
CITY OF ALGONAC

POLLUTION INCIDENT PREVENTION PLAN (PIPP)



PREPARED BY HUBBELL, ROTH & CLARK

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1.0 POLLUTION INCIDENT PREVENTION PLAN (PIPP)

The Pollution Incident Prevention (PIPP) Plan provides a response plan as required by the State of Michigan's Part 5 Rules. This plan provides spill response procedures and is intended to provide guidance in the event of a release of polluting materials to air, soil, or surface water at the City of Algonac's Department of Public Works (DPW) Facility. The provisions of this plan must be carried out immediately in the event of a release of polluting materials that could threaten human health or the environment. The Part 5 Rules require facilities that receive, process, manufacture, store, or ship polluting materials above the threshold amounts to develop and implement a PIPP and to provide containment for potentially polluting materials. Michigan Part 5 Rules defines "polluting material" as oil, salt, and any material listed on the Polluting Materials list.

Updated Material Safety Data Sheets (MSDSs) are continually tracked and filed and made readily available for review by employees at the facility. These are located inside the DPW Garage.

1.1 EMERGENCY CONTACTS

POLICE DEPARTMENT/DIPSATCH: 911

Michigan Department of Environment, Great Lakes and Energy (EGLE) – Southeast Michigan District Office	27700 Donald Court Warren, MI 48092-2793 Phone: 586.753.3700 Fax: 586.753.3751
EGLE 24-Hour Pollution Emergency Alert System (PEAS)	800-292-4706
St. Clair County Illicit Discharge Hotline	810-987-7253
St. Clair County Office of Emergency Management	810-989-6965
Poison Control Center	800-222-1222
State Emergency Response Commission	517-719-1195
National Emergency Response Center	800-424-8802
U.S. EPA Region 5 Office 24-Hour Number	312-353-2000
CHEMTREC (chemicals, spills, fires information)	800-262-8200
Michigan Department of Transportation (MDOT)	517-241-2400

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

1.2 PIPP Distribution

The Department of Public Works Foreman and the City Administrator maintain a copy of this PIPP. The PIPP is available to all personnel who are authorized to have access to it.

A letter certifying that the facility is in compliance with the Part 5 Rules will be sent to the EGLE – Water Resources Division within 30 days of finalizing the completion or updates to this Plan.

Copies of the PIPP and future revised versions will be available upon request to the list below:

1. EGLE Water Resources Division, SE Michigan District
2. City of Algonac Police Department
3. Emergency Response Contractor
4. St. Clair County Emergency Planning Committee
5. St. Clair County Health Department
6. State of Michigan Emergency Response Commission-EGLE Waste Management Div.
7. US EPA Regional Administrator

PIPP Amendments

This PIPP will be reviewed and updated as needed every three (3) years, or when facility personnel, processes, or procedures identified in the PIPP change or as otherwise necessary to maintain compliance with the Part 5 Rules. Upon completion of the updated PIPP, the owner shall recertify the PIPP and notify EGLE, the County Emergency Planning Committee, and the local Health Department (with a letter) of compliance with the Part 5 Rules.

1.3 Facility Description

The DPW administrative offices are located in the city office complex at 805 St. Clair River Dr. The DPW Facility Complex is located at 453 State St.

The DPW Facility has three employees.

The State St. site includes a locked garage building. The salt barn and above ground diesel tank are located on the north side of the yard with miscellaneous materials stockpiles on the south side of the salt barn, all inside a chain-link fence. The land area is approximately 1.80 acres.

The yard is all gravel and dirt that is in need of paving. There are no catch basins located within the yard. The closest storm catch basin is located along State St. The indoor drains go to sanitary.

The salt barn is located northwest of the DPW Garage. Approximately 300 tons of salt are stored and applied annually.

1.3.1 Operations

The DPW Facility is utilized for the storage of salt, sand, stone, and cold patch piles. Cement containment structures are utilized for most of these materials.

Routine vehicle maintenance is carried out at the DPW site, including lubrication, oil changes, power washing, minor repairs, and tire changes. Heavy repairs are sent to a car repair shop. Vehicles and equipment are washed inside the DPW Garage which drains to sanitary.

The yard provides the storage space for the various road maintenance equipment, materials and miscellaneous equipment.

A DPW Facility Site Map is included in Appendix C.

