



CONSTRUCTION ENVIRONMENTAL HEALTH & SAFETY EXHIBIT

SPILL PREVENTION CONTROL AND

COUNTERMEASURE PROGRAM

I. General Requirements

- A. All Contractors and Subcontractors performing work on projects conducted at or on behalf of the University shall comply with all applicable federal environmental regulations (EPA, OSHA, etc.), state environmental regulations (MassDEP, Department of Public Health, Massachusetts Water Resources Authority, etc.), and local environmental regulations and ordinances (as appropriate) as well as the University-specific guidelines outlined in the following Sub-Sections..
- B. The requirements included in the following Sub-Sections have been developed to aid Contractors and Subcontractors in navigating through relevant environmental regulations and potential environmental issues that may arise over the course of construction, therefore helping to minimize the overall impacts to the environment and to students, faculty, staff, and the general public. Where codes/regulations/requirements conflict, the more stringent guidelines shall apply.
- C. Harvard SPCC Program establishes University-wide procedures for the prevention and detection of spills and/or releases of oil or hazardous materials and varies based on where the work is being conducted. More information on the SPCC Program may be obtained from HUEHS.

II. Spill Prevention

- A. Based on the inventory of oil and hazardous chemicals that will be brought on-site, the Contractor shall have available equipment (e.g., secondary containment pallets, absorbent pads, absorbent booms, speedy-dry) that is suitable and sufficient to control a potential spill/release.
- B. Prior to the work, the Contractor is responsible for identifying conveyances to the environment (e.g., sumps, storm/floor drains, etc.) and adequately minimizing spill potential to these areas through protection, diking, etc.
- C. The Contractor is responsible for the proper storage and labeling of all flammable and combustible chemicals that are brought and/or stored on site to complete the work in accordance with Federal, State and local regulations. Such storage may require the use of safety containers, safety cabinets, and/or secondary containment. The Contractor shall also ensure that any incompatible chemicals are safely segregated. The Contractor is responsible for maintaining and securing all chemical containers and all chemical storage areas. This requires selecting locations and methods to minimize exposure to rainfall, surface water, and the ground surface or subsurface. Enclosures, shelters, and secondary containment should be used where appropriate.
- D. The Contractor must use appropriate protective procedures such as double containment, employee training, overflow protection, and other measures as part of activities involving the use, storage, or handling of petroleum products, chemicals or other hazardous materials on Harvard University Property.
- E. To ensure that construction activities and the use of heavy equipment does not increase the risk of release of oil or hazardous materials to the environment, the Contractor shall have and implement a Spill Prevention and Control Plan that reflects all regulatory standards and any additional procedures established by the Owner. Based on the inventory of oil and hazardous materials that will be brought on-site, the Contractor shall have available equipment (e.g., secondary containment pallets, absorbent pads, etc.) that



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is suitable and sufficient to control a potential spill/release. The Contractor is responsible for identifying conveyances to the environment (e.g., sumps, floor drains, etc.) and adequately minimizing spill potential to these areas. The Contractor shall ensure that his/her employees are adequately trained in spill response/notification procedures. The Contractor shall immediately report all spills/releases to the Owner and to the Owner's Operations Center at (617) 495-5560. The Contractor is the responsible party for any site release and is responsible for coordinating with the Owner and the Harvard University Environmental Health and Safety Department regarding reporting and follow-up documentation to outside regulatory agencies. The Contractor shall submit their Spill Plan to the Owner as part of their overall Health and Safety Plan.

III. Spill Control and Response

- A. In the event of a release or spill of oil or hazardous chemicals, the Contractor must follow all of the reporting requirements of the University's Spill Prevention Control and Countermeasures (SPCC) Program.
- B. The Contractor shall extinguish all sources of ignition and isolate incompatibles or reactive chemical substances.
- C. The Contractor shall determine if the spill/release is incidental or non-incidental (refer to Definitions in SPCC Program).
- D. For incidental spills/releases the Contractor shall conduct the following: attempt to stop or contain the spill/release at the source provided that doing so does not endanger anyone; prevent discharge of materials to environmental receptors including drains, surface water, outdoor air, sumps, soil, etc.; immediately notify the HUPM and HUEHS of all incidental spills/releases; and be responsible for the proper collection, storage and disposal of waste materials in compliance with EPA and MassDEP regulations, in cooperation with the HUPM and HUEHS.
- E. For non-incidental spills/releases the Contractor shall: immediately report the spill/release to the University Operations Center at (617)495-5560, who will in turn notify the HUEHS; and follow the steps to address the spill in accordance with the SPCC, if it is safe to do so.
- F. If it is deemed necessary to engage a professional spill cleanup company, the General Contractor will coordinate the cleanup through the HUPM and HUEHS. If the spill is deemed to be the fault of the General Contractor or any of his/her subcontractors, the General Contractor will be responsible for all costs and schedule impact associated with the spill, its cleanup any necessary remediation.
- G. HUEHS will manage and direct, together with the Contractor, *all* reporting to outside agencies and will conduct follow-up written notifications, if necessary. This does not infer that Harvard will be the Potentially Responsible Party. This will be assessed on a case-by-case basis.
- H. The General Contractor will conduct an incident investigation and coordinate with the HUPM and HUEHS on any actions that are required to prevent recurrence.