Effects of the Discharge
11. Whether an Evacuation may be Needed
12. Names of Individuals and/or Organizations Who Have Also Been Contacted  
(Refer to the Emergency Contact List in this Appendix)



Massachusetts  
Department  
of  
ENVIRONMENTAL  
PROTECTION

# fact sheet

## Managing spills of oil and hazardous materials

Information for municipalities

### Purpose

From time to time, every community must clean up an oil or chemical spill. Because timely response is critical to the success of any cleanup, the Massachusetts Department of Environmental Protection (DEP) has prepared this guide to help municipal officials:

- Take action when there is a small release of oil or hazardous material;
- Take a lead role in cleanup efforts for small spills; and
- Determine when DEP or a Licensed Site Professional (LSP) needs to lead a cleanup.

### Who must clean up a spill?

The primary responsibility for hiring contractors for on-site cleanup and disposal of waste materials, including all associated costs, rests with the person or party that causes or contributes to the release and/or with the owner of the property where it happens. They are collectively referred to as Potentially Responsible Parties (PRPs).<sup>1</sup>



*Methuen Fire Department response to liquid asphalt spill. Photo by Steven Ross, DEP.*

<sup>1</sup> M.G.L. Chapter 21E (the Massachusetts Oil and Hazardous Material Release Prevention Act) and 310 CMR 40.0000 (the Massachusetts Contingency Plan, or MCP) spell out the procedures and requirements for release notification, spill response and the cleanup standards that must be met.

Massachusetts Department of  
Environmental Protection  
One Winter Street  
Boston, MA 02108-4746

Commonwealth of Massachusetts  
Mitt Romney, Governor  
Kerry Healey, Lt. Governor  
  
Executive Office of  
Environmental Affairs  
Ellen Roy Herzfelder, Secretary

Department of  
Environmental Protection  
Robert W. Gollodge, Jr.,  
Commissioner

Produced by the  
Bureau of Waste Site Cleanup,  
2/01, rev. 4/04  
Printed on recycled paper

This information is available in  
alternate format by calling our ADA  
Coordinator at  
(617) 292-5565.



### **Does the size, type, or location of a spill make a difference?**

Yes. Depending on the size and type of spill, DEP and other local, state, and federal agencies may have a role in spill response. The PRP must report spills to DEP if they exceed specific thresholds. Some releases are exempt from reporting requirements under the MCP. These are spills that involve:

- fewer than 10 gallons of petroleum and that do not impact a waterbody;
- less than one pound of hazardous chemicals;
- fuel from passenger vehicle accidents; or
- a vault or building with a watertight floor and with walls that completely contain all released chemicals.

Regardless of whether DEP notification is required, all spills of oil and hazardous materials must be cleaned up to the extent that there is no risk to human health.

### **Who responds to small releases of oil and hazardous material?**

The local fire department normally responds to spills, initiates containment, and usually directs cleanup of small spills, i.e. those that do not trigger DEP reporting thresholds. When the PRP is unable or unwilling to take responsibility, the local fire department may also arrange for cleanup, either by hiring an outside contractor or by using in-house resources. The municipal public works department or other local agencies sometimes provide support. DEP may not respond to small or non-reportable releases, but will be available for technical support. DEP will always respond to larger and more complicated spills with potential for posing imminent health, safety, or environmental hazards. DEP also attempts to respond to releases where public safety officials request assistance in directing the cleanup.

### **What specific roles do local officials play?**

First responders to a spill are usually equipped to take some action to contain it. This containment is critical to protecting resources at risk. For example, the local fire department might take measures to stop the flow or contain the release with absorbents, while public works personnel deliver and spread sand, pick up debris, and provide street drainage maps to aid in the spill investigation. Some municipalities have one or more environmental cleanup firms on retainer to help deal with small spill response.

When PRPs are unable or unwilling to respond, a statewide comprehensive "Hazardous Material Collection and Disposal" contract can be used by towns, cities, and state agencies to hire cleanup companies. The contract also provides for emergency response preparedness training for government workers. The contract establishes "Not to Exceed" rates for labor, transportation, and oil and hazardous materials disposal. A copy of the contract may be found at the web site of the Massachusetts Operational Services Division at <http://www.mass.gov/osd>.

### **What training is necessary for cleanup workers?**

Because of their roles as first responders and the associated risks of direct exposure to hazardous chemicals, fire department personnel typically undergo training to deal with petroleum and chemical releases, as described in OSHA 1910.120. The International Association of Fire Fighters and the Massachusetts Firefighting Academy offer training programs.

Basic awareness training is highly recommended for staff from other municipal agencies who may be at less risk of direct exposure but still play critical support roles.

### **How do wastes from spill cleanups need to be handled?**

Sand and absorbents contaminated with petroleum can be reused, disposed, or otherwise handled as described in DEP policy WSC-94-400. But sand and absorbents that are saturated with petroleum products or by other hazardous chemicals may need special

handling (disposal) by licensed transporters. Depending on the size and severity of a spill, a Licensed Site Professional (LSP) may also need to be hired to oversee the cleanup and sign-off on the disposal. DEP requires municipalities to properly manage and store small quantities of hazardous materials from spill cleanups. If storage that is consistent with DEP guidelines is not possible, an environmental waste removal firm should be hired to remove the material.

**Contacting DEP Regional Offices:**

Northeast Regional Office - 205B Lowell Street Wilmington, Massachusetts 01887  
<http://mass.gov/dep/about/region/northeast.htm> (617) 654-6500  
Southeast Regional Office - 20 Riverside Dr., Lakeville, MA 02347  
<http://mass.gov/dep/about/region/southeast.htm> (508) 946-2700  
Central Regional Office - 627 Main St., Worcester, MA 01608  
<http://mass.gov/dep/about/region/centralr.htm> (508) 792-7650  
Western Regional Office - 436 Dwight St., Springfield, MA 01103  
<http://mass.gov/dep/about/region/westernr.htm> (413) 784-1100

Visit <http://mass.gov/dep/about/region/findyour.htm> to determine which DEP regional office serves your community.

**For more information:**

- If you have questions, please email DEP at [BWSC.Information@state.ma.us](mailto:BWSC.Information@state.ma.us).
- For copies of DEP regulations, policies, and other publications, visit: <http://mass.gov/dep/cleanup/>

**Related regulations and guidance documents:**

- Interim Remediation Waste Management Policy for Petroleum Contaminated Soil, WSC-94-400
- Reuse and Disposal of Contaminated Soil at Massachusetts Landfills, COMM-97-001
- Characteristics of Hazardous Waste, 310 CMR 30.120
- A Summary of Requirements for Small Quantity Generators, MA DEP.

**DEP Telephone numbers:**

- Hazardous Waste Compliance Assistance Line – (617) 292-5898
- Household Hazardous Products Hotline – (800) 343-3420

**Above ground or underground storage tanks:**

Call the local fire department or the Massachusetts Department of Fire Services at (978) 567-3300.

**LSP information:**

Visit the LSP Board's web page at <http://www.mass.gov/lsp> or call (617) 556-1091.

Massachusetts Department of  
Environmental Protection  
One Winter Street  
Boston, MA 02108-4746

Commonwealth of Massachusetts  
Mitt Romney, Governor  
Kerry Healey, Lt. Governor

Executive Office of  
Environmental Affairs  
Ellen Roy Herzfelder, Secretary

Department of  
Environmental Protection  
Robert W. Gollidge, Jr.,  
Commissioner

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Bureau of Waste Site Cleanup,  
2/01, rev. 4/04  
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This information is available in  
alternate format by calling our ADA  
Coordinator at  
(617) 292-5565.



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**DEP 24-hour Spill Reporting**  
**To report a release of oil or hazardous material, call the DEP 24-hour notification line toll-free**  
**(888) 304-1133**  
**From the Boston area dial (617) 556-1133**

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## **310 CMR 40.0300: Massachusetts Contingency Plan**

### **SUBPART C: NOTIFICATION OF RELEASES AND THREATS OF RELEASE OF OIL AND HAZARDOUS MATERIAL**

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This copy of the Massachusetts Contingency Plan, 310 CMR 40, is not an "Official Version" of the regulations. In particular, it lacks page numbers and the effective dates at the bottom of each page. Other unexpected differences may also be present. This HTML version is offered as a convenience to our users and DEP believes that the body of the text is a faithful copy of the regulations. If you REALLY, ABSOLUTELY, MUST know that the version you have is correct and up-to-date, then you must purchase the document through the State Bookstore (at <http://mass.gov/sec/spr/spridx.htm>). The official versions of all state statutes and regulations are only available through the State Bookstore.