1.4 Past Pollution Incidents

There has not been a reportable oil spill or chemical release incident in the past 3 years.

1.5 Emergency Response Personnel

1.5.1 Emergency Response Coordinator Responsibilities

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

- A. Ensuring that emergency response equipment inspections are conducted quarterly.
- B. Activating internal facility alarms or communication systems to notify all facility personnel of an emergency situation.
- C. Assessing the nature and extent of emergency situations and committing the resources necessary for proper response.
- D. Ensuring that injured personnel are given appropriate medical attention and/or arranging transportation to a hospital, when necessary.
- E. Maintaining adequate space for the movement of emergency response personnel and equipment.
- F. Ensuring that waste materials generated from emergency response activities are handled, stored, and disposed of in accordance with state and federal regulations.
- G. Notifying the appropriate local, state, and federal agencies of releases and emergencies.

- H. Minimizing the likelihood of an emergency situation recurring by evaluating incidents, critiquing response, and implementing improved procedures as necessary.

1.5.2 Emergency Response Coordinator

Primary Coordinator: Joe Vernier

Title: Foreman, Department of Public Works

Telephone: (810) 794-5451

Email: dpw@cityofalgonac.org

Alternate Coordinator: Denice Gerstenburg

Title: City Manager

Telephone: (810) 794-9361

Email: citymanager@cityofalgonac.org

1.6 Emergency Response Equipment

1.6.1 Spill Control and Personal Protection Equipment

City staff are trained to clean up small spills or releases in their work areas. In the event of an emergency, a spill contractor is on call to respond to spills and releases at the facility. Table 1.1 lists the available emergency response equipment. The equipment is stored near areas of concern and is immediately available.

Table 1.1 Spill Control and Personal Protection Equipment

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

1.7 Spill Prevention and Control

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

Significant spills occurring at the facility property will be recorded on the *EGL E Spill or Release Report* form located in Appendix D. Section 1.4 of this Plan will be updated if a significant spill or leak occurs. In addition, the spill prevention and response procedures will be evaluated to determine if the planned response was adequate. If necessary, the spill prevention and response procedures will be modified to include additional or alternative practices to minimize future spills.

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

1.7.1 Good Housekeeping

Most major repairs are handled by a commercial repair/maintenance station. Oil changing and greasing of vehicles and equipment are performed inside the DPW Garage. Specifically:

- Detailed maintenance logs are kept on all vehicles.
- Spare parts and some chemicals are located on shelving units.
- Solvents, cleaners, and miscellaneous chemicals are stored in designated cabinet or shelves of the DPW Garage.
- Waste oil, motor oil, mineral spirits, and other automotive fluids are stored in fifty-five (55) gallon drums inside of DPW Garage and is pumped out once per year or if the barrel becomes $\frac{3}{4}$ Full.
- Recyclable parts, materials, and fluids are recycled through a third-party vendor.
- DPW staff visually inspects all vehicles and equipment for leaks and maintenance issues at least monthly, and/or on rainy days when more time allows.
- Drip pans, containers, and 'quick-dry' agents are readily available for known leaks and repairs.
- One (1) indoor trench drain is located inside the DPW bay area. This goes to sanitary.
- Most chemicals and miscellaneous fluids are located and stored on shelving units in the DPW Garage.
- One (1) above ground diesel tank that is a sealed double walled tank. Any spills get cleaned up and any over fills get pumped out of bottom catchment.

1.7.2 Employee Training Program

The Phase II General MS4 Permit requires all DPW staff to be trained on pollution prevention and good housekeeping measures. The City will utilize online tools or in person trainings to fulfill this requirement. New staff should be trained within one year of employment, and all staff should have refresher training every permit cycle.

1.7.3 Best Management Practices

Regular sweeping of site will be conducted. Only minor vehicle maintenance and washing of vehicles are conducted indoors where the trench drain goes to sanitary. Spill kits are on site.

