

Environmental Compliance Assurance Procedure (ECAP) for Maintenance Work Activities

Purpose

The purpose of this procedure is to avoid environmental problems that could occur during highway maintenance activities and to understand the appropriate 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 790 Implementing Environmental Commitments of the WSDOT Environmental Procedures Manual (EPM).

Notification and Response Procedures

1. Spill Response

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? Who spilled? Are there resource damages (e.g. dead fish)? And who is reporting the spill?"

- For spills to soil 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	Mark Cornwall	206-440-4523
OR	Scott Shannon	360-570-6707
SWR	Candace Jochim	360-905-2173
SCR	Scott Anfinson	509-577-1758
NCR	Joe Williams	509-667-3054
ER	Dean Smith	509-324-6136



- 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 in-water work activity.** If prior notification is not possible due to an emergency action, then follow the emergency notification procedures below.
- 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.
- Adaptive Management (Implementing BMP's and Corrective Actions)**¹ – During the course of maintenance work, BMP's are installed and monitored. BMP monitoring occurs both during and after the maintenance work to evaluate the effectiveness.
 - The site monitor (lead technician or designee) will notify the lead technician or the RMEC of any apparent failures to meet BMP outcomes.
 - Recommendations for corrective action will be provided as appropriate. If a problem occurs, corrective action will be taken to avoid impacts and to achieve BMP outcome.
- Violation Reporting**² – 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 and Maintenance Superintendent. 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.
 - RMEC serves as the lead for resolving the issue that caused the violation, and will notify the Region Environmental Manager and HQ M&O Water Quality Manager.
 - The HQ M&O Water Quality Manager will elevate further notification consistent with EPM Chapter 790.

¹ Consistent with Element 6 Adaptive Management of the ESA Regional Road Maintenance Program & expired IL 4057 ECAP for Maintenance

² References Chapters 790 Implementing Environmental Commitments of the WSDOT Environmental Procedures Manual.