#### **40.0300: Notification of Releases and Threats of Release of Oil and Hazardous Material; Identification and Listing of Oil and Hazardous Material**

310 CMR 40.0301 through 40.0399, cited collectively as 310 CMR 40.0300, contain requirements and procedures for notifying the Department of releases and threats of release of oil and/or hazardous material.

#### **40.0301: Purpose and Scope**

(1) The purpose of 310 CMR 40.0300 is to identify oil and hazardous material which are subject to the provisions of this Contingency Plan, to identify those releases and threats of release of such oil and hazardous material that require notification to the Department, to set forth the time periods and procedures for notification, and to set forth provisions to allow limited removal of such oil and hazardous material under certain circumstances.

(2) Nothing in 310 CMR 40.0300 shall relieve any person described in M.G.L. c. 21E, Â§ 5(a)(1) through (5) from any liability which that person would otherwise possess in connection with a release or threat of release of any oil or hazardous material that is listed at 310 CMR 40.1600, identified by characteristic in 310 CMR 40.0347 or otherwise meets either the definition of oil or the definition of hazardous material, which are set forth in 310 CMR 40.0006.

(3) The Department may take response actions, seek any reimbursement or compensation to which the Commonwealth is entitled, and/or pursue enforcement actions in connection with any release or threat of release of oil and/or hazardous material, provided, however, that the Department shall not seek penalties for failure to provide notification to the Department of any release or threat of release:

- (a) unless notification is required pursuant to the provisions of 310 CMR 40.0300, or
- (b) for which notification is exempted pursuant to the provisions of 310 CMR 40.0317.

#### **40.0302: Applicability**

(1) The provisions of 310 CMR 40.0300 shall apply to all releases and threats of release of oil and/or hazardous material to the environment, except as set forth in 310 CMR 40.0302(2).

(2) The notification requirements set forth in 310 CMR 40.0300 shall only apply to:

(a) releases and threats of release that commence on or after October 1, 1993; and

(b) releases and threats of release of which knowledge is possessed or obtained on or after October 1, 1993, by any person listed at 310 CMR 40.0331.

Notwithstanding any other provision hereof, the applicable "2 Hour", "72 Hour" and "120 Day" notification time periods which arise solely as a result of 310 CMR 40.0300 shall commence no earlier than October 1, 1993.

#### **40.0303: Role of Licensed Site Professional**

Persons required to provide oral and/or written notification to the Department of releases and threats of release of oil and/or hazardous material to the environment pursuant to the provisions of 310 CMR 40.0300 may wish to retain the services of competent individuals, time permitting, or as circumstances require, to investigate, evaluate, and/or otherwise facilitate the fulfillment of that requirement, but shall not be obligated to use a Licensed Site Professional for that purpose.

#### **40.0310: Releases and Threats of Release Which Require Notification**

##### **40.0311: Releases Which Require Notification Within Two Hours**

Except as provided in 310 CMR 40.0317 or 310 CMR 40.0332(1) or (7), persons required to notify under 310 CMR 40.0331 shall notify the Department as soon as possible but not more than two hours after obtaining knowledge that a release meets one or more of the following sets of criteria:

(1) a sudden, continuous or intermittent release to the environment of any hazardous material that is listed at 310 CMR 40.1600 or that exhibits one or more of the characteristics described in 310 CMR 40.0347, when:

(a) the quantity of the release is equal to or greater than the applicable Reportable Quantity specified at 310 CMR 40.0352 or 40.1600; and

(b) it is likely that the release occurred within any period of 24 consecutive hours or less;

(2) a sudden, continuous or intermittent release to the environment of any hazardous material that is listed at 310 CMR 40.1600 or that exhibits one or more of the

characteristics described in 310 CMR 40.0347, when:

(a) the quantity of the release is unknown;

(b) it is likely that the quantity of the release is equal to or greater than the applicable Reportable Quantity specified at 310 CMR 40.0352 or 40.1600; and

(c) it is likely that the release occurred within any period of 24 consecutive hours or less;

(3) a sudden, continuous or intermittent release to the environment of oil that is listed at 310 CMR 40.1600 when:

(a) the quantity of the release is equal to or greater than the applicable Reportable Quantity specified at 310 CMR 40.0351 or 310 CMR 40.1600; and

(b) it is likely that the release occurred within any period of 24 consecutive hours or less;

(4) a sudden, continuous or intermittent release to the environment of oil that is listed at 310 CMR 40.1600, when:

(a) the quantity of the release is unknown;

(b) it is likely that the quantity of the release is equal to or greater than the applicable Reportable Quantity specified at 40.1600; and

(c) it is likely that the release occurred within any period of 24 consecutive hours or less;

(5) a sudden, continuous or intermittent release to the environment of any quantity of oil or waste oil that is listed at 310 CMR 40.1600 that results in the appearance of a sheen on surface water;

(6) a release to the environment indicated by the measurement of oil and/or hazardous material in a private drinking water supply well at concentrations equal to or greater than a Category RCGW-1 Reportable Concentration, as described in 310 CMR 40.0360 through 40.0369 and listed at 40.1600;

(7) any release of any oil and/or hazardous material, in any quantity or concentration, that poses or could pose an Imminent Hazard, as described in 310 CMR 40.0321 and 40.0950;

(8) any release of oil and/or hazardous material described in 310 CMR 40.0311(1) through (4) or 310 CMR 40.0311(7) that is indirectly discharged to the environment by means of discharge to a stormwater drainage system;

(9) any release of oil and/or hazardous material described in 310 CMR 40.0311(7) that is indirectly discharged into the environment by means of discharge to a sanitary sewerage

system.

#### **40.0312: Threats of Release Which Require Notification Within Two Hours**

Except as provided in 310 CMR 40.0317 or 310 CMR 40.0332(1) or (7), persons required to notify under 310 CMR 40.0331 shall notify the Department as soon as possible but not more than two hours after obtaining knowledge that a threat of release meets one or more of the following sets of criteria:

(1) a threat of release to the environment of oil and/or hazardous material that is listed at 310 CMR 40.1600 or that exhibits one or more of the characteristics described in 310 CMR 40.0347, when:

(a) it is likely that the release threatened is about to occur; and

(b) it is likely that the quantity of the release, if it occurred, would be equal to or greater than the applicable Reportable Quantity specified at 310 CMR 40.0351, 40.0352 or 40.1600; or

(2) a threat of release to the environment of oil and/or hazardous material that is listed at 310 CMR 40.1600 or that exhibits one or more of the characteristics described in 310 CMR 40.0347, which poses or could pose an Imminent Hazard, as described in 310 CMR 40.0321, irrespective of the quantity likely to be released.

#### **40.0313: Releases Which Require Notification Within 72 Hours**

Except as provided in 310 CMR 40.0317 or 40.0332(7), persons required to notify under 310 CMR 40.0331 shall notify the Department not more than 72 hours after obtaining knowledge that a release of oil and/or hazardous material(s) meets one or more of the following sets of criteria:

(1) a release to the environment indicated by the presence of a subsurface Non-Aqueous Phase Liquid (NAPL) having a measured thickness equal to or greater than  $\frac{1}{2}$  inch;

(2) a release to the environment indicated by the presence of oil and/or hazardous material within ten feet of the exterior wall of an underground storage tank, as established by measurement of equal to or greater than 100 parts-per-million (ppm) by volume of total organic vapors "as benzene" in the headspace of a soil or groundwater sample using a headspace screening method, and where such sample was obtained:

(a) greater than two feet below the ground surface; and

(b) as part of a closure assessment required pursuant to 527 CMR 9.00 and 40 CFR Parts 280 and 281, or in connection with the removal or closure of an underground storage tank otherwise regulated by M.G.L. c. 148 or 527 CMR 9.00;

(3) a release to the environment indicated by the measurement of oil and/or hazardous material in the groundwater at concentrations equal to or greater than a Category RCGW-1 Reportable Concentration, as described in 310 CMR 40.0360 through 40.0369 and listed at 40.1600, within:

(a) the Zone I of a public water supply well; or

(b) 500 feet of a private water supply well; or

(4) a release to the environment indicated by measurement within the groundwater of equal to or greater than five milligrams per liter of total volatile organic compounds at any point located within 30 feet of a school or occupied residential structure, where the groundwater table is less than 15 feet below the surface of the ground; or

(5) a condition of Substantial Release Migration.

