

## Farm Operation Suggested Mobility Plan- Part 117 of Act 451 Exemption

The exemption to the licensing requirements for the movement of portable toilets under Part 117 of Act 451 was granted based on agricultural industry need to minimize food safety associated risks when providing portable toilets for farm workers in the field.

Failure to follow these provisions can potentially negate your eligibility for the Part 117 exemption. The following provides assistance to confirm with the law as it relates to this exemption.

- Develop a map showing allowable routes for toilet transport and highlight limited access highways that can not be utilized to move units containing waste.
- Keep farm roads used to move portable toilets well graded and free of pot holes. Well maintained farm roads will reduce the likelihood of unnecessary spillage and the associated risk of contamination.
- Do not move portable toilets once their storage tanks become half- full, if it can be avoided. Purchase or rent enough toilets as needed.
- Provide and document training for workers, supervisors, and those who will be responsible for movement and sanitation of portable toilets. Training for individuals moving portable toilets should include instructions on:
  - Allowable travel speeds.
  - Recommended proximity to be maintained to workers.
  - Preparation procedures to move units down public road.
  - Inspection procedures to be followed when units are moved.
  - Cleaning procedures including proper disposal of cleaning materials.
  - Spill kit locations and spill response procedures.
- Retain records to show eligibility for the Part 117 exemption and due diligence in maintaining sanitation level in compliance with this exemption. Recommended records to keep include:
  - MDARD open letter publishing applicable standards.
  - Application or certification from the standard setting body.
  - Licensed septage hauler contract for pumping and final disposal of stored septage waste.
  - A site plan or map showing general locations of portable toilets used as part of your farm operation.
  - Spill response plan and emergency contact information.
  - Training materials used to train staff on moving portable toilets.
  - A log documenting provided training.

## Farm Operation Suggested Spill Response - Part 117 of Act 451 Exemption

To ensure that spill response materials are available in the event of a septage spill, it is recommended to maintain both a consumable cleaning kit and an emergency use spill kit.

A cleaning kit should contain:

- Rubber gloves
- Disinfectant sprayer
- 12" steel tongs
- Stiff bristle brush with 12" or longer handle
- Paper towels
- Tight sealing container for disposal of soiled materials
- Other cleaning materials as needed

A spill response kit should be available on or in each vehicle used to move portable toilets. Spill response kits should contain the following:

- Plastic drum with lid to transport spill kit and if necessary dispose of spilled waste.
- Shovel for building berms and clean up.
- Rubber boots or Tyvek booties, gloves, and face shield.
- Hydrated lime or cat litter should travel with the portable toilets for use in the event of a spill. Please note hydrated lime is a caustic material and can be dangerous to handle and apply. Read manufacturer's recommendations carefully before use and application.
- Plastic bags sized for barrel and/or cat litter containers.
- Emergency contact information and first responder plan.
- Caution tape and stakes to cordon off the area.

### First Responder Plan

This is applicable for a single unit or less than 100 gallons of spilled septage. If spill is larger or you need assistance, call your licensed septage hauler or the Migrant Labor Housing inspector listed on the contact sheet.

1. Clearly mark and cordon the impacted area to keep people away.
2. Open spill kit and retrieve emergency contact information.
3. Inform supervisor of spill.
4. Put on rubber boots or Tyvek booties, gloves, and face shield as needed.
5. If needed, use shovel to create a berm preventing movement of spilled contents.
6. If raining, use sheet plastic to cover spill and prevent runoff. Use rocks and soil to secure plastic.
7. Estimate volume of material spilled and obtain enough volume of disposal buckets. If spilled on a farm field it is OK to "weather in place." Use tongs and bag all solids on the soil surface. Apply hydrated lime once solids have been removed. Mark area with caution tape for 20 days. Do not harvest any crops that have come into contact with the spill.
8. If needed, right portable toilet. Use water and sprayer to clean human contact surfaces collecting waste water along with spilled materials.
9. Use cat litter to soak up spilled materials.
10. Put plastic bag in barrel/cat litter container(s) to keep their exteriors clean.
11. Shovel used litter back into container(s) removing all visibly contaminated materials and soils.
12. Clean and disinfect equipment, shovels, and other tools used. Then dispose of wash water with spilled materials.
13. Close interior bags and seal containers.
14. Spray sanitizer over spill until the surface is wetted and prevent contact with area.
15. Fully clean and inspect portable toilet unit before putting it back in service.
16. It is OK to dispose of materials in a farm dumpster if there are no free liquids. (Unless explicitly prohibited by the landfill or trash hauler).
17. Transport containers of solid contaminated materials to sanitary landfill for disposal. Do not place in residential trash service containers.