COMMON ACTIVITIES OF CONCERN:

Equipment Cleaning

- Equipment must be cleaned in a manner that does not create any discharge of cleaning agents, paints, oil or other pollutants to a storm sewer or waterway. Soaps and detergents must never be discharged to the ground or off-site. When rinsing painting equipment outside, rinse water must be contained in a bucket or other container. Water based or latex paint rinse water may be discharged to the sanitary sewer. Oil-based paint wastes, including solvents and thinners, must not be disposed of in the sanitary sewer; they must be collected and disposed of through the contractor's disposal company in accordance with applicable laws and regulations. Cement handling equipment must be rinsed in a contained concrete washout area installed in an area of minimal slope and there must be no drainage off-site.

Pressure Washing

- Discharges from pressure washing must not be allowed to enter a storm sewer or waterway. Consider vacuuming up the water or berming the process water and allowing it to evaporate. If the rinsate only contains water and dirt/sediment it may be discharged to a vegetated area with prior permission from Landscape Services and provided the area is large enough to accept the discharge and not enter a storm sewer or waterway. Depending on the content of the material it may also be possible to discharge to a sanitary sewer with prior permission from Environmental Health & Safety. (Permission to discharge to sanitary sewer may take up to seven business days.)

Waste Disposal

- Any trash or debris must be contained on site and disposed of in a recycling bin or waste receptacle in accordance with applicable laws and regulations to prevent wind or rain from carrying it off-site into a storm drain or waterway. Petroleum wastes, such as waste oil and used oil filters, must be containerized for recycling or disposal by the contractor. Non-hazardous solid wastes, such as general construction debris may be recycled or disposed of in the trash container. *Never dispose of liquid wastes <u>of any kind</u> in dumpsters*.

Packing Lamps

- Used fluorescent high intensity discharge (HID) and UV germicidal lamps must be collected in containers that protect the lamps during storage and transportation. The original shipping container is the preferred package for spent lamps. Remove extra cardboard end pieces to assure that lamps fit in the box. Remove any plastic lamp sleeves and tape from spent lamps when packing for waste collection. The Office of Environmental Health & Safety also has boxes available for packaging standard four foot and eight foot length fluorescent lamps. To receive a packing box, email EHS-HazardousMaterials@austin.utexas.edu with the subject line:

  CP# - BLDG - Fluorescent Light Bulb Storage Container Request. In the body of the email include:

  - Building and room
  - Contact Name and Phone Number
  - # of container(s) and length or appropriate number of bulbs to dispose of and length

  An open top metal drum or poly drum should be used for other types of lamps such as small lamps, mercury vapor lamps, and other odd shaped fluorescent tubes. In the case of smaller bulbs, additional packing materials such as vermiculite must be added to prevent breakage.

Broken Fluorescent Lamps

- When fluorescent lamps and HIDs are broken, mercury is released to the environment, but some mercury still remains on the surfaces of the glass, phosphor, and the metal or plastic. If a fluorescent, HID, or UV germicidal lamp is broken, all the broken parts must be collected as a hazardous material. Dedicate 30

gallon metal drums labeled with the words "broken fluorescent lamps" to collect the broken pieces, and contact EHS for disposal when the drum is full. The drum must be sealed when it is not actively receiving broken bulbs.

Sediment

- Proper erosion and sedimentation controls must be in place prior to any construction activity to prevent sediment or silt run-off. Sediment (including cement) should never be rinsed off the site; instead it must be cleaned up using dry cleanup methods or in a manner that does not allow any material to reach a storm drain or waterway. Equipment tires should be rinsed before leaving the site if necessary to avoid tracking sediment into the roadway or off the site. Erosion and sediment control plans and/or Storm Water Pollution Prevention Plans shall be submitted to EHS prior to soil disturbance. All erosion and sediment controls are to be maintained throughout the duration of the construction and maintained until all areas are stabilized.
- Erosion controls installed onsite must meet the requirements of UT Design and Construction Storm Water Management Standard 01 57 23.
- *All vehicles must leave the site through a stabilized construction entrance meeting the requirements of the University's Construction Standard 02060 regarding Erosion and Sedimentation Controls.*

Site Dewatering, Tank, & Pipe Testing

- Discharges from dewatering, water or fire line testing, hydrostatic tank testing or pipe pressure testing must be free from sediment, chemicals, and any other pollutants. Some discharges, such as those from underground storage tank pits, may require temporary discharge permits from EHS and contractor is responsible for obtaining such permits. EHS shall be notified prior to dewatering and/or discharging.

