City of Auburn Hills
Department of Public Works
Facility

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY PART 5 RULES

Pollution Incident Prevention Plan
April 5, 2022

AUBURN HILLS

Table of Contents

Chapter 1: General Facility Information

Table 1: General Facility Information

NAME OF FACILITY:	Auburn Hills Department of Public Works (DPW) Facility
FACILITY ADDRESS:	1500 Brown Road, Auburn Hills, MI 48326
FACILITY CONTACT INFORMATION	
Name and Title:	Stephen Baldante, Director of Public Works
Mailing Address:	1500 Brown Road, Auburn Hills, MI 48326
Telephone:	248-391-3777
Email:	sbaldante@auburnhills.org
SPILL PREVENTION AND CONTROL COORDINATOR	
Name and title:	DPW On-Call Crew Leader
Telephone:	248-800-6379
Email:	dpw@auburnhills.org
24-Hour Emergency Telephone:	9-1-1
ALTERNATE CONTACT	
Name and title:	Tim Wisser, Manager of Municipal Properties
Telephone:	248-364-6901
Email:	twisser@auburnhills.org

Chapter 2: Spill Response Team

The City of Auburn Hills DPW facility houses vehicles and materials for vehicle road maintenance and outdoor storage piles of aggregate materials. The facility also stores road salt and liquid brine in threshold management quantities that require the development of a Pollution Incident Prevention Plan (PIPP). The City of Auburn Hills DPW staff identified to assist in pollution incident prevention activities are as follows:

Table 2: Spill Response Team

NAME AND TITLE	RESPONSIBILITY
Tim Wisser, Manager of Municipal Properties	Spill response program oversight.
DPW On-Call Crew Leader	Onsite spill prevention and control.
Shawn Keenan, City Planner	Surveillance and monitoring activities.

Chapter 3: Site Map

The Auburn Hills DPW Facility consists of four buildings, three covered storage areas, areas for outdoor bulk material storage, brine storage tanks, and a fueling station. The buildings consist of:

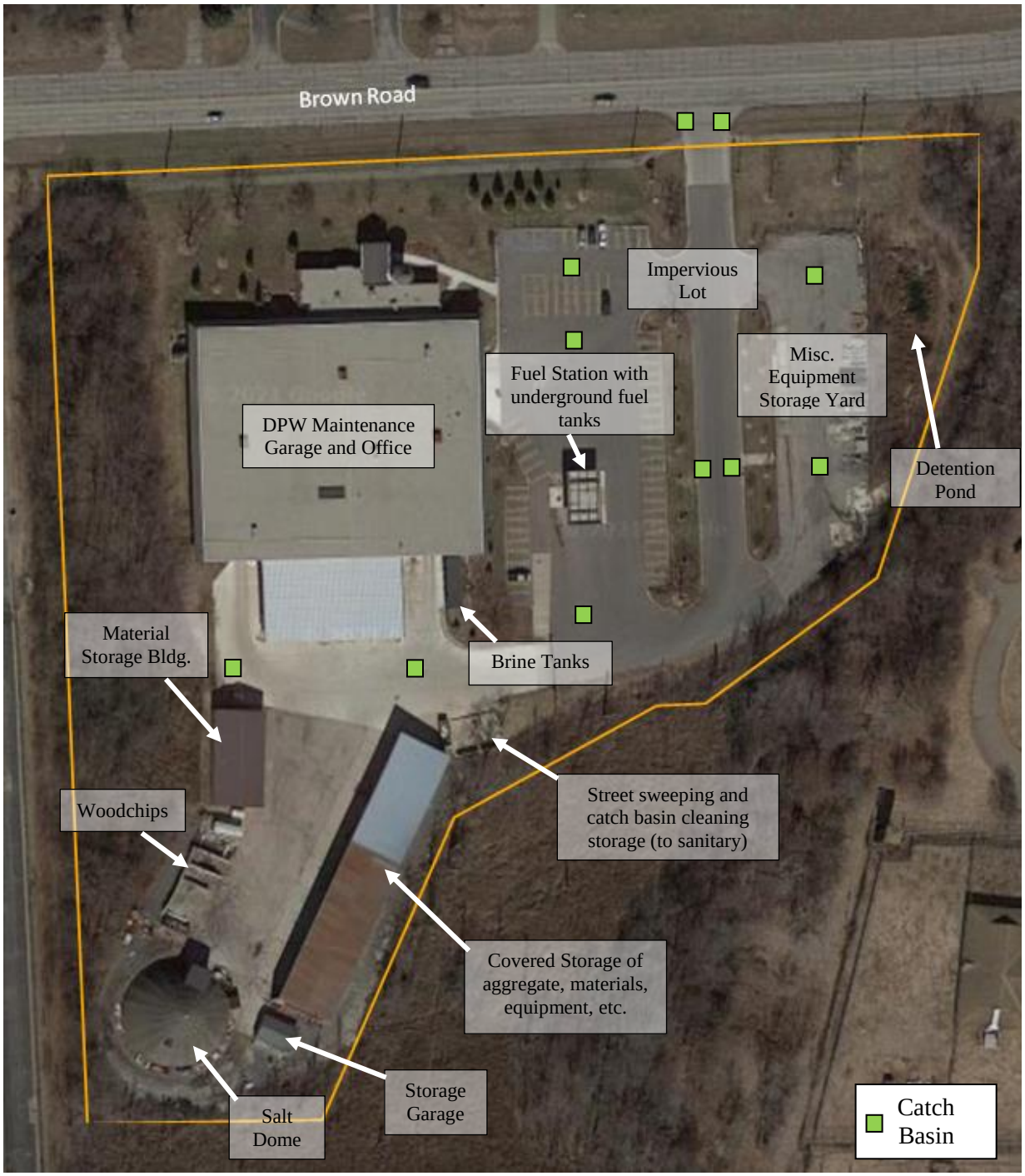
1. Maintenance Garage & Administrative Offices
2. Materials Storage Building
3. Storage Garage
4. Salt Dome (2,500 tons)

