



Highway Maintenance Manual
Chapter 06 Winter Maintenance
Section 20 Snow Removal Materials
Subject 35 Trans 277 Procedures

Bureau of Highway Maintenance
March 2017

1.0 Procedures

1. Compiling Site and Sub-site List

Unless completed under a third party contract with WisDOT, managed by the bureau of highway maintenance, the region systems maintenance manager shall complete, or have completed by others, site visits as necessary and completion of form DT-1871 as needed. Data from the applicable DT-1871 form shall be entered into MSSM as necessary to maintain an accurate list of road chemical storage sites and sub-sites in the region as of July 31 of each year.

2. Road Chemical Storage Site Record (DT-1871)

Regions may generate from the MSSM a blank DT-1871 for a new site or a previously completed DT-1871 for an existing site. The region systems maintenance manager may provide these forms to the site compliance contact for completion. DT1871 forms returned to the region systems maintenance manager shall be reviewed for completeness and accuracy by region staff.

The region systems maintenance manager is responsible for having corrections made for any incompleteness or errors on the DT1871. Corrections shall be made within 30 calendar days of receipt of the form by a means of the region systems maintenance manager's choosing. Upon securing a complete, accurate and signed DT1871, the region systems maintenance manager shall have the data entered in the MSSM within 30 calendar days of receipt of an acceptable DT1871.

3. Site Record Recertification

Unless the accuracy of a site record in MSSM is validated under a third party contract with WisDOT, managed by the bureau of highway maintenance, the region systems maintenance manager, on or before May 1, shall mail a copy of the current record (DT-1871) for the site compliance contact to use to certify the information on the record remains correct or to provide correct data by return mail to the region systems maintenance manager by July 1. Should the region systems maintenance manager not receive a compliance contact certification or corrections by July 1, an inspection of the site shall be made and personal contact made by region staff with the compliance contact to obtain either a signed certification or revisions to the current DT-1871. Necessary revisions, if any, to a DT-1871 shall be entered into MSSM on or before July 31 or within 30 calendar days of receipt.

4. Annual Sub-site Routine Inspection (Form DT-1873)

Except when routine inspections are conducted under a third party contract with WisDOT, managed by the bureau of highway maintenance, the region systems maintenance manager is responsible for accomplishing an annual routine inspection of each road chemical storage sub-site in the region. The onsite inspection shall collect the data called for on form DT-1873. The data collected on DT-1873 shall be promptly entered into MSSM within 30 calendar days of receipt. Annual inspections for the state fiscal year shall be conducted during the months of December, January, February, March, April and May. Additional inspection of sites and sub-sites may be made as frequently as the region systems maintenance manager finds appropriate.

5. Acting On Inspection Results

5.1 Annual Routine Inspections

Upon completion of the annual inspection and data entry by region staff or notice of inspection completion to region from a third party performing inspections under contract to the department, determine, within 10 working days of data entry or third party notice, which sub-sites have been given an inspection rating that requires a follow-up (hereafter called FUR).

During the first region staff field monitoring trip to a county in which a FUR sub-site is located, but no more than 21 days following identification of a FUR sub-site, a visit to the subject sub-site is made for the purpose of validating the inspection rating (validation visit).

Within 5 working days from the validation visit, region staff shall contact the compliance contact for the subject sub-site to discuss resolution of the problem found during the inspection and validated by. Resolution shall establish remedial action(s) and establish completion date(s) for the remedial action(s). Should region staff deem the inspection rating to be invalid, the compliance contact shall be so notified by within 5 days following the validation visit.

Region staff shall assure that the name of the region staff person contacting the compliance contact, the date contact is made, the name of the person agreeing to the remedial action and completion date on behalf of the site owner is recorded in the MSSM record for the sub-site along with a description of the remedial action and completion date.

The same data shall be recorded when the inspection rating is deemed invalid by region staff except, in place of the description of remedial action and completion date, the reason or reasons for deeming the inspection rating invalid shall be recorded. Region staff shall provide a notice of all sub-site numbers where an inspection rating is deemed invalid to the bureau of highway maintenance.

During the first region staff field monitoring trip to a county after the date by which a remedial action is to have been completed or notice of completion is provided, whichever occurs first, the region staff shall validate that the remedial action is or is not satisfactorily completed. Should region staff deem the remedial action to be satisfactorily completed, the compliance contact shall be so notified by region staff within 5 days following the validation visit.

If the remedial action is not satisfactorily completed, an informal letter signed by the Systems Planning & Maintenance manager (SPO); addressed to the County Highway Commissioner, City Mayor or Manager, Village President, Town Board Chairperson or Chief Executive Officer of any other owning entity as appropriate, shall address the non-completion of the remedial action at the subject sub-site. The purpose of this letter is to initiate further discussion, if needed, and to secure a commitment to the remedial action and a revised completion date.

Region staff shall assure that the names of the addressee and person signing this letter, the date the letter is sent and the reason for the letter is recorded in the MSSM record for the sub-site along with a description of any subsequent remedial action and completion date agreed to as a result of this letter.

Again, during the first region staff field monitoring trip to a county after the date by which a remedial action is to have been completed or notice of completion is provided, whichever occurs first, the region staff shall validate that the remedial action is or is not satisfactorily completed. Should region staff deem the remedial action to be satisfactorily completed, this finding shall be noted in the MSSM record for the sub-site and the compliance contact shall be so notified by region staff within 5 days following the validation visit.

If the remedial action is not satisfactorily completed by the date established under 5.1 C. above, under the authority of Trans 277.06 (2), the process set forth under 39.10 (7) G or H shall be implemented.

The informal letter under 5.1 C above may be in electronic form. Region staff may, at its option, make validation visits and contacts under a shorter time frame than set forth above. Region staff may also elect to bypass actions under 5.1 B. and or 5.1 C. above if the circumstance generating the need for follow-up is deemed to warrant taking initial action under 5.1 D. above.

5.2 Annual Routine Spring Inspections

Upon completion of a routine spring inspection and data entry by region staff, or notice of inspection completion to region from a third party performing inspections under contract to the department, of adequate covering of salt and salt-sand stockpiles determine, within 10 working days of data entry or third party notice, which sub-sites have been given an inspection rating that denotes a FUR.

During the first region staff field monitoring trip to a county in which a FUR stockpile sub-site is located, but no more than 21 days following identification of a stockpile FUR, a visit to the subject sub-site is made for the purpose of validating the inspection rating.

Within 5 working days from the validation visit, region staff shall contact the compliance contact of the inspection rating for the subject sub-site and arrange to discuss resolution of the problem found during the inspection and validated by region staff. Resolution shall establish remedial action(s) and establish completion date(s) for the remedial action(s). Should region staff deem the inspection rating to be invalid, the compliance contact may be so notified by region staff.

Region staff shall assure that the name of the region staff person contacting the compliance contact, the date contact is made, the name of the person agreeing to the remedial action and completion date on behalf of the site owner is recorded in the MSSM record for the sub-site along with a description of the remedial action and completion date. The same data shall be recorded when the inspection rating is deemed invalid by region staff except, in place of the description of remedial action and completion date, the reason or reasons for deeming the inspection rating invalid shall be recorded. Region staff shall provide a notice to the bureau of highway maintenance of all subsite numbers where an inspection rating is deemed invalid.

Should non-performance of remedial action take place, processes stated under 5.1 B., 5.1 C., and 5.1 D. above are followed.

6. New Site and Subsite Establishment and Inspection

Within 90 days of owner occupancy of a newly established site or sub-site, the region systems maintenance manager is responsible for assigning a site number and or sub-site identification label, creating a DT1871 record for a new site, conducting an inspection of the site or sub-site and having the data entered into MSSM.

7. Facility Termination Inspections (Form DT1872 Part C)

Within 90 days of notification of termination of road chemical storage at a site or sub-site, an inspection of site or subsite shall be accomplished at the direction of the region systems maintenance manager

8. Handling of Complaints of Contamination Resulting From a Road Chemical Storage Site or Sub-site.

A. Complaints must be in writing and a copy of the complaint provided to the region systems maintenance manager either by the owner or operator or compliance contact of the site or as a result of an inspection of site and sub-sites.

Data pertaining to the complaint shall be entered by the region into the subject site or sub-site record in MSSM within 10 working days of receipt of the complaint.

The region systems maintenance manager shall cause an inspection of the subject site or sub-site, using form DT1872 Part B, to be performed within 5 working days of receiving notice of the complaint. The data resulting from the inspection shall be entered into MSSM within 10 working days of receipt of the form DT104 Part B.

A notice from the Department of Natural Resources (DNR) to the Wisconsin Department of Transportation alleging non-compliance with a preventive action limit or enforcement standard shall cause the region systems maintenance manager to have region staff perform an inspection of the subject site or sub-site using form DT-1872 Part B. The data from the report from the DNR and the inspection shall be entered into MSSM within 10 working days of receipt.

In consultation with the director of the bureau of highway maintenance, the region systems maintenance manager shall propose appropriate action to resolve the complaint. The region systems maintenance manager shall inform, in writing, the owner and operator of the site of the results of the inspection and the appropriate action or actions proposed to resolve the complaint. These actions may include but are not limited to the following:

- a. Take no action.
- b. Conduct further investigation.
- c. Increase monitoring of the storage site or sub-site in coordination with DNR.
- d. Revise specific maintenance procedures at the site or sub-site.
- e. Repair or reconstruct the sub-site to comply with Trans 277.

- f. Construct a new sub-site.
- g. Prohibit activities or practices that use or produce the contaminating substance.
- h. Relocate the sub-site or the road chemical stored at the site.
- i. Close the site or sub-site.

F. In the event the site or sub-site is determined to be the source or probable source of contamination, the region systems maintenance manager shall discuss with the owner possible remedial actions.

G. Should the owner decline to undertake and complete acceptable remedial action, the region systems maintenance manager shall issue a directive specifying remedial action required to be taken by the owner. Prior to issuing a directive, the director of the bureau of highway maintenance shall approve or obtain approval for the region systems maintenance manager issuing the intended directive. If issued, the region systems maintenance manager shall assure that compliance with the directive is achieved.

H. In the event the site or sub-site owner fails to comply with the compliance directive within the time specified in the directive, the region systems maintenance manager shall issue a special order of remedial action. The director of the bureau of highway maintenance shall approve or obtain approval for the region systems maintenance manager issuing the intended directive. If issued, the region systems maintenance manager shall assure that compliance with the special order is achieved.