

VILLAGE OF ROMEO



**STORM WATER POLLUTION PREVENTION PLAN (SWPPP)/
POLLUTION INCIDENT PREVENTION PLAN (PIPP)**

Revised April 2023

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Figure 1 – Facility Site Map

GENERAL FACILITY INFORMATION

Name of Facility: Department of Public Works Garage, Salt Storage Facility, and Storage Sheds

Facility Address: 70350 Powell Road, Armada, MI 48005

Standard Industrial Classification (SIC) Code: N/A

Owner or Authorized Representative: **Ms. Kathryn Trapp, Village Clerk**

Facility Contact

Name: Mr. Tim Metz

Title: Department of Public Works Supervisor

Telephone: 586-752-2684

Mailing Address: 70350 Powell Road, Armada, MI 48005

Certified Storm Water Operator

Name & Certification Number: N/A (not required for watershed-based permit)

Permit Information

Certificate of Coverage Number: **MI0060174**

Effective Date of Coverage: **November 1, 2021**

Receiving Waters: Clinton River East Watershed (East Pond Creek, Healy Drain)

Brief Industrial Activity Description

The Department of Public Works' major areas of responsibility include: maintenance of streets, solid waste collection and disposal, sewer and water main repair and maintenance, and equipment operation and maintenance.

1.0 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for developing, implementing, maintaining, and revising this SWPPP. The members of the team and their primary responsibilities (i.e. implementing, maintaining, record keeping, submitting reports, conducting inspections, employee training, conducting the annual compliance evaluation, testing for non-storm water discharges, signing the required certifications) are as follows:

Name & Title	Responsibility
Ms. Kathryn Trapp, Village Clerk Mr. Tim Metz, DPW Supervisor	Certification Signing, Submitting Reports Implementation, Conducting Inspections, Employee Training
Mr. Al LaPeer, WWTP Supervisor	Record Keeping

2.0 SITE MAP

Preparing a site map or sketch is the first step in assessing the facility.

The facility's site map (**FIGURE 1**) includes all applicable items listed in the permit, which include:

- 1) Buildings and other permanent structures
- 2) Storage or disposal areas for significant materials
- 3) Secondary containment structures and descriptions of what they contain
- 4) Storm water discharge outfalls (numbered for reference)
- 5) Location of storm water and non-storm water inlets contributing to each outfall
- 6) Location of NPDES permitted discharges other than storm water
- 7) Outlines of the drainage areas contributing to each outfall
- 8) Structural runoff controls or storm water treatment facilities
- 9) Areas of vegetation (with brief description such as lawn, old field, marsh, wooded, etc.)
- 10) Areas of exposed and/or erodible soils
- 11) Impervious surfaces (roofs, asphalt, concrete, etc.)
- 12) Name and location of receiving waters
- 13) Areas of known or suspected impacts on surface waters as designated under Par 201 (Environmental Response) of the Michigan Act.

3.0 SIGNIFICANT MATERIALS

Definition: Significant materials are any material which could degrade or impair water quality, including but not limited to:

- ✓ Raw Materials
- ✓ Fuels
- ✓ Solvents
- ✓ Detergents
- ✓ Plastic pellets
- ✓ Finished materials (i.e. metallic products)
- ✓ Hazardous Substances designated under section 101(14) of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), see 40 CFR 372.65
- ✓ Any chemical the facility is required to report pursuant to section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA)
- ✓ Polluting Materials – Oil and any material, in solid or liquid form, identified as polluting material under the Part 5 Rules (Rules 324.2001 through 324.2009 of the Michigan Administrative Code)
- ✓ Hazardous Wastes as defined in Part 111 of the Michigan Act
- ✓ Fertilizers
- ✓ Pesticides
- ✓ Waste Products (i.e. ashes, slag, sludge, plant waste, animal waste)

During the significant materials identification phase, all sources of potential storm water contamination need to be identified. Both the inside and outside of the facility must be inventoried to determine the materials and practices that may be sources of contamination to storm water runoff. Note the identification phase must address residual contaminants which may be found on items stored outside.

4.1 Inventory of Exposed Significant Materials

The permit requires a general inventory of significant materials that could enter storm water. For each material listed the SWPPP shall include the ways in which each type of material has been or has reasonable potential to become exposed to storm water (e.g. spillage during handling; leaks from pipes, pumps, or vessels; contact with storage piles, contaminated materials or soils; waste handling and disposal; deposits from dust or overspray; etc.). In addition, the SWPPP must identify the outfall through which the significant material may be discharged if released.