All vehicle and equipment maintenance is performed indoors inside the Maintenance Garage (1), which has interior floor drains that discharge to the sanitary sewer. The Materials Storage Building (2) does not have any interior floor drains and stores small equipment and various parts and supplies. The Storage Garage (3) is cold storage of small supplies such as mailboxes and other various DPW materials. This building has a cement slab but no floor drains. The Salt Dome (4) is located at the back of the property and does not have any interior floor drains. Additional small shed and brine storage tanks are on the property. The brine storage tanks do have secondary containment.

A covered storage area consists of a metal roof with cement walls at the back that covers large vehicles and equipment and other various supplies to prevent exposure to stormwater.

Figure 1: Auburn Hills DPW Facility Property Map

Figure 2: Auburn Hills DPS Facility Site Map



Chapter 4: Polluting Material Inventory

Inventory and Description of Polluting Materials

To identify potential sources of significant materials, City staff, with the assistance of the Southeast Michigan Council of Governments (SEMCOG), conducted an inventory of municipal facilities, activities

and materials that may be identified as polluting materials under Part 5. Polluting materials that are listed under Part 5 and stored onsite at the City of Auburn Hills DPW Facility include the following:

- Salt in excess of 5 tons in solid form.
- Liquid brine in excess of 1,000 gallons is stored outdoors.
- Oil stored onsite in excess of 1,320 gallons

Material Safety Data Sheets are stored in the main office of the Public Works Building

Solid Salt Storage Area Description

The City of Auburn Hills DPW Facility stores road salt inside a covered Salt Dome on the rear of the property. The dome has a shingled roof, concrete floor, 6-foot concrete walls, and is in the shape of a dome. The capacity of the dome is 2,500 tons. The loading area of the Salt Dome is covered to prevent erosion of the salt pile out of the dome, exposure to runoff, and track out. There are no interior floor drains inside the dome.

Salt is delivered to the Auburn Hills DPW Facility and is placed just outside the dome. A staff person is present on-site during all salt deliveries to direct where and how the salt is delivered. Auburn Hills staff then immediately loads the salt into the dome using a front-end loader. Employees are trained in the procedure to immediately sweep excess salt from track out or spills back into the dome. There are no storm drains located near or around the salt dome. All stormwater runoff occurs as sheetflow and discharges onto the nearby vegetated ground through infiltration.

The City of Auburn Hills DPW maintenance garage performs onsite maintenance for the vehicles and equipment used in the department, including the loader and dump trucks used for snow plowing and salting activities. These vehicles are stored onsite and washed in a dedicated interior wash bay, where the wash water is discharged directly to the sanitary sewer. A sign is located outside of the DPW building indicating the following: “Wash vehicles in the bay only.” This is to assist in educating all DPW and Auburn Hills staff on the proper management of vehicle wash water.