#### **40.0314: Threats of Release Which Require Notification Within 72 Hours**

Except as provided in 310 CMR 40.0317, persons required to notify under 310 CMR 40.0331 shall notify the Department not more than 72 hours after obtaining knowledge of a threat of release of oil and/or hazardous material to the environment from an underground storage tank, as established by a tank test conducted in conformance with the methodology prescribed for that test which indicates:

(1) there is a substantial likelihood of a leak equal to or greater than 0.05 gallons per hour in a single walled tank;

(2) there is a substantial likelihood of a leak equal to or greater than 0.05 gallons per hour in the inner wall of a double-walled tank; or

(3) there is a substantial likelihood of a leak in the outer wall of a double-walled tank as established by the relevant parameters of that test.

#### **40.0315: Releases Which Require Notification Within 120 Days**

Except as provided in 310 CMR 40.0317 or 40.0318, persons required to notify under 310 CMR 40.0331 shall notify the Department not more than 120 days after obtaining knowledge that a release meets one or more of the following sets of criteria:

(1) a release to the environment indicated by the measurement of one or more hazardous materials in soil or groundwater in an amount equal to or greater than the applicable Reportable Concentration described in 310 CMR 40.0360 through 40.0369 and listed at 40.1600;

(2) a release to the environment indicated by the measurement of oil and/or waste oil in soil in an amount equal to or greater than the applicable Reportable Concentration

described in 310 CMR 40.0360 through 40.0369 and listed at 40.1600, where the total contiguous volume of the oil and/or waste oil contaminated soil is equal to or greater than two cubic yards;

(3) a release to the environment indicated by the measurement of oil in groundwater in an amount equal to or greater than the applicable Reportable Concentration described in 310 CMR 40.0360 through 40.0369 and listed at 40.01600; or

(4) a release to the environment indicated by the presence of a subsurface Non-Aqueous Phase Liquid (NAPL) having a measured thickness equal to or greater than  $\frac{1}{8}$  inch and less than  $\frac{1}{2}$  inch.

#### **40.0317: Releases and Threats of Release Which Do Not Require Notification**

Notwithstanding the provisions of 310 CMR 40.0311 through 40.0315, the following releases and threats of release of oil and/or hazardous material are exempt from the notification requirements set forth in 310 CMR 40.0300:

(1) releases of oil that occur during normal handling and transfer operations at an oil facility, if the releases are completely captured by a properly functioning oil/water separator; provided, however, that releases of oil which exceed the capacity of the oil/water separator, and that releases of oil from the oil/water separator, itself, in excess of its discharge permit limits, shall be subject to the notification requirements set forth in 310 CMR 40.0300;

(2) releases or threats of release of gasoline or diesel fuel that result from the rupture of the fuel tank of a passenger vehicle as a result of an accident involving that vehicle;

(3) releases of oil and/or hazardous material that are discharged or emitted from an outfall, stack or other point source, or as fugitive emissions, any of which are regulated under and have received a valid permit, license, or approval, or which are operating under a valid registration, order or guideline issued under a federal or state statute or regulation, unless the release:

(a) exceeds the amount allowed by the permit, license, approval, registration, order or guideline; and

(b) represents an Imminent Hazard to health, safety, public welfare or the environment. This provision shall not relieve any person from any other duty to notify which may exist under any other statute or regulation, nor shall it in any way limit the authority of any other agency, political subdivision or authority of the federal or state government or of any office or division of the Department to enforce or otherwise carry out the duties assigned to it by law;

(4) releases of radionuclides regulated by EPA under 42 USC Â§ 9602, 33 USC Â§Â§ 1321 and 1361, and 40 CFR Part 302 *et seq.*;

(5) releases of forbidden, Class A or Class B explosives, as defined in 49 CFR Â§Â§ 173.50, 173.53 and 173.88 respectively, if the explosives are under military transport or supervision and the U.S. Army Explosive Ordnance responds to the release;

(6) releases of methane, propane, and other component compounds associated with a release of natural gas, natural gas liquids and liquified natural gas;

(7) sheens:

(a) resulting from emissions or discharges from outboard motors in recreational use; or

(b) associated with normal surface water runoff from roadways, driveways, and parking lots;

(8) releases of hazardous material indicated by residues in the environment:

(a) emanating from a point of original application of lead-based paint;

(b) resulting from emissions from the exhaust of an engine; or

(c) resulting from the application of pesticides in a manner consistent with their labelling;

(9) releases of oil and/or hazardous material related to coal, coal ash, or wood ash, excluding wood ash resulting from the combustion of lumber or wood products that have been treated with chemical preservatives;

(10) releases of oil and/or hazardous material resulting from the land application, reuse, or disposal of wastewater residuals and/or dredged spoils conducted in accordance with an approval, permit or certification issued by the Department under the authority of 310 CMR 32.00, 314 CMR 9.00, M.G.L. c. 21, Â§Â§ 26 through 53, M.G.L. c. 111, Â§ 17, M.G.L. c. 83, Â§ 6 and 7 and c. 21A, Â§ 14 and any regulations promulgated thereunder;

(11) releases of oil and/or hazardous material in groundwater detected by sampling conducted by Public Water Supply owners or operators under 310 CMR 22.00 as indicated by the presence of oil and/or hazardous material in a public water supply source;

(12) releases of oil and/or hazardous material resulting or emanating from:

(a) the asphalt binder in bituminous pavement;

(b) piers, pilings and building foundation structures;

(c) landscaping timbers in use;

(d) utility poles in use; or

(e) building materials that are in good repair and still serving their original intended use;

(13) releases indicated solely by the presence of oil and/or hazardous material in soils that are treated, recycled, reused or disposed of at a facility licensed, permitted or approved by the Department, provided that:

(a) the soil has been excavated and transported from a disposal site in compliance with 310 CMR 40.0000; and

(b) the facility is operated in a manner consistent with the terms and conditions of its license, permit or approval;

(14) releases of oil and/or hazardous material that require notification solely because an RP, PRP or Other Person obtains knowledge of media concentrations and/or site conditions that meet one or more of the sets of criteria set forth in 310 CMR 40.0311 through 310 CMR 40.0315, when such media concentration value(s) and/or knowledge of site conditions resulted from a sampling, analytical or observational error, as established by a preponderance of the evidence and/or as verified by additional sampling, analyses, and/or observation, within the applicable time period for notification;

(15) releases of oil and/or hazardous material that require notification solely because an RP, PRP or Other Person obtains knowledge of soil concentrations equal to or greater than one or more applicable Reportable Concentrations, as specified in 310 CMR 40.0315, where a Limited Removal Action conducted under the provisions of 310 CMR 40.0318 has reduced soil concentrations of oil and/or hazardous material at the disposal site to an amount less than the Reportable Concentration(s), within the allowable time period for notification;

(16) releases indicated by the presence of oil and/or hazardous material in concentrations or quantities which would otherwise meet one or more of the sets of criteria set forth in 310 CMR 40.0313 through 310 CMR 40.0315 at a disposal site where:

(a) a response action is being undertaken in compliance with the provisions of 310 CMR 40.0000;

(b) a release notification was previously provided to the Department for the property on which the release has been observed or documented; and

(c) such presence of oil and/or hazardous material is consistent with the types, nature, and quantities of oil and/or hazardous material for which that notification was provided to the

Department;

(17) releases indicated by the presence of oil and/or hazardous material in concentrations which would otherwise meet one or more of the sets of criteria set forth in 310 CMR 40.0313 or 40.0315 unless the presence of such oil and/or hazardous material would negate or change such determinations or statements were that presence taken into account in the preparation thereof, or changes in activities, uses, and/or exposures at the disposal site require notification to the Department pursuant to the provisions of 310 CMR 40.0020:

(a) a disposal site where a Response Action Outcome Statement has been submitted to the Department in compliance with the provisions of 310 CMR 40.1000,

(b) a disposal site where a No Further Action Letter has been submitted to the Department in compliance with the provisions of 310 CMR 40.0600,

(c) a disposal site where the Department has made a written determination that no further actions are required,

(d) a disposal site where an LSP Evaluation Opinion has been submitted to the Department in compliance with 310 CMR 40.0600 stating either that the site is not a disposal site for which notification is required pursuant to 310 CMR 40.0300 and no further response actions are required or that completed response actions meet the requirements of a Response Action Outcome, or

(e) a disposal site where a Waiver Completion Statement has been submitted to the Department in compliance with the provisions of 310 CMR 40.537 and/or 310 CMR 40.0630.

