



## **Standard Operating Procedure 003: Contractor and Supplier Activity**

### **1.0 PURPOSE**

This procedure defines the process for controlling the environmental aspects of on-site contractors and their sub-contractors, tenants, and suppliers.

### **2.0 REFERENCES**

- 2.1 ISO 14001 Standard (Operational Controls)
- 2.2 Storm Water Pollution Prevention Plan
- 2.3 Spill Prevention, Control and Countermeasures Plan

### **3.0 SCOPE AND RESPONSIBILITIES**

- 3.1 The scope of this procedure is for any contractor performing work on behalf of the Port of Virginia and any of the VPA owned Marine Terminals.
- 3.2 It is the responsibility of:
  - 3.2.1 The Engineering Department, Purchasing/Procurement Department, and/or the Operations and Maintenance Departments to ensure the Environmental General Conditions Statement is applicable and accurate.
  - 3.2.2 The Contracting Officer, the Purchasing/Procurement Department, and/or the Operations and Maintenance Departments to insure the Environmental General Conditions Statement is included with contractual documents.
  - 3.2.3 The Engineering Department, the Purchasing/Procurement Department, and/or the Operations and Maintenance Departments to monitor construction activities to ensure compliance with this procedure and with the environmental permits and requirements of the Port of Virginia Marine Terminals.
  - 3.2.4 The scope also includes a description of the environmental requirements for tenants and suppliers.

### **4 REQUIREMENTS**

- 4.1 A written statement, prepared by the contractor, shall be submitted which outlines the work to be undertaken and the method(s) used for minimizing and managing the environmental impacts.
- 4.2 For any contractors, vendors, and/or suppliers that will be providing environmental services to the port, Port personnel will ensure the company has the proper certifications (EPA ID#s, Hazardous Waste Certification, etc.) for the environmental work they are intending on carrying out for the port.
- 4.3 Prior to on-site work, contractors shall:
  - 4.2.1 Be provided with information and documents to insure their awareness of the facilities Environmental Management System and their conformance to it.
    - 4.2.1.1 When contractor activity is requested either by invitation for Bid (IFB) or Request for Proposal (RFP), the contractor will have included in the bid package a General



Construction/Procurement Environmental – General Conditions packet. Signed contract documents serve as acceptance of environmental requirements.

4.2.1.2 When contractor activity is approved by a purchase order without IFB or RFP bid documents, the contractor will be given a Construction by Purchase Order Only (Without Contract) Environmental – General Conditions. Upon acceptance of the project, before work commences, the contractor will sign and return to the Project Manager a Contractor Acknowledgement of Environmental Requirements form for inclusion in the project files.

- 4.2.1 Submit a completed Environmental General Conditions Statement to the activity.
- 4.2.2 The Environmental General Conditions Statement shall include an assessment of the environmental issue associated with the specified work activities and measures necessary to minimize the environmental impact.
- 4.2.3 While on-site, contractors shall conform to the facilities Environmental Management System and to all applicable legal, regulatory, or other environmental requirements.
- 4.2.4 Contractors shall maintain records as specified by the facilities Environmental Management System and by contract requirements and be available for inspection.
- 4.2.5 Contractors' areas are inspected quarterly by the Sustainability Department and/or designee during the Quarterly Storm Water inspections.

#### 4.3 Suppliers

- 4.3.1 Vendors and suppliers accessing the facility to provide supplies, goods and materials to the Port of Virginia, acknowledge their acceptance of Port of Virginia's environmental requirements when accepting a Purchase Order. Environmental requirements are contained in the purchase order Terms and Conditions and is available for public viewing in the POV website at <http://www.portofvirginia.com/about/policies/po-terms-conditions/>
- 4.3.2 See section 5.0 of this procedure for a description of the chemicals procurement process.
- 4.3.3 All suppliers (e.g. fuel delivery, waste pick-up) that enter the terminal will be briefed on the Environmental Management System and the environmental requirement specific to their task by their respective employer as stated in the Purchase Order - Terms and Conditions.
- 4.3.4 While on-site, suppliers shall conform to the facilities Environmental Management System and to all applicable legal, regulatory, or other environmental requirements.