Significant Material	Storage Area	Exposure Method	Outfall
Synthetic motor oil/waste oil	DPW garage	Dripping from vehicle	All storm inlets drain to onsite retention pond
Parts solvents	DPW garage	Spillage during cleaning	
Diesel fuel	DPW garage	Spillage when fueling	
Hydraulic oil	DPW garage	Dripping from vehicle	
Antifreeze	DPW garage	Dripping from vehicle	
Road salt	Salt storage area	Spillage during loading	
Sugar beet juice deicer	Storage barn	Spillage during loading	

4.2 Description of Industrial Activities & Significant Material Storage Areas

The permit requires industrial facilities to evaluate the reasonable potential for contribution of significant materials to storm water runoff from at least the following areas or activities:

- 1) Loading, unloading, and other material handling operations
- 2) Outdoor storage including secondary containment structures
- 3) Outdoor manufacturing or processing activities
- 4) Significant dust or particulate generating processes
- 5) Discharge from vents, stacks, and air emission controls
- 6) On-site waste disposal practices
- 7) Maintenance and cleaning of vehicles, machines, and equipment
- 8) Areas of exposed and/or erodible soils
- 9) Sites of Environmental Contamination listed under Part 201 (Environmental Response) of the Michigan Act
- 10) Areas of significant material residues
- 11) Areas where animals congregate (wild or domestic) and deposit wastes
- 12) Other areas where storm water may contact significant materials

For each applicable item, the permit requires a written description of the specific activity or storage area. Along with the written description of the activities or storage areas, a description of the significant materials associated with those items must be included.

Description #1
De-icer Storage, Handling and Loading – The Village obtains approximately 500 tons of sodium chloride each year which is stored in a covered facility. A de-icing product made from beet juice is stored in a heavy plastic container in the storage barn. There is minimal risk of spills during loading activities and the pavement is swept periodically.
Description #2
Vehicle Fueling and Maintenance – The Maintenance Garage stores fuels, antifreeze, synthetic motor oil, and parts solvents. Vehicles are maintained indoors and fueled outdoors. The only way that significant materials could come in contact with storm water is by minor dripping from vehicles following maintenance and fueling. During a recent Environmental Assessment performed by the Village’s consultant, recommendations were made to install Catch-All storm drain inserts to help filter sediment, salt, and detergents.
Description #3
Cleaning of Vehicles and Equipment – Most vehicles are washed inside the DPW garage. The garage is supplied with a trench drain system that connects to the adjacent OSDS. The trench drain is periodically vacuumed out and the waste materials are transported to the Wastewater Treatment Plant. Some vehicles are occasionally washed outside in the rear parking lot. One catch basin is located in the rear parking lot area. All catch basins drain directly to the retention pond on site, located north of the facilities.
Description #4
Sanding, Grinding, and Painting – These activities are occasionally performed both indoors and outdoors at the DPW garage. During a recent Environmental Assessment performed by the Village’s consultant, recommendations were made to use tarps, containers, and vacuums to collect waste materials.

4.3 List of Significant Spills

The permit requires a list of significant spills and significant leaks of polluting materials that occurred at areas that are exposed to precipitation or that otherwise discharge to a point source at the facility. The listing shall include spills that occurred over the three years prior to the effective date of a certificate of coverage authorizing discharge under the General Permit. The listing shall include the date, volume, exact location of release, and actions taken to clean up the material and/or prevent exposure to storm water runoff or contamination of surface waters of the state. Any release that occurs after the SWPPP has been developed shall be controlled in accordance with the SWPPP and is cause for the SWPPP to be updated as appropriate within 14 calendar days of obtaining knowledge of the spill or loss.

Date:	Material:	Volume:	Location:
Actions Taken: No recent significant spills have been reported.			

4.4 Summary of Sampling Data

The permit requires a summary of existing storm water discharge sampling data (if available) describing pollutants in storm water discharges associated with industrial activity at the facility. The summary shall be accompanied by a description of the suspected sources of the pollutants detected.

Summary of Sampling Event #1: There is no existing storm water discharge sampling data at the DPW site.

4.0 NON-STRUCTURAL CONTROLS

Non-structural controls are practices that are relatively simple, fairly inexpensive, and applicable to a wide variety of industries or activities. Non-structural controls are intended to reduce the amount of pollution getting into the surface waters of the state and are generally implemented to address the problem at the source. They do not require any structural changes to the facility. These are typically everyday types of activities undertaken by employees at the facility. Many facilities may already have nonstructural controls in place for other reasons. The permit requires that the SWPPP shall, at a minimum, include each of the following non-structural controls.

5.1 Preventative Maintenance Program

The permit requires a description of a program for routine preventive maintenance which includes inspection and maintenance of storm water management and control devices (e.g. cleaning of oil/water separators and catch basins) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters. A log of the inspection and corrective actions shall be maintained on file and shall be retained for three years. The Preventative Maintenance and Good Housekeeping Inspection Form is in Section 13.0. Biweekly routine inspections are

conducted on site of stormwater management and control devices to ensure materials and equipment are clean and orderly to prevent pollutant runoff.