The City of Auburn Hills DPW staff perform a pre-trip vehicle inspection each time they drive a City of Auburn Hills vehicle. The inspection includes a comprehensive examination of the vehicle for safety, proper operation, and environmental impacts such as fluid leaks. When problems occur, the vehicle drivers indicate the problems to the DPW Fleet Division. Maintenance is scheduled on the vehicle within 24 hours. If fluid leaks are present, drip pans are used to catch fluids to prevent spills or releases.

The DPW Facility is fenced from the public and werewolves with a gate that remains locked when not in use and during non-business hours. There are floodlights located throughout the complex so that the yard may remain lit 24-hours per day.

The salt dome is not located within 50 feet of a lakeshore, stream bank, or wetland, nor is it located in a 100-year floodplain.

Liquid Brine Storage Area Description

Liquid Brine (water mixed with solid road salt) is created on-site with an indoor brine maker and is stored outside in three 3,000-gallon tanks. Boost is stored outside in a single-walled 3,000-gallon tank in the same area. All tanks are located inside a secondary containment system that consists of a concrete pad with wood walls and crack-sealed joints. The secondary containment area has the capacity to store 100% of the combined 12,000-gallons of material.

The secondary containment unit is monitored for accumulated precipitation after each rain or snow event. If stormwater or snow is present inside the unit greater than 12 inches high, the precipitation is characterized using a visual inspection. Once the precipitation is characterized, material with a negative reading is removed from the unit using shovels (for snow) or a sump pump and discharged to the turfgrass adjacent to the unit. If the material is positive, spill response procedures will be enforced to reuse the material in the brine trucks and to thoroughly inspect the tanks and hoses for the source of the leak.

The loading of vehicles with brine takes place on an impervious concrete pad adjacent to the secondary containment area. All loading nozzles and hoses remain inside the containment area to prevent any spills or leaks of brine from entering the storm sewer system.

Oil Storage Area Description

DPW Maintenance Garage

The DPW Maintenance Garage houses vehicles, equipment, and materials needed for road, water, and sewer maintenance in the City of Auburn Hills. The main floor of the maintenance garage includes general mechanics areas that have the following oil materials and capacities:

- Two 220-gallon tanks of new oil
- Three 50-gallon drums of new oil (in secondary containment pallets)
- One 96-gallon canister of used oil (used for draining oil filters)
- One 300-gallon tank of used oil (in the secondary containment area)
- One 200-gallon tank of washer fluid
- One 200-gallon container of floor cleaner
- One 300-gallon container of DEF fluid

The two 220-gallon tanks are self-contained tanks with sight gauges to judge the quantity of oil in the tanks at all times. They have metered nozzles to distribute new oil directly into vehicles or canisters as needed by City mechanics. They are filled through an enclosed distribution system with new oil that is stored inside the Maintenance Garage but in a separate elevated loft.

The one 96-gallon used oil canisters are on wheels and hold a large drip pan for draining oil filters. The canisters automatically capture the used oil as it drains in an enclosed system. The used oil filters are drained for at least 12 hours, placed in a container, and hauled away for recycling. The used oil is then canisters are then drained directly into the used oil tank through a spout at the bottom of the canister.

Used oil is stored in an aboveground storage tank inside the Maintenance Garage with a capacity of 300-gallons. This tank is stored in a single-form plastic secondary containment system to prevent any leaks or spills from entering the sanitary system. When the tank is full, the used oil is hauled out and recycled by a contractor. The contractor will connect a hose to the outlet structure of the tank and pump the material into the truck for proper disposal.

There are spill response materials located in the oil storage area. These materials include spill pads, absorbent booms, and oil dry absorbent material.

DPW Elevated Loft Vehicle Fluid Storage

Inside the Maintenance Garage, there is an elevated loft that contains additional quantities of bulk vehicle fluids. The elevated loft storage contains the following material and quantities:

- Three 50-gallon drums of salt block detergent

All of the drums that are actively hooked to the distribution system are located on a secondary containment pallet as a preventative measure to capture any leaks or spills. Each drum is connected directly to hydraulic hoses that lead into the ceiling of the Maintenance Garage, where they are pumped through overhead nozzles to minimize leaks and spills. All drums are labeled with clear, readable labels. A spill kit is located in this area that consists of oil dry and absorbent pads.