## 5.0 CHEMICAL PROCUREMENT

### 5.1 Responsibilities

- 5.1.1 Contractors will ensure that their vendors provide most recent SDS of chemicals that will be used

- 5.1.2 Operations & Maintenance Manager(s), Environmental Department, Director of H&S, or designee will review SDS, as necessary.
- 5.1.3 Contractors will ensure that their vendors follow proper manufactures requirements for use of chemicals.
- 5.1.4 Contractors will ensure that all chemicals are in proper storage areas.
- 5.1.5 Contractors will ensure that all used chemicals are placed in drums with proper labels and drums are placed in a designated area with adequate secondary containment until disposed of by proper waste hauler.

## 5.2 Requirements

### 5.2.1 Procurement of materials, paints, chemicals, cleaners and/or degreasers

- 5.2.1.1 Contractors shall require their vendors to include the most recent SDS with the product shipment. Inclusion with the packing documents, e-mail, or sending by facsimile is acceptable. SDS sheets shall be available for inspection by the O&M Manager(s), Director of H&S, or their designee to screen the SDS's for products that may be not authorized for discharge into the wastewater treatment system or storm water system.

### 5.2.2 Use of cleaners and/or degreasers at the container wash areas

- 5.2.2.1 If the product is in a concentrated state, the manufacturers requirements for mixing or dilution of the product will be followed including the use of proper protective clothing. The container containing the diluted product will be identified with the product name and the concentration value and the manufacturers requirements for use will be followed.
- 5.2.2.2 If the product is pre-mixed, the manufacturers requirements for use will be followed.
- 5.2.2.3 All cleaners or degreasers will be stored either in a covered shelter or on containment pallets on the container wash pad.

### 5.2.3 Diposal of paints, chemicals, cleaners, and/or degreasers

- 5.2.3.1 Drums or containers will be placed in a designated area, on secondary containment, until picked up and disposed of by an authorized waste hauler. **DIPOSAL ON VPA OWNED TERMINALS IN NOT AUTHORIZED**
- 5.2.3.2 **UNDER NO CONDITION OR CIRCUMSTANCE WILL CONCENTRATED OR DILUTED PAINTS, CHEMICALS, CLEANERS AND/OR DEGREASERS BE DIPOSED OF DIRECTLY INTO THE WASTEWATER TREATMENT OR STORM DRAIN COLLECTION SYSTEMS.**

## 6.0 CONSEQUENCES OF DEVIATION FROM PROCEDURE

Deviations from this procedure could result in negative environmental impacts at the facility such as unpermitted discharges of waste or violations of environmental permits. Such negative impacts result in fines or notices of violation from the Virginia Department of the Environment and/or could result in harm to individuals or the environment.



## **7.0 ATTACHMENTS (Controlled Documents) – Not Applicable**

## **8.0 RECORDS FOR MONITORING AND MEASURING**

- 8.1 Records as required to be maintained by and for the contractor and contract documents.
- 8.2 Quarterly Storm Water Inspection
- 8.3 Applicable Product Safety Data Sheet (SDS)
- 8.4 Disposal Records (contractors)

## **9.0 DEFINITIONS**

Not Applicable

## **10.00 REVISION HISTORY**

10.1 Effective Date: 1/1/2013

10.2 Latest Revision Date: 4/3/18 – added line item stating port will check for environmental qualifications. 11/13/13 – updated employee and division titles. 1/24/13 removed Tenants from this SOP because they have their own SOP. 7/10/12 – combined all Contractor, Tenant, and Supplier Activity SOP's for all terminals into one SOP and added Chemical Procurement Process for Contractors and Tenants. 6/1/11 – Revised to show contractor areas are inspected by quarterly inspections. 1/10/2011 – Updated tenant monthly inspection procedure. 11/10/2009

10.3 Approval: Scott Whitehurst, Director, Environmental Policy and Compliance

10.4 Last Reviewed: 12/12/18

10.5 Reviewer: Billy Goodson, Environmental Compliance Specialist