

LAFAYETTE COLLEGE

Construction Safety

Public Safety Department
Environmental, Health and Safety (EHS) Division
Standard Operating Procedure (SOP) #40

Lafayette College Construction Safety Program

Public Safety Department – Environmental, Health and Safety (EHS) Division

Standard Operating Procedure (SOP) #40 – Revised November 2012

1.0 Introduction

As part of the Lafayette College Environmental Health and Safety (EHS) Program, this guide serves as a working document for Lafayette College Project Managers in regards to issues relevant to EHS during construction activities at Lafayette College. This program will be updated frequently. The newest version may be viewed on the [EHS website](#) or by requesting a copy from EHS.

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3.0 Objective

This program has been designed to provide consistent information about the minimum EHS requirements for safety in construction areas.

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4.0 Applicability

Construction activities pose a danger to the health and safety of not only contractors and their employees working on the jobsite, but to all Lafayette College employees working in, adjacent to, or in buildings in which construction activities are taking place.

It is the responsibility of all Lafayette College departments, contractors, vendors and staff to participate in, and comply with, all components of the Lafayette College Safety Program, including the Construction Safety Program.

This program applies to all construction and renovation projects and is not intended to be all inclusive. It is merely a guide to outline some of the important concerns of Lafayette College, and protocols that must be followed by all contractors when working at any Lafayette College facility.

All contractors are expected to comply with all federal, state and local laws, codes and standards. They should incorporate best practices into their daily operation and maintain a clean and orderly worksite at all times.

5.0 General Safety Practices

It is the policy of Lafayette College to comply with all OSHA standards including the general duty clause. We expect all contractors, sub-contractors, and their employees to comply with these regulations, and it is the responsibility of the general contractor to enforce these standards and practices. The general contractor will designate a qualified employee to be the Site Safety Supervisor. The Site Safety Supervisor will be the on-site contact person responsible for compliance with the Lafayette College Construction Safety Program.

EHS is vested with the authority to intervene when construction activities cause conditions that pose a danger to the health and safety of workers, Lafayette College staff, visitors and the general public, or damage to Lafayette College property. During monitoring activities when non-compliance issues are identified, EHS staff will take all necessary steps to ensure that all violations are immediately corrected.

Gross violations of the construction safety program, including activities or behavior that is considered immediately dangerous to life and health, or repeat violations will result in the cessation of construction activities and the permanent removal of the offending contractor or worker(s).

5.1 General Guidelines:

1. The job site must remain secured at all times and protected against the entry of any unauthorized personnel.
2. Anyone entering the construction site should be wearing head protection until the point when all overhead work is completed.
3. All employees working on the site must use appropriate personal protective equipment including eye protection.
4. Article 7 of the International Building prohibits dropping material or debris from a building without the use of an appropriate chute.

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5.2 Indoor Air Quality Guidelines:

1. The job site must be properly separated from adjacent areas and precautions taken to keep construction dust and dirt from migrating outside the work site.
2. All doorways, plenums, and penetrations will be sealed using 6 mil poly or comparable material to mitigate the migration of dust and other particulates from the work site.
3. The work site will be well ventilated using either natural or mechanical means to provide sufficient air exchanges and fresh air supply.

5.3 Hazardous Material Guidelines:

1. If hazardous materials are being used on the work site, the general contractor will provide EHS with all applicable Material Safety Data Sheets (MSDS's) prior to the materials' arrival.
2. At no time will the storage of flammable liquids be allowed on the work site.

5.4 Demolition Guidelines:

When performing work at a location that is located above an occupied area, and demo work is being performed using jack hammers, chipping guns or other tools that cause vibration or impact on the lower floor, an initial evaluation needs to be performed by the contractor as follows:

1. A worker must be dispatched to the occupied area below with a two way communication with the operator above to evaluate noise and vibration and the impact on the occupants below.
2. Confirm that the noise and vibration level is tolerable for the occupants and whenever possible mitigate the impact by the following methods:
 - Always choose the lowest impact tool available that will still effectively perform the task.
 - Work intermittently, taking periodic breaks to alleviate continuous noise and vibration.
 - When breaking up a slab, angle the tool to the surface and make fissures in the material avoiding positioning the tool perpendicular to the work.