(18) threats of release indicated by the outcome of tank tests specified in 310 CMR 40.0314, where a tank test outcome has resulted from a testing error, as documented within the allowable time period for notification by an additional test conducted on identical and unrepaired underground storage tank system elements;

(19) releases of oil and/or hazardous material to:

(a) an underground utility vault if such releases are completely contained within the vault; or

(b) the interior of a building, provided such releases are completely contained within the building;

(20) releases of chloroform in groundwater attributable to naturally-occurring ecological processes and/or leakage or discharges from a public water supply system; and

(21) releases of oil or waste oil of less than a Reportable Quantity that result in a sheen on

a surface water, provided that:

- (a) federal officials receive notice of such release pursuant to the Federal Water Pollution Control Act as amended;
- (b) a response occurs as directed by those federal officials and according to other federal, state or local requirements applicable to such a release and response;
- (c) the sheen does not persist for more than 24 consecutive hours; and
- (d) the sheen does not recur at the same location within any 30 day period.

**40.0318: Limited Removal Actions**

(1) Limited Removal Actions may be undertaken by RPs, PRPs or Other Persons prior to notification to the Department of those "120 Day Notification" releases described in 310 CMR 40.0315.

(2) Limited Removal Actions shall not be initiated or continued:

(a) after obtaining knowledge that a release or threat of release requires notification under the "2 Hour" or "72 Hour" notification provisions of 310 CMR 40.0311 through 40.0314, whether or not notification has been made to the Department;

(b) following notification to the Department by any person listed at 310 CMR 40.0331 of any release or threat of release of oil and/or hazardous material at the disposal site which requires notification under 310 CMR 40.0315; or

(c) at any Location to Be Investigated or disposal site subject to the provisions of 310 CMR 40.0600.

(3) RPs, PRPs or Other Persons who undertake Limited Removal Actions shall conform to the Response Action Performance Standard specified in 310 CMR 40.0191.

(4) Limited Removal Actions shall be restricted to the excavation and off-site recycling, reuse, treatment, and/or disposal of not more than the following cumulative volumes of soil removed from a disposal site with measured concentrations of oil or hazardous material equal to or greater than an applicable Reportable Concentration:

(a) not more than 100 cubic yards of soil contaminated solely by a release of oil or waste oil; and

(b) not more than 20 cubic yards of soil contaminated by a release of hazardous material or a mixture of oil or waste oil and hazardous material.

(5) All excavation activities conducted by an RP, PRP or Other Person as a Limited

Removal Action shall occur within 120 days of obtaining knowledge of a release described in 310 CMR 40.0315.

(6) All contaminated soil generated as a result of a Limited Removal Action shall be stockpiled, stored, characterized, transported, and recycled, reused, treated, or disposed of as set forth in 310 CMR 40.0030.

(7) Records documenting:

(a) the concentrations of oil and/or hazardous material in soil at the disposal site following a Limited Removal Action; and

(b) the chemical characterization and volume of soil removed from a disposal site as part of a Limited Removal Action, shall be maintained by the RP, PRP or Other Person undertaking the Limited Removal Action for a minimum of five years or for so long as is required under 310 CMR 40.0014, whichever is longer.

(8) Limited Removal Actions conducted in compliance with the provisions of 310 CMR 40.0318 shall not require oversight by a Licensed Site Professional, except for Limited Removal Actions that involve the use of the Bill of Lading soil management process described in 310 CMR 40.0030.

(9) In those cases where volumes of contaminated soil encountered unexpectedly exceed initial estimates and the volumetric excavation limits specified in 310 CMR 40.0318(4), persons required to notify under 310 CMR 30.0331 shall notify the Department of the release at the disposal site within the allowable time period for notification, and the person conducting the Limited Removal Action shall either:

(a) cease remedial actions; or

(b) continue removal actions at the disposal site as a Release Abatement Measure, as specified in 310 CMR 40.0443.

#### **40.0320: Releases and Threats of Release that Pose Imminent Hazards**

#### **40.0321: Reporting of Releases and Threats of Release that Pose or Could Pose an Imminent Hazard**

(1) For the purpose of fulfilling the "Two Hour" release notification obligations of 310 CMR 40.0311(7), the following releases shall be deemed to pose an Imminent Hazard to health, safety, public welfare and/or the environment:

(a) a release to the environment which results in the presence of oil and/or hazardous material vapors within buildings, structures, or underground utility conduits at a concentration equal to or greater than 10% of the Lower Explosive Limit;

(b) a release to the environment of reactive or explosive hazardous material, as described in 310 CMR 40.0347, which threatens human health or safety;

(c) a release to a roadway that endangers public safety;

(d) a release to the environment of oil and/or hazardous material which poses a significant risk to human health when present for even a short period of time, as specified in 310 CMR 40.0950;

(e) a release to the environment of oil and/or hazardous material which produces immediate or acute adverse impacts to freshwater or saltwater fish populations; or

(f) a release to the environment which produces readily apparent effects to human health, including respiratory distress or dermal irritation.

(2) For the purpose of fulfilling the "Two Hour" release notification obligations of 310 CMR 40.0311(7), the following releases could pose an Imminent Hazard to human health:

(a) a release to the environment indicated by the measurement of oil and/or hazardous material in a private drinking water supply well at a concentration equal to or greater than ten times the Category RCGW-1 Reportable Concentration, as described in 310 CMR 40.0360 through 40.0369 and listed at 310 CMR 40.1600; or

(b) a release to the environment indicated by the measurement of concentrations of hazardous material, equal to or greater than any of the following concentrations of hazardous

material in surficial soil (within a depth of 12 inches, but as close to the surface as possible), at any location within 500 feet of a residential dwelling, school, playground, recreation area or park, unless access by children is controlled or prevented by means of bituminous pavement, concrete, fence, or other physical barrier:

<b>Hazardous Material</b>	<b>CAS number</b>	<b>Concentration (ug/g dry wt)</b>
Arsenic (total)	7440382	40
Cadmium (total)	7440439	60
Chromium (VI)/Total Chromium	18540299	200
Cyanide (available)	57125	100
Mercury (total)	7439976	300
Methyl Mercury	22967926	10
PCB (total)	1336363	10

or

(c) a release to the environment for which estimated long-term risk levels associated with current exposures are greater than ten times the Cumulative Receptor Risk Limits in 310 CMR 40.0993(6). Past exposures may be included in such evaluations to the extent that it is reasonable to quantify those exposures.

(3) For the purpose of fulfilling the notification obligations of 310 CMR 40.0312(2), threats of release which pose or could pose an Imminent Hazard to health, safety, public welfare and/or the environment shall consist of any threat of release where, if the release were to occur, it is likely that that release would meet any of the criteria described in 310 CMR 40.0321(1) or 40.0321(2).

(4) Notwithstanding the provisions of 310 CMR 40.0321(2) and 40.0321(3), a person required to notify under 310 CMR 40.0331 may demonstrate to the Department by a preponderance of the evidence that release or site conditions specified in 310 CMR 40.0321(2) and/or 40.0321(3) do not constitute an actual Imminent Hazard to human health, in conformance with the Imminent Hazard Evaluation process described in 310 CMR 40.0426, and in consideration of the site-specific factors and the risk assessment and risk management criteria contained in 310 CMR 40.0950. No such demonstration, however, shall relieve any person of the obligation to notify the Department of a release or threat of release under the provisions of 310 CMR 40.0311 or 40.0312.

(5) No provision contained in 310 CMR 40.0321 shall limit the Department's authority to determine that an Imminent Hazard exists at any site, consistent with the provisions of 310 CMR 40.0950, nor shall any such provision limit the Department's authority to undertake response actions, seek any reimbursement or compensation due to the Commonwealth, or pursue enforcement actions in accordance with any such determination.

#### **40.0322: Response Actions to Prevent or Abate Imminent Hazards**

(1) An Immediate Response Action, as described in 310 CMR 40.0400, shall be taken to prevent, eliminate, or abate all Imminent Hazards.

(2) Immediate Response Actions shall not be delayed or deferred at sites where continued inaction would likely result in the development of an Imminent Hazard condition.

#### **40.0330: Notification Requirements and Procedures**

##### **40.0331: Who Shall Notify**

(1) The following persons shall notify the Department in accordance with 310 CMR 40.0300 of a release or threat of release of oil or hazardous material:

- (a) the owner or operator of a vessel or a site from or at which there is or has been a release or threat of release of oil and/or hazardous material;
- (b) any person who at the time of storage or disposal of any hazardous material owned or operated any site at or upon which such hazardous material was stored or disposed of and from which there is or has been a release or threat of release of hazardous material;
- (c) any person who by contract, agreement, or otherwise, directly or indirectly, arranged for the transport, disposal, storage or treatment of hazardous material to or in a site or vessel from or at which there is or has been a release or threat of release of hazardous material;
- (d) any person who, directly or indirectly, transported any hazardous material to transport, disposal, storage or treatment vessels or sites from or at which there is or has been a release or threat of release of such material;
- (e) any person who otherwise caused or is legally responsible for a release or threat of release of oil and/or hazardous material from a site or vessel;
- (f) any fiduciary who holds title to or possession of a site or vessel from or at which there is or has been a release or threat of release of oil and/or hazardous material;
- (g) any secured lender who holds title to or possession of a site or vessel from or at which there is or has been a release or threat of release of oil and/or hazardous material;
- (h) any agency of the Commonwealth or any public utility company that owns a right of way that is a site from or at which there is or has been a release or threat of release of oil and/or hazardous material; and
- (i) any person otherwise required to notify the Department of a release or threat of release pursuant to M.G.L. c. 21E.

