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DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL COMPLIANCE OFFICE

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TDOT STANDARD OPERATING PROCEDURE - ENVIRONMENTAL

NO.
001

Subject: **SPILL PREVENTION AND RESPONSE AT TDOT FACILITIES**

Reviewed and
approved by:

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1.0 PURPOSE AND SCOPE

This Standard Operating Procedure (SOP) identifies the general steps necessary to prevent spills of products or wastes at TDOT facilities which could contribute pollutants to storm water discharges. It also addresses the general procedures TDOT employees must follow in the event of a spill of any material which may adversely impact storm water at a TDOT facility or on TDOT right-of-ways (ROWs) while performing maintenance activities.

This SOP applies to all TDOT facilities and activities that accumulate or use materials in a manner that has the potential to contribute pollutants to storm water discharges. These materials include, but are not limited to, both products and wastes consisting of petroleum (oil, gasoline, diesel, lubricants, hydraulic fluid, transmission fluid, brake fluid, grease, gear lubricant), antifreeze, paint, wash water, salt, salt brine, calcium chloride, laboratory chemicals, herbicides, soil stockpiles, and asphalt milling stockpiles. Some of those materials may be, or may contain, *hazardous chemicals* or *hazardous wastes*, and will thus require a greater level of care or response. Specific TDOT activities that may have the potential to contribute pollutants to storm water discharges include material handling/storage, vehicle maintenance, vehicle storage, waste generation, material loading and unloading, and material transportation.

2.0 DEFINITIONS

Commercial Chemical Product — A material that is purchased (or otherwise acquired) and used by TDOT primarily for its chemical rather than structural properties. Such products may be used as received by TDOT or in formulations created by TDOT personnel (i.e., mixed with water or other solvent). Examples include fuels, lubricants, hydraulic fluids, coolants, paints and other surface coatings, anti-icing and de-icing chemicals (including salt), soaps, detergents, herbicides, solvents (other than water), and cleaners. Commercial chemical products may be hazardous chemicals or petroleum products.

Spill Manager — One of two or more individuals at a TDOT facility designated with the primary responsibility of preparing for and responding to spills, including implementation of this SOP. Each person designated as a Spill Manager must be thoroughly familiar with this SOP; the facility layout, all operations at the facility, the locations and characteristics of all hazardous chemicals, hazardous wastes, and petroleum products used or stored at the facility, and the locations of records relative to such materials. In addition, this person must have the authority to order the evacuation of all or affected parts of a facility, to commit the facility's resources as might reasonably be needed to respond to a spill, and to otherwise make the decisions necessary to carry out this SOP.

Hazardous Chemical — Any element, chemical compound, or mixture of elements and compounds that is a physical hazard or a health hazard as defined by the federal Occupational Safety and Health Administration (OSHA) standard in 29 Code of Federal Regulations (CFR) Section 1910.1200(c) or a hazardous substance as defined by the federal OSHA standard at 29 CFR Section 1910.1200(d). For purposes of this SOP, any product acquired by TDOT that is or should be accompanied by a Safety Data Sheet (SDS) shall be considered a hazardous chemical, and any mixture created by TDOT that contains such a product shall be considered a hazardous chemical unless and until determined otherwise by the Office of Environmental Compliance.

Hazardous Waste — A waste, or combination of wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (1) cause or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. For purposes of this SOP, hazardous wastes shall include any waste so identified in the TDOT *Yellow Book* and the contents of any container or tank carrying a "Hazardous Waste" label.

Major Spill — The following are considered major spills:

- (1) A spill of a commercial chemical product, a formulation containing such a product, or a waste outside secondary containment that has significant potential to contribute pollutants to storm water discharge.
- (2) A spill or release — no matter the size — of a commercial chemical product, a formulation containing such a product, or a waste that enters a watercourse or becomes ignited.
- (3) A spill of a commercial chemical product, a formulation containing such a product, or a waste that available TDOT facility personnel cannot safely, promptly, and effectively contain and clean up.
- (4) A spill of 42 gallons or more of a petroleum product or waste to the ground surface outside secondary containment.

- (5) A spill of 15 gallons or more of a hazardous chemical or a hazardous waste to the ground surface outside secondary containment.

Minor Spill — A spill or release of a commercial chemical product, a formulation containing such a product, or a waste that is not a major spill. This will typically include spills or releases into secondary containment and spills or releases onto floors or other impervious surfaces that are promptly and completely cleaned up. A minor spill can become a major spill if not properly managed.

Special Waste — A waste that is not a hazardous waste but, because of its physical form (e.g., liquid) or other characteristics, cannot be disposed of in the normal municipal waste stream (i.e., placed in a trash can or dumpster). For the purpose of this SOP, special wastes shall include any waste so identified in the TDOT *Yellow Book*.

