



Environmental Guideline
Deicing (areas other than streets)

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Activity Description

Application of deicing and anti-icing materials and granular materials (sand, salt, magnesium chloride, etc) to all areas other than streets during winter snow removal operations, including sidewalks, stairs, entrances, and other areas. Application of these materials to streets are described in CCD-301.03.07 Deicing Streets.

Potential Environmental Risks

The following environmental concerns are associated with this activity:

- Overuse and/or inappropriate application of deicing materials
- Contamination of soil
- Improper or inappropriate disposal of off-specification or waste deicing materials.
- Contamination of surface water
- Contamination of groundwater
- Air pollution (from sand)

Potential consequences from performing the activity incorrectly:

- Property damage, personal injury, damage to the environment.
- Possible regulatory non-compliance, Notice of Violation and related [financial & non-financial] penalties.

Critical Operating Requirements

A. General Requirements

Prohibited Activities

- Improper disposal of deicing, anti-icing and sand materials.
- Overuse or improper use of deicing chemicals and sand.
- Use of organic-based fluids.
- Use of urea.

General Considerations

- Each operator conducting deicing activities is responsible for understanding the applicable regulations and managing their activities accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations.
- Use appropriate deicing products for the application and understand the specifications for choosing an appropriate deicing product.

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Critical Operating Requirements

A. General Requirements

Training Requirements

- All operators of deicing equipment must be adequately trained in the proper application procedures.

Storage & Material Handling Requirements

- Utilize appropriate spill prevention equipment for containers, vessels, hoses, transfer areas, etc.
- Store all deicing fluids in containers that are in good condition. When stored outdoors, storage areas should be managed to minimize the potential of spills/leaks from discharging to Waters of the State.
- Do not waste fluid: The amount of the deicing agent applied should be appropriate to the need and not excessive. The actual quantity and mix of deicing agent applied is at the discretion of the operator and/or as per manufacturer’s specifications.

B. Planning *Responsible: Operator*

B1. Develop and implement a training program to train deicing staff in the proper use and application of deicing and anti-icing materials.

B2. Maintain adequate supplies of spill response equipment and materials in accessible locations near areas where spills are likely to occur.

C. Critical Tasks *Responsible: Agency*

None identified.

D. Emergency Response *Responsible: Operator*

If a spill occurs, refer to Environmental Guideline Spill Response.
 • **Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills.**

E. Inspection and Maintenance Requirements *Responsible: Operator*

Maintain deicing equipment according to the manufacturer’s recommended maintenance schedule.

Expected Records / Outputs

<u>Record / Output</u>	<u>Instructions</u>
MSDSs	<ul style="list-style-type: none"> MSDSs for deicing fluids should be maintained at areas where fluids are stored and used (if appropriate).

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References

Phone Numbers

- **311 (for Spill Reporting during normal business hours).....3-1-1**
- DEH DEQ Emergency Response (after normal business hours)..... (303) 206-0001
- Gary Lasswell (DEH DEQ Environmental Compliance Supervisor)..... (720) 865-5440

Guidance Materials (list not limited to the following)

- MSDSs
- Deicing fluid and application equipment manufacturers specs
- WMD MS4 Permit

Training Materials (list not limited to the following)

- CCD-302.04 Hazardous Waste Generator and Stormwater Training

Related Environmental Guidelines (list not limited to the following)

- CCD-301.03.26 Spill Response
- CCD-301.03.10 General Regulated Waste Management

Applicable Regulations (list not limited to the following)

Federal:

- 40 CFR 122-124 NPDES Regulations for Storm Water Discharges

State:

- CDPHE Colorado Discharge Permit System (CDPS) Permit Number COS-000001

CCD Revised Municipal Code:

- Sec. 56-102. Disposal of wastes and use of public sewers.

DPW Rules and Regulations Governing Sewerage Charge and Fees and Management of Wastewater:

- Sec. 7.01. Prohibited Discharges to the Storm Sewer System

Other Documents

- Equipment Operation standard operating procedures

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