(2) If a release to the environment has occurred or a threat of release to the environment exists at any site or vessel and there is a substantial likelihood that such release or threat of release includes or would include oil and/or hazardous material which appears at 310 CMR 40.1600 or exhibits any of the characteristics described in 310 CMR 40.0347, then any owner, operator, or fiduciary or secured lender who holds title to or possession of such site or vessel, shall determine whether such is the case, and whether any such release or threat of release requires notification to the Department under 310 CMR 40.0300.

#### **40.0332: Timing of Notifications**

(1) **Two Hour Notifications.** Notification to the Department of any release or threat of release specified in 310 CMR 40.0311 and 40.0312 shall be made as soon as possible but not more than two hours after obtaining knowledge that the release or threat of release

meets one or more of the sets of notification criteria, unless the person responsible for notifying establishes, by a preponderance of the evidence, that extenuating circumstances prevented notification within said two hour time period. In that event, notification to the Department shall be made as soon as possible thereafter, taking into account the extenuating circumstances. Extenuating circumstances shall include, without limitation, the following:

- (a) a lack of reasonably available communication equipment at the site of the release or threat of release;
- (b) a need to take actions prior to notification in order to mitigate or prevent an Imminent Hazard and/or threat to public safety; and/or
- (c) a physical injury to the person responsible for notifying caused by or associated with the release or threat of release, when the injury reasonably prevents that person from notifying.

(2) **72 Hour Notifications.** Notification to the Department of any release or threat of release specified in 310 CMR 40.0313 and 40.0314 shall be made not more than 72 hours after obtaining knowledge that the release or threat of release meets one or more of the sets of notification criteria.

(3) **120 Day Notifications.** Notification to the Department of any release specified in 310 CMR 40.0315 shall be made not more than 120 days after obtaining knowledge that the release meets one or more of the sets of notification criteria, and prior to the commencement of any remedial actions at the site, with the exception of Limited Removal Actions, as set forth in 310 CMR 40.0318.

(4) If a release or threat of release is subject to more than one notification time period, the shorter time period shall apply.

(5) No provision of 310 CMR 40.0332 shall be construed to prevent a person responsible for notifying from implementing a response action necessary to mitigate or prevent an Imminent Hazard.

(6) No provision of 310 CMR 40.0332 shall be construed to allow an unreasonable delay in notification of the Department after obtaining knowledge of a release or threat of release that meets one or more of the sets of notification criteria specified in 310 CMR 40.0311 or 40.0312.

(7) The notification timelines specified in 310 CMR 40.0332 shall commence at the time that the person required to notify obtains knowledge, or at the time that a person who has knowledge obtains the status of a person required to notify, whichever is later.

**40.0333: How to Notify**

(1) **Two Hour and Seventy-Two Hour Notifications.** Persons described in 310 CMR 40.0331(l) shall:

(a) notify the Department of a release or threat of release specified in 310 CMR 40.0311 through 40.0314, inclusive, by calling a telephone number published by the Department and designated for that purpose and orally providing to the Department the information specified in 310 CMR 40.0334; and

(b) within 60 days thereafter, submit a completed Release Notification Form, as described in 310 CMR 40.0371, to the Department office located in the DEP region in which the release or threat of release occurred. Where appropriate, the Release Notification Form may be accompanied by a Response Action Outcome Statement, as described in 310 CMR 40.1000.

(2) **120 Day Notifications.** Persons described in 310 CMR 40.0331(1) shall notify the Department of a release specified in 310 CMR 40.0315 by submitting a completed Release Notification Form, as described in 310 CMR 40.0371, to the Department office located in the DEP region in which the release occurred. Where appropriate, the Release Notification Form may be accompanied by a Response Action Outcome Statement, as described in 310 CMR 40.1000.

#### **40.0334: Content of the Notification**

Oral notification to the Department pursuant to 310 CMR 40.0333(1)(a) shall consist of the following information to the extent known to the person responsible for providing the notification:

- (a) the name and telephone number of the caller;
- (b) the location of the release or threat of release;
- (c) the date and time the release occurred;
- (d) the set(s) of notification criteria that is the basis for notification;
- (e) the name of the oil and/or hazardous material(s) released or of which there is a threat of release;
- (f) the approximate quantity of the oil and/or hazardous material(s) which has been released or of which there is a threat of release;
- (g) the source of the release or threat of release;
- (h) a brief description of the release or threat of release;
- (i) the name and telephone number of the owner/operator of the site or vessel where the

reporting criteria; and

(e) the signature of the person retracting the notification, attesting to the accuracy and completeness of the information contained in the retraction submittal, as specified at 310 CMR 40.0009.

(3) Except as provided in 310 CMR 40.0335(7), all retractions pursuant to 310 CMR 40.0335 must be received by the Department no later than 60 days after the person providing the retraction first notified the Department of the subject release or threat of release.

(4) All retractions pursuant to 310 CMR 40.0335 shall be submitted to the Department using a transmittal form established by the Department for such purposes.

(5) Submission of a notification retraction in conformance with the provisions of 310 CMR 40.0335 shall terminate all future response action requirements and submittals that would otherwise be necessitated by the reporting of said release or threat of release, unless written notice to the contrary is provided by the Department within 21 days of the Department's receipt of such retraction.

(6) Nothing in 310 CMR 40.0335 shall limit the Department's authority to initiate, oversee, or order the performance of any response action deemed necessary by the Department to protect health, safety, public welfare, or the environment.

(7) The deadline for retracting notifications established by 310 CMR 40.0335(3) shall be extended to the date that is 90 days after the effective date of the first revision to the definition of the term "Potentially Productive Aquifer" in 310 CMR 40.0006 and to 310 CMR 40.0932(5)(b) promulgated after December 15, 1995, provided that the following conditions are met:

(a) the groundwater at such disposal site at the time of notification is defined as Category RCGW-1 solely pursuant to 310 CMR 40.0362(1)(a)3. (*i.e.*, such groundwater is defined as RCGW-1 solely because the groundwater is within a Potentially Productive Aquifer); and/or

(b) the soil is defined as Category RCS-1 solely pursuant to 310 CMR 40.0361(1)(a)2. (*i.e.*, the soil is defined as RCS-1 solely due to its location above groundwater that meets the requirements of 310 CMR 40.0362(1)(a), and such groundwater is defined as Category RCGW-1 solely pursuant to the requirements of 310 CMR 40.0362(1)(a)3.).

**40.0336: Notification Requirements for Persons that Receive a Notice of Responsibility**

(1) Except as provided in 310 CMR 40.0336(2), persons who have not previously notified the Department of a release or threat of release in accordance with 310 CMR 40.0300, and who receive a Notice of Responsibility from the Department requiring

**FACILITY CERTIFICATION**

**SPCC PLAN**

**Facility Information**

Name: Tewksbury Department of Public Works Facility  
Address: 999 Whipple Road, Tewksbury, MA 01876  
Description: Public Works Facility  
Date of Initial Operation: \_\_\_\_\_

**Owner/Operator Information**

Name: Toma Duhani, Superintendent of Public Works  
Address: 999 Whipple Road, Tewksbury, MA 01876  
Phone: (978) 640-4440 (Department of Public Works)

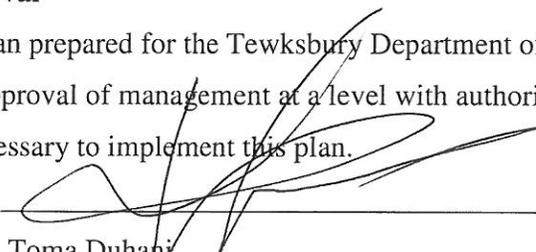
**SPCC Plan Coordinators**

Name & Title: Toma Duhani, Superintendent of Public Works  
Name & Title: Larry Gilbert, Fleet Maintenance Division Supervisor  
Name & Title: \_\_\_\_\_

**Spill History Information** – provided in SPCC Plan at Previous Spill Events (112.7)

**Management Approval**

The SPCC Plan prepared for the Tewksbury Department of Public Works Facility has the full approval of management at a level with authority to commit the resources necessary to implement this plan.