5.5 Electrical Guidelines:

1. All temporary electric must be installed as specified in the ? Electrical Code and OSHA 1926.402 (a).
2. Temporary electric circuits shall be tested and color coded.
3. All power hand tools and extension cords connected to temporary electricity are required to be GFCI protected.
4. Electric power tools and extension cords that are not in good repair must be removed from service.

6.0 Pre-Demolition

6.1 General Demolition:

Prior to permitting the start of demolition operations, an engineering survey must be made, by a competent person, of the structure to determine the condition of the framing, floors, and

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walls, and possibility of unplanned collapse of any portion of the structure. Any adjacent structure where employees may be exposed must also be similarly checked. The project manager must have in writing evidence that such a survey has been performed.

6.2 Laboratory Demolition:

Laboratories that will be renovated or that are adjacent to renovations must be surveyed to determine the International Fire Code (IFC) laboratory type (i.e. fire rating and sprinklers). The fire rating of laboratories adjacent to renovation projects must be maintained.

6.2.1 Lab Clearance:

Areas that were previously laboratories must be cleared and closed out by EHS prior to the start of any demolition work pursuant to the existing laboratory closeout procedure. Clearance involves a complete site inspection followed by the issuance of a **Laboratory Clearance Form** by EHS. Principal Investigators currently occupying laboratories are responsible for leaving the laboratory in a state that clearance can be granted. Prior coordination with existing laboratory occupants is critical to the clearance process.

7.0 **Personal Protective Equipment**

Personal protective equipment (PPE) is used to increase individual safety while performing potentially hazardous tasks. PPE may include safety glasses, hard hats, gloves, respirators, or any equipment or clothing used to protect against injury or illness. Contractors must ensure that the proper types of PPE are available and used by employees. At a minimum, contractors must wear:

- **Safety glasses** with side shields to protect against flying particles (e.g., saw dust, nails, metal shavings, etc.). Goggles should be used to protect against molten metal, liquid chemicals, acids and caustic liquids, chemical gases and vapors. Shaded eyewear should be used to protect against potentially injurious light radiation (e.g., cutting and welding, lasers).
- **Hard hats** must be worn at all times during a construction project until the finished ceiling or equivalent has been installed. All workers in areas where there is a possible danger of head injury from impact, from falling or flying objects, or from electrical shock and burns must also be protected by a hardhat.
- **Footwear:** Leather work shoes are required. Sneakers are not permitted. Protective footwear (e.g., steel toe boots, reinforced soles, insulated, etc.) must be worn in areas where there is the potential for foot injuries from falling or rolling objects, from objects piercing the sole, or from exposed energized electrical conductors that could contact the feet.
- **Clothing:** Pants must be worn while at a construction site. Shorts are not permitted.
- **Hand protection:** Proper hand protection (e.g., leather work gloves, welder's gloves, appropriate chemical protective gloves, etc.) to protect against cuts or lacerations, abrasions, punctures, hazards of skin absorption of harmful substances, chemical burns, thermal burns, or harmful temperature extremes must be worn.
- **Hearing protection** must be worn on the job site when noise levels exceed the permissible exposure limit defined by the Occupational Safety and Health Administration pursuant to requirements outlined in OSHA 1910.95.
- **Contractors (if qualified) may use respiratory protection to protect against inhalation hazards when engineering and administrative controls are not feasible or adequate. If not qualified for respiratory protection, workers should be replaced by qualified personnel.**

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8.0 Smoking

Smoking is prohibited in all Lafayette College buildings (including rooftops) during ALL phases of construction projects. Workers found smoking may be removed from the work site at the discretion of Lafayette College.

9.0 Hot Work

Hot Work is defined as welding, cutting, soldering, brazing, grinding, and other forms of torch operations that will introduce sparks or open flame to a work area. Potential health, safety, and property hazards result from the fumes, gases, dust, sparks, hot metal and radiant energy produced during hot work operations.

All contractors that intend to perform hot work activities at Lafayette College must review the [Lafayette College Hot Work Program](#) prior to commencing work. All welding, cutting, brazing, soldering and sweating will be done by permit only and with the prior knowledge and consent of EHS. Hot work being performed without the issuance of a hot work permit may result in corrective action.

All hot work will comply with all applicable Federal, State and Local regulations and national codes and standards.

1. The work area must be swept clean and free of all combustible material within 30 feet of the worksite.
2. A Fire Watch will be posted at the worksite and in all areas outside of plain site of the operator where heat can be conducted or sparks have the potential for penetration.
3. The fireguard(s) providing the fire watch will be in possession of a valid and appropriate Certificate of Fitness issued to him / her by the EFD?
4. The fireguard(s) must be equipped with adequate and appropriate fire extinguishing appliances.
5. All combustible material that cannot be removed must be covered and shielded from heat using any approved method including ceramic shields and heat sinks.
6. If and when required, the operator will be in possession of a valid Certificate of Fitness or other license or proof of qualification issued by the authority having jurisdiction.

10.0 Animal Welfare Assurance (AWA)

All work that must be completed inside one of the AWA areas must be approved and coordinated with the AWA Manager prior to any work being done.

10.1 AWA RULES AND REGULATIONS:

1. No food or drink is allowed in the animal facility.
2. All PPE requirements stated on doors must be followed as well as room entry orders.
3. Any changes to PPE requirements must be approved in advance by the AWA Manager.

10.2 OCCUPATIONAL HEALTH AND SAFETY REQUIREMENTS:

According to which areas of the animal facility being accessed individuals may be required to comply with specific Occupational Health and Safety (OHS) requirements. The extent of these requirements will be determined in consultation with AWA management. OHS requirements may include, but not be limited to, verification of current TB status and tetanus immunization.

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11.0 Painting/Floor Coating

All painting (other than the use of water-based paint), varnishing, sealing, coating, etc. must be coordinated with EHS to ensure that surrounding areas are not affected by the work. Currently, the EFD requires a permit for the following (must verify any permit requirements with EFD):

- Floor Finishing Product Storage – 5 gallons flammable, 10 gallons combustible
- Floor Finishing Use - >20 gallons - project completion <30 days – city wide permit required
- Floor Finishing Use - >20 gallons – project completion >30 days – site-specific permit required

Evidence of all approved permits must be submitted to EHS prior to delivery of material on-site.

All flammable products must be stored in an NFPA approved flammable storage cabinet. All finishes must meet the minimum International Fire Code (IFC) and / or EFD requirements for flame spread and smoke development ratings.

12.0 Ladders

The chief hazard when using a ladder is falling. Proper use of ladders is essential in preventing accidents. Even a good ladder can be a serious safety hazard when used by workers in a dangerous way.

Types of ladders:

- Portable stepladders longer than 20 feet are not allowed. The top of a regular stepladder is not to be used as a step.
- Single ladders must not be longer than 30 feet.
- Extension ladders must not be longer than 60 feet.

At a minimum, the following safety precautions for ladder use must be followed:

- Ladders must be inspected frequently. Those that have developed defects must be immediately tagged or marked (Dangerous, Do Not Use), **and** be removed from service for repair or destruction.
- Ladders must be placed on secure footing, and an even surface when possible, or they must be tied off at the top, middle, and bottom to prevent slipping.
- Ladders used to gain access to a roof or other area must extend at least three feet above the roof in order to provide a point of support when stepping on the roof.
- The worker will always face the ladder when climbing up or down. The worker must have at least one hand and two feet or two hands and foot on the ladder at all times to maintain 3-point climbing.
- Short ladders must not be spliced together to make long ladders.
- Ladders must not be used in the horizontal position as scaffolds or work platforms.
- Metal ladders must never be used near electrical equipment.

13.0 Fall Protection

Fall protection is a combination of methods and devices used to protect workers from falling off, onto, or through working levels. Fall protection also includes methods and devices that protect workers from being struck by falling objects. Examples of fall protection include rails, guards, guardrails, barriers, hole covers, fall arrest systems, positioning device systems, safety nets,

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and various work practices and procedures.

Fall protection must be implemented when work is performed on elevated surfaces that are **six feet or more** above the surrounding area. Fall arresting systems, which include lifelines, body harnesses, and other associated equipment are often used when railings, floors, nets, and other means cannot control fall hazards. The Site Safety Supervisor must analyze the work site, the potential hazards and the magnitude of possible injury to workers in assessing which type of fall protection system should be used.

14.0 Confined Spaces

A confined space is any space that is large enough and so configured that an employee can bodily enter and perform assigned work, that has a restricted means of entry or exit, and that is not designed for continuous employee occupancy.

Permit-required confined space is a confined space that has one of the following characteristics:

- Hazardous atmosphere or potential to produce a hazardous atmosphere
- Engulfment hazard by a flowable material
- Inwardly converging walls or a floor that tapers to a smaller cross-section so that an entrant could be trapped or asphyxiated
- Equipment or stored energy hazards such as electrical current, hydraulic operators, or steam lines
- Other serious safety or health hazards

All workers that intend to perform activities in confined spaces must review the [Lafayette College Confined Space Program](#) prior to commencing work.

15.0 Energy Control (Lockout/Tagout)

Energy control (Lockout/Tagout) is a program intended to prevent the unexpected energizing or the release of stored energy in machines or equipment on which servicing and maintenance is being performed by employees.

Outside personnel or contractors involved in service, maintenance, or construction operations must review the [Lafayette College Lockout/Tagout Program](#) prior to work activities beginning. Contractors must submit Lockout/Tagout procedures to EHS one week before work activities begin for prior review.

16.0 Barricades and Fencing

Barricades act as warning devices alerting others of the hazards created by construction activities. They should be used to control traffic, both vehicular and pedestrian, safely through or around the work site. Contractors must use barricades wherever necessary for the physical protection of people or property.

Temporary cyclone fencing, plastic safety fencing and portable manhole barricades are examples of acceptable barricading. Yellow caution tape and/or cones are not considered acceptable barricades, and should be used only until more suitable barricades can be erected. Signage and illumination should be used where appropriate.

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At a minimum, contractors must barricade the following areas:

- Areas with temporary wiring operating at more than 600 volts
- Work areas for electrical equipment with exposed, energized parts
- The swing radius of the rotating superstructure of cranes
- Temporary wall or floor openings

17.0 Access to Construction Areas

Access into construction areas must be limited to authorized personnel only. The following rules must be followed at all times:

- Doors into construction areas must be kept in the closed position at all times (unless in use).
- Construction projects that open onto a common public corridor must be secured at all times.
- Once the space is given over to the contractor, all entrances must be immediately secured by the contractor through the installation of a unique dedicated construction lock. Keys will be distributed to: Facilities Management, EHS, and Public Safety upon installation.
- **Stairwell Doors:** all stairwell doors must remain fully closed at all times (except when using the door for entry or exit).
- **Security:** doors that would normally be locked must not be chocked in the open position. Security must be maintained at all times.
- **Children:** children are not permitted in any construction site or area at any time.
- **Fire Stopping:** fire stopping must be maintained at all times during a construction project.

18.0 Cranes/Material Hoists

Proper coordination in advance of any project involving the use of a crane must be ensured. Flagmen, street and sidewalk permits, sidewalk closures, evacuations, etc. are all issues that need to be coordinated. Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.

Crane operators and personnel working with cranes must to be knowledgeable of basic crane capacities, limitations, and specific job site restrictions such as the location of overhead electric power lines, unstable soil, or high wind conditions. Accessible areas within the swing radius of the body of a revolving crane must be physically guarded or other equally effective means must be taken during operations.

19.0 ADA Access

Access to handicap entrances must be maintained at all times during the course of a project. Alternative routes must be designated prior to the beginning of the project. A contingency plan must be completed if routes have to be altered.

20.0 Chemical Hazard Communications

All contractors must comply with the [Lafayette College Hazard Communication Program](#) and review the program prior to commencing work.

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Contractors are required to:

- Take all necessary precautions to protect Lafayette College employees, students, and visitors from exposure to chemicals.
- Maintain MSDS's **on-site** and have readily accessible for all hazardous chemicals used or stored at the job site.
- Maintain an inventory of all hazardous chemicals used on the job site.
- Clean up any spills created or caused. Contractors must alert EHS immediately upon discovering a spill or contact Public Safety during off hours.

21.0 Gasoline Powered Equipment

Easton Fire Code prohibits the use or storage of gasoline, or gasoline powered equipment within any enclosed building.

22.0 Fire Safety

At no time will a contractor be allowed to create a life safety hazard such as:

- Blocking exit access, egress or exit discharge.
- Wedge open fire or smoke doors.
- Remove or modify exit signage or emergency lighting.
- Remove fire extinguishers, smoke detectors or any other signaling device or any fire suppression equipment without the prior knowledge and authorization of EHS.
- At no time will a contractor compromise the fire rating of a partition, door, or other barrier to smoke and fire spread.
- At no time will a contractor leave supplies, materials, tools, equipment, ladders, ropes, scaffolding or other objects in public or common areas, outside the work site, unattended for any length of time.

Contractors must insure that:

- All construction will be compliant with NFPA 101 including the fire stopping of penetrations through smoke and fire partitions.
- All contractors will protect walls, floors and other surfaces from damage while moving equipment, materials, debris or other objects.
 - Floors will be protected with either contractor paper or Masonite sheets and will be so arranged to provide a smooth even walking surface free from any slip, trip or fall hazards.
 - Edges will be feathered to provide an even surface with the existing floor.
- When working in public areas, cordon off the work area using caution tape with an appropriate number of caution signs placed conspicuously in order to alert the public that the area is off limits to unauthorized personnel.
- All doors leading into and out of any worksite shall be secured to prevent access by unauthorized individuals.

23.0 Incident Reporting

Although the general contractor is responsible for maintaining the OSHA 300 log, any incident involving an occupationally related illness or injury occurring on the jobsite will be reported to EHS immediately. Copies of any incident report, interview or any other related documentation will be provided to EHS which will trigger an independent investigation by EHS staff.

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If it is determined at the conclusion of this investigation that the incident may have been caused by the negligence of the contractor then the contractor may be subject to disciplinary action by Lafayette College or potentially being removed from the approved contractor list, barring the contractor from bidding on any future projects.

24.0 Operational Impact/Transport of Materials and Supplies

24.1 Vertical Transportation

A schedule will be developed during the planning stages of the project to provide for the vertical transport of materials and equipment from the receiving area or entrance to the building, to the jobsite. At no time will a contractor attempt to transport materials and equipment without the prior knowledge and consent of the project manager or EHS staff. Any contractor, sub-contractor or their employees found violating this policy will be inserviced and potentially reprimanded and / or disciplinary action may be taken against them.

24.2 Elevators

In buildings where there are service elevators, all contractors and their employees must use **ONLY** the service elevators. At no time will the use of other elevators be permissible for use by contractors, except under special or extreme circumstances. In buildings where there are no service elevators, contractors and their employees should always yield the right of way to passengers.

At no time should any tools, supplies or materials be transported on a passenger elevator when there are other passengers using the elevator. All passenger elevators shall be protected by covering and taping the floor with contractor paper and when necessary, by covering the walls with padding. Paper should be changed periodically when necessary but no less than once a week.

All areas leading to and from the elevator to the jobsite will be protected from damage to floors and walls. These areas must remain clean and free of debris. Materials and equipment deliveries will be scheduled at times arranged to be the least intrusive and obstructive to building operations and occupant movement. The removal of debris and waste should be scheduled after 4:00 PM if possible.

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25.0 Housekeeping

Contractors must comply with the following housekeeping regulations:

- Maintain the jobsite in a clean, uncluttered and organized condition free of the accumulation of unnecessary combustible material.
- Floor surfaces and corridors will remain free of any slip, trip and fall hazards and exits maintained clear and unobstructed.
- Areas leading to and from the jobsite will be protected from damage and remain clean on a daily basis.
- Contractors and their employees will not be allowed to walk through occupied areas of the building wearing dirty clothing and work shoes.
- Transport should be directly to and from the jobsite, preferably through the receiving area if the building has a receiving area / loading dock.
- Debris will be removed from the jobsite on a daily basis especially during demolition operations.
- Tack mats shall be placed at all entrances to every jobsite to remove dust and dirt from work shoes and reduce the amount of dirt being brought through occupied areas.

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26.0 Waste Generation

26.1 NON-HAZARDOUS WASTE

Contractors are responsible for the disposal of all non-hazardous construction waste.

26.2 HAZARDOUS WASTE

All hazardous waste, as defined by the Environmental Protection Agency (EPA), will be reviewed on a case by case basis to determine whether the contractor or Lafayette College will handle, prepare for shipment, and dispose of hazardous waste. All contractors are required to comply with all laws governing the protection of the environment and proper handling, transporting and disposal of all regular and hazardous waste. All contractors are required to maintain all applicable permits and licenses required by federal, state and local laws governing the collection, packaging, transportation and disposal of all regular and hazardous waste. The contractor is responsible for immediately contacting the EHS office whenever during the course of work, the contractor comes in contact with any hazardous material on the job site. The contractor shall not handle the material until it is evaluated by EHS.

27.0 Temporary Partitions

The following guidelines should be followed when constructing temporary partitions:

- