

Environmental Management Practices



Activity: Automobile Storage and Transport

EMP No. O-1

Description:

Prevent discharge of pollutants related to storage of vehicles, including car washing activities, and accidental spills and leaks from fueling or maintenance activities.

Targeted Activities:

- Vehicle Storage
- Vehicle Washing
- Vehicle On- and Off-loading
- Vehicle Fueling
- Vehicle Maintenance

Development EMPs:

- When practicable, design new facilities to minimize travel distance from off-loading and on-loading facilities to storage area to minimize air emissions
- Slope storage areas to enhance collection through separate storm drain system
 - Storm water systems should be equipped with devices such as oil/water separators to minimize the release of oils and greases.
 - Maintain oil/water separators as discussed in EMP O-6.
- On-loading/Off-loading and storage areas should be paved to reduce dust emissions
- Install separate collection system for areas where maintenance or washing occurs. Discharge contaminated waters from these areas to a POTW.
 - Floating materials should be disposed of at a POTW or through a recycler, if possible
 - Solids should be disposed of at a permitted landfill
- Fuel dispensing facilities should be installed as discussed in EMP O-6.
- Separate vehicle washing areas should be designated and installed as discussed in EMP O-12.
- Storage areas should be bermed or raised above surrounding elevations to minimize run on of stormwater.
 - Pavement should be sealed to minimize release of pollutants into soils
 - Vehicle washing solvents should be stored as described in EMP O-5 with proper secondary containment and leak detection



Potential Pollutants:

- Oil and Grease
- Sediments
- Floatables
- Soaps
- Combustion By-products

Target Environmental Media:

- Air
- Surface Water

US Regulatory Requirements & Guidance:

- 40 CFR 50 -99 Clean Air Act Regulations
- 40 CFR 110.3 Discharge of Oil
- 40 CFR 112 Oil Pollution Prevention (SPCC/OPA Plans)
- 40 CFR 117.3 Determination of Reportable Quantities for a Hazardous Substance
- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges
- 40 CFR 260-262, 268, and 270-272 Hazardous Waste Management
- 40 CFR 264-265 Preparedness, Prevention and Contingency (PPC) Plan
- 40 CFR 401 Effluent Limitation Guidelines
- 49 CFR 171-173, 175, and 177 Department of Transportation (DOT) Regulations
- EPA - Storm Water Management for Industrial Activities - Developing Pollution Prevention Plans and Best Management Practices
- EPA - Sector Notebook - Profile of the Water Transportation Industry
- State and Local Regulations as appropriate to the Port

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Operational EMPs:

- Retrofit existing vehicle maintenance facilities to include oil/water separators for storage and vehicle maintenance areas.
- Ensure vehicle washing and maintenance areas are routed to sanitary sewers
 - Do not allow vehicle washing where wash water can enter the storm drain system
- Inspect storage area frequently for leaks of oils, hydraulic fluids, antifreeze and other lubricants from vehicles
- Inspect fuel equipment as described in EMP O-6.
- Inspect pavement
 - Seal cracks and joints regularly to minimize release of contaminants to underlying soils.
- Encourage reduction in engine idling during on- and off-loading activities to reduce air emissions.
- Encourage minimizing re-storage and reshuffling of vehicles in storage area to reduce air emissions.
- Encourage use of water soluble vehicle protection coatings

Considerations:

- Provide training or training materials to port operations staff on appropriate controls.
- Costs for new fueling and washing facilities should be moderate.
- Conduct routine inspections of storage and maintenance areas including stormwater control devices, painting, and maintenance areas
- Costs for retrofitting should be low to moderate.