Signature:   
Name: Toma Duhani  
Title: Superintendent of Public Works  
Date: \_\_\_\_\_

**REGISTERED PROFESSIONAL ENGINEER CERTIFICATION  
SPCC PLAN**

**Facility Information**

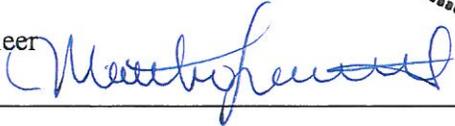
Name: Tewksbury Department of Public Works Facility  
Address: 999 Whipple Road, Tewksbury, MA 01876  
Description: Department of Public Works Facility

I, Matt Lundsted, certify that I have reviewed the attached Spill Prevention Control and Countermeasure (SPCC) Plan for the above listed facility. I have evaluated the subject facility based on field inspections and information provided by other qualified personnel, and being familiar with the provisions of Title 40 Code of Federal Regulations Part 112, I hereby certify that this plan has been prepared in accordance with good engineering practices.

The tasks listed in the Task List & Schedule provided in the SPCC Plan for the above listed facility should be completed in accordance with the schedule provided in the plan.



Registered Professional Engineer

Signature:   
Name: Matt Lundsted  
Registration No.: 40894  
Date: 1/23/07

**Appendix F**  
**Record of Changes/Plan Amendments**

**RECORD OF CHANGES  
SPCC PLAN**

The SPCC Plan shall be updated whenever there is a change in the “facility design, construction, operation or maintenance which material affects the facility’s potential for the discharge of oil” (40 CFR Part 112.5(a)) and in accordance with the requirements of 40 CFR Part 112.5(b). These plan amendments shall be completed within six months after the facility changes. In addition a review and evaluation of the plan shall be completed at least once every five years. All technical amendments to the SPCC Plan shall be certified by a registered Professional Engineer (see certification). All amendments to the plan shall be recorded on this sheet and maintained with the plan.

Amendment Number	Date of Change	Significant Changes	Date Recorded	Signature of Person Recording Change
1	1/23/07	Entire Plan Update		
2				
3				
4				
5				
6				

Original Plan Date: November 25, 2002	Approved By:
---------------------------------------	--------------

**Amendments shall be recorded in each copy of the SPCC Plans, as listed below:**

Location of SPCC Plan	Quantity of Plans
Tewksbury Department of Public Works Office	(1)
Fleet Maintenance Division Office	(1)

## **Appendix E**

### **Stormwater Pollution Prevention Plan (SWPPP)**

# Stormwater Pollution Prevention Plan (SWPPP)

Draft





Environment

Prepared for:  
Department of Public Works  
Tewksbury, MA

Prepared by:  
AECOM  
Chelmsford, MA  
60303397  
9/13/2013

# Document Title

## Draft

---

Prepared By [Name]

---

Reviewed By [Name]

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## List of Acronyms

AST – Above Ground Storage Tank

BMP – Best Management Practice

DEP – Department of Environmental Protection

DPW – Department of Public Works

SOP – Standard Operating Procedures

SPCC - Spill Prevention and Countermeasure

SWPPP - Stormwater Pollution Prevention Plan

NPDES – National Pollutant Discharge Elimination System

MSGP - Multi- Sector General Permit

MS4 - Municipal Separate Storm Sewer Systems

MSDS- Material Safety Data Sheet

TSS – Total Suspended Solids

PPE – Personal Protective Equipment

## **1.0 Introduction**

In accordance with the National Pollutant Discharge Elimination System (NPDES) Phase II Permit, the Town of Tewksbury has adopted pollution prevention controls that are intended to ensure operations conducted at the Department of Public Works (DPW) facility do not contribute to stormwater pollution. The facility is located on 999 Whipple Road and the coverage area of this document includes the facility itself, the parking lot in front of the building, and the storage area behind the facility. Town employees are to use Best Management Practices (BMP's), to prevent stormwater pollution. Activities include street sweeping, catch basin cleaning, vehicle maintenance, vehicle washing, and lawn maintenance.

### **1.1 Purpose and Scope**

The Stormwater Pollution Prevention Plan (SWPPP) is a guidance document prepared for the Town of Tewksbury DPW facility at 999 Whipple Road. Its purpose is to provide BMP's for typical DPW operations and activities in order to minimize pollutant loading to the Towns stormwater drainage system and adjacent wetlands and water bodies. This SWPPP is intended to address regulations outlined in the Towns NPDES Phase II Permit for Regulated Small Municipal Separate Storm Sewer Systems (MS4s). This SWPPP includes BMPs based on review and inventory of Town operations at the DPW. The BMPs are intended to provide straightforward procedures for personnel to follow during everyday activities. This SWPPP should be reviewed and revised periodically depending on Town operations, facility changes, or in response to regulatory changes.

### **1.2 Pollution Prevention Team**

The Pollution Prevention Team, located at 999 Whipple Road, Tewksbury, MA is listed below and they can be reached at (978)-640-4440

Rick Spinale – Assistant Superintendent of the Department of Public Works

Michelle Stein, P.E.– Town Engineer

Dan Scott– Assistant Town Engineer

### 1.3 Pollutants of Concern

Typical pollutants and their most common sources are listed in the table below.

**Table 1.3-1. Target Stormwater Pollutants**

Pollutant	Facts
Sediment	<ul style="list-style-type: none"> <li>Contains the largest pollutant loading associated with stormwater, effects include increase turbidity and higher loadings of other contaminants due to them binding on to sediment particles. Common activities associated with sediment include construction, and runoff from piles of debris.</li> </ul>
Nutrients	<ul style="list-style-type: none"> <li>Most common nutrients include phosphorous and nitrogen, and in surface water these loads can result in heavy algae growth, eutrophication, and low dissolved oxygen levels. Common activities associated with high nutrient levels include landscaping practices, and sanitary sewer leaks.</li> </ul>
Organic Matter	<ul style="list-style-type: none"> <li>High levels of organic matter leads to depleted oxygen levels in surface water which can harm aquatic life. Common sources include trash, yard waste, and decaying leaves.</li> </ul>
Pathogens/Bacteria	<ul style="list-style-type: none"> <li>High bacteria levels are found as a result of pet waste, garbage, wildlife, and illicit connections to the drainage system. Impacts of pathogens and bacteria can cause sickness and can impact recreational use and aquatic life.</li> </ul>
Oil and Grease	<ul style="list-style-type: none"> <li>Numerous activities in urban areas result in oil and grease, including fueling and maintenance activities, leaks and spills, and manufacturing processes.</li> </ul>
Heavy Metals	<ul style="list-style-type: none"> <li>Typical metals include copper, lead, zinc, arsenic, chromium, and cadmium. This can be toxic to aquatic life. Common sources include automobiles, preservatives, and uncovered scrap metal piles.</li> </ul>
Asphalt millings	<ul style="list-style-type: none"> <li>Can lead to higher loading of Total Suspended Solids (TSS), and heavy metals. Sources can include uncovered piles of asphalt millings.</li> </ul>

### 1.4 Existing Conditions

Currently, employees at the DPW practice good housekeeping, dispose of waste oil properly, and perform other pollution prevention activities. The figure in Appendix A shows the existing conditions at the DPW. This includes storage piles, dumpsters, and fuel tanks.

## **1.5 Best Management Practices**

Guidance on various issues for the Town of Tewksbury is presented in the following sections. Each issue to address is followed by various BMP's that are listed below, which will include a brief description, BMPs, and employee training opportunities. Appendix B is an inspection log which should be used by DPW managers to keep track of conditions at the facility.

- Road Sand/Salt Application & Storage
- Materials Storage
- Vehicle and Equipment Fueling, Maintenance, Washing, and Storage
- Runoff Management and Erosion Control
- Spill Prevention and Response

## 2.0 Best Management Practices

### 2.1 Road Sand/Salt Application and Storage

Sand/salt storage and application is important to prevent contamination to surface and groundwater resources. Salts are soluble; therefore once they are contact water they cannot be removed. Sand and salt mix kills vegetation, causes corrosion, blocks storm drains and swales, increases sedimentation to streams, and contains small amounts of phosphorus, nitrogen, copper and cyanide.

#### 2.1.1 BMPs

- Cover sand/salt piles with a tarp on impervious surfaces or store inside a building or under a roof.
- Contain stormwater runoff from sand and gravel stockpiles by using barriers or berms.
- Storage facilities should not be located in a water supply watershed or within a 100 year floodplain.
- Should not dispose of sand/salt mixtures on wetlands, or in well locations and public drinking supplies.
- Properly remove sand and salt by street sweeping and catch basin cleanouts.
- Establish low salt areas near water bodies or residential areas.
- Regulate amount of road salt used to prevent over-salting.
- Use sand or gravel in sensitive areas.
- Inspect sheds and application equipment on a regular basis
- Inspect surface areas for evidence of runoff, such as salt stains in the ground downslope of a storage shed.

