




STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL COMPLIANCE OFFICE
SUITE 900 - JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-0334

TDOT STANDARD OPERATING PROCEDURE - ENVIRONMENTAL

NO.
023

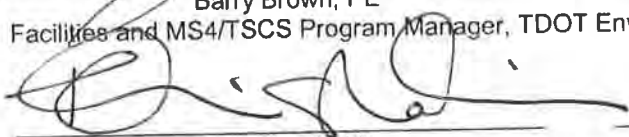
Subject: **MANAGEMENT OF SCRAP METAL**

Reviewed and
approved by:



05-02-17
Date

Barry Brown, PE
Facilities and MS4/TSCS Program Manager, TDOT Environmental Compliance Office



5-5-17
Date

Toks Omishakin
Environmental Bureau Chief, TDOT Environmental Planning Bureau

Status: Initial issuance

Version 1

1.0 PURPOSE AND SCOPE

When disposed, scrap metal is subject to the provisions included within the regulations governing solid waste disposal within the state of Tennessee. The uncontrolled storage of scrap metal can often result in the mixing of solid and potential hazardous wastes within the piles. This is due to TDOT personnel inadvertently placing metal containers of products or trash in the piles when emptying TDOT vehicles and equipment. In addition, oil-coated or -containing parts may result in a release of petroleum contaminants to storm water from sources such as metal piping, engine/hydraulic components, or fuel tanks improperly drained.

2.0 RESPONSIBILITIES

It is the responsibility of facility managers to ensure that scrap metal is properly stored at TDOT facilities. Each facility accumulating scrap metal must do so in designated areas only. In addition, any TDOT employee who places scrap metal into a designated storage area must ensure that the scrap is free of trash or debris and has been cleaned to the extent possible to limit potential transfer of contaminants to storm water.

3.0 COLLECTION AND STORAGE OF SCRAP METAL AT TDOT FACILITIES

1. Scrap metal should be stored in an area that minimizes potential run-on or run-off of storm water to prevent possible migration of contaminants from the material.
2. Scrap metal must be segregated from other waste or materials such as trash, wood debris, or liquids.
3. Petroleum such as oil, grease, or fuel should be removed from material deemed to be scrap metal to the extent possible.
4. In the event pollutants or contaminants are found to be released to storm water from scrap piles and an observed sheen is observed leaving the site, the TDOT ECO office shall be notified. A spill event record must be completed in accordance with the facility Storm Water Pollution Prevention Plan and maintained as required.
5. In the event pollutants or contaminants are found to be released to storm water from the scrap piles and remains on the premises, a spill event record must be completed in accordance with the facility Storm Water Pollution Prevention Plan and maintained as required.

Note: Although not specifically mandated by this standard operating procedure, it is preferred that scrap metal be contained within a bin or other structure with at least three sides.