Petroleum — Any petroleum-based product or waste, including but not limited to, gasoline, diesel, motor oil, hydraulic oil, kerosene, used oil, and emulsified asphalt.

Illicit Discharge — Any discharge to or from the TDOT storm sewer system (TDOT ROW ditches, culverts, and catch basins) that is not entirely composed of storm water. Exceptions include: water line flushing; landscape irrigation; diverted stream flows; rising ground water; uncontaminated ground water infiltration; uncontaminated pumped ground water; discharges from potable water sources; foundation drains, pumped crawl space water, or footing drains; air conditioning condensate; irrigation water; springs; residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; sidewalk, driveway, and street wash water; and discharges or flows from firefighting activities.

3.0 SITE-SPECIFIC CONSIDERATIONS

- 3.1 For certain TDOT facilities that are regulated by 40 CFR 112, a site-specific Spill Prevention, Control, and Countermeasures (SPCC) Plan will be developed by the TDOT Environmental Compliance Office and implemented by TDOT facility personnel. SPCC Plans will provide detailed site-specific procedures that TDOT facility personnel will implement to prevent and control spills associated with petroleum (products and waste). SPCC Plans will be written to comply with 40 CFR 112 and the general procedures outlined within this SOP, but will also be specifically tailored for the individual TDOT facility. Any facility that has a site-specific SPCC plan must follow the response measures outlined within that document.
- 3.2 The TDOT Municipal Separate Storm Sewer System (MS4) Permit (Permit No. TNS077585) requires that a site-specific Storm Water Pollution Prevention Plan (SWPPP) be developed for many of TDOT's facilities. Such SWPPPs will be developed by the TDOT Environmental Compliance Office and implemented by TDOT facility personnel. SWPPPs will provide detailed site-specific procedures that TDOT facility personnel will implement to prevent and control spills associated with products and wastes that have the potential to contribute pollutants to storm water discharges. SWPPPs will be written to comply with the TDOT MS4 Permit and the general procedures outlined within this SOP, but will also be specifically tailored for the individual TDOT facility. Any facility that has a site-specific SWPPP must follow the response measures outlined within that document.

- 3.3 The TDOT MS4 Permit requires that all illicit discharges be reported in accordance with the TDOT Illicit Discharge Detection and Elimination Plan approved by TDEC in 2007. The plan identifies examples of possible illicit discharges as: soils and solid materials tracked on to the roadway; chemical pollutants and fuel discharged onto the highways from vehicles due to leaks; spills and intentional discharges, bacterial contamination due to discharge from animal transport vehicles, leaking storage tanks, and run-on from adjacent properties; and non-storm water discharges from adjacent commercial and industrial operation. TDOT does not intend to conduct field surveys intended specifically to identify possible illicit discharges along its ROWs. Rather, existing ongoing TDOT activities and other sources will be used to identify possible problem areas.

4.0 SPILL PREPAREDNESS AND PREVENTION POLICIES AND PROCEDURES

- 4.1 TDOT personnel will be proactive in attempting to prevent any unplanned and/or unapproved placement or release of commercial chemical products and waste onto the ground surface. Commercial chemical products shall only be used in accordance with their intended purposes as described by their printed instructions or TDOT's written policies and procedures.
- 4.2 Where possible, vehicle and equipment maintenance activities will occur under roof and will be protected from storm water run-on/off or in outside areas designed to capture and manage releases. In the event that vehicle and equipment maintenance activities must take place outside buildings or specially designed areas, additional care will be taken to prevent or minimize the release of commercial chemical products or waste onto the ground surface.
- 4.3 All tanks and containers (e.g., stationary and portable tanks, 55-gallon drums, 5-gallon buckets, 1-quart containers, spray cans) storing commercial chemical products, hazardous wastes, and special wastes, must be kept closed except when material is being removed from or added to the container. For containers holding hazardous chemicals or liquids, and which are of a size (55-gallon drums and smaller) and in a location such that they might reasonably be tipped over or jostled (e.g., by human or vehicular traffic), the cap, lid, or bung must be tightly closed such that no splashing, spilling, or leaking will occur even if the container is tipped over. **Note:** Except for products stored in tanks, most commercial chemical products should be stored in the U.S. Department of Transportation-approved containers in which the products were received.
- 4.3.1 All tanks, mobile tanks, or other containers used to store product, product mixtures, or waste must be labeled according to the tank/container content.
- 4.4 Containers (but not necessarily tanks) holding commercial chemical products and special wastes must be stored in areas that are under roof and protected from storm water run-on/run-off, except as may be authorized by the Regional Environmental Technical Group or the TDOT Environmental Compliance Office.
- 4.5 Containers (but not necessarily tanks) holding hazardous chemicals and hazardous wastes must be stored in areas that are under roof and protected from storm water run-on/run-off.