#### *Employee Training Opportunities*

Employees should be educated on hazards of over salting roadways. They should be educated about where to store salt and sand, and should understand where no salt areas are. Employees should also know where sensitive watersheds are.

### 2.2 Materials Storage

Proper storage of hazardous and nonhazardous materials is essential to prevent pollution of stormwater. Hazardous materials include cleaning agents, petroleum products, vehicle maintenance fluids, and paints. Hazardous materials can have dangerous effects on aquatic life and the environment. Nonhazardous materials storage includes other items such as wood, steel, or asphalt piles. If not properly contained these items can also have a damaging effect on the watershed. Additional information on DPW materials and storage can be found in section 3.0 of the DPW Spill Prevention and Countermeasure (SPCC) plan in Appendix D.

## 2.2.1 BMPs

### *Outdoor Storage Areas*

- If possible, store all containers indoors. If they must be stored outdoors, place them in a shed or under a roof.
- All containers and dry materials should be covered or have secondary containment.
- Place all containers on a plastic pallet or other device that elevates them off the ground or pavement and provides containment. This avoids contact with storm water on the ground.
- Place containers on paved, impervious surfaces and as far from (or at lower elevation than) storm drain inlets and drainage ditches as possible.
- Keep a spill kit near storage areas. Clean up any spills, leaks or discharges promptly.
- If a container is found to be leaking either empty the contents into a leak-tight container or place entire leaking container inside of a larger leak-tight container. Clean up spills promptly.
- Make sure outdoor barrels are covered at all times, and use barrels that do not have holes in the bottom.
- If rain water collects in a secondary containment structure, allow the water to evaporate if possible. If not possible, verify with sight & smell that the water is not contaminated with a hazardous substance and then pump to sanitary sewer for disposal. If water is suspected of containing hazardous waste (oil sheen, odor), the water must be treated as hazardous waste and be disposed of properly.
- Contain stormwater runoff from dirt and gravel stockpiles by using barriers or berms.
- Inspect all containers stored outdoors regularly.

### *Liquid Bulk Material Storage*

- Provide impervious secondary containment for all Above Ground Storage Tanks (ASTs), except double-walled tanks, sufficient to contain the entire contents of the largest single tank plus an additional 4 inches of rainfall.
- Keep drain valves in secondary containment at ASTs locked in the closed position at all times. Open for draining only under supervision.
- Make sure an adequate spill kit with sufficient equipment and supplies is located near storage areas where spills are possible. Clean up any spills, leaks or discharges immediately.
- Make sure that inspections for petroleum storage continue once a year, unless a year pass is granted for passing the previous two years in a row.

### *Construction & Demolition Materials*

- Stockpile only materials that have value and a high likelihood of being reused on projects.
- Locate stockpiled materials far from storm drains and cover any materials that could erode or leach in stormwater.
- Treated timber, sand/gravel, and asphalt debris must be stored under cover or tarps with provisions to avoid contact with surface runoff (placed on tarp/pallet or berm).
- Chipped or ground wood products must be stored under cover where they will not be mobilized by stormwater.

- Dispose of all other building demolition, land clearing, pavement maintenance, or other construction debris immediately after completing the project.
- If a container is found to be leaking either empty the contents into a leak-tight container or place entire leaking container inside of a larger leak-tight container. Clean up spills promptly.
- Inspect all containers stored outdoors regularly.

#### *Hazardous Material Storage*

- All facilities should have proper procedure for loading /unloading hazardous materials received.
- If possible, load and unload all hazardous materials in covered areas.
- Place containers in areas that are free of cracks and is paved.
- Keep containers away from high traffic areas.

#### *Material Inventory*

- Identify all hazardous and non- hazardous substances by reviewing purchase orders and conducting a walk- through of the facility.
- Compile Material Safety Data Sheets (MSDS) for all chemicals.

#### *Employee Training Opportunities*

Employees should be trained routinely on new products, proper use, storage, disposal, and safety concerns. Employees should also review MSDSs and they should be readily accessible in central facility location.

## **2.3 Vehicle and Equipment Fueling, Washing, and Storage**

Vehicle and equipment repair, service, replacement of fluids, washing, and outdoor equipment storage and parking can impact the water quality of stormwater runoff. Spills and leaks can contribute to contamination from hydrocarbons, oil and grease, wash water, and heavy metals.

### **2.3.1 BMPs**

#### *Vehicle and Equipment Maintenance*

- Store cracked batteries in leak proof secondary containers.
- Conduct all maintenance and repair work inside or under cover.
- Only emergency maintenance or maintenance that does not involve fluids may be performed outside.
- Move leaking vehicles or equipment indoors or under cover.
- Use drip pans for leaking vehicles that need to be stored outside.
- Contain leaking fluids and tag the vehicle to alert drivers that vehicle is non-operational.
- Perform all maintenance activities involving fluids indoors only (except in emergency cases).

- Dispose of wastewater from tire leak check to sanitary sewer, not storm drain.
- Promptly transfer used fluids to recycling drums or hazardous waste containers.
- Dispose of liquid waste properly.
- Keep equipment clean; don't allow excessive buildup of oil and grease.

#### *Vehicle & Equipment Fueling*

- Fuel carefully to minimize drips on the ground.
- Do not "top off" fuel tanks.
- Remain present at the fueling station during the entire fueling operation.
- When fueling small equipment in the field such as lawn mowers, weed whackers, etc., do so over a paved surface, at a location that is down gradient from and far away from the nearest storm drain.

#### *Disposal*

- Recycle or properly dispose of fluids.
- Dump full pans into 55-gallon drums.
- Dispose of debris including oil filters, oil cans, rags, and clean up supplies.
- Do not dump vehicle or equipment fluids down storm drains.
- Recycle used oil.
- Do not mix waste with used oil.

#### *Employee Training Opportunities*

Employees should be properly trained on fueling and handling oil and waste oil. They should also be familiar with the consequences of misusing fueling areas and the impact on the stormwater system and surrounding watershed.

## **2.4 Runoff Management and Erosion Control**

Controlling runoff and erosion control is important to prevent the transport of sediment and other pollutants to the stormwater system, and wetlands and water bodies. Erosion is caused from scouring of the soil usually from large precipitation events, which can lead to poor bank stability and high TSS in receiving water bodies.

### **2.4.1 BMPs**

- Large storage areas should be kept graveled to prevent sediment discharge.
- Do not dispose of sweepings behind of DPW property or reuse for other purposes.
- Schedule street sweeping to be at least twice per year, and schedule additional sweeping after large storm events or for maintenance projects that leave debris behind.
- Repair areas with significant erosion.

- Make sure to sweep or vacuum the pavement after the final snowmelt.
- Paved areas should be vacuumed as necessary during the summer months.
- Clean leaves, trash, sand, and debris from parking lots regularly or as needed to prevent contaminants from reaching storm drain inlet or detention area.
- Protect nearby storm drain inlets using drain covers, inserts, berms, etc. over or around inlets when doing maintenance work within 25 feet of an inlet.
- Use erosion and sediment control during any earth disturbing activities.
- Avoid plowing, pushing, blowing, or storing excess snow or other debris into storm drains.

#### *Employee Training Opportunities*

Employees should be properly trained on using sediment and erosion control. They should be familiar with the different tools and methods that can be used to prevent this. Employees should have hands on training with berms and other containment tools by experienced personnel.

## **2.5 Spill Prevention and Response**

Having a plan in place in case of a spill is important to ensure contaminants do not mix with stormwater runoff. A spill prevention and response plan can be effective at reducing the risk of contamination to surface and groundwater. However, proper personnel training, equipment, and following instructions are essential. This is a general outline of spill prevention and response, a specific plan and task list is provided in the DPW SPCC plan in Appendix D.

### **2.5.1 BMPs**

#### *Spill/Leak Prevention*

- Berm storage areas so that if a spill or leak occurs, the material is well contained.
- Cover outside storage areas with a permanent structure.
- Properly label containers so contents can easily be identified.
- Place drip pans or absorbent materials beneath mounted taps during filling and unloading.
- Install a spill control device in any catch basins that collect runoff from any storage areas if the materials stored are oil, gas or other materials that separate or float on water.
- Refer to section 6.0 of the DPW SPCC plan in Appendix D for spill potential and containment structures.
- Check containers often for leaks and spills replace containers in poor condition.
- Hazardous Waste materials must be removed by Clean Harbors twice a year. They can be reached at (978)-683-1002.

