

Environmental Compliance Assurance Procedure (ECAP) for Maintenance Activities

Purpose

The purpose of this procedure is to avoid environmental problems that could occur during highway maintenance activities and to understand the required communication and response measures to prevent violations. This procedure is a supplement to the Programmatic Field Book for Maintenance Work and serves as ECAP for maintenance as provisioned in WSDOT General HPA permits and consistent with Chapter 700 of the WSDOT Environmental Procedures Manual (EPM).

Notification and Response Procedures

1. Spill Response Related To WSDOT Operations [Not third party spills]

All maintenance activities will have available spill kits used for small spills related to equipment failure. If you have spilled oil or other hazardous material under the following circumstances the notification procedures below shall be followed:

- For spills into or that could enter state waters, municipal storm sewers, or you observe a sheen from petroleum products on the water, immediately notify the RMEC **AND** the following 24 hour numbers:
 - National Response Center – 1-800-424-8802
 - Washington Emergency Management – 1-800-258-5990
 - Ecology Regional Offices (See Ecology region map below)
 - Southwest 1-360-407-6300
 - Northwest – 1-425-649-7000
 - Central – 1-509-575-2490
 - Eastern – 1-509-329-3400

When making notification, be prepared to give the following information: Where is the spill? What spilled? How much spilled? How concentrated is the spilled material? Who spilled? Is anyone cleaning up the spill? Are there resource damages (e.g. dead fish)? Who is reporting the spill? And how can we get back to you?

- For spills to soil, water or on the roadway that would require more than a basic spill kit to clean up immediately contact the RMEC and Ecology Regional Office (see contact information above).
- Notification is not necessary for spills that meet **ALL** of the following criteria:
 - The spill is located in an area that is fully contained (such as some maintenance yards, or enclosed paved areas).
 - Can be cleaned up immediately by on-scene personnel using resources immediately available (e.g. the spill kit in your truck); no additional personnel, equipment or resources required.
 - Can be disposed in existing drums used for absorbent materials.

RMEC Contact Information:

NWR	Andrew Gross	206-440-4951
OR	Scott Shannon	360-570-6707
SWR	Tom Kohl	360-905-2183
SCR	Scott Anfinson	509-577-1758
NCR	Joe Williams	509-667-3054
ER	Carson Welch	509-324-6133



Ecology Regional Offices

2. **Planned In-water Maintenance Work** – Maintenance work in or adjacent to streams, wetlands, lakes, or marine water may require some form of environmental review and/or notification. This is coordinated through the Regional Maintenance Environmental Coordinator (RMEC). **The RMEC must be notified before beginning any work in watercourses or that could impact water.** If prior notification is not possible due to an emergency action, then follow the emergency notification procedures below.
3. **Emergency In-water Maintenance Work** – Emergency response notification procedures for in-water work have been developed and are made available by each region environmental office. These notification procedures must be followed for all emergency in-water work. ***The WDFW through the state Hydraulic Code requires immediate notification for any emergency work in waters of the state. The WDFW emergency hotline number is 360-902-2537.*** The RMEC or Region Environmental Office will make additional notifications as necessary following their region emergency notification procedures [includes the Corps, NMFS, USFWS etc.]

Maintenance Non-Compliance and Violation Reporting

Compliance Monitoring and Adaptive Management – During the course of maintenance work, permit provisions that apply to the work will be followed and any appropriate BMP's will be installed and monitored for effectiveness. **If problems occur:**

The site monitor (lead technician or designee) will immediately notify the Supervisor and RMEC (or designee if the RMEC is not available) of any apparent failures to meet permit compliance or BMP outcomes.

The RMEC will provide recommendations for corrective action to avoid impacts and achieve BMP outcomes as appropriate. The RMEC will determine whether the apparent failures to meet permit compliance or BMP outcomes require notifying permit agencies.

In cases where regulations or permits are not complied with the RMEC will notify M&O Water Quality Manager, Region Environmental Manager, Region Area Superintendent , and Region Maintenance Engineer.

Violation Reporting – If a maintenance action results in a notification from a resource agency that a violation has occurred the following reporting process will be followed:

On-site maintenance personnel will immediately notify the RMEC, Region Environmental Manager, Maintenance Superintendent, and Region Maintenance Engineer. Notification will include a description of the activity that triggered the violation, time and location of work, potential solutions to the problem, how to prevent the situation in the future, and any related constraints or safety issues.

The Region Environmental Manager and RMEC serves as the lead for resolving the issue that caused the violation. The RMEC or Region Environmental Manager will notify the Headquarters Maintenance and Operations Water Quality Manager and Director of Environmental Services. The Headquarters Maintenance and Operations Water Quality Manager will notify the Director of Maintenance and Operations.