Stormwater BMP	Tasks	Frequency
Catch basin sumps	Sump clean out	All sumps are cleaned at least every 3 years, before the sump is 50% full
Dry swale	Mowing	Weekly (or as needed)
Retention basin	Physical inspection	Every 5 years (or as needed)

5.2 Comprehensive Site Inspection

The permit requires a schedule for comprehensive site inspection to include visual inspections of equipment, plant areas, and structural pollution prevention and treatment controls to be performed at least once every six months. A report of the results of the comprehensive site inspection shall be prepared and retained for three years. The report shall identify any incidents of non-compliance with the SWPPP or this permit. If there are no reportable incidents of non-compliance, the report shall contain a certification that the facility is in compliance with this permit. Specific dates should be identified in the SWPPP. The MDEQ recommends scheduling the comprehensive site inspection in the spring and fall. The Comprehensive Site Inspection Form is in Section 14.0.

Comprehensive Site Inspection Schedule:

Spring (approx. April) and Fall (approx. October) of each year. A log shall be maintained and records will be retained for a minimum of three years.

Comprehensive Site Inspection Description:

Inspections shall verify the presence of spill kits, the condition of storm sewer catchbasins, the presence of excessive road salt, sediment, stains or debris within the storage yard, spills, and any incidents of noncompliance with the SWPPP of the Village's MS4 Stormwater Permit.

5.3 Housekeeping Procedures

The permit requires that the SWPPP include a description of good housekeeping procedures to maintain a clean, orderly facility. Housekeeping procedures are intended to reduce the potential for significant materials to come in contact with storm water. The Preventative Maintenance and Good Housekeeping Inspection Form is in Section 13.0.

Housekeeping Procedure Description:

All spills will be handled in a timely manner, insure timely pickup of waste materials from the hauler, maintain clean and dry surfaces, check for vehicle leaks, and provide secondary containment for critical materials.

5.4 Material Handling & Spill Prevention / Clean-Up Procedures

The permit requires a description of material handling procedures and storage requirements for significant materials. Equipment and procedures for cleaning up spills shall be identified in the SWPPP and made available to the appropriate personnel. The procedures shall identify measures to prevent spilled materials or material residues on the outside of the containers from being discharged into storm water.

The SWPPP may include, by reference, requirements of either a Pollution Incident Prevention Plan (PIPP) prepared in accordance with the Part 5 Rules (Rules 324.2001 through 324.2009 of the Michigan Administrative Code); a Hazardous Waste Contingency Plan (HWCP) prepared in accordance with 40 CFR 264 and 265 Subpart D, as required by Part 111 of the Michigan Act; or a Spill Prevention Control and Countermeasure (SPCC) plan prepared in accordance with 40 CFR 112.

The following plans are on file at the facility:
A Spill Prevention and Reaction Plan.

Spills and leaks together are the largest industrial source of storm water pollution. Thus, this SWPPP specifies material handling procedures and storage requirements for significant materials. Equipment and procedures necessary for cleaning up spills and preventing the spilled materials from being discharged have also been identified. All employees have been made aware of the proper procedures.

Description # 1
Potential Spill Area: Maintenance Garage
Material Handling and Storage Procedures: On file at facility
Spill Response Procedures and Equipment: Spill kits are available for motor oil, fuels, and solvents. Adsorbents are used per the manufacturer's instruction and a disposed of appropriately by the Village's waste hauler.

Description # 2
Potential Spill Area: Fueling Area
Material Handling Material Storage Procedures: On file at facility
Spill Response Procedures and Equipment: Spill kits are available for motor oil, fuels, and solvents. Absorbents are used per the manufacturer's instruction and a disposed of appropriately by the Village's waste hauler.

Description # 3
Potential Spill Area: Salt and Compost Storage Areas
Material Handling Material Storage Procedures: Employee Handbook
Spill Response Procedures and Equipment: Sweeping Procedures, Installing Catch-All storm inlet filters

5.5 Soil Erosion & Sedimentation Control Measures

The permit requires the identification of areas which, due to topography, activities, or other factors, have a high potential for significant soil erosion. Areas commonly prone to soil erosion are: gravel lots, bare earth or gravel at material handling areas around storm water inlets, areas with concentrated storm water runoff into streams or ditches, and access roads over open streams or ditches. Control measures must be implemented in areas prone to soil erosion and sedimentation

Area of Concern	Control Measures
Storage yard cold patch, sand, and gravel stockpiles	Pavement sweeping, catchbasin cleaning, installing silt sacks at CB inlets

5.6 Employee Training Program

The permit requires a description of employee training programs which will be implemented to inform appropriate personnel at all levels of responsibility of the components and goals of the SWPPP. The SWPPP shall identify periodic dates for such training. MDEQ recommends that employees are trained at the time of hire, then annually.

Employee training will be a major component in ensuring the success of the facility's SWPPP. The more knowledgeable all employees are about the facility's SWPPP and what is expected of them, the greater the chance that the plan will be effective. The following is a description of the employee training programs to be implemented to inform appropriate personnel at all levels of responsibility of the components and goals of the SWPPP (i.e. good housekeeping practices, spill prevention and response procedures, waste minimization practices, informing customers of facility policies, etc.). The Employee Training Form is in Section 15.0.

