April 2016

The Monthly Dirt

A Monthly Newsletter on the California Construction General Permit
By WGR Southwest, Inc.

Kick the Bucket

Spills! Are you ready for them? Is your construction crew ready for them? What is the first thing that you should do when there is a spill? It might not be the action you think should happen first. In this edition of *The Monthly Dirt*, we will explore how to prepare for a spill and what State and Federal agencies expect of construction sites when it comes to spill prevention, response, cleanup, and notifications.

Regulatory Requirements – Not just industrial facilities have regulations concerning preventing and responding to spills – construction projects are also regulated by the State Water Board and the United States Environmental Protection Agency (USEPA). The Construction General Permit (CGP) requires that all risk levels develop a spill response and implementation element of the SWPPP prior to commencement of construction activities. Specifically, the SWPPP must identify the location of equipment and materials available onsite for the cleanup of spills and leaks. Normally, we visualize oil and fuel when we think of spills and leaks, but, please note, that the CGP does not mention a specific material. Presumably, this section of the permit would apply to any material present at the construction site that could be spilled or leaked including non-oil substances such as concrete and paint washout materials; liquid and powder concrete additives; paints; solvents; detergents; acids; lime; and fertilizers. The CGP states that the spilled or leaked material must be cleaned up immediately and disposed of properly (as a hazardous or non-hazardous waste). Finally, the CGP requires something that very few construction sites do – which is to assign personnel to response activities and train them. But, those are only the Water Board's requirements, there are other Federal, State, and local requirements for responding to spills. For more information on additional regulatory requirements, please see the related articles on the next page.

Spill Equipment and Materials – So, what do you have onsite to respond to spills? Most people will point to a spill kit, a bag of granular absorbent, or oil-absorbing pads. While these may be good for a small spill of oil or fuel, they may not be effective at all for absorbing an aqueous solution or a powder. When it comes to responding to a spill you want to 1) stop the flow, 2) isolate the spilled material, 3) recover the spilled material, and 4) clean contaminated surfaces and storm water conveyances. Your arsenal of cleanup materials will depend upon the amount and type of materials that you have at the construction site. Typically, you would want to have tools such as shovels, push brooms, and squeegees. You will also want something to stop the flow; in a pinch, shoveling dirt in the pathway of the flow can do the trick. You will then need absorbent materials and/or a wet/dry vacuum to recover the spilled liquid or powder. Finally, you will need to identify the means to clean up the contaminated surfaces. Soil surfaces can be excavated and disposed of following hazardous waste regulations. Impervious surfaces and storm drains can be washed as long as the rinsate is captured and disposed of properly.

Train the Response Team – The CGP requires that the response team personnel be identified in the SWPPP. It is our observation that very few SWPPPs identify onsite spill response personnel. These members of the spill response team also need to be trained (and that means documented training). We have developed a very simple, yet, very effective means of training on spill response and cleanup. We call it the "Kick-the-Bucket" drill. In fact, we suggest training all on-site personnel using this simple 20-minute demonstration. It involves simulating a small spill by kicking over a 5-gallon bucket of water somewhere on your site. While everyone is standing there just watching the water enter the drain inlet, the trainer talks through the appropriate response actions. Questions are asked. What should we do first? Where are the clean-up supplies? Participation is required. Go get the supplies! Use them to clean up the spill! The trainer talks through the next steps. We recommend using this at your site. In this newsletter, you will find a guide to help you conduct a Kick-the-Bucket drill at your construction site. *MD*

Reportable Spills

When is a spill reportable? Who needs to be notified? These are common questions that are asked during the Kick-the-Bucket Drill; and should be asked before spills occur. They should also be addressed in each project's SWPPP. The following are guidelines for reporting a spill.

According to the California Governor's Office of Emergency Services (CalOES), the following types of spills must be reported:

- Discharges or threatened discharges of oil in marine waters;
- Any spill or other release of one barrel (42 gallons) or more of petroleum products at a tank facility;
- Discharges of any hazardous substances or sewage, into or on any waters of the State;
- Discharges that may threaten or impact water quality;
- Any found or lost radioactive materials;
- Discharges of oil or petroleum products, into or on any waters of the State; and
- Hazardous Liquid Pipeline releases and every rupture, explosion or fire involving a pipeline.

According to CalOES, the following notifications must be made immediately:

- ✓ The Local Emergency Response Agency (911)
- ✓ The Local Unified Program Agency (if different from the local fire department). For example, in San Joaquin County, the local agency is San Joaquin County Office of Emergency Services (209) 953-6200. Look this information up ahead of time and put it in your SWPPP. Usually it is readily available by doing an internet search for "reporting spills in [your county or city]".
- ✓ CalOES State Warning Center: (800) 852-7550

But, that is just a start of the notifications, for NPDES Permit holders, the legal responsible person or their representative must also notify the Regional Water Quality Control Board of spills or discharges of illicit materials to the storm drain which would constitute non-compliance with the permit. The name and contact information for the appropriate Regional Board should be included in the SWPPP.

Other agency notifications may also be required. Depending upon the location of the project and the nature of the spill these notifications may include:

- National Response Center
- United States Coast Guard
- California Highway Patrol
- Cal/OSHA
- Dept. of Toxic Substances Control
- Dept. of Fish and Wildlife

For more information on spill reporting requirements, download and read the CalOES California Hazardous Materials Spill / Release Notification Guidance:

http://www.caloes.ca.gov/FireRescueSite/Documents/CalOES-Spill_Booklet_Feb2014_FINAL_BW_Acc.pdf

The *Monthly Dirt* recommends that this guidance document be printed and posted on your job site or within the SWPPP document at the project. You might also consider referencing it during the "Kick-the-Bucket" drill. *MD*

Upcoming Training

Got SWPPP? Classes coming to Lodi:

- ✓ PDU Week, May 23 -27, 2016
- ✓ QSP/QSD Training, July 12 - 14, 2016

(For more information about these classes, go to www.gotswppp.com.)

Quick QSP Quote

The Construction General Permit requires chemicals to be stored in "watertight containers (with appropriate secondary containment to prevent any spillage or leakage) or in a storage shed (completely enclosed)." One good way to accomplish this is to rent a storage shed / container with a lockable door at one end. Elevate the side with the door by placing a railroad tie under the entrance. This will help contain liquids that spill within the container.

Construction Sites and SPCC Plans

The SWPPP may not be the only compliance document your project needs, it may also need a Spill Prevention Control and Countermeasures (SPCC) Plan. Construction projects must meet SPCC regulatory requirements if they meet the following three criteria:

- It stores, uses, transfers, or otherwise handles oil (including fuel);
- It has a maximum aboveground storage capacity greater than 1,320 gallons of oil (which includes both bulk and operational storage volumes) OR total underground storage capacity greater than 42,000 gallons of oil; AND
- There is a reasonable expectation (based on the location of your site) that an oil spill would reach navigable waters or adjoining shorelines of the United States.

The following items at your construction site are exempt from SPCC requirements and are not included in the storage capacity calculations:

- Completely buried tanks that are subject to all the technical requirements of the underground storage regulations;
- Storage containers with less than 55-gallon storage capacity (both aboveground and belowground tanks); and
- Permanently closed tanks.

When calculating the storage capacity, ***you must include the capacity of the fuel and fluid tanks of onsite mobile and operational equipment*** (e.g., fuel tanks on bulldozers, cranes, backhoes of greater than 55 gallons).

Information source:
EPA/305-B-04-003 EPA Office of Compliance, Managing Your Environmental Responsibilities: A Planning Guide for Construction and Development; April 2005

Please contact us if you have any questions ...

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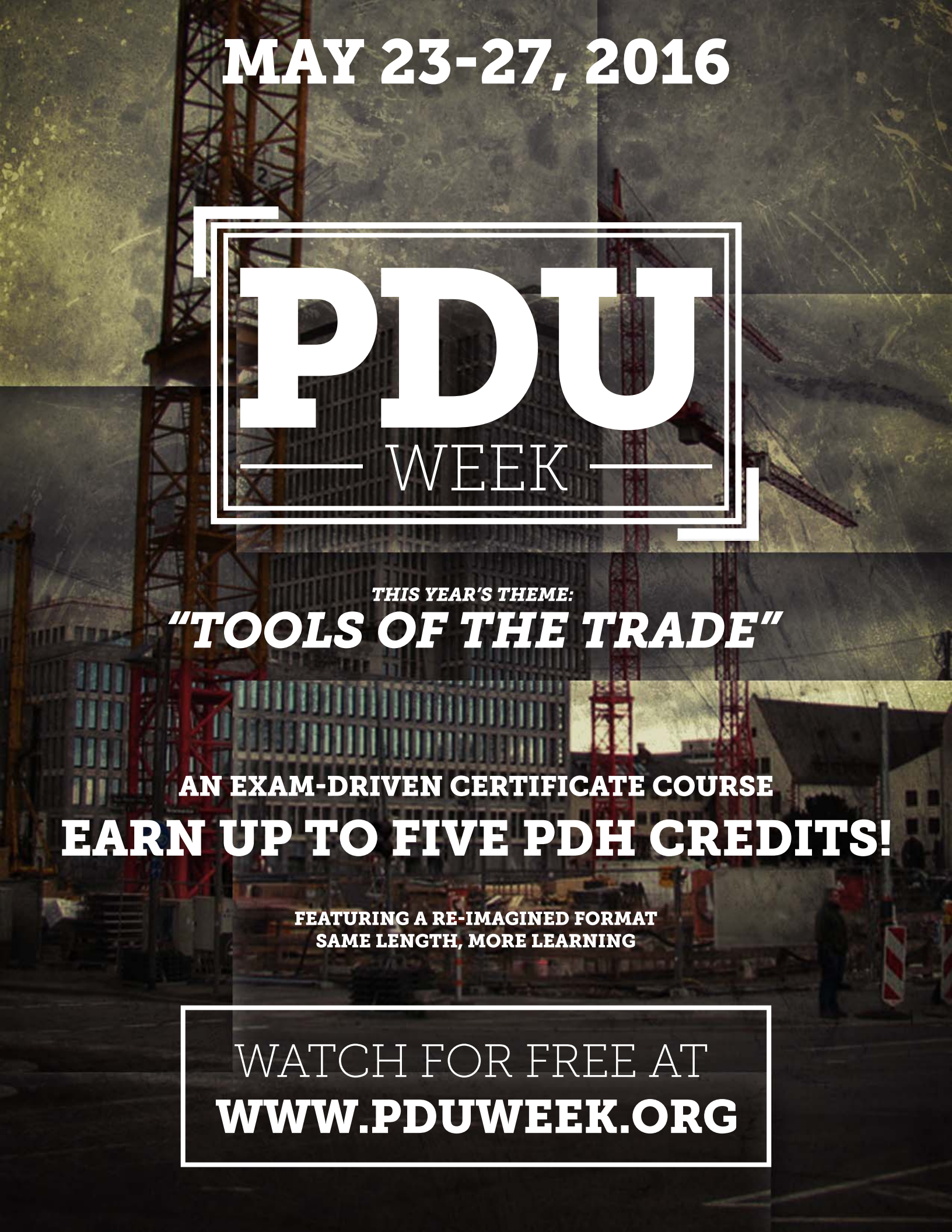
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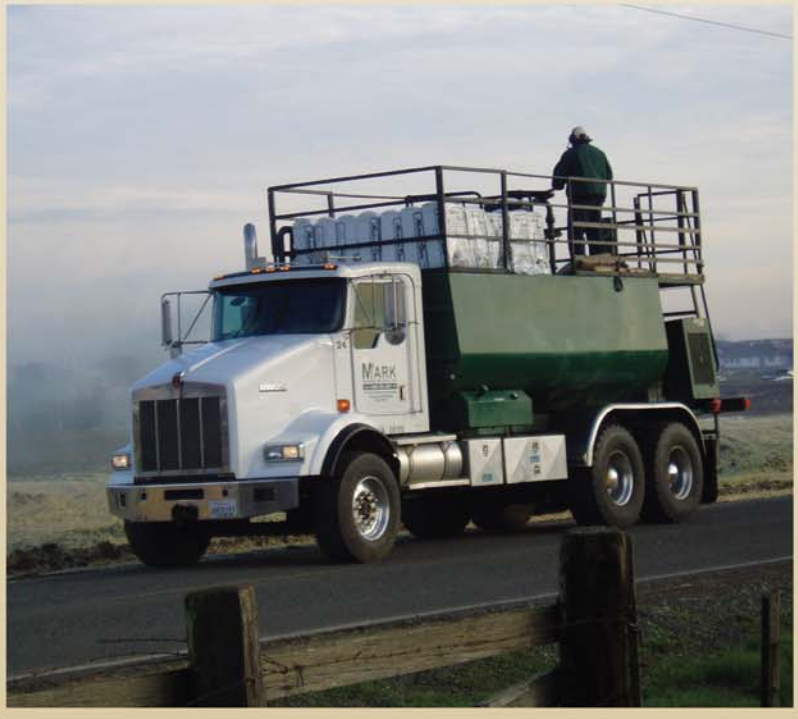

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STORMWATER MANAGEMENT PERMITS & LOW IMPACT DEVELOPMENT (LID)

Wednesday, May 11, 2016

City of Redding-Community Room, 777 Cypress Ave., Redding, CA 96001

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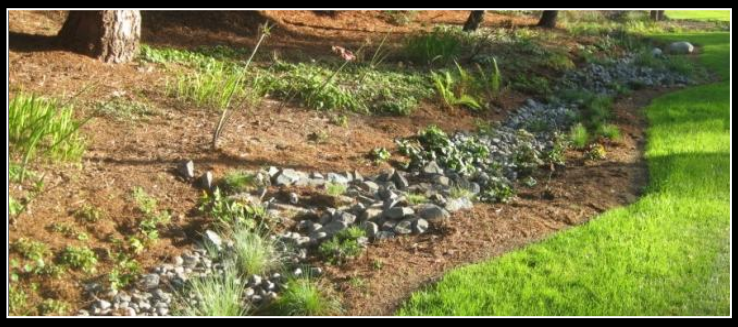
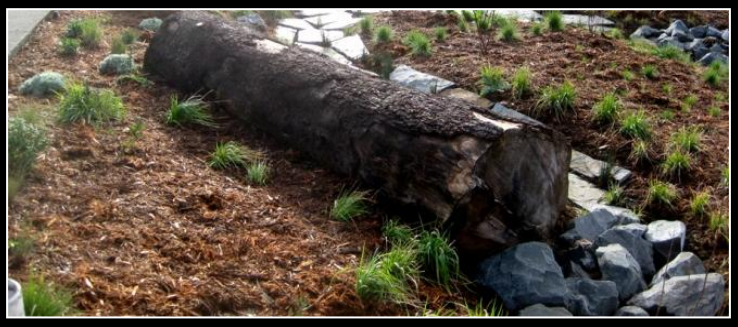
Streamline Planning Consultants

City of Redding California Public Works Department





9:00-10:00	Industrial General Permit: When you might need LID
10:00 -10:15	**Break**
10:15-11:00	Construction General Permit: Post-construction Requirements
11:00-12:00	City of Redding MS4 General Permit Requirements
12:00-1:15	**Lunch (no host)**
1:30-2:45	LID-A Holistic Approach to Achieving Stormwater Permitting Compliance
2:45-3:00	**Break**
3:00-4:00	LID-Practical Installation Methods and Overcoming Common Hurdles

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The Kick the Bucket Drill

It is necessary and, in many cases, required to train employees, contractors, and other staff on how to respond to a spill. We have found a simple simulated spill to be far more effective in communicating how to properly respond to a spill than by having the participants just listen to a classroom presentation. We call it the Kick-the-Bucket Drill. Here is how this 20-minute drill works:

Prep …

- Fill a clean 5-gallon bucket with tap water
- Identify a place to stage your drill. Ideally, to make the simulation more interesting, pick a location up-gradient of a drain inlet or where flow leaves your site. Make sure that the location you select is in a safe place away from vehicle or other hazards.
- Make sure you know the location of the spill equipment and cleanup supplies. Check to ascertain the condition and stock of supplies. Even if supplies are not adequately stocked or present, the demonstration will be meaningful if everyone else discovers that to be the case. It should lead to some meaningful conversations and, hopefully, decisions.
- Make sure that you have permission to use some of the spill supplies for the spill response simulation.

The Set-up …

- Gather everyone around the bucket. Kick the bucket over while they are watching.
- Explain the scenario to them while they watch the water flow towards the drain. Usually, I will say something like, "*The pipefitters were hurrying out the gate to go to lunch and they were in such a hurry that they forgot about the 5-gallon bucket of cutting oil sitting on their tailgate. You walked out of the job trailer and discovered this (point to the spill).*"

The Training …

- **Ask the group: What should you do first?** Wait for responses. When someone says that the spill response supplies should be used. **Ask the group: Where are the supplies located?** Wait for a response. If they don't know, tell them where they can be found. Send a 2 or 3 people to go get them.
- While they are gone looking for and gathering the spill supplies. **Ask the group: What did those who went to get the supplies not think of? Could vehicle or foot traffic move through this spill zone and make it worse?** Instruct 1 or 2 persons to stand in front of the spill and direct traffic around it. If traffic cones are available, have someone grab them and set them up.
- When those who went to get the cleanup supplies return, **ask the group: How should we clean up the spill?** They should identify the following actions: 1) stop the flow, 2) isolate the spilled material to keep it from going down the drain inlet, 3) recover the spilled material, and 4) clean up the contaminated surfaces and storm water conveyances. You may need to help walk them through these steps. **Ask the group: How can we keep the material from going down the drain?** Let them suggest ways. **Ask the group: Did any of the spilled material leave the site or go into the drain inlet?** It may be obvious. Try to have placed the bucket so that this is unavoidable. **Ask the group: Where does the drain inlet discharge?** If they don't know, ask them how they can find out. **Ask the group: Is it important to know where the drain inlet discharges?** The answer is, obviously, "yes".
- Tell the group that the spill has now been contained and for the most part cleaned up. **Ask the group the following questions:**
  - **What do we do about the spilled material that went into the drain inlet and, presumably, off site?**
  - **What do we do with the used absorbents and contaminated cleanup supplies?**
  - **If the spill was on soil, what do we do with the contaminated soil?**
  - **If the spill was on a paved surface, will a sheen or contaminants be present the next time storm water flows across the spill zone? What should be done to keep the sheen or contaminants from being washed off by the next storm event?**
- **Ask the group: Who do we need to tell or report to about this spill?** Talk through the notification requirements to CalOES, 911, the local hazardous materials oversight agency, the Regional Water Quality Control Board, and other agencies. In addition, talk about internal company-specific notification, documentation, and reporting requirements.