- 4.6 Except for vehicle-mounted tanks and containers, tanks and containers with a volume of 55 gallons or greater that are holding liquid wastes, petroleum products, or petroleum wastes must be stored within secondary containment (i.e., storage rooms, spill pallets, double-walled tanks, concrete secondary containment structures, earthen berms).
- 4.7 Where possible, product and waste transfer activities will be conducted inside a building or within a contained area. Product and waste transfer activities must be visually monitored by TDOT personnel knowledgeable of response procedures. Extra precaution against releases will be taken for transfers taking place during wet weather.
- 4.8 Containers will be gauged or visually checked prior to product or waste transfer to ensure there is adequate space in the receiving container or tank. Adequate headspace at the top of the container or tank should be left to allow for material expansion.
- 4.9 Each TDOT facility must maintain sufficient equipment and materials to control and clean up at least minor spills of commercial chemicals products, hazardous wastes, and special wastes that the facility might reasonably have on hand. Attachment A contains a list of spill equipment and materials that every TDOT facility must maintain. Additional equipment and materials may be required at facilities that are subject to SWPPPs and SPCC Plans.
- 4.10 During refueling activities, at least one TDOT employee knowledgeable of response procedures must stay with the vehicle or equipment to monitor and control the process.
- 4.11 Where possible, all vehicles and equipment will be stored in areas under roof and protected from storm water run-on. In the event that not all vehicles and equipment can be stored in such areas, priority will be given to vehicles and equipment with the greater potential for significant releases to storm water (i.e., tanker trucks, road-oiling equipment, vehicles waiting to be prepared, leaking equipment). All vehicles and equipment stored outside such areas will be inspected at least quarterly for leaks and spills of automotive fluids. If found, active leaks must be appropriately addressed to prevent storm water impacts.
- 4.12 Spill Managers
- 4.12.1 For each TDOT facility, including unmanned facilities, the Region Director or his designee will designate individuals as primary and secondary Spill Managers for the facility, and may designate a Spill Manager for each different area of operation (e.g., individual buildings or groups of buildings), with one individual serving as primary Spill Manager for the overall facility.
- 4.12.2 At all times, there must be at least one Spill Manager either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time).
- 4.12.3 The Spill Manager will be responsible for:
- a. Periodically assessing the facility (or their designated area) for compliance with the spill preparedness and prevention provisions of this SOP.
 - b. Coordinating the response to a minor spill within the facility (or their designated area) as set forth in this SOP.

- c. For major spills, implementing the notification and reporting requirements of Section 6.1 of this SOP.
 - d. Providing annual training to personnel at the facility (or their designated area) in spill response procedures (unless such training is provided by the Regional Environmental Technical Group. Implementing the post-incident follow-up procedures set forth in Section 8.0 of this SOP.
- 4.13 A list of personnel and agencies to contact in the event of an emergency shall be posted near telephone(s) at the TDOT facility. This list shall at a minimum include the following: (1) the facility's Spill Managers, (2) local police department (3) local fire department, (4) local hospital or emergency ambulance service, (5) TDOT Regional Environmental Technical Group, and (6) key TDOT Environmental Compliance Office personnel. Model emergency contact lists for each TDOT region are included in Attachment B.
- 4.14 TDOT personnel must implement the procedures listed in TDOT's *Salt Handling and Salt Brine Management SOP 011* to prevent spills of salt, salt brine, calcium chloride, and other road de-icing or anti-icing agents.
- 4.15 TDOT personnel must implement the procedures listed in TDOT's Management of Material Stockpiles SOP 018 to prevent the discharge of highly erodible materials such as soil and sand into storm water.
- 4.16 TDOT personnel and contractors must follow all precautions listed on the herbicide label being applied and in TDOT's *Integrated Vegetation Management Program Guidelines* to ensure only target species are affected and to prevent run-off into waters of the state.
- 4.17 Emergency contact signage must be in place and visible from the primary access gate(s). For facilities with more than one primary access gate, multiple signs will be required. Signs must be legible from the area immediately outside the primary access gate(s).

5.0 SPILL RESPONSE

5.1 General

- 5.1.1 The specific spill response actions to be taken by TDOT personnel will vary depending upon what the spilled material is, how much was spilled, where it was spilled, and other factors. However, the overall principles guiding spill response by TDOT personnel are as follows:
- a. TDOT personnel must take no actions that will put themselves or others in danger. TDOT does not intend that its employees be emergency responders, and no response actions should be attempted by persons who do not understand the hazards associated with the spilled material.
 - b. If they can safely do so, TDOT personnel that are knowledgeable of the hazards associated with a spilled material and the proper response procedures should take appropriate actions to first reduce the dangers to themselves and others, and then to contain and clean up the released material. The materials that are likely to be spilled are materials that TDOT employees work with every day, and such persons should be aware of the hazards (if any) that the materials pose and how to clean up minor spills.