1.8 Emergency Management Activities

1.8.1 Initial Response Procedures

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

- A. **Ensure the safety of employees in the area.** If an employee is injured, immediately contact the Primary Emergency Response Coordinator or supervisor for further instructions.
- B. If no danger to an employee exists, **attempt to stop the spill or leak at its source.**
- C. **If possible, identify the spilled material.** It is important to identify the spilled material so that the MSDS can be used to identify health hazards, environmental warnings, and material compatibility.
- D. **Notify the Primary Emergency Coordinator** as soon as possible. The Primary Emergency Response Coordinator will contact additional Emergency Response Coordinators whenever necessary.
- E. **Contain the material** in the smallest possible area by using the emergency response equipment provided in this plan. If the spill is small, use a broom or shovel to clean up the spill. Dispose of materials appropriately. Prevent spills from entering the storm drain.
- F. **Begin the Notification Procedure.** The Emergency Response Coordinator has authority to determine if outside contractors are needed to help clean a spill and will coordinate with management if agency reporting is required. If the Reportable Quantity of a particular material is released, agency notification must begin as soon as practicable (within 30 minutes of discovery of the incident).
- G. **Recover or cleanup the spilled material.** Remove the spilled material through the use of a shovel or front-end loader. As much material as possible should be recovered and reused where appropriate.
- H. After the spill has been cleaned, the Emergency Response Coordinator will **complete a report** summarizing the details of the incident. This report shall be retained in Appendix A of this Plan.
- I. **Evaluate the PIPP** and amend, if necessary. Determine the cause of the incident and evaluate the emergency response procedures. Correct any deficiencies and amend the plan accordingly.

1.8.2 Emergency Notifications

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

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

If the Emergency Response Coordinator determines that a Polluting material has reached or has the potential to reach surface or groundwaters of the State, verbal notice shall be given as soon as practicable after detection of the release to the **EGLE 24-Hour Pollution Emergency Alert System (PEAS) at (800) 292.4706 and to 911.**

Within ten (10) days of the incident, the Emergency Response Coordinator must file a written report with the **EGLE Southeast Michigan District Office** (586.753.3700) and the St. Clair County Health Department. The written report shall outline the cause of the incident, its discovery, and any procedures taken to remove the oil, salt, or Polluting Material(s) from the waters of the State.

Additional External Emergency Notifications:

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

St. Clair County Office of Emergency Management	810-989-6965
State Emergency Response Commission	517-719-1195
National Response Center (NRC)	800-424-8802

Internal Notifications:

The following City personnel shall be contacted in the event of a spill incident that requires state or federal agency notification or cleanup assistance from an outside contractor. This contact

should normally be made after a spill incident has occurred and the appropriate response has taken place, but before outside agencies are notified. Note that requirements to contact outside agencies are time critical. The agency calls must be made quickly even if management cannot be reached.

JOE VERNIER

810-794-5451 or 810-533-1652

Table 1.2 Oil & Polluting Materials Storage

Material	Location	Container Material	Inside/ Outside	Safety Devices	Potential to Discharge	Secondary Containment	Storage Capacity	Secondary Containment Volume
Road Salt	Salt Barn	Wood	Outside	Fence around property, locked door to structure	Very low	Contained by barn structure with ceiling, surrounding walls and locked door.	200-500 yards	N/A
Materials Stockpiles	East of Salt Barn	Cement	Outside	Fence around property	Low	Containment walls on sides of piles	5-60 yds	N/A
Paint	Inside DPW Garage	Metal	Inside	Locked DPW Garage	Very low	On shelves; pallets off the floor	1–5-gallon containers	N/A
Hydraulic, Oil, Misc. Drums	Inside DPW Garage	Metal & Plastic Drums	Inside	Locked DPW Garage	Very low	On shelves; pallets off the floor; on floor – double-walled catchment	55-gallon	N/A
Cold Patch		Cement	Outside	Fence around property	Low	Containment walls on sides of piles	3-5-gallon	N/A
Hazardous/ Flammable Materials	Inside DPW Garage	Plastic, metal	Inside	Locked DPW Garage	Low – Spillage while using	Fireproof locker	N/A	N/A
Above ground diesel tank	West side of yard	Metal	Outside	Fence around property	Low	Sealed double walled tank	560 gallons	N/A

Appendix A
PIPP Review Form

PIPP REVIEW FORM

Date of Review:

Reviewer	
Print:	Signature:

