



Standard Operating Procedure 014: Environmental Management System and Storm water Pollution Prevention Program Requirements

1.0 PURPOSE

To reduce the storm water and ground contamination impacts associated with improper materials storage and disposal, and/or accidental spills associated with corrective and preventative chassis, container, reefer, and vehicle/equipment maintenance activities and ensure compliance with the Federal Oil Pollution Act of 1990, the Federal Clean Water Act, the Federal Resource Conservation and Recovery Act, the Virginia Pollution Discharge Elimination System, and the Occupational Safety and Health Administration.

2.0 REFERENCES

- 2.1 VPDES Permit NIT VAR050313
- 2.2 VPDES Permit NNMT VAR050314
- 2.3 VPDES Permit PMT VAR050312
- 2.4 VPDES Permit VIG VAR051764
- 2.5 VPDES Permit VIP VAR050313
- 2.6 VPDES Permit RMT VAR051020
- 2.7 NIT, NNMT, PMT, RMT, VIP, & VIG SWP3
- 2.8 NIT, NNMT, APMT, VIP, RMT, & VIG SPCC

3.0 SCOPE & RESPONSIBILITIES

- 3.1 All areas owned by the Port of Virginia, operated by the Port of Virginia, and/or licensed for use by third party tenants will be subject to the work area and inspection requirements listed herein and any additional regulations/requirements provide in the Port of Virginia's Storm Water Pollution Prevention Plan (SWP3) and the Port of Virginia's Spill Prevention, Control and Countermeasures Plan (SPCC).
- 3.2 The Sustainability Department is responsible for quarterly stormwater/compliance inspections of maintenance and repair areas on The Port of Virginia's Marine Terminals.
- 3.3 The Sustainability Department is responsible for the oversight of the required monthly stormwater/compliance inspections of all maintenance and repair areas on The Port of Virginia's Marine Terminals.

4.0 REQUIREMENTS

4.1 WORK AREA REQUIREMENTS

4.1.1 Above-Ground Storage Tanks (AST)

- 4.1.1.1 Please see **SOP-010** for all AST requirements.

4.1.2 Materials Storage



4.1.2.1 Flammable materials shall be stored in flammable cabinets, including aerosol cans containing paints, solvents, lubricants, and cleaners.

4.1.2.2 Scrap steel, brake shoes, and other parts shall be stored under cover or up off of the ground.

4.1.2.3 Tires that are not on rims must be stored under cover.

4.1.2.4 All materials must be properly labeled with contents.

4.1.3 **Hazardous Waste, Universal Waste, and Used Oil**

4.1.3.1 Please see **SOP-006** for complete procedures for waste materials.

4.1.3.2 All drums holding materials must be labeled with the proper contents and have the required Accumulation Start Date (ASD), along with adequate secondary containment.

4.1.3.3 A copy of all hazardous waste manifests must be kept on site for at least one year.

4.1.4 **General Housekeeping**

4.1.4.1 Internal and external work areas shall be kept free of litter and debris.

4.1.4.2 Machinery, equipment, or parts that are not necessary for operations and/or are in disrepair should be removed from the property.

4.1.5 **Spill Clean-up**

4.1.5.1 There should be no evidence of spills anywhere that can come in contact with storm water. Leaking equipment should be fixed or have drip pans to catch the leaks so the fluid does not come in contact with stormwater.

4.1.5.2 Spills are to be cleaned up immediately, refer to **SOP-016** for proper spill procedures.

4.1.5.3 Spill Pads – please see **SOP-006** for proper spill pad maintenance.

4.1.6 **TRAINING**

4.1.6.1 All managers/assistant managers are required to attend annual EMS/SWP3 training that is held by the Sustainability Department. Port of Virginia employees may also receive this training through the ports online training system.



4.1.6.1.1 Employees are required to be aware of the Port's EMS and are required to be trained on required Standard Operating Procedures (SOP's), as required.

4.1.6.1.1.1 All training logs are to be submitted to the Workforce Development Coordinator when complete.

4.2 MONTHLY INSPECTION REQUIREMENTS

4.2.1 Storm Water Pollution Prevention, RCRA compliance, and Fuel Storage Tank and Piping inspections shall be completed monthly for all maintenance and repair locations, using the monthly inspection forms issued by the Sustainability Department at the annual SWP3 and EMS training. **(please see section 6.0 for copies of the inspection forms)**

4.2.2 The work area Supervisor or his/her designated inspector, shall inspect all internal and external work areas, wash racks (if applicable), fueling locations, and material storage areas. Inspection form should be completed for each location.

4.2.3 Completed inspection forms shall be submitted to the Sustainability Department (wgoodson@portofvirginia.com) by the end of each month.

4.2.4 Crane and Vehicle Maintenance are required to conduct monthly inspections for decommissioned equipment.

4.2.4.1 Inspections are to be completed on the Monthly Decommissioned Equipment Inspection Form **(see section 6.3 of this procedure for form)**.

4.2.4.2 Records are kept in the Crane and Vehicle Maintenance Managers Office and are to be readily available for Sustainability Department inspection.

4.3 QUARTERLY INSPECTIONS

4.3.1 The Sustainability Department Managers or designee will conduct quarterly facility-wide pollution prevention/compliance inspections. The quarterly inspections will include inspections of maintenance & operational areas, AST's, material storage areas (inside or outside), and general housekeeping.

4.3.2 Records of the Sustainability Departments inspections results are kept on file with the Environmental Compliance Specialist.

4.3.3 If deficiencies are found in the quarterly inspections, the Environmental Compliance Specialist will issue a corrective action form to the appropriate manager. The manager will complete the corrective action form and submit the form back to the Environmental Compliance Specialist for review. If the Environmental Compliance Specialist is satisfied with the response on the corrective action form, he/she will submit the EMR for review and signature.



5.0 “Environmental Stewardship Awards” RECOGNITION PROGRAM

All tenant maintenance and POV maintenance areas are eligible to receive an “Environmental Stewardship Award”.

5.1.1 Work areas may receive an annual gold, silver, or bronze award. If the following criteria are not met, the eligible party will not receive an award and a Sustainability Department staff member will review with the tenant and/or POV staff members the reason for not receiving an award in an effort to improve future compliance.

5.1.2 All Award Levels (Quarterly and Annual):

All required monthly storm water inspections must be submitted to the Environmental Compliance Specialist. Also, Employee EMS Awareness Training must be completed and submitted to the Environmental Compliance Specialist (wgoodson@portofvirginia.com) by December 1 of that calendar year.

Environmental Inspections: Inspections will be conducted quarterly and will be assigned point values based upon performance for each “Area” listed on the inspection form. Point assignments will be assigned as follows: Unsatisfactory = 1 Satisfactory = 2 Above Satisfactory = 3. The average for each area will be calculated and an inspection score established between 1 and 3.

Quarterly point averages will be calculated at the end of the calendar year. The following annual Environmental Stewardship Awards will be awarded based upon the average inspection points earned during the year and the occurrence of repeat corrective actions.

Gold Level: No repetitive corrective actions, an average annual inspection score between 2.5 and 3 AND No violations resulting in outside regulatory authority action.

Silver Level: No more than one repetitive corrective action, an average annual inspection score between 1.9 and 2.4 AND No violations resulting in outside regulatory authority action.

Bronze Level: No more than two repetitive corrective actions, an average annual inspection score between 1.3 and 1.8 AND No violations resulting in outside regulatory authority action.

5.1.3A banner will be presented to those receiving annual recognition identifying their award as gold, silver or bronze.

6.0 CONSEQUENCES OF DEVIATION FROM PROCEDURE

6.1 Deviations from this procedure can result in negative environmental impacts at the facility such as un-permitted discharges of waste or violations of environmental permits. Such negative impacts result in fines or notices of violation from the Virginia Department of Environmental Quality and/or could result in harm to individuals or the environment.



7.0 ATTACHMENTS

- 7.1 Storm Water Monthly Inspection Form
- 7.2 Monthly Storage Tank and Piping Checklist

- 7.3 Monthly Decommissioned Equipment Inspection Form

8.0 RECORDS

- 8.1 Monthly decommissioned equipment checklist
- 8.2 Monthly & Quarterly Storm Water Inspections
- 8.3 Monthly Storage Tank and Piping Checklist

9.0 DEFINITIONS

- 9.1 Not Applicable

10.0 REVISION HISTORY

- 10.1 Effective Date: 6/1/11
- 10.2 Revision Date: 11/10/16 – added VIP and RMT. 1/20/16 – updated for new award program. 11/13/13 – updated division and employee titles. 1/24/13 – changed weekly de-activated equipment inspection to monthly inspection. 7/23/12 – combined all SOP's into one. 6/14/12 – added updated monthly inspection form. 8/29/11 – removed tenants from this SOP because they have a separate SOP.
- 10.3 Approval: Scott Whitehurst, Director, Environmental Policy and Compliance
- 10.4 Last Reviewed: 1/25/19
- 10.5 Reviewer: Billy Goodson, Environmental Compliance Specialist