1. APPLICABILITY

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, as well as leased spaces.

In accordance with UCF Policy FSP EHS0002, UCF Environmental Health and Safety (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 or renovation projects 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 one of the following activities:

- Use of chemical products or oils.
- Release of industrial wastewater.
- Disruption of more than one 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.

2. PROCEDURE STATEMENT

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

3. DEFINITIONS

Department of Transportation (DOT): The term DOT is often used interchangeably to refer to the Department, as well as 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 through 1,580.

Direct Support Organization: An organization that is certified by the UCF Board of Trustees as operating in a manner consistence 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: 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): Created by the Occupational Safety and Health Act of 1970, OSHA ensures safe and healthful working conditions for working women and men by setting regulations that 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 laws, regulations, and EPA policy and guidance. The law describes the waste management program mandated by Congress that gave the EPA authority to develop the RCRA program. EPA regulations carry out 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 Plan (SPCC): 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 EPAs Oil Pollution Prevention Regulations. These regulations can be found in Title 40 of the Code of Federal Regulations (CFR), Parts 110 and 112.

4. RESPONSIBILITY

UCF Environmental Health and Safety is responsible for the development of this procedure. It is the responsibility of UCF contractors and sub-contractors to follow said procedure, which is listed below.

5. ASSOCIATED DOCUMENTS

EHS_SOP318_FORM005 Environmental Accident Report
EHS_SOP319_FORM001 UCF Tank Registration Information
EHS_SOP319_FORM003 Contractor Environmental Management Agreement
EHS_SOP319_FORM004 Hazardous Waste Management Agreement
EHS_SOP319_FORM006 Contractor Hazardous Material and Waste Inventory

6. PROCEDURE

- **General Instructions**

    - 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 Officer.

    - All contractors and their sub-contractors must document information related to on-site activities using the "EHS_SOP019_FORM004: Hazardous Waste Management Agreement".

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

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

- Contractors and their sub-contractors shall notify EHS immediately of any changes to proposed activities.

- 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.

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

- Contractors and their sub-contractors 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.

- **Training**

  - 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.

  - 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 if requested.

- **Hazardous Materials**

  - Contractors and their 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.

- Copies of SDS must be provided to EHS upon request.

- Work involving the use of chemical products requires completion of the "EHS_SOP019_FORM006: Contractor Hazardous Material/Waste Inventory". Include the product name and manufacturer of all hazardous materials that will be used during the project, as well as the estimated quantity of hazardous waste generated from their use prior to the start of the project.

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

- 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. Contractors must submit a job-site specific Spill Prevention Plan to EHS. At minimum, the plan shall include a description of storage device (e.g., tank or drums) and secondary containment, inspection protocol, a list of emergency contacts, discharge prevention measures, and spill cleanup and reporting measures. Contractor is responsible for monthly inspections of storage containers and secondary containment to ensure there are no visible leaks and containers are closed and secure. See the section "Spill Control" for information regarding spill control. Contractor must maintain inspection records onsite with their Plan.

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

- **Used Oil**

  - 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, then labeled "used oil" with beginning accumulation date.

  - Bulk storage (over 55 gallons) of used oil products shall be managed in accordance with the requirements of the section "Hazardous Materials" above.

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

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

- EHS will verify the classification of the used oil. If the classification is unacceptable, the contractor shall bear the cost of laboratory analysis for adequate classification.
- The contractor/sub-contractor is responsible for all costs related to disposal of the used oil, based on the pricing agreement with current UCF waste vendor.

- For contractor arranged disposal through approved vendor:
  - Contractors must forward the name, address, and EPA identification number(s) of the proposed waste transporter and disposal sites to EHS for approval prior to scheduling pickup.
  - UCF shall receive copies of the non-hazardous waste manifest documenting the shipment of the used oil.

- **Hazardous Waste**

  - Contractors shall be responsible for estimating the type and quantity of hazardous waste that will be generated during the project using the "EHS_SOP019_FORM006: Contractor Hazardous Material/Waste Inventory".

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

  - 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.

  - Contractors shall store waste in appropriate containers:
    - All hazardous waste containers must be closed at all times except when adding waste.
    - Containers 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 appropriately sized containers.
    - In no case shall evaporation be used to dry solvent-laden materials destined from disposal.

  - 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.

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

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

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

- For disposal through EHS:
  - Contractors or sub-contractors shall coordinate with EHS for the pick-up of hazardous waste from the job site.
  - EHS will verify the classification of the waste. If the classification is unacceptable, the contractor shall bear the cost of laboratory analysis for adequate classification.
  - The contractor/sub-contractor 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 “EHS_SOP019_FORM004: Hazardous Waste Management Agreement”.

- 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 classification of the waste and sign manifests on day of the pickup.
  - The University shall receive generator, original, and land disposal restrictions copies of manifests.

- **Lamps, Mercury Containing Devices, Batteries, and Ballasts**

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

    - Lamps shall be placed in appropriately 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.

    - 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 and initiate spill cleanup in accordance with the Section “Spill Control.” Dispose of spill cleanup material as hazardous waste.

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

    - Ballasts shall be separated into PCB categories and placed into separate 55-gallon (or appropriate smaller size) open-head 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.

    - 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.

    - 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/sub-contractor 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 “EHS_SOP019_FORM004: 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 the "Hazardous Waste" section above.

- **Storage Tanks**

  - Contractors must report proposed installation of all storage tanks on "EHS_SOP019_FORM001: UCF 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

  - Petroleum storage tanks with capacity of greater than 550 gallons must be registered with the FDEP. EHS is responsible for filing the registration with FDEP based on information provided on the "EHS_SOP019_FORM001: UCF 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.

  - 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.

  - Internal combustion equipment associated with storage tanks may need air permitting. See the Section "Air Pollution" for information regarding air permitting.

  - Tanks with capacity of greater than 550 gallons must be inspected by the local FDEP designated tank inspection authority:
    - On day of installation and
    - after the system is fueled and fully operational.

- 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.

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

- **Spill Control**

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

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

  - Place drip pans or absorbent materials under leaking equipment.

  - Call 911 for emergency response.

  - 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 "EHS_SOP018_FORM001: 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.

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

- **Discharges to Storm Water and Sanitary Sewer**

  - 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.

  - 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.

- Contractor shall report all discharges to storm water or sanitary sewer of hazardous chemical or petroleum products using the "EHS_SOP018_FORM001: 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.

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

- **Air Pollution**

  - 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.

  - 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.

7. RECORD KEEPING

Contractors are required to have a record of the control process for their documents. EHS will keep records based on the procedure "EHS_SOP010 EHS Document Control."

8. ARCHIVES

Contractors are required to archive their control documents. EHS archives documents based on the procedure "EHS_SOP010 EHS Document Control."

9. DISTRIBUTION

This document is shared through:

□ EHS only
□ Facility and Safety
☑ UCF community
□ Secured Document
☑ Contractor
☑ EHS Web site
□ Other: _____

10. DOCUMENT HISTORY

Date	Revision number	Author	Modifications
07/01/2019	0	Casey Brock	New format based on the EHS_SOP001
10/16/2023	1	Renee Michel	Annual Review