PIPP Review Checklist

1) Facility general information and Spill Response Team information is current and accurate	Yes	No	
2) Site map is current and accurate	Yes	No	
3) Significant material inventory is current and accurate	Yes	No	
4) New exposures, processes and related controls have been documented	Yes	No	NA
5) Spills have been recorded and reported as appropriate	Yes	No	NA
6) Ensure Material Safety Data Sheets are up-to-date and available for all chemicals onsite	Yes	No	
7) Review Spill Response Procedures and phone numbers for updates	Yes	No	

Additional Comments:

Appendix B

DPW Facility Site Map

City of Algonac

DPW Yard

Legend



453 State St

Cold patch

Salt Barn

Dumpster

Above ground diesel tank

DPW Garage

Materials stockpiles

Machinery storage shed

Closest storm catch basin

453 State St

State St

Worfolk Dr

State St

Google Earth

200 ft



Appendix C

EGL E Spill or Release Report



SPILL OR RELEASE REPORT

NOTE: Some State and Federal regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures **MUST** be used and followed if reporting under those regulations. Please refer to the Michigan Reporting Requirements Tool to aid you in determining the proper form to use. This report form, although not required to be used, is designed to aid person to report releases under regulations. To report a release, some regulations require a facility to call the EGLE PEAS Hotline at 800-292-4706 (or the EGLE District Office that oversees the county where it occurred) and other agencies and provide information that is included in this form. This form may also be used for the written follow-up report to the department. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address. Go to www.michigan.gov/chemrelease for more information.

Please print or type all information.

Name of Person Submitting Written Report		Title of Person Submitting Written Report		Telephone Number (provide area code)		
Name of Business		Release Location (Provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.)				
Street Address						
City	State					ZIP
Business Telephone Number (provide area code)						
Site Identification Number and Other Identifying Numbers (if applicable)		County	Township	Tier/Range/Section (if known)		
Release Data: Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary.						
Date of Release (if known)	Date of Discovery	Duration of Release (if known)	Type of Incident			
Time of Release (if known)	Time of Discovery					
	am pm	days hours minutes	<input type="checkbox"/> Explosion <input type="checkbox"/> Loading/unloading release <input type="checkbox"/> Fire <input type="checkbox"/> Pipe/valve leak or rupture <input type="checkbox"/> Leaking container <input type="checkbox"/> Vehicle accident <input type="checkbox"/> Other			
Material Released (chemical or trade name)		CAS Number or Hazardous Waste Code		Estimated Quantity Released (indicate unit e.g. lbs, gals, cu ft or yds)	Physical State Released (indicate if solid, liquid, or gas)	
<input type="checkbox"/> Check here if additional materials listed on the attached page						

Factors Contributing to Release		Source of Loss	
<input type="checkbox"/> Equipment failure <input type="checkbox"/> Operator error <input type="checkbox"/> Faulty process design	<input type="checkbox"/> Training deficiencies <input type="checkbox"/> Unusual weather conditions <input type="checkbox"/> Other	<input type="checkbox"/> Container <input type="checkbox"/> Railroad car <input type="checkbox"/> Pipeline <input type="checkbox"/> Ship	<input type="checkbox"/> Tanker <input type="checkbox"/> Tank <input type="checkbox"/> Truck <input type="checkbox"/> Other
Type of Material Released	Material Listed on or Defined by	Immediate Actions Taken	
<input type="checkbox"/> Agricultural: manure, pesticide, fertilizer <input type="checkbox"/> Chemicals <input type="checkbox"/> Flammable or combustible liquid <input type="checkbox"/> Hazardous waste <input type="checkbox"/> Liquid industrial waste <input type="checkbox"/> Oil/petroleum products or waste <input type="checkbox"/> Salt <input type="checkbox"/> Sewage <input type="checkbox"/> Unknown <input type="checkbox"/> Other	<input type="checkbox"/> CAA Section 112(r) list (40 CFR Part 68) <input type="checkbox"/> CERCLA Table 302.4 (40 CFR Part 302) <input type="checkbox"/> EPCRA Extremely Hazardous Substance (40 CFR Part 355) <input type="checkbox"/> NREPA Part 31, Part 5 Rules polluting material <input type="checkbox"/> NREPA Part 111 or RCRA hazardous waste <input type="checkbox"/> NREPA Part 121 liquid industrial waste <input type="checkbox"/> Unknown <input type="checkbox"/> Other	<input type="checkbox"/> Containment <input type="checkbox"/> Diversion of release to treatment <input type="checkbox"/> Dilution <input type="checkbox"/> Evacuation <input type="checkbox"/> Decontamination of persons or equipment <input type="checkbox"/> Hazard removal <input type="checkbox"/> Neutralization <input type="checkbox"/> Monitoring <input type="checkbox"/> System shut down <input type="checkbox"/> Other	
Release Reached <input type="checkbox"/> Surface waters (include name of river, lake, drain involved) <input type="checkbox"/> Distance from spill location to surface water, in feet <input type="checkbox"/> Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known) <input type="checkbox"/> Drain connected to storm sewer (include name of drain or water body it discharges into, if known) <input type="checkbox"/> Groundwater: <div style="margin-left: 40px;"> Is it a known or suspected drinking water source? Yes No <input type="checkbox"/> </div> <div style="margin-left: 40px;"> What is the name of aquifer, if known? </div> <input type="checkbox"/> Soils (include type e.g. clay, sand, loam, etc.) <input type="checkbox"/> Ambient Air <input type="checkbox"/> Spill contained on impervious surface			
Extent of Injuries(if any)		Was Anyone Hospitalized? <input type="checkbox"/> Yes Number Hospitalized: <input type="checkbox"/> No	Number of Injuries Treated Onsite:

Describe the incident, the type of equipment involved in the release, how the volume of loss was determined, along with any resulting environmental damage caused by the release. Identify who immediately responded to the incident (own employees or contractor — include cleanup company name, contact person, and telephone number). Also identify who did further cleanup activities if performed or known when report submitted.

☐ **Check here if description or additional comments are included on attached page**

Estimated quantity of any recovered materials and a description of how those materials were managed (include disposal method if applicable)

☐ **Check here if description or additional comments are included on attached page**

Assessment of actual or potential hazards to human health (Include known acute or immediate and chronic or delayed effects, and where appropriate, advice regarding medical attention necessary for exposed individuals.)

☐ **Check here if description or additional comments are included on attached page**

Michigan Department of Environment, Great Lakes, and Energy Notified

Initial Contact by: ☐ Phone ☐ FAX
☐ Email ☐ Other

Date of Initial Contact

Time of Initial Contact

All EGLE Staff Contacted Telephone Number

Name of Person Making Initial Report

Title of Person Making Initial Report

Contact made by calling EGLE Pollution Emergency Alerting System (PEAS):
800-292-4706

Log Number Assigned

EGLE District or Field Office:

☐ Bay City ☐ Cadillac ☐ Calumet
☐ Crystal Falls ☐ Detroit ☐ Gaylord
☐ Grand Rapids ☐ Jackson ☐ Kalamazoo
☐ Lansing ☐ Marquette ☐ Newberry
☐ Warren

Note: EGLE Office locations are subject to change

Divisions or Offices Contacted

☐ Air Quality Division
☐ Drinking Water and Environmental Health Division
☐ Environmental Support Division
☐ Materials Management Division
☐ Office of Climate and Energy
☐ Office of the Clean Water Public Advocate
☐ Office of the Environmental Justice Public Advocate
☐ Office of the Great Lakes
☐ Oil, Gas, and Minerals Division
☐ Remediation and Redevelopment Division
☐ Water Resources Division

Other Entities Notified

Date: Time:

- ☐ National Response Center (NRC): 800-424-8802
☐ US Coast Guard Office:
 Detroit Grand Haven Sault Ste. Marie
☐ US Department of Transportation
☐ US Environmental Protection Agency
☐ 911 (or primary public safety answering point)
☐ Local Fire Department
☐ Local Police/State Police/Sheriff Dept
☐ Local Emergency Planning Committee
☐ State Emergency Response Commission via MI SARA Title III Pgm
☐ Wastewater Treatment Plant Authority
☐ Hazmat Team
☐ Local Health Department
☐ MIOSHA
☐ Bureau of Fire Services Fire Marshal Division
☐ MI Dept of Agriculture & Rural Development: 800-405-0101
☐ Other _____

Person Contacted:

Telephone Number:

Date Written Report Submitted
Signature of Person Submitting Written Report

For information or assistance on this publication, please contact the Environmental Support Division, through EGLE Environmental Assistance Center at 800-662-9278. This publication is available in alternative formats upon request.

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