Petroleum

- Spills of hydraulic fluid, oil and other petroleum products must always be immediately cleaned up to prevent discharge of these fluids with stormwater run-off. Petroleum contaminated soil must be cleaned up and disposed of properly in accordance with applicable laws and regulations. Storage containers must be kept closed, clean and free of oily residue. Containers stored outside with any of the above fluids must be stored in secondary containment or on appropriately sized spill pallets.

Temporary Storage Tanks

- SEMI-PERMANENT INSTALLATION - tanks must either be 2-hour fire rated (will carry a designation of UL-2085 & are double walled) or be internal to a liquid tight concrete vault.

- TEMPORARY/CONSTRUCTION SITE USE – Must be located in a bermed containment area.
  In this case, the tank must be installed/located as follows:
  - The berm should be about 3 feet out in all directions from tanks.
  - The height of the berm must contain the maximum contents of the largest tank + 8 inches --this almost always equates to about a 10 inch tall berm.
  - First lay down 2 inches of sand, then water tight barrier (should be minimum 6 mil plastic or rubber), build up 10 inch berm height with dirt or whatever, lap barrier over berm and weight down with more dirt, put 2 inches of sand in bottom over barrier.
  - Storage tanks must be 50 feet from nearest building and property lines.
  - It is best to use tanks on skids with pumps (pumps must be UL rated for fuels).
  - If using the "tower" or gravity feed type setup, the containment must be wide enough that if either tank falls to the side it will entirely land inside of containment. There must also be a fusible link at the valve that will shut off flow to hose in the event of a fire.

Separators or Traps

- Before removing oil/water separators or traps connected to storm sewers, the materials in them must have been tested (by Toxicity Characteristic Leachate Procedure or TCLP) within the last two years before they are cleaned out. Be aware that this test may take three weeks to complete if a recent test has not been completed. Contractor is solely responsible for accommodating the time for such testing and no claims for delay arising out of such testing will be permitted. Documentation of the test results must be submitted to EHS staff for review and approval before emptying or removing the trap.

SPILL PREVENTION, CLEAN-UP AND DISPOSAL

- Be prepared to contain spills to prevent spreading. Small areas are easier to clean than large ones. Spill kits are recommended to be kept on hand by anyone working on exterior projects. Spill cleanup materials recommended to be kept on hand may include; sorbent materials such as clay (kitty litter), polypropylene booms and pads, rags and sawdust to contain spills immediately.

Clean-Up

- Sorbent materials can be used to effectively clean-up various materials spilled on pavement, water and soil. Soil or other media which has been contaminated with petroleum or other pollutants must be excavated or remediated in accordance with applicable laws and regulations to prevent contaminated discharges to a storm drain or waterway. Excavated contaminated materials must be stored in containers or on plastic and covered so as to ensure that the contamination is not flushed back onto the ground during a rainstorm.

Contaminated Material Disposal

- Proper disposal of waste materials depends partly on the type of contaminant. Hazardous wastes (such as flammable petroleum products and solvents, thinners) and materials contaminated with hazardous wastes are considered regulated wastes, and should be containerized for transport and disposal by a permitted company in accordance with applicable laws and regulations. Disposal also depends on the amount of contaminant. Contact EHS at 471-3511 for assistance in the disposal required.

CONTRACTOR REQUIREMENTS AND RESPONSIBILITIES

- Contractors are solely responsible for cleaning up and properly disposing of all spilled pollutants brought to the site as part of the contractor's work, including oil, paint, fuels, antifreeze, solvents, etc. in accordance with applicable laws and regulations. Contractor must keep accurate records (such as receipts, copies of analytical results, etc.) indicating proper disposal of spilled materials in accordance with applicable laws and regulations. Furthermore, Contractor is responsible for ensuring that all discharges from the site are in compliance with all applicable laws and regulations.

- No substance may be dumped or leaked onto the ground or allowed to run-off of a construction site that might cause pollution. Be aware that the contractor is responsible for preventing pollutant contaminated run-off and proper disposal of all waste materials generated as a result of the contractor's activities.

NOTIFICATION REQUIREMENTS AND PROCEDURES

UT EHS (471-3511) should be notified immediately in the event of:

- Any spill that threatens to enter a storm sewer or watercourse.
- All petroleum spills e.g. hydraulic fluid, transmission fluid, diesel, gasoline, etc.
- Any hazardous or unknown material spill, e.g. many solvents, cleaners, etc.
- Any discharge from your site which you suspect may be in violation of City Code, state regulations, or other applicable laws and regulations, e.g. discharges which are cloudy, foul smelling, colored, contain chemicals or heavy sediment loads.

Notification can be accomplished by calling the UT-Austin EHS at 471-3511 during regular business hours and calling 911 after hours.

The University of Texas at Austin Environmental Health and Safety Department would like to acknowledge the assistance of the City of Austin Watershed Protection Department for the use of some of the information contained within this document.