Spill Response Procedures and Equipment

Under both Part 5 rules and stormwater rules, the MDEQ must be contacted if the following materials are released to the environment in the identified quantities:

To The Ground:			**To Waters of the State:**			**To Sanitary Sewer (*contact WWTP only*):**	
Oil	7 gallons		Salt, liquid brine, oil, any significant material	Any quantity that causes visible sheens, oil films, unnatural turbidity, foams, or deposits in a waterbody		Sodium hypochlorite, Oil, any significant material	Any quantity not currently authorized by receiving WWTP
Salt	50 pounds						
Liquid Brine	50 gallons						

During Regular Business Hours:
Warren District Office
27700 Donald Court
Warren MI 48092-2793
586-753-3700

During Non-Business Hours:
Pollution Emergency Alert System (PEAS)
1-800-292-4706

Detailed spill response procedures related to both the SWPPP and the PIPP are located in **Appendix D**.

Chapter 5: Routine Inspections

Preventive maintenance at the City of Auburn Hills DPW Facility involves the regular inspection, testing, and cleaning of facility equipment, vehicles, and operational systems. A Routine Inspection Form has been created for the City of Auburn Hills DPW Facility and is located in **Appendix A**. The Routine Inspection Form will be used by facility staff during site walk-throughs that will be conducted on a **monthly** basis to observe the salt storage area. The purpose of these inspections is to identify and prevent conditions that could lead to the release of polluting materials to sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwaters of this state. Good housekeeping procedures reduce the potential for pollutants to come into contact with the environment. A log of the routine inspections and corrective actions shall be maintained on file and shall be retained for three years.

Chapter 6: Three-Year Plan Review

The completed PIPP requires the City of Auburn Hills to notify the MDEGLE Water Bureau District Office within 30 days at:

Warren District Office
27700 Donald Court
Warren, MI 48092-2793
586-753-3700

The City of Auburn Hills will also notify the following agencies that the PIPP requirements have been completed:

Oakland County Health Division, North
Oakland County Health Center
1200 North Telegraph, Building 34 East
Pontiac, MI 48341
248-858-1280

Oakland County Local Emergency
Planning Committee
1200 N. Telegraph Road
Pontiac MI 48341
248-858-5371

Part 5 requires that the PIPP be evaluated every three years and after any release requiring implementation of the plan. The Plan will also be updated if any facility personnel, processes, materials, or procedures that were included in the plan change (See **Appendix C** for PIPP Review Form).

Based on the three-year review, the City of Auburn Hills DPW Facility will amend the PIPP as needed to ensure continued compliance with the terms and conditions of Part 5. Recertification and re-notification of updates need to be sent to the MDNRE District Office, the Oakland County Health Department, and the Local Emergency Planning Committee.

City of Auburn Hills DPW Facility will maintain records of all PIPP-related inspections and activities, including Routine Inspections, Three-Year Review, and Spill Reports. Records will also be kept describing other illicit discharges that can affect the quality of stormwater runoff. All such records will be retained for three years.

Appendix A: PIPP Routine Inspection Form

Date:	Facility Name:
Inspector Name:	
Routine Inspection Schedule: Monthly	

Salt Storage Area

Check Box	Method	Comment/Action Taken
☐	Inspect roof of salt dome for holes and loose shingles. (*If defects are detected, schedule facility for necessary repairs*.)	
☐	Inspect the outside of the salt dome to look for seepage of salt outside of the structure. Inspect joints between the floor and the walls, the roof and the walls, and all areas of the ground. (*If material is detected, clean up salt immediately and schedule facility for necessary repairs*.)	
☐	During salt deliveries, ensure staff is present to prevent salt from entering storm drains and to immediately load salt into bays. (*Do not allow deliveries to stand outside of the barn uncovered.)*	
☐	Salt storage area is swept to contain "trackout", and salt is returned for reuse (D*on't hose down the area*.)	
☐	Check loading/unloading equipment for leaks, through a vehicle/equipment inspection	
☐	Wash equipment and vehicles inside the designated bay where the water goes to the sanitary sewer.	

