

# ABANDONED CONTAINER MANAGEMENT MANUAL

For Abandoned Containers on MnDOT Property Policy (OE017)

3-17-2020

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## Introduction

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This document is the technical companion to the Minnesota Department of Transportation's (MnDOT's) [Abandoned Containers on MnDOT Property Policy](#). All employees are required to follow this manual.

Abandoned containers on MnDOT's property can be a hazard to MnDOT employees and the public. Abandoned containers must be handled in a safe, efficient and cost-effective manner in order to protect human health and to ensure proper management.

The procedures in this manual are limited to MnDOT's response for safe removal of intact abandoned containers from MnDOT's property; it does not address management of spills of liquid or cargo or non-containerized debris. See [Technical Memorandum No. 16-03-ENV-01](#) for procedural information on vehicle fluid and/or cargo spill incidents. If assistance is needed regarding handling of non-containerized debris or any materials on MnDOT property, the [District Safety Administrator \(DSA\)](#) or the State Duty Officer at (800) 422-0798 or (651) 649-5451 shall be contacted for assistance. Request that the State Duty Officer notify the on-call MnDOT Hazardous Materials Specialist (Haz Mat) from the Office of Freight and Commercial Vehicle Operations (OFCVO).

If the owner/responsible party for the container can be determined, every attempt shall be made to have the owner/responsible party remove the container or have the owner/responsible party pay for all costs associated with management of the container. If the owner/responsible party of the container cannot be identified, MnDOT will typically be responsible for all costs, however, in some cases, the Minnesota Pollution Control Agency (MPCA) or the emergency responder will pay.

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## Definitions

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### **Abandoned Container**

A container or other receptacle with potentially dangerous contents that has been left on MnDOT's property.

### **Abandoned Container Awareness Training**

Training provided to MnDOT employees as a part of Right-to-Know training about abandoned containers.

### **Abandoned Container Triage Person**

A designated MnDOT employee who has been trained in the triage and removal of abandoned containers.

Note: This person has the authority to retain an emergency contractor to handle abandoned containers. District Adopt a Highway Coordinators and the Highway Sponsorship Program Director are not considered Abandoned Container Triage Persons.

### **Abandoned Container Triage Training**

A course instructing MnDOT employees in the awareness, identification, and safe handling and removal of abandoned containers on MnDOT's property.

Note: Training is co-sponsored by the Offices of Environmental Stewardship (OES) and OFCVO.

### **District-Designated (Storage) Facility**

A MnDOT District site established to receive abandoned containers from MnDOT's property for proper storage prior to disposal.

### **Emergency**

A threat to public health, welfare, or safety that threatens the function of government, the protection of property, or the health or safety of people.

### **Emergency Response Contractor**

A state-authorized vendor providing environmental emergency response services that can be retained through the Department of Administration's Contract Release: H-63(5), ENVIRONMENTAL EMERGENCY RESPONSE – FULL SERVICE contract to properly remove and transport hazardous waste.

\* See [State Emergency Response Contractors](#)

### **Hazardous Waste Contractor**

A MnDOT-approved vendor authorized to handle abandoned containers.

\*See: [MnDOT Approved List of Waste Contractors](#)

### **Imminently Dangerous Material**

Any material that is immediately dangerous to life and/or health because of toxicity, reactivity, or other hazardous characteristics.

### **MnDOT Property**

Any property that MnDOT owns or has right of access to, including the interstate and state trunk highways, remote yards and pits, operational facilities, and rest areas.

### **Not Safe to Handle**

Descriptor for material that is not imminently dangerous but has been determined by an Abandoned Container Triage Person or MnDOT Hazardous Materials Specialist as unsuitable for MnDOT personnel to handle.

## **Procedures**

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### **Reporting**

When an abandoned container is discovered by, or reported to, a MnDOT employee, the employee shall contact a District Abandoned Container Triage Person with the location and description of the container. The discoverer of the abandoned container shall call 911 in an emergency.

The Abandoned Container Triage Person shall determine if the container is within tribal land and follow the process in the Tribal Communication Index to properly notify the Tribal representative and to manage the container.

## **Assessment, Removal and Disposal**

A MnDOT Abandoned Container Triage Person shall conduct an on-site assessment to determine if the container is an Imminently Dangerous Material or Not Safe to Handle. If assistance is needed to make this determination, the Abandoned Container Triage Person shall contact the State Duty Officer at (800) 422-0798 or (651) 649-5451 and ask to speak with the on-call Haz Mat Specialist from OFCVO.

### ***If determined Imminently Dangerous Material:***

If the Abandoned Container Triage Person determines the container to be Imminently Dangerous Material, MnDOT personnel shall not handle the container and shall follow the procedures below.