- c. Cooperate with professional emergency responders that may become involved. Whether from public agencies or TDOT contractors, professional emergency responders will need the cooperation of TDOT personnel to describe the physical situation, unlock or lock gates or doors, account for personnel, and perform other support functions. Such professionals are trained to understand the risks associated with hazardous spill situations and to minimize the dangers to which untrained personnel are exposed .
- 5.1.2 In the event of a spill or release of any material, the response objectives are to (1) stop any continuing release, (2) contain the released material, and (3) clean up the released material. For minor spills, TDOT facility personnel will typically be able to safely and effectively achieve these objectives on their own. Major spills, however, will require external involvement, at least by the TDOT Environmental Compliance Office and the Regional Environmental Technical Group and perhaps by contractors and other public agency personnel.
- 5.1.3 By their very definition, spills of hazardous chemicals and hazardous wastes pose special concerns to personnel and/or the environment. Appropriate personal protective equipment (PPE) should be utilized for any response action (other than evacuation of the area) involving spills of such materials.
- 5.1.4 In the event of a spill or release, all TDOT personnel should:
- Stay calm and use common sense.
 - If you do not know what to do, leave the area and notify others. If you can smell the spilled material, you are probably too close.
 - Do not smoke near a spill of gasoline or other flammable material.
 - Do not walk or drive through spilled material unless absolutely necessary.
 - Alert nearby workers and try to keep others from coming into contact with the spilled material.
 - Follow the instructions of competent personnel.

5.2 Initial Response Procedures

- 5.2.1 If possible to do so safely, the TDOT employee who first becomes aware of a spill should alert other nearby workers and then assess the situation and attempt to determine the following:
- What is the spilled material?
 - What is the source of the spilled material?
 - Approximately how much was spilled?
 - What are the potential hazards associated with the spilled material? Most importantly, does it pose a significant inhalation, fire, or explosion hazard?
 - Note: This information is available from the SDS.
 - Are there potential ignition sources near the spill?
 - Is there potential for a release outside containment?

- 5.2.2 Based on this initial assessment, the incident-identifying employee and/or other TDOT employees who become aware of the situation should choose the most appropriate procedures listed below:
- a. Notify supervisors and call for help as needed. For minor spills, sufficient help will likely be available within the workplace, or at least within the TDOT facility. For major spills, external emergency assistance (e.g., fire, police, HazMat team) may be needed.
 - b. If the material is flammable or combustible, and if possible to do so safely, TDOT personnel should extinguish all potential sources of ignition in the area of the spill, including:
 - Running combustion engines (e.g., vehicles, compressors, generators).
 - Open flames (e.g., petroleum-fueled heaters, welding torches).
 - Open electrical circuits, especially those near floor level (e.g., electric heaters, power tools, motors, lights).
 - c. In the event of a fire, and if it is possible to do so in a reasonably safe manner, TDOT personnel trained in the use of the available fire extinguishers should attempt to extinguish the fire. If the fire is not controllable, TDOT personnel should evacuate the area and immediately call 911.
 - d. If possible to do so safely, and using appropriate PPE, TDOT personnel should attempt to stop or slow down the flow of material from the container or tank. This may include efforts such as:
 - Closing discharge valves.
 - Turning off or cutting power to a pump.
 - Righting an overturned drum.
 - e. If possible to do so safely, TDOT personnel should attempt to prevent the migration of spilled material to storm drains and natural drainage ways. This may include actions such as:
 - Placing barriers of sorbent materials (e.g., booms, pads, granular material) to confine movement of the spilled material.
 - Verifying that secondary containment structures are not leaking and that drains are closed.
 - Closing or covering storm drains.
 - Using soil to construct a flow-confining berm around a large outdoor spill area or around a storm drain.
 - Excavating a trench to redirect spilled material away from a storm drain or drainage way.

5.3 Spill Cleanup

- 5.3.1 Minor spills will typically be contained and cleaned up by TDOT workplace personnel and/or other TDOT facility personnel using one or more of the following procedures, as appropriate for the material and situation:
- Sorbent materials (e.g., booms, pads, and/or granular sorbents) may be spread over spilled liquid materials to solidify them and allow them to be swept or shoveled up and placed in a waste container. Such waste containers should then be securely closed and marked or labeled as to their contents.

- Spills of small amounts of volatile liquids like gasoline may be cleaned up by simply evacuating the area and allowing the volatile material to evaporate. If it can be done safely, doors and windows should be opened to ventilate the area and speed up evaporation.
- Spilled solids should be swept or shoveled up and placed either back into the original container (if it is not so contaminated that it cannot be used) or into a waste container. Such waste containers should then be securely closed and marked or labeled as to their contents.
- All of the original spilled material and all contaminated residues should be cleaned up. Unless the spilled material is benign, minor spills of liquids to a gravel or soil surface will require over-excavation of the impacted area to ensure that all residues are removed. Such excavation should be accomplished as soon as reasonably possible to minimize both the potential for migration of harmful constituents into the environment and the amount of gravel or soil requiring removal. All excavated materials should be placed in a waste container, and the container should then be securely closed, dated and labeled or marked as to its contents. If suitable containers are unavailable or the amount of excavated material is large, the excavated materials should be placed on an impervious surface and protected from storm water. This could mean stockpiling the material inside a building or on and under plastic sheeting. Excavated areas should be backfilled with clean fill material. [Disposal of excavated material shall be arranged by the TDOT Environmental Compliance Office.]

5.3.2 Containment and clean-up of major spills will be planned and coordinated on a case-by-case basis with the Regional Environmental Technical Group and personnel from the TDOT Environmental Compliance Office. Personnel from local fire and police departments, state environmental regulatory agencies, and TDOT contractors may also be involved. Such clean ups will typically involve the same procedures as described above for minor spills, but additional or alternative procedures may also be required depending upon the type and amount of spilled material(s), the location and timing of the release, and other factors.

5.4 Management of Spill Cleanup Residues

- 5.4.1 All of the waste materials generated during response to a spill, including but not necessarily limited to unusable spilled product, contaminated sorbent materials, contaminated media (i.e., soil, gravel, water) and debris (i.e., removed structural materials like asphalt and concrete), and contaminated PPE should be accumulated in closed containers (e.g., 55-gallon drums, roll-off boxes, tanks) or otherwise contained and protected from storm water (e.g., placed in piles inside a building or on and under plastic sheeting). All containers of spill residue must be closed (except when adding waste), labeled with contents, and dated.
- 5.4.2 Disposal of spill cleanup residues will be coordinated by the TDOT Environmental Compliance Office and/or appropriate TDOT contractors. Containers of spill cleanup residues should be specifically identified on the Monthly Waste Inventory form that is submitted.

- 5.4.3 Depending upon the hazard characteristics of the material that was spilled and cleaned up and the nature of the response generating the residue, a spill cleanup residue may be a hazardous waste, a special waste, or a waste that can be placed in the municipal waste container. These determinations will be made on a case-by-case basis by the TDOT Environmental Compliance Office and/or TDOT contractor personnel.

6.0 NOTIFICATION AND REPORTING OF MAJOR SPILLS AND ILLICIT DISCHARGES

6.1 Emergency Determinations/Notifications

Upon identification of a major spill at a TDOT facility, the Spill Manager must be immediately notified. The Spill Manager must then determine whether facility personnel can safely, quickly, and effectively contain and clean up the spill or whether external emergency response or professional cleanup assistance is needed.

- 6.1.1 If there is a fire or the significant potential for a fire, the Spill Manager must immediately call 911 to obtain assistance from the local fire department.
- 6.1.2 If he/she determines that the spill presents a public health or safety threat (i.e., poses potentially significant risks to persons outside the facility or on a public ROW), the Spill Manager must immediately call 911 to obtain assistance from local fire and police departments.
- 6.1.3 If he/she determines that professional assistance will be needed to safely, quickly, and effectively contain and clean up the spill, the Spill Manager should immediately contact TDOT's Emergency Response Contractor identified in Attachment B. This should only be done for major spills that enter watercourses (or imminently threaten to do so), that are ignited, or that TDOT personnel can not safely contain or clean up.
- 6.1.4 As soon as possible after making the determinations described above, the Spill Manager must call the Regional Environmental Technical Group and appropriate personnel from the TDOT Environmental Compliance Office (see Attachment B) to notify them of the spill and the response actions that have been taken. The facility's Spill Manager will then respond as directed by the Regional Environmental Technical Group and/or the TDOT Environmental Compliance Office.

6.2 External Notifications – Based on information obtained from the internal reporting described in Section 6.1 above, the Director of the TDOT Environmental Compliance Office (or their designee) will make the external notifications described below:

- 6.2.1 If a petroleum spill enters a "navigable waterway" (i.e., stream, wetland, lake, or a flowing ditch or storm drain that leads to a stream, wetland, or lake) in levels which are considered harmful quantities (i.e., cause a film or sheen upon the surface of the water), the TDOT Environmental Compliance Office will notify the National Response Center (800-424-8802), U.S. Environmental Protection Agency (U.S. EPA) Region 4 (800-564-7577) and/or the Tennessee Emergency Management Agency (TEMA) (800-262-3300) as required.

- 6.2.2 If either of the following occur: (1) more than 1,000 gallons of petroleum enter in navigable waters in a single event or (2) discharges more than 42 gallons of petroleum in each of two discharges within a 12 month period, the TDOT Environmental Compliance Office will notify USEPA Region IV (800-564-7577) and the Tennessee Division of Water Pollution Control at the local Environmental Field Office.
- 6.2.3 In the very unlikely event that a release of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substance into the environment (i.e., surface water, land surface) in an amount equal to or greater than a Reportable Quantity (RQ) occurs at a TDOT facility or originates from a TDOT vehicle, the TDOT Environmental Compliance Office will notify the National Response Center (800-424-8802) and the Tennessee Emergency Management Agency (800-262-3300) as required. A spill reporting form will be provided to the Environmental Compliance Office to determine whether a RQ release has occurred. Examples of a spill that would trigger this notification include: 100 lbs (about 15 gallons) of an ignitable D001 hazardous waste such as waste oil-based paint; 100 lbs (about 15 gallons) of a D002 hazardous waste such as a strong acid or strong base; 100 lbs of the herbicides Journey, Sahara, or Fusilade; or 100 lbs (about 15 gallons) of trichloroethylene from the laboratory. Petroleum spills, including gasoline and diesel spills, are not subject to CERCLA reporting.
- 6.2.4 If an herbicide-related adverse incident (e.g., application resulting in loss of fish and/or aquatic species) has been determined to have occurred, the TDOT Environmental Compliance Office will be immediately contacted. The appropriate TDEC Environmental Field Office and Tennessee Department of Agriculture, Pesticide Section, must be notified within 24 hours, as required by Section 6.4 of the TNP100000, General NPDES Permit for Discharges from the Application of Pesticides. Within 30 days of an adverse incident, an Adverse Incident Written Report must be provided to the TDEC Environmental Field Office.

6.3 Reporting on Spills

- 6.3.1 If the TDOT facility has a SWPPP and a major spill of product or waste occurs, then the designated TDOT Facility personnel will complete a *Spill Reporting Form* and maintain it in the SWPPP at the facility for a minimum of three years. Additionally, the TDOT Environmental Compliance Office will submit to the Tennessee Division of Water Pollution Control at the local Environmental Field Office a written report describing the release and proposed modifications to the SWPPP to prevent future occurrences.
- 6.3.2 If the TDOT facility has a SPCC Plan and a release of petroleum occurs, then the designated TDOT Facility personnel must also complete and maintain a copy of the *Spill Reporting Form* in the SPCC Plan for a minimum of three years (see Appendix C).
- 6.3.3 If an herbicide-related adverse incident occurs, per Section 6.2.4, an Adverse Incident Report must be completed and maintained for three years. A copy of the report must be sent to the Environmental Compliance Office.

6.4 Notification of Illicit Discharges

6.4.1 If during the course of normal TDOT operations an employee identifies a release that is an illicit discharge not subject to immediate reporting and notification as described in Sections 6.1 through 6.3, notification of the discharge must be provided to the TDOT Environmental Compliance Office as soon as possible. This includes, but is not limited to, the release of soils and solid materials tracked onto the roadway that could result in contamination of storm water; chemical pollutants and fuel discharged onto the highways from vehicles due to leaks; spills and intentional discharges, bacterial contamination due to discharge from animal transport vehicles, leaking storage tanks, and run-on from adjacent properties; and non-storm water discharges from adjacent commercial and industrial operation.

6.4.2 Upon identification of a potential illicit discharge (or potential source of contamination to storm water) TDOT employees shall notify their direct supervisor of the event. The responsible TDOT supervisor shall notify the Regional Technical Group who will provide notice to the TDOT Environmental Compliance Office by email or phone. Information provided will include the location of the event (i.e., facility location or route and mile marker), a description of the discharge, and whether the discharge is leaving the TDOT facility or ROW.

7.0 TRAINING

7.1 SPCC Plan Requirements

All TDOT facility personnel that handle petroleum products or wastes and are located at TDOT facilities with SPCC Plans will be annually trained in spill prevention and response procedures. These TDOT facility personnel will be trained to effectively respond to and promptly clean up spills that might typically occur at their facility. They will be initially trained by TDOT Environmental Compliance Office personnel or by designated TDOT contractor personnel. Annual refresher training of such personnel will subsequently be provided by the TDOT Facility Supervisor or their designated representative, unless such training is provided by the Regional Environmental Technical Group. A record of the attendees will be maintained within the SPCC Plan. This refresher training will be conducted to ensure understanding of the SPCC Plan.