#### *Upland Spills*

- Confirm the spill is an incidental release before proceeding. If the spill is an uncontrolled release of hazardous material as defined in the SPCC, the employee should call 911 and initiate the emergency response.
- Consult the MSDS sheet for the product of concern. MSDS sheets are transported with all hazardous materials.
- Block nearby storm drain inlets and place containment booms around the spill if it has the potential to become mobile.
- Put on the appropriate Personal Protective Equipment (PPE) as specified by the MSDS. Only use a respirator if you have been properly trained and fitted, and are using the appropriate cartridge for the spilled chemical.
- Place absorbents on the spill and sweep the dry material into a containment vessel.
- Dispose of the material as hazardous waste.

#### *In-Water Spills*

- For small spills that can be contained with materials in the DPW spill kit, deploy containment boom and absorbent pads.
- Contact a cleanup contractor, if needed to complete the in-water cleanup.
- For any spill involving flammable liquid (i.e. fuel), any spill involving more than a minor and very small area of sheen, or any spill of a substance representing an immediate hazard to life or the aquatic environment, call 911 and initiate the SPCC emergency response actions.
- Notify the Department of Environmental Protection 24-hour Spill Response & Reporting Line at (888) 304-1133.

#### *Reporting*

- Report any spills to the facility manager
- Spills that pose an immediate threat to human health or the environment must be reported immediately to the Town Health Department at 978-640-4470 and the Fire Department at 911.
- Federal Regulations require any oil spill that enters a water body or adjoining shoreline must be reported to the National Response Center at 800-424-8802.
- Call MassDEP immediately if there is a spill of oil 10 gallons or more at 888-304-1133.
- A detailed report about the incident should be generated and kept on file after the spill has been contained and cleaned.

#### *Employee Training Opportunities*

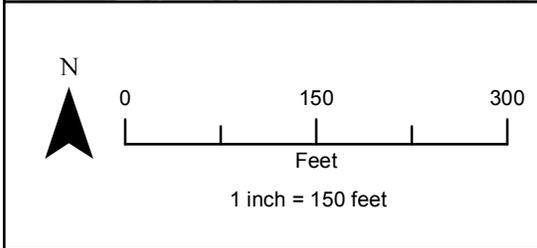
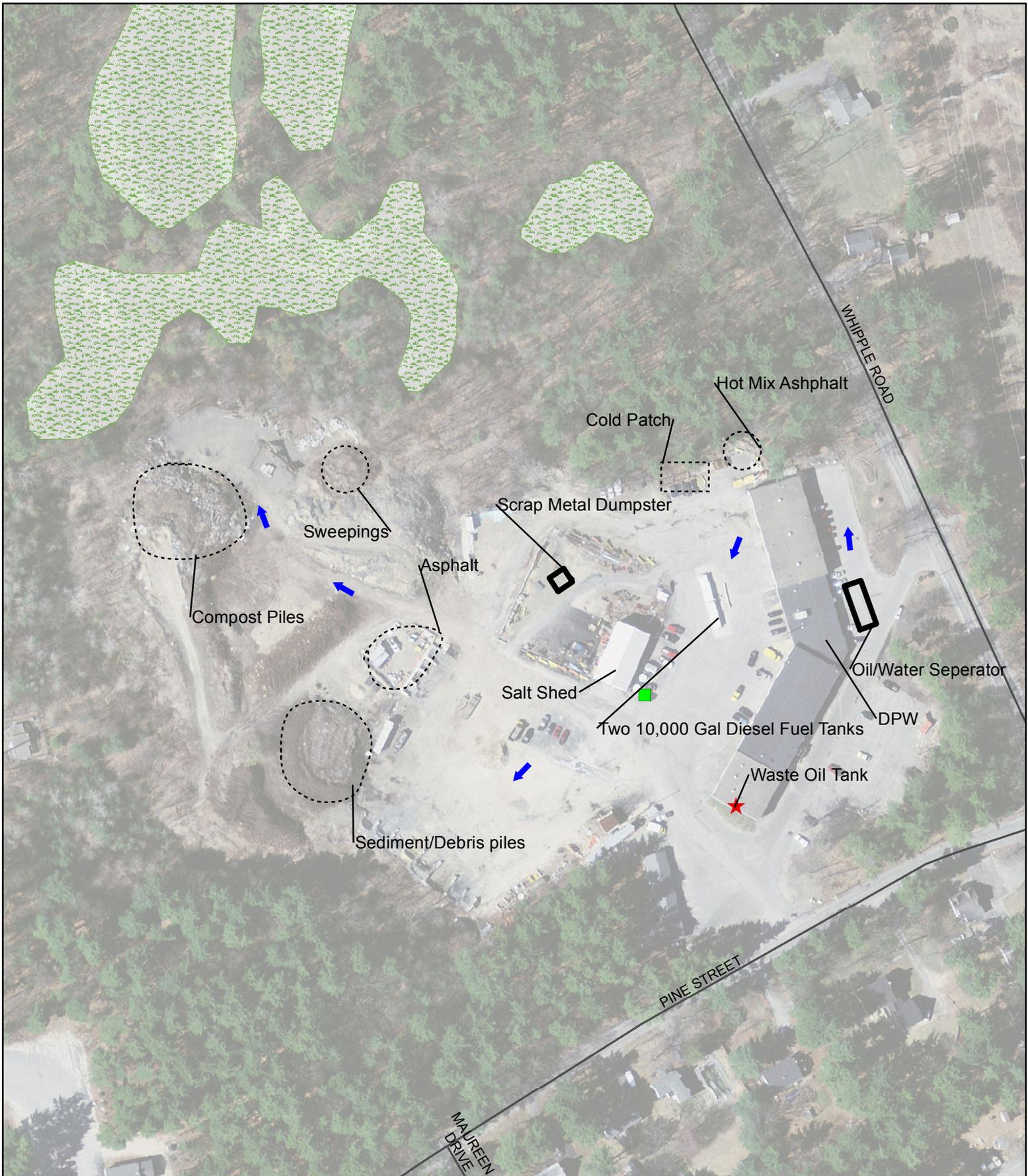
See page 12- 14 of DPW SPCC plan for employee training details.

### **3.0 Additional Procedures**

BMP's addressing pet waste and wildlife management are not necessary at the DPW facility. There is currently no need for practices within this subject because it is not an issue at the DPW. However, if it becomes an issue, and pets or waterfowl begin to congregate on DPW property, additional BMP's can be developed.

It should be noted there are other procedures to address which are not outlined in this SWPPP, but are contained in the DPW Operations and Maintenance (O&M) Plans. Additional procedures for fertilizer, pesticide, herbicide application, road and parking lot maintenance, grounds maintenance, and general good housekeeping are outlined in the DPW O&M manuals.

**Appendix A**  
**DPW Facility Map**



**Appendix A**  
**Department of Public Works**  
**Facility Map**

999 Whipple Rd.  
 Tewksbury, MA  
 September 2013

Legend	
↑	Flow Direction
■	Dumpster
[Hatched Box]	Wetlands
—	Roads



**Appendix B**  
**Inspection Log**

APPENDIX B: TEWKSBURY DEPARTMENT OF PUBLIC WORKS MAINTENANCE FACILITY  
ANNUAL BMP EVALUATION

Inspection Date: \_\_\_\_\_ Property Location: \_\_\_\_\_

Inspection Conducted By: \_\_\_\_\_

Activity Reference & Description	Satisfactory?	Additional Notes/Action Needed
<b>Road Sand/Salt Application and Storage</b>		
1. Stored Under Cover.		
2. Salt stands downslope of storage areas.		
3. Street sweeping at least twice a year.		
<b>Materials Storage</b>		
1. Provide secondary containment for materials stored in containers and for transferring.		
2. Outdoor barrels and dumpsters covered.		
3. Containers on impervious surfaces.		
4. Condition of storage tanks.		
5. MSDS for all chemicals.		
<b>Vehicle and Equipment Fueling, Maintenance, Washing, and Storage</b>		
1. Ensure vehicles and equipment are not leaking.		
2. Park vehicles and equipment under cover.		
<b>Runoff Management and Erosion Control</b>		
1. Graveled Storage Areas		
2. Vacuumed paved areas.		
<b>Spill Prevention and Response</b>		
1. Spill kit on site.		
2. Properly labeled containers, in good condition.		
3. Drip pans beneath mounted tabs during filling.		
4. Employees properly trained.		

Department of Public Works:  
Tewksbury, MA  
(978) 640-4440