- The Abandoned Container Triage Person shall call 911.
- The MnDOT Abandoned Container Triage Person shall call the State Duty Officer at (800) 422-0798 or (651) 649-5451 to report discovery of the container and request that the Haz Mat Specialist on-call at OFCVO be notified. The State Duty Officer notifies the Minnesota Pollution Control Agency (MPCA).
- Depending on the situation, the 911 emergency responder, MPCA, the Haz Mat Specialists and/or DSA determines who will manage the container. If the owner of the container cannot be identified, the disposal costs will typically be paid by MnDOT, the MPCA, or the emergency responder depending on circumstances of the situation.
- If it is determined that MnDOT will manage the container, the Abandoned Container Triage Person shall retain an emergency contractor through the state emergency response contract or the hazardous waste contractor to remove and dispose of the container or to repack the container making it safe for MnDOT personnel to handle. Disposal of this material is typically at MnDOT's cost. Consult the MnDOT Regulated Material Management website for information on proper storage and disposal of abandoned containers made safe by the emergency contractor for MnDOT personnel to transport to a Designated Facility which can be found at:  
<http://www.dot.state.mn.us/environment/regulatedmaterials/wastemgmt.html>.

### ***If determined Not Imminently Dangerous and is safe to handle:***

If the Abandoned Container Triage Person determines the container is not imminently dangerous and is safe for MnDOT personnel to handle, MnDOT personnel shall transport the container to the nearest District-Designated Facility. Contact the District Abandoned Container Triage Person or DSA for the Designated Facility location. Consult the MnDOT [Regulated Material Management website](#) for information on proper storage and disposal of abandoned containers.

### ***If determined Not Safe to Handle:***

A container that is not imminently dangerous, but is determined by a District Abandoned Container Triage Person or MnDOT Haz Mat Specialist as not safe for MnDOT personnel to handle, must be managed using the MnDOT Office of Environmental Stewardship (OES) contract. Contact OES for assistance to containerize, transport, and dispose of the container.

## ***Disposal***

All abandoned containers deemed safe for MnDOT personnel to handle must be managed through MnDOT's Regulated Materials Management program. Guidance can be found at:

<http://www.dot.state.mn.us/environment/regulatedmaterials/wastemgmt.html>. Contact the DSA or OES for further assistance, as needed.

## Cost Recovery

The Abandoned Container Triage Person shall make every reasonable and businesslike effort to identify the owner/responsible party for the abandoned container. Identification techniques include:

- Documenting information on the container with photos\*, including:
  - package marking
  - package labeling
  - package identification markings
  - manufacturer information
  - barcoding
  - batch number (designation printed on the label that allows tracing of the history of its production)
  - PRO number / other shipping information (The PRO number is short for “Progressive Number.” The series of numbers is used as a tracking tool for transporters.)
- Documenting information from a witness
- Reviewable video records from traffic cameras

\*Photos can assist in determining the owner/responsible party and can also be used as evidence.

For assistance in interpreting the data collected, request that the State Duty Officer contact the on-call MnDOT Hazardous Materials Specialist (Haz Mat) from the Office of Freight and Commercial Vehicle Operations (OFCVO).

If the owner/responsible party is identified and MnDOT has incurred costs, supply contact information to the District Damage Restitution Coordinator.

If MnDOT is unable to determine the owner/responsible party, MnDOT will typically be responsible for all costs, however, in some cases, the MPCA or the emergency responder will pay. The District pays for management of the container in most situations. Funding for management of imminently dangerous or not safe to handle containers may be available from OES. Call the OES Regulated Materials Management Team for assistance.

## Documentation

- The MnDOT Abandoned Container Triage Person must record all incidents on the [Abandoned Container Notification and Assessment Form](#) provided by OES. The Abandoned Container Triage Person or other District personnel must upload the form into eDIGS and notify the DSA. This documentation meets applicable regulatory requirements for transport and management of the container.
- MnDOT personnel involved in management of abandoned containers must code their time using the appropriate project ID and source code when filling out timesheets, including delivering and attending associated training events. **The project ID is T06ACS.** The source code depends on the specific activity being performed, such as:
  - 1075 – Contaminated Material Spills Management
  - 2214 – Debris Clearance
  - 0052 – Statewide/Interagency Program Development (updating/creating policy)
  - 0600 – General Training Attended (initial and biannual training)

- 6259 – Motor Carrier Communication and Training (presenting the annual training)
- 1502 – Maintenance Support

If you are unsure which Source Code to use, contact your supervisor for assistance.

## Training

- Awareness training must be included as part of Right-to-Know training. Methods may include face to face and e-learning options.
- All Abandoned Container Triage Persons, Highway Sponsorship Program Director and District Adopt a Highway Coordinators shall attend Abandoned Container Triage Training at least every two years. This training is provided by MnDOT OES and OFCVO annually. Initial training must be received in a live session in-person. MnDOT personnel may choose to complete refresher training by attending a live session or through e-learning.
- The District Adopt a Highway program coordinators shall provide awareness information regarding abandoned containers to Adopt a Highway program volunteers.
- The Highway Sponsorship program director shall provide awareness information regarding abandoned containers to Highway Sponsorship program participants and volunteers.

## Abandoned Container Triage Person List

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The DSA in each District must maintain a current, accessible list of designated Abandoned Container Triage Persons. This list must be available on each District's Safety iHUB page.

## Abandoned Container Web Site

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<http://www.dot.state.mn.us/environment/regulatedmaterials/containers.html>

## Forms and Instructions

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[Abandoned Container Flowchart](#)

[Abandoned Container Notification and Assessment Form](#)

## Related Information

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[Roadway Incident Procedure: Vehicle Fluid and Cargo Spill Response, Technical Memorandum No. 11-10-M-02](#) provides the procedure for MnDOT response to vehicle fluid and cargo spills resulting from crashes.

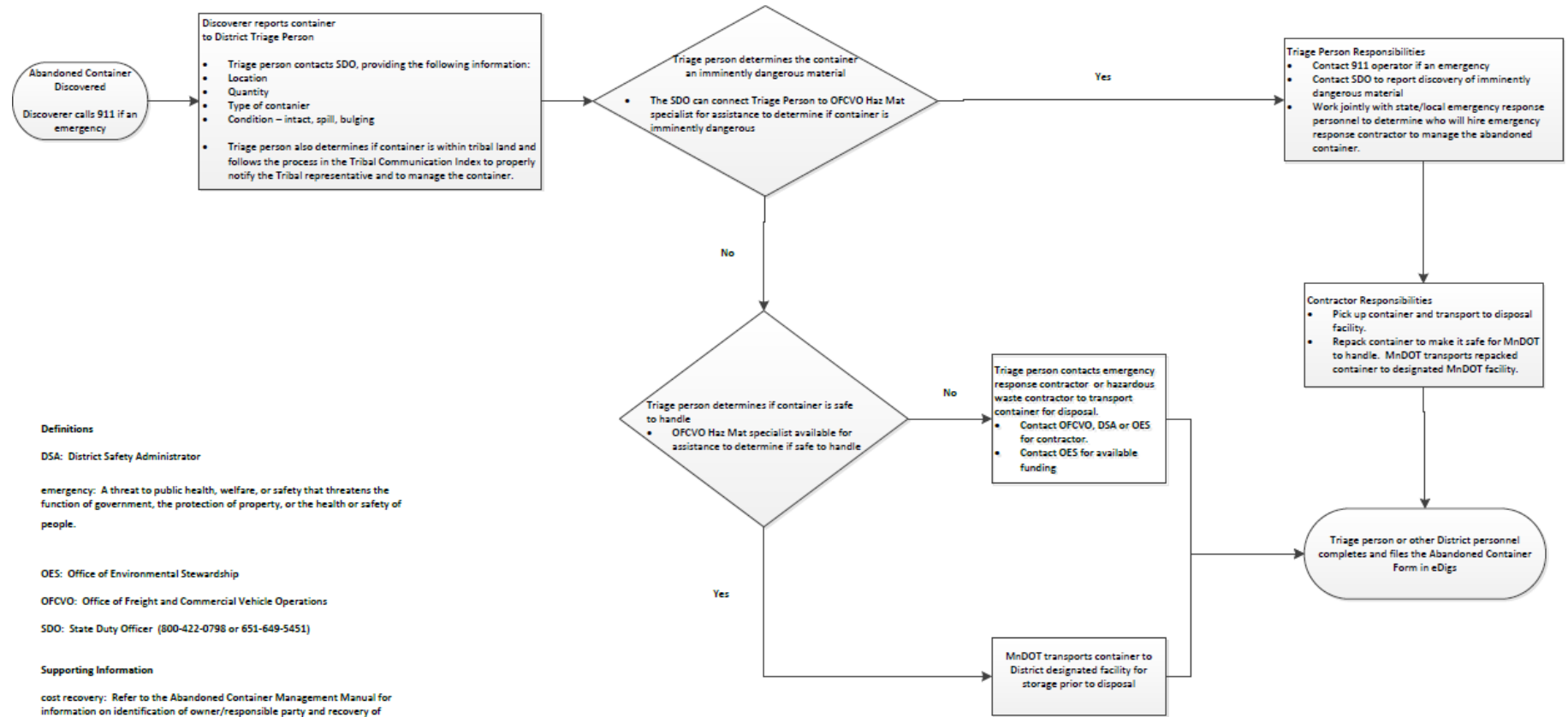
[State of Minnesota "Open Roads Policy,"](#) dated 7/6/10, is an agreement between MnDOT and Minnesota State Patrol to expedite the removal of vehicles, cargo, and debris from the roadways on the state highway system.

Guidance for managing explosives, meth labs, and chemical suicides are available at:

<http://www.dot.state.mn.us/environment/regulatedmaterials/containers.html>

# Abandoned Container Management Flow Chart

## Abandoned Container Management Flowchart



### Definitions

DSA: District Safety Administrator

emergency: A threat to public health, welfare, or safety that threatens the function of government, the protection of property, or the health or safety of people.

OES: Office of Environmental Stewardship

OFCVO: Office of Freight and Commercial Vehicle Operations

SDO: State Duty Officer (800-422-0798 or 651-649-5451)

### Supporting Information

cost recovery: Refer to the Abandoned Container Management Manual for information on identification of owner/responsible party and recovery of costs

District Triage Person: contact District Safety Administrator for list of triage persons