Brine Tanks and Secondary Containment Structure

Check Box	Method	Comment/Action Taken
☐	Inspect four 3,000-gallon brine containers for leaks, cracks, and loose fittings. Repair all leaks immediately.	
☐	Inspect 2,100-gallon brine container for leaks, cracks, and loose fittings. Repair all leaks immediately.	
☐	Inspect 1,800-gallon brine container for leaks, cracks, and loose fittings. Repair all leaks immediately.	
☐	Inspect hoses for rips, tears, and leaks	
☐	Inspect tank foundations, connections, and piping systems for corrosion, leaks, and cracks. Repair as necessary.	
☐	Identify where spill clean-up materials are located to ensure they are easily reachable in case of a spill. co	
☐	Inspect tank labels to ensure they are clearly readable	
☐	Inspect cement walls diligently for open cracks. Ensure all cracks are sealed immediately.	
☐	Inspect joints of cement walls to asphalt surface. Ensure all joints are properly sealed and are not leaking material (or accumulated stormwater)	
☐	Ensure joints are freshly crack-sealed at least yearly	
☐	Inspect the ground outside of the secondary containment structure. Ensure evidence of brine material or accumulated stormwater is not visible on the outside of the structure.	

Oil Storage Area and Pollution Prevention Practices

Check Box	Method	Comment/Action Taken
☐	Maintenance garage floor is clean of any oil or fluid residue (*Any oil dry used to clean past spills is swept from floor*)	
☐	Spill clean-up materials are clearly accessible to employees in fluid storage areas	
☐	Pre-trip inspections are performed on all vehicles and heavy equipment prior to use (Use forms when possible)	
☐	Block interior floor drains when changing vehicle fluids nearby (P*revents oil in the sanitary system*).	
☐	Drip pans and funnels are used when transferring fluids or to collect leaking or dripping fluids	
☐	Drain all used oil filters for at least 12 hours prior to being recycled.	
☐	Inspect used oil filter canister for leaks, cracks, or drips. Repair or replace immediately.	
☐	All tanks and drums are inspected for leaks or cracks and are repaired or replaced immediately.	
☐	All tanks and drums are properly labeled, including used antifreeze tank	
☐	All tanks and drums are free of fluid residue (use spill pads, rags, and absorbents to clean and prevent leaks)	
☐	Drums are kept closed at all times, except when filling	
☐	Hand cans are properly labeled and stored in a secure manner (not balanced on tops of drums)	

Oil Storage Loft

Check Box	Method	Comment/Action Taken
☐	Tanks are inspected for leaks or cracks and are repaired immediately.	
☐	Tanks are properly labeled, with clear, readable labels	
☐	Tanks are free of fluid residue (Use spill pads and absorbents to clean and prevent leaks)	
☐	All joints, fittings, and hoses are inspected for leaks and repaired immediately.	
☐	The spill kit is located in this area and is fully stocked	

Appendix B: Three-Year PIPP Review Form

Date of Review:

Reviewer Name	
Print:	Signature:

1) Facility general information and Spill Response Team information is current and accurate	Yes	No
2) Site map is current and accurate	Yes	No
3) Polluting 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) Review Routine Inspections and have all forms available	Yes	No
7) Review spill reports (if applicable)	Yes	No
8) Review Spill Response Procedures and phone numbers for updates	Yes	No
9) Ensure Material Safety Data Sheets are up-to-date and available for all chemicals onsite	Yes	No

Additional Comments:

Appendix C: City of Auburn Hills DPW Facility Spill Response Plan

EMERGENCY NUMBERS (to be posted at key telephones throughout facility)

Agency Name	Phone Number
Local Fire Department	
Emergency	**911**
Nonemergency	**248-370-9461**
Police	
Emergency	**911**
Nonemergency	**248-370-9444**
Oakland County Environmental Health Department	
Nonemergency	**248-858-1312**
U.S. Coast Guard	
National Response Center	**800-424-8802**
Michigan Department of Environment, Great Lakes and Energy (EGLE)	
8:00 a.m. – 5:00 p.m. Warren District Office	**586-753-3700**
After Hours: PEAS Hotline	**1-800-292-4706**
Young's Environmental	
To be called for spill response services in the event the City is unable to properly respond, if not the Fire Dept. (i.e., large or hazardous spills)	**1-800-496-8647**
Great Lakes Water Authority (GLWA)	
For spills into the sanitary system, contact the local WWTP - DWSD	**844-445-4592**

SPILL RESPONSE PLAN - FOR SMALL SPILLS (Less than 5 gallons)

1. Make sure the area is safe for entry and the spill does not pose an immediate threat to the health or safety responder
2. Stop source of spill (plug hole, upright the container, shut off valve)
3. Check for hazards (flammable material, noxious fumes, cause of spill). If a flammable liquid is spilled, turn off engines and (nearby electrical equipment). If serious hazards are present leave the area and call 911. When in doubt consult the Material Safety Data Sheets for hazards
4. Notify Supervisor
5. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain)
6. If spilled material has entered a storm sewer, check catch basins and contact On-Call DPW Crew Leader.
7. Clean up spilled material/absorbent (do not flush with water)
8. Dispose of cleaned material/absorbent into a secure container for proper disposal
9. Complete a Spill Reporting Sheet

