

Title: Contractor Safety

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Responsible Office: EH&S

I. Purpose

To provide guidelines to contractors for ensuring the safety of the contractor employees, faculty, staff, students and visitors while conducting operations on the College campus.

II. Responsibilities

The contractors shall comply with current requirements of VOSHA and state and federal environmental protection agencies as outlined but not limited to topics in this document. All personal protective equipment and job specific equipment to include barricades, ladders, lifts, pumps, air monitors, spill response materials, containers, etc. shall be supplied by the contractor.

III. Definitions

Competent Person: As related to scaffold erection, excavation, trenching or shoring work, the contractor's "competent person" means one who is capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Contractor: An entity or agency employed by the university to perform the installation or maintenance of equipment, or the renovation or construction of a building, room or space on College property. Includes all subcontractors employed by the contractor during the performance of the work on College property.

Confined Space: A confined space is a space that is large enough for a person to enter, that has limited means for entry or exit, and that is not designed for continuous occupancy. Examples include tanks, silos, storage bins or hoppers, utility vaults, and pits. A permit-required confined space is a confined space that contains potential or known safety hazards that must be dealt with prior to or during entry. Trained personnel under an approved permit program are only allowed entry into a permit-required confined space.

Environment Health and Safety (EHS): The Department at the College responsible for the overall safety on campus and regulation compliance with regards to the environment.

Facilities Planning Design Construction (FPDC): Department within Facilities Management that is responsible for planning, design and construction of high quality facilities that on campus.

Facilities Management: Facilities Maintenance provides a comprehensive approach to the operation and maintenance services for the College facilities

FM Directive 781: Facilities Management procedure that establishes minimum guidelines to ensure the safety and health of personnel who may be required to work on any type of equipment capable of being energized or containing stored energy.

FM Directive 788: Facilities Management procedure that provides guidelines on when permits are required before performing cutting, welding, grinding and/or brazing activities and identifies the responsible party who will issue the permit under each condition where a permit is required.

Lockout/Tagout: A program used to ensure that employees are protected from sources of potentially hazardous energy. The program requires that hazardous energy sources be identified and locked and/or tagged out before work is done on the system(s).

Project Manager: The individual(s) within a department that has been assigned duties related to oversight or coordination of work performed by a contractor as defined above.

IV. Safety Orientation

- a. Copy of this document shall be provided to prospective bidders at the pre-bid/pre-proposal conferences for the work. This document shall be either included with or referenced in the contract documents.
- b. The project manager shall review the safety program and related policies pertinent to the work being conducted. The project manager can utilize staff from the Environment, Health and Safety (EHS) office to review program documents and must involve EHS staff where regulated or hazardous waste will be generated.

- V. **Submittals/Requirements for the contractor and subcontractor(s)**
- a. **Risk Analysis and Project Safety Plan:** The Contractor shall prepare a risk analysis for each phase of work and a Project Safety Plan keyed to the exposures determined in the risk analysis as outlined in the Facilities Management Design and Construction Manual, Chapter 9, Design Coordination and Quality Assurance.
 - b. **Safety Data Sheets:** The contractor shall maintain SDS on-site for all hazardous chemicals used or stored at the job site. Copies of SDS shall be provided to the project manager and EHS prior to start of work.
 - c. **Waste Manifests:** The contractor shall take precautions to ensure hazardous chemicals or materials are handled and disposed of in accordance with federal and state regulations.
 - i. Prior to any removal or shipment of hazardous waste, coordination shall be made with the project manager and EH&S department.
 - ii. Where a hazardous waste disposal manifest is required by these regulations, the contractor shall supply a copy of the waste manifest to EHS within 24-hours of receipt. This shall include, but is not limited to lead based paint and asbestos. The contractor will need to provide documentation they are certified to sign the transportation manifest prior to the shipment.
 - d. **Air Sampling Records:** Where the contractor has secured air samples documenting employee exposure to airborne hazards during the course of their work, a copy of all air sample results shall be provided to the project manager and shall be copied to EHS within 24-hours of receipt by the contractor.
 - e. **Emergency Contact Phone Number:** Provide the project manager with emergency contact phone number(s), usable 24 hours a day, for the contractor's representative. These phone numbers shall be copied to the affected department, EHS and the William and Mary Police Department prior to the work.
 - f. **Confined Spaces:** Each contractor who is retained to perform work that will require permit confined space entry operations shall:

1. May request a copy of W&M Permit-Required Confined Spaces from the EH&S Office.
2. Coordinate entry operations with the project manager when both the contractor and College personnel will be working in or near permit spaces.
3. Provide a copy of the contractor's Confined Space Program to the project manager as well as training records for those individuals that will be involved with confined space work.
4. A copy of the canceled permit(s) shall be available to the project manager
5. Contractors must provide their own air monitoring and rescue equipment

g. Electrical Safety and Lockout/Tagout:

1. The contractor shall provide the project manager a copy of their Lockout/Tagout program.
2. The contractor shall ensure that his/her personnel, to include subcontractors, understand the College's control procedures and comply with the requirements of the Lockout/Tagout programs. If the contractor does not have a LOTO policy in place they shall be trained to the College's Directive and act in accordance with all the requirements set forth.

h. Trenching and Excavations:

1. The contractor shall coordinate trenching and excavation work with the project manager and Facilities Management to assure the coordination of the work and shutdown of utilities if necessary. This includes the coordination of marking through Miss Utility requests.
2. The design of sloping and benching systems, support systems, shield systems or other protective systems shall conform, at a minimum, to the OSHA requirements detailed in 29 CFR 1926 Subpart P.

3. Trenching or excavations below the level of the base or footing of any foundation or retaining wall, or adjacent to any utility, sidewalk or roadway, will not be permitted unless:
 - a. A registered professional engineer has approved the determination that the structure is sufficiently removed from the excavation so as to be unaffected by the excavation activity, or
 - b. A registered professional engineer has approved the determination that such excavation work will not pose a hazard to employees.
 - c. This determination is the responsibility of the contractor except as permitted, required or otherwise allowed by the project specifications or drawings.
 - d. Where the design of a sloping and benching system, support system, shield systems or other protective systems requires review and approval by a registered professional engineer, the contractor shall submit a copy of the completed review to the project manager prior to start of work.
4. The contractor shall notify the project manager in writing of the name of the individual that is to serve as the contractor's competent person as defined by this program and VOSHA regulations. Training records for the competent person shall be provided to the project manager as well.

i. Hot Work Permits:

1. Each contractor conducting work requiring a Hot Work Permit (e.g. torch cutting, gas welding, arc welding, open flame soldering, grinding, use of fired heaters in all buildings or areas outside of a building where ignition may occur, spark or ignition producing work in hazardous areas of buildings, or any such work in confined spaces) shall coordinate this permit process with the project manager and/or the EH&S Office's Fire Safety Officer as outlined in FM Directive 788 and the FM design & Construction Manual.

- a. New construction does not need a separate hot work permit. Hot work activities are covered under the Construction Permit issued for the contract.
- b. Contractors performing work in occupied buildings shall follow their own hot work program and issue their own permits. The contractor shall provide the project manager with a copy of their hot work program.
- c. For hot work conducted by contractors through Facilities Management Operations & Maintenance (O&M), the O&M project manager shall issue a hot work permit under the College's program and shall act as the Permit Assigning Individual (PAI). The completed permit shall be returned to the Fire Safety Officer in the EH&S Office.
- d. Project Managers, both FPDC and O&M, will provide routine oversight of hot work activities and may stop work if a serious safety concern is observed.
- e. Copies of the Hot Work permits shall be provided to the EH&S Office Fire Safety Officer within 5 days after completion of the hot work.

j. Contractor Life Safety System Impairments:

1. Fire/life safety systems are comprised of fire detection, fire suppression and fire rated assembly systems. For repairs to fire/life safety systems during construction/renovation that require system deactivation (building occupied):
 - a. The contractor is responsible for coordinating and scheduling the repair with the FPDC CM.
 - b. The FPDC CM will coordinate the impairment with the FPSMS for the affected portion of the system.
 - c. The Project Manager (PM) or CM will complete the Impairment Permit and notify all appropriate personnel of the impairment.

k. Control of Fugitive Emissions

1. The contractor shall take all necessary precautions to control or contain fugitive emissions from the job site. Fugitive emissions

include, but are not limited to: nuisance dust, chemical odors, hazardous materials (such as lead dust or asbestos) and noise.

2. Where the chemicals or materials that are to be used on a job-site have a permissible exposure limit (PEL) established by VOSHA, the contractor shall:
 - a. Include in the Project Safety Plan the methods that will be employed as necessary to limit, control or eliminate exposure of University staff, students and/or the public to these chemicals, materials or other hazards.
 - b. Where engineering controls will not control fugitive emissions or are not feasible, then the contractor shall monitor, or shall contract to have monitored, work area exposure conditions. Monitoring shall occur, at a minimum, during the start of work and whenever there is a change in procedure, process, or chemical or material used. A copy of the monitoring results shall be submitted to the project manager and shall be copied to EHS within 24-hours of receipt by the contractor.

1. Accidental releases/spills

In the event of an accidental release or spill of chemicals or other hazardous materials the contractor shall:

1. Immediately take action as appropriate to contain the spill if this action can be taken without jeopardizing the health or safety of staff.
2. Notify the rescue squad, fire department or other entities as needed or required by dialing 911,
3. Contact the project manager. The project manager shall notify, affected departments if necessary.
4. Spilled fuels, lubricants, antifreeze, hydraulic fluids, etc. from vehicles and equipment must be cleaned up and disposed of immediately.
5. Clean up materials for chemicals or petroleum products must be available on site.

6. Every effort must be made to prevent run-off of spilled materials from entering the storm drainage system.
7. The Project Manager shall prepare a spill report and submit it to the EH& Office within 3 calendar days of the spill event.

m. Fall protection

1. Roof construction, repair and other maintenance operations require manual labor at dangerous heights and on steeply pitched working surfaces. Contractors shall comply with VOSHA fall protections standards when working at elevated heights over 4 feet.
2. The contractor shall supply appropriate protective equipment specific to the jobsite.
3. Contractors shall protect people, building occupants, facilities and equipment below the work areas with appropriate, OSHA approved, signs, barricades, road guards, traffic controls, etc.
4. Exit doors must be blocked with signs inside and outside; however, emergency access must be allowed in case of fire and building occupants needs to exit.

n. Tools/Equipment:

1. Tools and equipment must be maintained in good repair without causing undo risks to operations, building occupants, passersby or University facilities.
2. Contractors shall provide proof that heavy construction equipment (cranes, backhoes, aerial lift platforms) brought onto the campus have passed inspection within the year preceding the start of work on campus.

o. Work Site Inspections

1. Unannounced work site inspections may be conducted by EH&S staff. These inspections are conducted solely for the benefit of the University, and shall not relieve the contractor of responsibility for enforcement of and compliance with VOSHA or environmental protection regulations.

2. In the event that work site conditions exist that potentially impact the safety of University staff, students, or the public, the EHS inspector shall notify the Project Manager who will follow-up with the Contractor on the concern. If the unsafe conditions cannot be immediately corrected, and represent a danger or have the potential to harm College staff, students or the public, then the EHS inspector shall issue a Stop Work to
 3. Reports of deficiencies may be factored into the evaluation of the contract by the university, and may be included in a Vendor Complaint file that is available for review by other state agencies.
 4. Repeat safety violations and/or a single serious, willful safety violation by a contractor may warrant review and termination of the contract. A "serious, willful safety violation" is defined, for the purposes of this program, as a work activity with a substantial probability that death or serious physical harm could result, where the potential hazard was known or should have been known, but where the work activity was continued regardless of the existence of the potential safety hazard.
 5. General worksite conditions must not present any hazards to faculty, staff, student or visitors to the campus. All areas must be posted as a worksite, hard hat area, limited access, etc. Barricades and signs shall be utilized to warn and prohibit access to unauthorized people.
 6. Contractor is responsible for repairs to damages to sidewalks, curbs, and roadways caused by their equipment and activities.
- p. **Worker Protection:** The use of hard hats, safety glasses, fall protection, hearing protection, safety shoes, etc. shall be enforced daily at the job site.
 - q. **Training:** Contractor shall ensure their staff meet minimum OSHA training requirements by providing documentation of safety training for the project requirements in their Project Safety Plan.
 - r. **Cleaning:** Contractor shall ensure that the worksite is cleaned of all construction debris, such as nails, sharp or protruding objects, or anything recognized as a

VI. University Deliverables to Contractors

- a. **Asbestos/Lead Data:** EH&S, at the request of the project manager, will provide known data for a building/area regarding asbestos and lead that is present.
- b. **Lockout/Tagout (LOTO):** FM Directive 781 shall be shared with contractors conducting LOTO in occupied buildings and renovation projects by the project manager. The Directive contains documentation that must be signed by the project manager and the contractor to indicate the information has been shared and understood.
- c. **Confined Space:** EH&S, at the request of the project manager, will provide the contractor with information regarding the location of confined spaces in areas associated with proposed work.
- d. **Safety Data Sheets (SDS):** EH&S, at the request of the project manager, will provide the contractor with SDS for chemicals located in areas associated with proposed work.

References:

William and Mary FM Directives

<http://www.wm.edu/offices/facilities/directives/index.php>

William and Mary FPDC Design & Construction Manual

<http://www.wm.edu/offices/facilities/services/fpdc/references/dcmanual.pdf>

William and Mary FPDC Tech Standards

<http://www.wm.edu/offices/facilities/documents/fpdc/techstandard.pdf>

WILLIAM
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ENVIRONMENTAL
HEALTH & SAFETY

Virginia OSHA Standards

http://www.doli.virginia.gov/vosh_enforcement/vosh_standards.html



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