<p>Employee Training Description: The Village DPW Supervisor and staff have attended various training opportunities in the past. Training may be provided internally or by SEMCOG or the Michigan Green Industry Association (MGIA).</p>
<p>Employees Included: All field DPW staff will be trained.</p>
<p>Frequency of Training: The DPW staff will continue to receive training at least every three years. New staff will be trained within one year of employment.</p>

5.7 TMDL Requirements

The permit requires that if there is a Total Maximum Daily Load (TMDL) established by the Department for the receiving water, which restricts the discharge of any of the identified significant materials or constituents of those materials, then the SWPPP shall identify the level of control for those materials necessary to comply with the TMDL, and an estimate of the current annual load of those materials via storm water discharges to the receiving stream.

The TMDL means the amount of pollutant load a water body, such as a lake or stream, can assimilate and still meet water quality standards. If a receiving water body does not meet the water quality standards for a specific pollutant, the MDNRE will establish the appropriate daily maximum load for that pollutant to allow the water body to again meet water quality standards. If a permitted facility is expected to discharge that specific pollutant in its storm water to that water body, the General Permit requires the facility to list actions it will take to meet that TMDL requirement. For example, if the TMDL calls for storm water dischargers to reduce their phosphorus inputs by 50%, the permittee would need to identify phosphorus sources at their

facility and estimate their current annual load. The permittee must list actions to reduce storm water phosphorus discharges from their facility by 50%.

Is there a TMDL requirement for the receiving water?

East Pond Creek – *E. coli*

Below is the identification of actions to limit the discharge of significant materials in order to comply with TMDL requirements:

TMDL # 1	
TMDL Pollutant: <i>E. coli</i>	Current Annual Loading: <i>Numeric Target: 130 col./ 100 mL MGM and 300 col. / 100 mL GM</i>
Best Management Practices: The pavement is swept regularly which removes sediment and possible feces from wild animals.	

5.8 List of Significant Materials Still Present

The permit requires the identification of significant materials expected to be present in storm water discharges following implementation of non-structural preventative measures and source controls. Non-structural controls are used to reduce pollutants at the source before they can get into the storm water runoff. In some cases, these types of controls will not be enough. A list of significant materials expected to be present in storm water discharges after implementation of nonstructural controls must be included in the SWPPP. The materials listed below will be addressed through the use of structural controls. (If there will be no significant materials present after the implementation of non-structural controls, state that in this section.)

Material:	Location:	Outfall:
Planned Control Measure: There will be no known significant materials present in stormwater discharges after the implementation of non-structural controls.		

5.0 STRUCTURAL CONTROLS

The permit requires that where implementation of non-structural controls does not control storm water discharges in accordance with water quality standards, the SWPPP shall provide a description of the location, function, and design criteria of structural controls for prevention and treatment.

Structural controls may be necessary:

- 1) To prevent uncontaminated storm water from contacting or being contacted by significant materials; or
- 2) If preventive measures are not feasible or are inadequate to keep significant materials at the site from contaminating storm water. Structural controls shall be used to treat, divert, isolate, recycle, reuse, or otherwise manage storm water in a manner that reduces the

level of significant materials in the storm water and provides compliance with the Water Quality Standards

Examples of structural controls:

- ✓ Signs and Labels
- ✓ Safety Posts
- ✓ Fences
- ✓ Security Systems
- ✓ Temporary and Permanent Coverings
- ✓ Storm Water Conveyances
- ✓ Diversion Dikes
- ✓ Grading
- ✓ Paving
- ✓ Curbing
- ✓ Drip Pans
- ✓ Secondary Containment
- ✓ Catch Basin Inserts
- ✓ Detention and Retention Ponds
- ✓ Vegetative Filters
- ✓ Sand Filters
- ✓ Oil/Water Separators

These types of controls are physical features that control and prevent storm water pollution. They can range from preventive measures to collection structures to treatment systems. Structural controls will typically require construction of a physical feature or barrier. Below is a description of the structural controls used at the facility.

Structural Control #1	
Area that it is used: DPW Yard	Material intended to control: Stormwater runoff, sediment
Description of the structural control and its design criteria: Catchbasin sumps – standard 2ft deep sumps are used at catchbasin inlets. The sumps act as a pre-treatment for coarse sediment and debris and are cleaned out periodically. The storm sewer system is design to convey the peak discharge from a 10-yr storm. Catch basin inlet filters – The Village will install catch basin inlet filters throughout the asphalt lot area as funding allows.	
Structural Control #2	
Area that it is used: DPW Yard	Material intended to control: Stormwater runoff, sediment
Description of the structural control and its design criteria: <i>Dry swale</i> – The dry grassed swale contains beehive catch basins and conveys runoff from the DPW Yard to the retention basin. The swale is designed to convey the peak discharge from a 10-yr storm. Dry swales provide some infiltration and pre-treatment of finer sediments and nutrients before runoff is discharged into the basin. The swale is mowed regularly. Neither fertilizers nor pesticides are used in the turf or swale areas.	
Structural Control #3	

Area that it is used: DPW Yard	Material intended to control: Stormwater runoff, sediment
Description of the structural control and its design criteria: <i>Retention Basin</i> – Retention basins do not have a formal outlet structure and retain all of the stormwater flows which are then infiltrated or evaporated. The design criterion for the retention basin is not available, but such basins are typically designed to contain two 100-yr storms. The retention basin is typically dry except following a rain event. It is not regularly mowed.	

