

# Environmental Compliance Assurance Procedure (ECAP) for Maintenance Activities

The purpose of ECAP 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

### 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, follow the notification procedures below.

- For spills into or that could enter state waters, municipal storm sewers, or you observe a sheen from petroleum products on the water, immediately contact the following (available 24-hours):
  - WSDOT RMEC
  - Department of Ecology Regional Office
  - National Response Center: 1-800-424-8802
  - Washington Emergency Management: 1-800-258-5990

Be prepared to provide:

- Location of the spill
  - What spilled
  - How much spilled
  - How concentrated is the spilled material
  - Who spilled
  - Is anyone cleaning up the spill
  - Resource damages (e.g. dead ish)
  - Who is reporting the spill and their contact information
- Contact the RMEC and Ecology Regional Office (see contact information above) immediately for spills to soil, water or on the roadway that would require more than a basic spill kit to clean up.
  - 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).
    - The spill 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.
    - The spill can be disposed in existing drums used for absorbent materials.

### **Planned In-water Maintenance Work**

Contact the RMEC before beginning any work in watercourses or that could impact water. 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 RMEC. If prior notification is not possible due to an emergency action, follow the emergency notification procedures below.

### **Emergency In-water Maintenance Work**

Contact the WDFW emergency hotline number at 360-902-2537 for any emergency work in waters of the state. The RMEC or Region Environmental Office will make additional notifications (Corps, NMFS, USFWS, etc.) as necessary. Emergency response notification procedures for in-water work have been developed and are made available by each region environmental office.

## **Non-Compliance and Violation Reporting Procedures**

### **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:

1. 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.
2. 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.
3. 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:

1. 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.

2. 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.
3. The Headquarters Maintenance and Operations Water Quality Manager will notify the Director of Maintenance and Operations.

## Contact information

WSDOT RMECs (see WSDOT's [Region Map webpage](#) for Regional boundaries):

- Northwest: Andrew Gross, 206-440-4951
- Olympic: Paul Dreisbach, 360-570-6683
- Southwest: Tom Kohl, 360-905-2183
- Southcentral: Scott Anfinson, 509-577-1758
- Northcentral: Joe Williams, 509-667-3054
- Eastern: Carson Welch, 509-324-6133

Department of Ecology Regional Offices (see Ecology's [Regional office contacts website](#) for Regional boundaries and additional contact information):

- Southwest: 1-360-407-6300
- Northwest: 1-425-649-7000
- Central: 1-509-575-2490
- Eastern: 1-509-329-3400