



Massachusetts
Department
of
ENVIRONMENTAL
PROTECTION

Municipal Compliance Fact Sheet

Environmental Compliance in Public Works Operations

What You Should Know About This Issue:

As a senior municipal official representing the interests of your community, you should be aware of the public works operations that may create environmental compliance issues. A variety of state environmental requirements apply to using and storing hazardous chemicals and wastes, running a fleet of vehicles and construction equipment, and doing work that can affect water resources.

While keeping track of these can be a challenge, environmental compliance is important primarily for the health and safety of workers and the public. Noncompliance is typically much more expensive than compliance. Cleanup costs can be prohibitive to municipal budgets and enforcement actions by MassDEP can include significant financial penalties.

Examples of Municipal Facilities & Activities Involved:

- Hazardous waste management and storage.
- Leak, spill and environmental emergency reporting.
- Vehicle operation, fueling, maintenance and washing.
- Wastewater discharges and runoff management.

Common Compliance Issues:

Hazardous Waste Management & Spills

- Know your facility's hazardous waste and waste oil generator status. This determines how much waste you may accumulate at your site at one time, and how quickly you need to ship it off-site for recycling or disposal. Before generating, accumulating, or shipping any hazardous waste, you must either register or notify as a generator with MassDEP.
- Label hazardous waste and waste oil storage drums, tanks, and other containers with the names of materials they hold and the hazards they present (e.g., corrosive, ignitable) and the dates when accumulation began. Ensure that waste containers are compatible for the wastes they hold, are in good condition and are kept tightly closed while in use. Hazardous waste and waste oil storage drums must be stored on impervious surfaces in designated and marked storage areas, with secondary containment areas to guard against leaks or spills.
- Perform regular inspections of hazardous waste and waste oil storage.
- Notify the local fire department and MassDEP within two hours of any leak, spill or other environmental emergency involving more than 10 gallons of petroleum, more than one pound of hazardous chemicals, or an imminent threat to public health or safety. MassDEP operates a 24-hour toll-free reporting line at 1-888-304-1133.

Vehicle Operation, Fueling, Maintenance & Washing

- Ensure that Stage II vapor recovery systems are installed and regularly inspected and tested at all municipal fueling facilities, and submit annual compliance certifications to MassDEP.
- Keep parts cleaner lids closed except when in use. Place oily shop rags in sealed, labeled metal containers and have them laundered by a licensed facility.
- When washing vehicles with detergents/and or high-pressure hoses, do so only indoors where floor drains lead to a municipal or Massachusetts Water Resources Authority (MWRA) sewer through an oil/water separator, or to a MassDEP-approved, certified tight tank that is pumped out on a regular basis by a licensed hauler. Vehicles may also be washed at an offsite commercial car wash or by a mobile vehicle washing business that collects wastewater.
- Turn engines off when cars, trucks, and construction equipment are not actively in use. State law and MassDEP regulations limit vehicle idling to no more than five minutes in most cases with a few exceptions.



Wastewater & Runoff Management

- Eliminate floor drains whenever possible, notifying MassDEP both 30 days before work begins and after it is completed. At a minimum, ensure that floor drains lead to a public sewer or to a MassDEP-approved tight tank. It is illegal for a floor drain to empty into ground or surface water. MassDEP guidance identifying the proper notifications and closeout procedures can be found at: www.mass.gov/dep/water/laws/ws94001.htm
- Store road salt piles in sheds or other covered enclosures and sweep up salt and salt/sand mixtures to prevent rain and wind from washing or blowing these materials.
- Prepare and implement a Stormwater Pollution Prevention Plan to ensure that rain and snow melt do not co-mingle with minor chemical and fuel spills, solid or hazardous wastes, or wastewater from vehicle fueling, maintenance and washing operations.

Environmental Stewardship Tips:

An Environmental Management System (EMS) can improve regulatory compliance and promote environmental stewardship at municipal facilities. An EMS is a set of policies, procedures and tools an organization can use to analyze, control, and reduce its environmental impacts, operate more efficiently, and save money.

There are many opportunities for pollution prevention and waste reduction in day-to-day municipal public works operations. Among them:

- Explore possible cost savings from using a single vehicle fuel vendor and consider switching to biodiesel as a primary truck and heavy equipment fuel. Your municipality may be able to leverage one or more statewide fuel contracts, which can be found by searching on the keyword "fuel" at <http://www.comm-pass.com>.
- Purchase vehicles powered by alternative fuels or hybrid engines when replacing cars, trucks, and heavy equipment or adding new vehicles to the municipal fleet.
- Remove underground storage tanks that contain petroleum or waste oil, which are not in an impermeable secondary containment such as vault, and switch to aboveground tanks. This will considerably reduce the likelihood of leaks and spills.
- Obtain MassDEP approval to re-use catch basin cleanings such as leaves, sand, and twigs to grade and shape a landfill undergoing closure, or as daily cover or grading material at an active landfill.
- Use paints and solvents that are lower in volatile organic compounds or contain none at all. Buy these items in bulk quantities and distribute them in reusable containers as needed to reduce waste and save money.

Technical Assistance, Outreach, Grants & Loans:

To boost local waste reduction, recycling, and natural resource conservation efforts, municipalities may apply for MassDEP recycling equipment and climate protection grants. The annual application deadline is September 15. For more information, see www.mass.gov/dep/recycle/recawgr.htm

Contacts at MassDEP for More Information:

- MassDEP Hazardous Waste webpage: www.mass.gov/dep/recycle/hazwaste.htm
- MassDEP Water, Wastewater & Wetlands webpage: www.mass.gov/dep/water/index.htm
- Call the MassDEP 24-Hour Emergency Response Line toll-free at 1-888-304-1133 in the event of an oil or hazardous chemical release.
- Contact the service center in the MassDEP regional office with jurisdiction in your city or town to be connected with staff experts who can answer your environmental compliance questions. Find a listing of communities covered by each regional office at: www.mass.gov/dep/about/region/findyour.htm

Subscribe to the MassDEP e-newsletter at: www.mass.gov/dep/public/publications/enews.htm

Massachusetts Department of
Environmental Protection
One Winter Street
Boston, MA 02108-4746
<http://www.mass.gov/dep>

Commonwealth of
Massachusetts
Deval L. Patrick, Governor
Timothy P. Murray, Lt. Governor

Executive Office of
Energy & Environmental Affairs
Ian A. Bowles, Secretary

Department of
Environmental Protection
Arleen O'Donnell,
Acting Commissioner

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