7.2 SWPPP Requirements

Personnel at TDOT facilities with SWPPPs will be initially trained by TDOT Environmental Compliance Office personnel or by designated TDOT contractor personnel in their SWPPP responsibilities, including spill prevention and response. Annual refresher training of such personnel will subsequently be provided by the TDOT Facility Supervisor or their designated representative, unless such training is provided by the Regional Environmental Technical Group. A record of the attendees will be maintained within the SWPPP. This refresher training will be conducted to ensure understanding of the SWPPP.

7.3 General Requirement

Each TDOT Facility Supervisor is responsible for ensuring that facility employees under their supervision receive training on the requirements of this SOP commensurate with their job responsibilities.

8.0 POST-INCIDENT FOLLOW-UP

8.1 Post-Incident Evaluation

Promptly following an incident involving a major spill, the TDOT Facility Spill Manager (or their designee), the TDOT Environmental Compliance Office (or their designee), and other appropriate TDOT personnel, will hold a meeting or meetings with the key individuals involved to evaluate the cause of the spill or release and all aspects of the response, and to identify ways by which spill prevention or spill response can be improved. Senior managers will act to implement the reasonable improvements identified, which may involve changes in materials utilized or handling practices, increased training of personnel, changes in response procedures, construction of new secondary containment, or other actions.

8.2 Replenishment of Spill Response Supplies

- 8.2.1 Promptly following an incident involving a major spill, the TDOT Facility Spill Manager will inventory the spill response equipment and materials at the facility or job site and ensure that sufficient new equipment and supplies are obtained to replace those consumed or contaminated beyond use by the spill response.
- 8.2.2 The TDOT Facility Spill Manager (or their designee) should inventory the spill response equipment and materials on a monthly basis and replace those consumed or contaminated beyond use by routine operational use and minor spill response.

ATTACHMENT A
REQUIRED SPILL RESPONSE EQUIPMENT

REQUIRED SPILL RESPONSE EQUIPMENT

District and Regional Facilities and Airport Hangar — At a minimum, the following equipment and supplies should be provided at each TDOT District and Regional garage facilities and at the TDOT Airport Hangar:

A self-contained basic labeled spill kit within a plastic 55-gallon drum (Grainger Product Number 5UZ70, 5UZ67, or equivalent) that contains:

- Sorbent sheets/pads (50 or more sheets/pads)
- Sorbent socks (4 or more 3-inch diameter x 12-foot long socks/booms)
- Sorbent Pillows (8 or more 18- inch square)

In addition, the following should be available at the facility:

- Empty 55-gallon drums (2 or more)
- Nitrile gloves (several boxes)
- Granular absorbent (50 or more pounds)
- Push broom
- Flat-head shovel
- Fire extinguishers of appropriate class

County Facilities, Floating Maintenance Facilities, and Floating Help Truck Facilities — At a minimum, the following equipment and supplies should be provided at each TDOT County garage facility, Floating Maintenance Facility, and Floating Help Truck Facility:

A self-contained basic labeled spill kit within a plastic 20-gallon container (Grainger Product Number 5UZ69, 5UZ66, or equivalent) that contains:

- Sorbent sheets/pads (12 or more sheets/pads)
- Sorbent socks (4 or more 3-inch diameter x 12-foot long socks/booms)
- Sorbent Pillows (2 or more 18-inch square)

In addition the following should be available at the facility:

- Empty 55-gallon drum or two 30-gallon drums
- Nitrile gloves (several boxes)
- Granular absorbent (10 or more pounds)
- Push broom
- Flat-head shovel
- Fire extinguishers of appropriate class

Fuel Transfer Vehicles — At minimum, the following equipment and supplies should be provided for each TDOT vehicle transporting petroleum products in tanks:

A self-contained basic labeled spill kit (Grainger Product Number 2GU51, 5TR06, 3AP01, 5UZ72, or equivalent) that contains:

- Sorbent sheets/pads (10 or more sheets/pads)
- Sorbent socks (2 or more 3-inch diameter x 4-feet-long socks/booms)

In addition, the following may be available in the transport vehicle depending upon the size of the tank(s):

- Nitrile gloves
- Granular absorbent (10 or more pounds)
- Fire extinguishers of appropriate class

Herbicide Application Vehicles — At a minimum, the following equipment and supplies should be provided for each TDOT vehicle transporting herbicide in application tanks:

A self-contained basic labeled spill kit (Grainger Product Number 2GU51, 2GU52, 5TR06, 3AP01, or equivalent) that contains:

- Sorbent sheets/pads (10 or more sheets/pads)
- Sorbent socks (2 or more 3-inch diameter x 4-feet long socks/booms)

In addition, the following may be available in the transport vehicle depending upon the size of the tank(s):

- Nitrile gloves
- Granular absorbent (10 or more pounds)
- Broom and dust pan

ATTACHMENT B
MODEL EMERGENCY CONTACT LISTS

EMERGENCY PHONE NUMBERS (TDOT REGION 1 FACILITIES)

Facility Spill Managers:

Primary: _____ Office: _____

Cell: _____

Home: _____

Secondary: _____ Office: _____

Cell: _____

Home: _____

Local Police Department: 911 or _____

Local Fire Department: 911 or _____

Local Hospital or Emergency Ambulance Service: 911 or _____

TDOT Regional Environmental Technical Group:

Mark Doty: Office: 865-594-2439
Cell/Other: 865-712-8295

Matt Bowling: Office: 965-594-4518
Cell/Other: 865-440-4153

Key TDOT Environmental Compliance Office Personnel:

Barry Brown: Office (Nashville): 615-741-4732
Cell: 615-969-6580

John Nichols: Office (Nashville): 615-741-4732
Cell: 615-804-4978

Email: tdot.env.facilitycompliance@tn.gov

EMERGENCY PHONE NUMBERS (TDOT REGION II FACILITIES)

Facility Spill Managers:

Primary: _____ Office: _____

Cell: _____

Home: _____

Secondary: _____ Office: _____

Cell: _____

Home: _____

Local Police Department: 911 or _____

Local Fire Department: 911 or _____

**Local Hospital or Emergency
Ambulance Service:** 911 or _____

TDOT Regional Environmental Technical Group:

Tommy Paul: Office: 423-510-1293
Cell: 423-763-8014

Sara Snyder: Office: 423-510-1295
Cell: 423-298-8873

Key TDOT Environmental Compliance Office Personnel:

Barry Brown: Office (Nashville): 615-741-4732
Cell: 615-969-6580

John Nichols: Office (Nashville): 615-741-4732
Cell: 615-804-4978

Email: tdot.env.facilitycompliance@tn.gov

EMERGENCY PHONE NUMBERS (TDOT REGION 3 FACILITIES)

Facility Spill Managers:

Primary: _____ Office: _____
 Cell: _____
 Home: _____

Secondary: _____ Office: _____
 Cell: _____
 Home: _____

Local Police Department: 911 or _____

Local Fire Department: 911 or _____

Local Hospital or Emergency Ambulance Service: 911 or _____

TDOT Regional Environmental Technical Group:

Michael Finks: Office: 615-350-4212
Cell/Other: 629-203-4712

David Sizemore: Office: 615-350-4590
Cell/Other: 615-476-8861

Key TDOT Environmental Compliance Office Personnel:

Barry Brown: Office (Nashville): 615-741-4732
Cell: 615-969-6580

John Nichols: Office (Nashville): 615-741-4732
Cell: 615-804-4978

Email: tdot.env.facilitycompliance@tn.gov

EMERGENCY PHONE NUMBERS (TDOT REGION 4 FACILITIES)

Facility Spill Managers:

Primary: _____ Office: _____

Cell: _____

Home: _____

Secondary: _____ Office: _____

Cell: _____

Home: _____

Local Police Department: 911 or _____

Local Fire Department: 911 or _____

Local Hospital or Emergency Ambulance Service: 911 or _____

TDOT Regional Environmental Technical Group:

Lou Timms: Office: 731-935-0212
Cell/Other: 731-234-2147

Jared McCoy: Office: 731-935-0172
Cell/Other: 731-234-1874

Key TDOT Environmental Compliance Office Personnel:

Barry Brown: Office (Nashville): 615-741-4732
Cell: 615-969-6580

John Nichols: Office (Nashville): 615-741-4732
Cell: 615-804-4978

Email: tdot.env.facilitycompliance@tn.gov

ATTACHMENT C
SPILL REPORTING FORM

Spill Reporting Form

Instructions: This reporting form will be completed for all significant spills which have the potential to come into contact with storm or surface water.

- ▶ **A copy of all completed forms will be maintained in Appendix 5 of the SWPPP and/or in the SPCC Plan. A copy will be sent to the Regional Environmental Technical Group as soon as possible after becoming aware of the incident.**

Date of discharge: _____

Facility: _____

Tank, drum, or area from which spill occurred: _____

Contents of tank or drum: _____

Estimated volume of spill: _____

Description of affected area(s): _____

Description of spill: _____

Corrective action taken: _____

Plans for prevention of reoccurrence: _____