SPILL RESPONSE EQUIPMENT

- 5 lb floor dry
- 1 – Shovel
- 1 - Broom
- 1 – Absorbent Boom
- 5– Absorbent Pads
- Container for clean-up (dustpan, 5-gallon container, etc)

SPILL RESPONSE PLAN - MEDIUM SPILLS
(5 < 50 gallons)

1. Make sure the area is safe for entry and the spill does not pose an immediate threat to the health or safety of the responder.
2. Stop the source of the spill (plug hole, upright the container, shut off valve).
3. Check for hazards (flammable material, noxious fumes, cause of spill). If a flammable liquid is spilled, turn off engines and nearby electrical equipment. If serious hazards are present leave the area and call 911. When in doubt consult the Material Safety Data Sheets for hazards.
4. Contact co-workers and Supervisor for assistance and to make them aware of the spill and potential dangers.
5. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
6. Stop spill from spreading (use absorbent or other material).
7. If spilled material has entered a storm sewer, check catch basins and contact On-Call DPW Crew Leader.
8. Clean up spilled material/absorbent (do not flush with water) – If outside clean-up service is required contact.
9. Dispose of cleaned material/absorbent into a secure container for proper disposal.
10. Complete a Spill Reporting Sheet.

SPILL RESPONSE EQUIPMENT

- 20 lb floor dry
- 1 – Shovel
- 1 - Broom
- 2 – Absorbent Booms
- 20 – Absorbent Pads
- Container for clean-up (30 gal)

SPILL RESPONSE PLAN - LARGE SPILLS
(Greater than 50 Gallons or 50 pounds)

1. Make sure the area is safe for entry and the spill does not pose an immediate threat to the health or safety of the responder
2. Stop the source of the spill (plug hole, upright the container, shut off valve)
3. Check for hazards (flammable material, noxious fumes, cause of spill). If a flammable liquid is spilled, turn off engines and nearby electrical equipment. If serious hazards are present leave the area and call 911.
4. Call On Call DPW Crew Leader to make them aware of the spill and potential dangers. Notify police and fire departments if necessary for possible lane closure and need for assistance.
5. **LARGE SPILLS ARE LIKELY TO PRESENT A HAZARD AND WILL REQUIRE SPILL RESPONSE SERVICES FROM YOUNG'S ENVIRONMENTAL**
6. Protect all drains from spilled material (use absorbent or other material as necessary, cover or plug drain)
    a. A spill kit is located at DPW Facilities and consists of items listed on page 20
    b. The MSDS for salt and oil is kept in the DPW breakroom near the time clock
7. Stop spill from spreading (use absorbent or other diking material such as sand, dirt, etc.)
8. For spills of materials indoors, clean up spilled material with absorbents, oil dry, etc. (Do not flush with water). If material is spilled outside, a clean-up service may be required.
9. Spilled salt will be swept up and either transferred to the salt dome, or into a truck for road application use. Industry standards will be followed regarding usage concentration and application rates using normally accepted practices.
10. Dispose of cleaned material/absorbent into a secure container for proper disposal.
11. A call to EGLE PEAS at 800-292-4706 will be made to report the release.
12. A written report MUST be submitted within 10 days after the release to:

    Michigan EGLE
    525 West Allegan Street
    P.O. Box 30473
    Lansing, MI 48909-7973

    Oakland County Health Department
    1200 N. Telegraph Road, 34 East
    Pontiac, MI 48341

SPILL RESPONSE EQUIPMENT

- 20 lb floor dry
- 1 - Broom
- 1 – Shovel
- Caution Tape
- 5– Absorbent Booms
- 20 – Absorbent Pads
- Container for clean-up (30 gallon)

Appendix D: SPILL REPORTING SHEET

Date of Incident	
Time of Incident	
Location & Cross Streets	
Type of Spill	
Estimated Quantity	
Reported To	
Time Reported	
Responsible Party	
Address	
Phone Number/Contact	
Describe materials used to clean up the spill:	
Describe response measures that have been done, and the schedule for completion of other measures to be taken, or both	
Describe measures taken to prevent the recurrence of similar releases	
Completed By:	

Additional Notes: