SUBJECT:	Effective Date:	Procedure Number:	
Contractor Environmental Management Procedures	09/03/13	emp11	
	Supersedes:	**Page**	**Of**
	EMS Procedure-011	**1**	**11**
	Responsible Authority: Director of Environmental Health and Safety		

APPLICABILITY/ACCOUNTABILITY:

This procedure applies to all areas and departments authorizing vendors, contractors and their sub-contractors to work on University owned or operated facilities and University affiliated Direct Support Organization facilities at the main and branch campuses and leased spaces.

In accordance with UCF Policy FSP EHS0002, UCF EHS is the designated authority for implementing health and safety regulations at UCF. To align with this Policy and ensure campus safety and health, UCF EHS requires that Contractors and Sub-contractors be accountable for controlling environmental and safety aspects during construction with regards to hazardous materials and waste management, fuel tanks, water pollution and air pollution requirements.

This procedure includes vendors and contractors whose work involves, but is not limited to, any of the following activities:

Use of chemical products or oils
Release of industrial wastewater
Disruption of more than 1 acre of land
Dewatering activities
Installation of stationary combustion equipment,
Installation of chemical processes
Installation of storage tanks
Demolition
New construction or renovation
Disposal of hazardous materials or wastes

This procedure does not include:

Clerical, accounting or similar administrative work

PROCEDURE STATEMENT:

This procedure defines the process for controlling the environmental aspects of hazardous materials and waste management, fuel tanks, water pollution and air pollution of on-site vendors, contractors and their sub-contractors at University of Central Florida (UCF) facilities.

DEFINITIONS:

Department of Transportation (DOT): The term DOT is often used interchangeably to refer to the Department, law, regulations, policy and guidance. DOT regulations carry out the Congressional intent by providing explicit, legally enforceable requirements for transportation. These regulations can be found in Title 49 of the Code of Federal Regulations (CFR), Parts 1-1580.

Direct Support Organization: An organization that is certified by the University of Central Florida Board of Trustees as operating in a manner consistent with the goals of the University and the best interests of the State.

Florida Administrative Code (FAC): Codes, Laws and Rules specific to the State of Florida. The Florida Department of Environmental Protection falls under Part 62 of the FAC.

Industrial Waste Water: Means wastewater not otherwise defined as domestic wastewater, including the runoff and leachate from areas that receive pollutants associated with industrial or commercial storage, handling or processing.

Occupational Safety and Health Administration (OSHA): With the Occupational Safety and Health Act of 1970, Congress created the Occupational Safety and Health Administration (OSHA) to ensure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance. These regulations can be found in Title 29 of the Code of Federal Regulations (CFR), Parts 1910 and 1926**.**

National Pollution Discharge Elimination System (NPDES): A national program under Section 402 of the Clean Water Act for regulation of discharges of pollutants from point sources to waters of the United States. Discharges are illegal unless authorized by an NPDES permit.

Resource Conservation and Recovery Act (RCRA): The term RCRA is often used interchangeably to refer to the law, regulations, and EPA policy and guidance. The law describes the waste management program mandated by Congress that gave EPA authority to develop the RCRA program. EPA regulations carry out the Congressional intent by providing explicit, legally enforceable requirements for waste management. These regulations can be found in Title 40 of the Code of Federal Regulations (CFR), Parts 239 through 282.

Spill Prevention, Control and Countermeasures (SPCC) Plan: This SPCC Plan establishes preparedness, prevention, planning, spill response, and spill notification procedures as set forth in applicable state and federal regulations pursuant to the Environmental Protection Agency's Oil Pollution Prevention Regulations These regulations can be found in Title 40 of the Code of Federal Regulations (CFR), Parts 110 and112.

PROCEDURES:

1 General Instructions

1.1 Copies of Forms and Agreements referenced within this procedure can be found at the following web address http://www.ehs.ucf.edu/ or by contacting the EHS Environmental Management Coordinator.

1.2 All contractors and their sub-contractors must document information related to on-site activities using the Contractor Environmental Management Agreement.

1.3 Completed Contractor/Sub-Contractor Environmental Management Agreements shall be submitted to the UCF Department of Environmental Health & Safety (EHS) prior to start of on-site work. Fax completed forms to 407-823-1219 or mail to

UCF-EHS
Attn: Environmental Management Coordinator
3512 Perseus Loop
Orlando, FL 32816-3500

1.4 Contractors and their subcontractors shall notify EHS immediately of any changes to proposed activities.

1.5 All contractors, sub-contractors and their employees must comply with the following procedures and to all applicable legal and other requirements. Contractors responsible for violations of state and federal regulations are responsible for any fines or civil and criminal actions resulting from the violations.

1.6 Contractors and their sub-contractors shall maintain records as specified by this work practice and by contract requirements.

1.7 Contractors and/or their subcontractors shall not correspond with Regulatory Agencies on behalf of UCF unless UCF EHS has given them permission. Contractors shall contact their UCF Project Manager or EHS if a Regulatory Agency appears at their construction site.

2 Training

2.1 Prior to on-site work, contractors and their sub-contractors shall attend a one hour training session provided by EHS regarding UCF safety and compliance policies. Contractors and their sub-contractors shall ensure their on-site staff is aware of these policies. Training is required annually.

2.2 Each contractor, sub-contractor and their employees who use hazardous materials and may generate a hazardous waste must provide evidence of having received RCRA Hazardous Awareness Training and annual refresher training as required by 40 CFR 265.16 and 262.34.

3 Hazardous Material

3.1 Contractors and sub-contractors shall identify all chemical and hazardous materials and maintain Safety Data Sheets (SDS) for each product on site as required by OSHA Hazard Communication Standard 29 CFR 1910.1200.

3.2 Copies of Safety Data Sheets must be provided to EHS upon request.

3.3 Work involving the use of chemical products requires completion of the Hazardous Materials & Waste Generation Form. Include product name and manufacturer of all hazardous materials that will be used during the project and estimated quantity of hazardous waste generated from their use prior to the start of the project.

3.4 All hazardous materials must be stored in a safe, secure and weatherproof location that meets fire code requirements.

3.5 Bulk storage, over 55 gallons, of petroleum-based products shall be equipped with appropriate secondary containment and must be stored in a safe and secure location that meets fire code requirements. Contractor must submit to EHS a job-site specific Spill Prevention Plan. At a minimum the Plan shall include a description of storage device (e.g. tank or drums) and secondary containment, inspection protocol, list of emergency contacts, discharge prevention measures, and spill cleanup and reporting measures. Contractor is responsible for weekly inspections of storage containers and secondary containment to assure there are no visible leaks and containers are closed and secure. See section 8 for information regarding spill control. Contractor must maintain inspection records onsite with their Plan.

3.6 Use of chemical materials in or around occupied buildings may require a ventilation plan or after hours work.

4 Used Oil

4.1 All used oil must be stored in a safe, secure and weatherproof location that meets fire code requirements. All containers of used oil must be sealed and stored on weatherproof secondary containment and labeled “used oil” with beginning accumulation date.

4.2 Bulk storage, over 55 gallons, of used oil products shall be equipped with appropriate secondary containment. Contractor must submit to EHS a job-site specific Spill Prevention Plan. At a minimum the Plan shall include a description of storage device (e.g. tank or drums) and secondary containment, inspection protocol, list of emergency contacts, discharge prevention measures, and spill cleanup and reporting measures. Contractor is responsible for weekly inspections of storage containers and secondary containment to assure there are no visible leaks and containers are closed and secure. See section 8 for information regarding spill control. Contractor must maintain inspection records onsite with their Plan.

4.3 Contractors shall dispose of used oil through the University EHS department or an EHS approved waste vendor:

4.3.1 For disposal through EHS

Contractors or sub-contractors shall coordinate with EHS for pickup of the used oil from the job site.

EHS will verify the identification of the used oil. If the identification is unacceptable, the contractor shall bear the cost of laboratory analysis for adequate identification.

The contractor/subcontractor is responsible for all related cost for disposal of the used oil based on the pricing agreement with the current UCF waste vendor.

4.3.2 Contractor arranged disposal through approved vendor

Contractors must forward the name, address and EPA identification number(s) of the proposed waste transporter and disposal site to EHS for approval prior to scheduling the pickup.

The University shall receive copies of the non-hazardous waste manifest documenting shipment of the used oil.

5 Hazardous Waste

5.1 Contractors shall be responsible for estimating the type and quantity of hazardous waste that will be generated during the project using the Hazardous Materials & Waste Generation Form.

5.2 Contractors shall be responsible for the proper storage, identification and management of all hazardous wastes within the scope of a given project.

5.3 Contractors shall identify a secure waste accumulation area:

All hazardous waste must be stored in a secured, locked, and weatherproof location. Incompatible waste must be stored in physically separate locations or in adequate secondary containment.

5.4 Contractors shall store waste in appropriate containers:

All hazardous waste containers must be closed at all times except when adding waste.

Container must be compatible with the waste type, sealable and free of leaks.

Paint brushes, rollers, rags, sludge, absorbent, etc. used with oil paints or solvents and that are waste materials, shall be placed in 5-gallon sealable bucket, or other appropriate size containers.

In no case shall evaporation be used to dry solvent-laden materials destined for disposal.

5.5 Contractors shall identify the contents of the containers including the words "Hazardous Waste" and beginning waste accumulation date.

Examples of Hazardous Waste that may be generated include but are not limited to:

PCB Ballast
Lead-containing Paint
Mercury containing devices (thermostats & controls)
Mineral Spirits
Toluene
Acetone
Oil-based paints and stains
Paint Thinners
Aerosol cans (paints, cleaners, adhesives)
Roof Patch Coatings/Tar
Carpet Glue
PVC Primer and glue
Brushes, rollers, and rags used with oil-based paints and solvents
Sludge from cleaning oil paints and equipment
Waste product from any container labeled flammable or combustible, or that contains "petroleum distillates" or chlorinated hydrocarbon compounds

5.6 Contractors shall verify the accumulation time does not exceed 90 days.

5.7 Contractors shall document inspection of the containers on a weekly basis. This documentation shall be available to EHS upon request.

5.8 Contractors shall dispose of hazardous waste through the University EHS department or an EHS approved hazardous waste vendor:

5.8.1 For disposal through EHS

Contractors or sub-contractors shall coordinate with EHS for pick up the hazardous waste from the job site.

EHS will verify the identification of the waste. If the identification is unacceptable, the contractor shall bear the cost of laboratory analysis for adequate identification.

The contractor/subcontractor is responsible for all related cost for disposal of the waste based on the pricing agreement with the current UCF hazardous waste vendor as outlined in the Hazardous Waste Management Agreement.

5.8.2 Contractor arranged disposal through approved vendor

Contractors must forward the name, address and EPA identification number(s) of the proposed hazardous waste transporter and disposal site to EHS for approval prior to scheduling the pickup.

Schedule with EHS to verify identification of the waste and sign manifests on day of the pickup.

The University shall receive generator, original, and land disposal restrictions copies of manifests.

6 Lamps, Mercury Containing Devices, Batteries and Ballasts

6.1 Contractor must remove lamps and ballasts from lighting fixtures prior to disposal of fixture. They must be stored in a safe, secure and weatherproof location.

6.2 Lamps shall be placed in appropriate sized boxes or fiber drums. All drums shall be kept closed and all boxes shall be taped shut unless adding lamps. Lamps should not be taped together.

6.3 Lamps are to be handled properly to avoid breakage. In the event of bulb breakage, broken lamps must be place in sealed containers and handled separately from unbroken bulbs. If liquid mercury is observed, cordon off the area an initiate spill cleanup in accordance with Section 9. Dispose of spill cleanup material as hazardous waste.

6.4 Each box or drum must be labeled in accordance with FAC 62-737 and dated, for example "Spent Mercury-Containing Lamps for Recycling."

6.5 Ballasts shall be separated into PCB categories and placed into separate 55-gallon (or appropriate smaller size) open-head steel DOT drums. Each drum must be labeled with appropriate date and labels; "PCB Ballast" or "Non-PCB Ballast for Recycling." Drums shall be kept closed unless adding ballasts.

6.6 UCF recycles lead acid and rechargeable batteries: lithium ion, nickel cadmium, and nickel metal hydride. Contractor to dispose of spent alkaline and fully spent non-rechargeable lithium batteries as solid waste. Batteries shall be separated into types and placed into separate 30-gallon (or appropriate smaller size) open-head poly DOT drums, cardboard boxes, fiber drums, or 5 gallon plastic buckets with lids. Each drum or bucket must be kept closed, unless adding batteries, and labeled with appropriate date and DOT shipping name. All battery terminals must be taped using nonconductive tape.

6.7 It is the contractor's responsibility to arrange recycling of lamps, ballasts and batteries with the current University universal waste recycler. The Contractor shall coordinate this with EHS in order to ensure proper shipment. The contractor/subcontractor is responsible for all related cost for recycling of the universal waste based on the pricing agreement with the current UCF hazardous waste vendor as outlined in the Hazardous Waste Management Agreement.

In the event a contractor intends to transfer universal waste off site for recycling through a contractor selected vendor: Contractors must forward the name, address and EPA identification number(s) of the proposed universal waste recycler and address of the new collections site to EHS for approval prior to removing the universal waste from the UCF job site. The University shall receive documentation of the quantities shipped as well as proof that the universal waste removed from campus has been recycled.

If the universal waste vendor will not take PCB ballasts then the Contractor shall manage the material as hazardous waste and follow Section 5 above.

7 Storage Tanks

7.1 Contractors must report proposed installation of all storage tanks on Tank Registration Information Form to EHS prior to ordering the tank system. Installation, construction, repair, closure and disposal of storage tanks must be in

accordance with FAC 62-762. This applies to tanks that store mineral acid, petroleum products, compression vessels and hazardous substances. Equipment must be on the FDEP approved equipment list
http://www.dep.state.fl.us/waste/categories/tanks/pages/equip.htm

7.2 Petroleum storage tanks with capacity of greater than 550 gallons must be registered with the Florida Department of Environmental Protection. EHS is responsible for filing the registration with FDEP based on information provided on the Tank Registration Information Form. Contractor shall provide leak tests as required by the FDEP. The UCF project is responsible for the registration fee and additional fines or fees associated with improper notification of activities to EHS.

7.3 All fuel filled tanks and oil-filled equipment greater than 55 gallons will be added to the UCF Spill Prevention and Countermeasures (SPCC) Plan. EHS is responsible for the update of the SPCC. The UCF project is responsible for the SPCC amendment costs and for any fees or fines associated with improper notification of activities to EHS. SPCC amendment costs vary per project.

7.4 Internal combustion equipment associated with storage tanks may need air permitting. See section 10 for information regarding air permitting.

7.5 Tanks with capacity of greater than 550 gallons must be inspected by the local FDEP designated tank inspection authority
1) on day of installation and
2) after the system is fueled and fully operational.

7.6 Contractor is responsible for scheduling with the appropriate inspection authority and EHS and implementing any corrective actions related to tank design or installation. Notification of installation schedule is required 21 business days prior to tank installation.

7.7 All installations of storage tank for petroleum products and synthetic or vegetable oils must have rain-tight secondary containment, be secure, and be located in a well-lit area.

8 Spill Control

Contractors must

8.1 Maintain adequate spill control supplies to respond to incidental releases of project related hazardous materials immediately.

8.2 Clean up spills and contaminated materials or soils as soon as practicable.

8.3 Place drip pans or absorbent materials under leaking equipment.

8.4 Call 911 for emergency response.

8.5 Report all releases of chemical or petroleum products to UCF Project Manager and Work Control 407-823-5223 as soon as possible. Fill out the Environmental Accident Report Form and submit to EHS on day of the release. Include time, date, location, information on material spilled, amount, on pervious or impervious surface, storm water, etc. and a description of response measures.

8.6 Contractors are responsible for any spill remediation and waste disposal costs. Provide copies of disposal documents to EHS.

9 Discharges to Storm Water and Sanitary Sewer

9.1 Contractor shall not discharge any industrial waste water, hazardous chemicals or hazardous waste to the storm water system. Contractor shall collect rinse water from paint equipment; brushes, rollers, rags and cement mixing for proper offsite disposal. Contractor shall use all paint on the roller or brush and dispose of the dry brushes, rollers and rags for non-oil based paints in the trash. Oil-based paint materials shall be handled as hazardous waste as described above.

9.2 Contractor shall not discharge any hazardous chemicals or hazardous waste to the sanitary sewer. Use of sewer shall be in accordance with City of Orlando Ordinances, Chapter 30.

9.3 Contractor shall report all discharges to storm water or sanitary of hazardous chemical or petroleum products using the Environmental Accident Report Form to EHS on day of the release. Include time, date, location, information on material spilled, amount, on pervious or impervious surface, storm water, etc. and a description of response measures.

9.4 Contractors shall follow UCF's NPDES permit and the project specific storm water pollution plan to minimize storm water discharges from construction activities.

10 Air Pollution

10.1 Contractors that are required to purchase and/or install equipment that may be expected to emit any air pollutant shall contact EHS to ensure that an air pollution permit has been obtained or that the equipment falls under an air permit exemption. Equipment includes, but is not limited to, boilers, generators, printing presses, baking or cooking equipment, gas powered pumps, and water heaters.

10.2 Projects that require installation of generators that are greater than 200 kw require an air construction permit prior to ordering the generator set. Information must be submitted to EHS at least six (6) months prior to ordering this type of equipment. EHS will obtain the permit and provide the contractor with notice to proceed with

ordering the generator. The project is responsible for permit application fees, consultant fees, compliance testing fees and for any fees or fines associated with improper notification of activities to EHS. EHS is responsible for determining the need for air permitting, submitting construction permits, arranging compliance testing and applying for final air operation permits.

10.3 Contractors shall follow UCF's NPDES permit and the project specific storm water pollution plan to minimize air pollution from construction activities.

11 EHS Environmental Management Contacts

Environmental Management Coordinator 407-823-0707

Sr. Hazardous Materials Specialist 407-823-0474

Fax completed environmental management forms to 407-823-1219 or mail to
UCF-EHS
Attn: Environmental Management Coordinator
3512 Perseus Loop
Orlando, FL 32816-3500

Websites:
http://www.ehs.ucf.edu/

ENFORCEMENT:

EHS will perform periodic inspections to determine compliance with this procedure. If a violation of this procedure is noted, EHS will ask the contractor to correct the violation. EHS will contact the UCF project manager to document the violation. The UCF project manager is responsible for ensuring the Contractor corrects the violation immediately. EHS will perform a follow up inspection within five days of the violation.

The Environmental Protection Agency (EPA), the Florida Department of Environmental Protection (FDEP), Orange County Environmental Protection Department Air Quality Management, City of Orlando Industrial Waste Pretreatment Program and Seminole County Industrial Pretreatment Program periodically perform inspections of UCF operations. If a regulatory agency notes a violation caused by Contractor activities, the Contractor will be held responsible for these fines.

AGREEMENTS AND FORMS:

Contractor/Sub-contractor Environmental Management Agreement
Hazardous Waste Management Agreement
Environmental Accident Report Form
Hazardous Materials & Waste Inventory Form
Storage Tank Registration