6.0 NON-STORM WATER DISCHARGES

The permit requires that all discharge locations be evaluated for the presence of non-storm water discharges. Any unauthorized storm water discharges must be eliminated, or covered under another NPDES permit.

Storm water shall be defined to include all of the following non-storm water discharges provided pollution prevention controls for the non-storm water component are identified in the SWPPP:

- 1) Discharges from fire hydrant flushing
- 2) Potable water sources including water line flushing
- 3) Fire system test water
- 4) Irrigation drainage
- 5) Lawn watering
- 6) Routine building wash down which does not use detergents or other compounds
- 7) Pavement wash waters where contamination by toxic or hazardous materials have not occurred (unless all contamination by toxic or hazardous materials have been removed) and where detergents are not used
- 8) Air conditioning condensate
- 9) Springs
- 10) Uncontaminated ground water
- 11) Foundations or footing drains where flows are not contaminated with process materials such as solvents

Discharges from fire fighting activities are authorized by the permit, but are exempted from the requirement to be identified in the SWPPP.

The table below specifies what non-storm water discharges occur at the facility.

Description #1
Non-storm water discharge: There are no known non-storm water discharges at the DPW facilities.
Pollution Prevention Controls:
Outfall that receives the discharge:

7.0 ANNUAL REVIEW

The permit requires that the permittee shall review the SWPPP annually after it is developed and maintain written summaries of the reviews. Based on the review, the permittee shall amend

the SWPPP as needed to ensure continued compliance with the terms and conditions of the permit. The annual review is to be retained on site. It does not need to be submitted to the MDEQ. The Annual Review Form is in Section 16.0.

8.0 CERTIFIED OPERATOR UPDATE

The permit requires that if the certified operator is changed or an additional certified operator is added, the permittee shall provide the name and certification number of the new certified operator to the Department. The new operator shall review and sign the SWPPP.

9.0 RECORD KEEPING

The permit requires that the permittee shall maintain records of all SWPPP related inspection and maintenance activities. Records shall also be kept describing incidents such as spills or other discharges that can affect the quality of storm water runoff. All such records shall be retained for three years.

10.0 SWPPP CERTIFICATION

The permit requires that the SWPPP shall be signed by the storm water certified operator and by either the permittee or an authorized representative in accordance with 40 CFR 122.22. The SWPPP shall be retained on-site at the facility which generates the storm water discharge.

I certify under penalty of law that the storm water drainage system in this SWPPP has been tested or evaluated for the presence of non-storm water discharges either by me, or under my direction and supervision. I certify under penalty of law that this SWPPP has been developed in accordance with the General Permit and with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. At the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Permittee or Authorized Representative
Printed Name & Title: Tim Metz, DPW Supervisor
Signature & Date:

Certified Operator – N/A for Watershed Permittees
Printed Name & Certification Number:
Signature & Date:

12.0 POLLUTION INCIDENT PREVENTION PLAN (PIPP)

The Pollution Incident Prevention Plan (PIPP) 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 Village of Romeo's Public Works Facility. As such, this plan has been integrated into the Village's SWPPP to avoid overlap and to create a single plan for staff to reference. 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 PIP Plan and to provide containment for potentially polluting materials.

Facility Identification, Location, and Emergency Contacts (see page 2); Facility Operations (pages 2 & 5); Facility Security (page 11); Past Pollution Incidents (page 6); Facility Inventory (page 4); Secondary Containment and Pollution Prevention Measures (pages 5-10); Facility Drainage and Prediction of Flow (Appendix A)

EMERGENCY CONTACTS

POLICE AND FIRE DEPARTMENTS – EMERGENCIES: 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: 586.751.4690
EGLE 24-Hour Pollution Emergency Alert System (PEAS)	800.292.4706
State Emergency Response Commission	517.898.9749
McLaren Macomb	586.493.8000 1000 Haring Rd. Mt. Clemens, MI 48043
Macomb County Management and Risk Assessment Program	586.469.5236
Macomb County Health Department	586.469.5235 43525 Elizabeth Rd. Mt. Clemens, MI 48043
National Emergency Response Center	800.424.8802
U.S. EPA Region 5 Office 24-Hour Number	800.621.8431
CHEMTREC (chemicals, spills, fires information)	800.424.9300

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

12.1 PIPP Distribution

The Village Clerk/Administrator and DPW Supervisor maintain a copy of this PIP Plan. The Plan is available to all personnel who are authorized to have access to it. Copies of the Plan are available in the office of the Supervisor of Public Works.

A letter certifying that the facility is in compliance with the Part 5 Rules will be sent to the MDEQ – Water Bureau within 30 days of finalizing the completion or updates to this Plan. The LEPC and the local Health Department will also be notified that the Plan is complete.

Copies of this Plan and future revised Plans will be available upon request to the list below:

1. US EPA Regional Administrator
2. Romeo Fire Department
3. Emergency Response Contractor
4. Macomb County Health Department
5. MDEQ Water Resources Division
6. State of Michigan Emergency Response Commission-MDNRE Waste Management Div.

12.2 PIPP Amendments

This Plan will be reviewed and updated as needed every three years, or when facility personnel, processes, or procedures identified in the Plan change or as otherwise necessary to maintain compliance with the Part 5 Rules. Upon completion of the updated Plan, the owner shall recertify the Plan and notify MDEQ, the local LEPC, and the local Health Department (with a letter) of compliance with the Part 5 Rules. Copies of the letter or amendments are maintained in the SWPPP log.

12.3 Emergency Response Personnel

12.3.1 Emergency Response Coordinator Responsibilities

The Emergency Response Coordinator (ERP) has a wide range of responsibilities including employee training, conducting facilities inspections, and committing village resources to respond to emergency situations. The ERC must be thoroughly familiar with facility operations and the Plan 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.

12.3.2 Emergency Response Coordinator

Primary Coordinator: Mr. Tim Metz
Title: Supervisor of Public Works
Telephone: 586-752-2684

Alternate Coordinator: Mr. Al LaPeer, WWTP Supervisor
Telephone: (586) 752-9321

12.3.3 Spill Contractor

In case of a spill that requires a spill clean-up contractor, the Village of Romeo has a contract with the Village Fire Department.

12.4 Emergency Response Equipment

12.4.1 Spill Control and Personal Protection Equipment

The Village DPS 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 12.1 lists the available emergency response equipment. The equipment is stored near areas of concern and is immediately available.

Table 12.1 Spill Control and Personal Protection Equipment

Equipment	Location	Intended Use
Shovels/brooms	Available in maintenance garage	Used to clean up spill adsorbents and solid pollutants
First Aid Kits	Various locations	Available for use and treatment of minor medical emergencies
Fire extinguishers	Various locations	Available to assist in fire control
Spill kits/adsorbents	Available in maintenance garage	Contain and clean up minor spills

12.5 Spill Prevention and Control

Material storage, spill training, and preventative maintenance practices will be the primary methods used at the Romeo 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 *DEQ Spill or Release Report* form located in the SWPPP logbook. Section 4.3 of this Joint Plan will be update to include this incident 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 Romeo DPW Facility:

- Preventative Maintenance Program (Section 5.1)
- Comprehensive Site Inspections (Section 5.2)
- Good Housekeeping (Section 5.3)
- Material Handling & Spill Prevention / Clean-Up Procedures (Section 5.4)
- Employee Training Program (Section 5.6)

12.6 Site-Specific Best Management Practices (BMPs)

Storage Areas – check to ensure that the salt pile is contained within the salt dome and that the doors remain closed except during loading. Do not allow materials from the salt dome of storage piles to enter the storm drains.

Fueling Areas – train employees on proper fueling procedures and keep spill kits on hand near the fueling areas.

Vehicle and Equipment Inspections – check regularly for leaking oil and fluids, use dry absorbents to clean leaks, segregate and label waste materials, and ensure proper disposal of materials.

Structural BMPs – see Section 6.0

12.7 Emergency Management Activities

12.7.1 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 (see beginning of Section 12) whenever necessary.
- E. Contain the material in the smallest possible area by using the emergency response equipment provided in this plan (see Section 12.4.1). If the spill is small, use a broom or shovel to clean up the spill. Dispose of materials appropriately. Prevent spills from entering the combined sewer system.
- 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 the SWPPP/PIP logbook. A copy of the form is in Section 18.
- I. Evaluate the PIP Plan and amend if necessary. Determine the cause of the incident and evaluate the emergency response procedures. Correct any deficiencies and amend the plan accordingly.

12.7.2 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 made. **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 MNDRE 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 **MDEQ 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 **MDEQ Southeast Michigan District Office** and the local 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 DPW 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.

Macomb County Local Emergency Planning Committee	586.469.5270
State Emergency Response Commission	517.898.9749
National Response Center (NRC)	800.424.8802

Internal Notifications:

The following Village 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.

Kathryn Trapp **586.752.3565**

12.7.3 Response Assessment

After all report requirements have been completed, the Emergency Response Coordinator should perform an internal assessment to critique response activities. This should include a comprehensive evaluation of the effectiveness of the response, encountered problems or shortcomings, and recommendations to improve future response activities. Changes to the response actions in the Plan may be warranted if the assessment identifies more effective techniques to improve future response options.

13.0 PREVENTATIVE MAINTENANCE AND GOOD HOUSEKEEPING INSPECTION FORM

Date:	Time:
-------	-------

Inspector	
Print:	Signature:

Check Box	Method	Comments/Actions Taken
<input type="checkbox"/>	Inspect fuel tank for cracks, leaks, or dripping.	
<input type="checkbox"/>	Spill Clean-up materials are located near fuel tank.	
<input type="checkbox"/>	Employees are trained to report fuel leaks as soon as possible.	
<input type="checkbox"/>	Examine materials stockpiles for erosion outside of containment area. Sweep/shovel aggregate back into piles as necessary.	
<input type="checkbox"/>	Examine salt containment area for erosion towards storm drains. Sweep/shovel salt back into pile as necessary.	
<input type="checkbox"/>	Inspect beet juice/brine tank for leaks or cracks. Repair or replace immediately as needed.	
<input type="checkbox"/>	Inspect all chemical/oil drums for leaks or cracks. Repair or replace immediately as needed.	
<input type="checkbox"/>	Prior to storing any drums outside, ensure they are triple-rinsed with wash water collected and disposed of in a sanitary sewer.	
<input type="checkbox"/>	Store drums upside down to avoid collection of stormwater.	
<input type="checkbox"/>	Recycle (or crush and place in landfill) any unused drums or containers not planned for future use.	
<input type="checkbox"/>	Inspect dumpster for rusted holes, leaking seals or cracks. <i>If leaks are found contact waste management company for repair or replacement.</i>	

<input type="checkbox"/>	Dumpster lids are kept closed at all times, except when filling and emptying	
<input type="checkbox"/>	Hazardous materials are not disposed of in dumpster	
<input type="checkbox"/>	Clean floors with brooms, sweep up debris and dispose of in dumpster (rather than hosing down with water)	
<input type="checkbox"/>	Maintenance garage floor is clean of any oil or fluid residue (<i>any oil dry used to clean past spills is swept from floor</i>)	
<input type="checkbox"/>	Spill clean-up materials are clearly accessible to employees	
<input type="checkbox"/>	Drip pans and funnels are used when transferring fluids or to collect leaking or dripping fluids	
<input type="checkbox"/>	Drain all used oil filters for at least 12 hours	
<input type="checkbox"/>	Clean vehicles and equipment inside where the wash water is directed to the onsite sewage disposal system	
<input type="checkbox"/>	All vehicle fluid containers are kept closed at all times	
<input type="checkbox"/>	All containers are off the floor on pallets, spill-containment units, or shelving.	
<input type="checkbox"/>	Ensure all areas are clean of foreign debris	

14.0 ROMEO COMPREHENSIVE SITE INSPECTION FORM

Date:	Time:
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Inspector	
Print:	Signature:

Is the Facility in compliance with the General Permit and the SWPPP:
--

Check Box	Method	Comments/Actions Taken
<input type="checkbox"/>	Review Routine Inspection and Good Housekeeping Forms and conduct monthly inspection.	
<input type="checkbox"/>	Review vehicle and equipment maintenance logs	
<input type="checkbox"/>	Review spill reports (if applicable)	
<input type="checkbox"/>	Inspection of discharge points for Buildings and Grounds Facility and Fueling Station	
<input type="checkbox"/>	Spill response plan is up to date	
<input type="checkbox"/>	Spill response phone numbers are up-to-date and posted near shop phone	

15.0 EMPLOYEE TRAINING FORM

Date of Session:

Trainer	
Print:	Signature:

Topics Covered:

Attendee Name	Attendee Signature

16.0 ANNUAL SWPPP/PIPP REVIEW FORM

Date of Review:

Reviewer	
Print:	Signature:

1) Facility general information and SWPPP 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
5) Spills have been recorded and reported as appropriate	Yes	No
6) Records of routine preventative maintenance, housekeeping and employee training are available in the SWPPP file	Yes	No
7) Comprehensive site inspections have been completed, certified and filed in the SWPPP/PIPP file	Yes	No
8) Corrective actions noted in the inspection reports have been completed	Yes	No
9) Annual fees have been paid	Yes	No
10) Permit renewal request has been processed	Yes	No
11) Material Safety Data Sheets are up-to-date and available for all chemicals onsite	Yes	No
12) SWPPP has been reviewed and signed by the Stormwater Program Manager or designated representative	Yes	No

Additional Comments:

17.0 DEQ Spill or Release Report



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

SPILL OR RELEASE REPORT

NOTE: Some 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. This report form is to aid persons reporting releases under regulations that do not require a specific form. This report form is not required to be used. **To report a release, some regulations require a facility to call the PEAS Hotline at 800-292-4706, or DEQ District Office that oversees the county where it occurred, and other regulating agencies and provide the following information. A follow-up written report may be required. Keep a copy of this report as documentation that the release was reported. 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. See the DEQ website on [Spill/Release Reporting](#) for more reporting information.**

Please print or type all information.

NAME AND 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 CODE			
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 & TIME OF RELEASE (if known) ____/____/____ _____am/pm	DATE & TIME OF DISCOVERY ____/____/____ _____am/pm	DURATION OF RELEASE (if known) _____ days _____ hours _____ minutes		TYPE OF INCIDENT <input type="checkbox"/> Explosion <input type="checkbox"/> Fire <input type="checkbox"/> Leaking container <input type="checkbox"/> Loading/unloading release <input type="checkbox"/> Pipe/valve leak or rupture <input type="checkbox"/> Vehicle accident <input type="checkbox"/> Other _____	
MATERIAL RELEASED (Chemical or trade name) <input type="checkbox"/> CHECK HERE IF ADDITIONAL MATERIALS LISTED ON ATTACHED PAGE.		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)	
FACTORS CONTRIBUTING TO RELEASE <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 _____		SOURCE OF LOSS <input type="checkbox"/> Container <input type="checkbox"/> Railroad car <input type="checkbox"/> Pipeline <input type="checkbox"/> Ship <input type="checkbox"/> Tank <input type="checkbox"/> Tanker <input type="checkbox"/> Truck <input type="checkbox"/> Other _____			
TYPE OF MATERIAL RELEASED <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"/> Other _____ <input type="checkbox"/> Unknown		MATERIAL LISTED ON or DEFINED BY <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"/> Michigan Critical Materials Register or permit <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"/> Other list _____ <input type="checkbox"/> Unknown		IMMEDIATE ACTIONS TAKEN <input type="checkbox"/> Containment <input type="checkbox"/> Dilution <input type="checkbox"/> Evacuation <input type="checkbox"/> Hazard removal <input type="checkbox"/> Neutralization <input type="checkbox"/> System shut down <input type="checkbox"/> Diversion of release to treatment <input type="checkbox"/> Decontamination of persons or equipment <input type="checkbox"/> Monitoring <input type="checkbox"/> Other _____	
RELEASE REACHED					
<input type="checkbox"/> Surface waters (include name of river, lake, drain involved) _____		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 (indicate if it is a known or suspected drinking water source and include name of aquifer, if known) _____					
<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 <hr/> <hr/>	WAS ANYONE HOSPITALIZED? <input type="checkbox"/> Yes NUMBER _____ HOSPITALIZED: _____ <input type="checkbox"/> No	TOTAL NUMBER OF INJURIES TREATED ON-SITE: <hr/>																																																			
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 <input type="checkbox"/> CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE <hr/> <hr/> <hr/> <hr/>																																																					
ESTIMATED QUANTITY OF ANY RECOVERED MATERIALS AND A DESCRIPTION OF HOW THOSE MATERIALS WERE MANAGED (include disposal method if applicable) <input type="checkbox"/> CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE <hr/> <hr/>																																																					
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.) <input type="checkbox"/> CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE <hr/> <hr/>																																																					
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFIED: INITIAL CONTACT BY: <input type="checkbox"/> Telephone <input type="checkbox"/> Fax <input type="checkbox"/> Email <input type="checkbox"/> Other DATE/TIME INITIAL CONTACT: _____ <input type="checkbox"/> PEAS: 800-292-4706 Log Number Assigned _____ <input type="checkbox"/> DEQ District or Field Office Divisions or Offices Contacted: <input type="checkbox"/> Baraga <input type="checkbox"/> Gwinn <input type="checkbox"/> Air Quality <input type="checkbox"/> Bay City <input type="checkbox"/> Jackson <input type="checkbox"/> Land & Water Management <input type="checkbox"/> Cadillac <input type="checkbox"/> Kalamazoo <input type="checkbox"/> Office Geological Survey <input type="checkbox"/> Crystal Falls <input type="checkbox"/> Lansing <input type="checkbox"/> Remediation and Redevelopment <input type="checkbox"/> Detroit <input type="checkbox"/> Newberry <input type="checkbox"/> Waste and Hazardous Materials <input type="checkbox"/> Gaylord <input type="checkbox"/> Warren <input type="checkbox"/> Water Bureau <input type="checkbox"/> Grand Rapids <input type="checkbox"/> Wyoming <small>DEQ Office locations are subject to change</small>	OTHER ENTITIES NOTIFIED: <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;"></th> <th style="width: 10%; text-align: center;">Date:</th> <th style="width: 10%; text-align: center;">Time:</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> National Response Center (NRC): 800-424-8802</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td><input type="checkbox"/> US Coast Guard Office: <input type="checkbox"/> Detroit <input type="checkbox"/> Grand Haven <input type="checkbox"/> Sault Ste. 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FIGURE 1 – FACILITY SITE MAP
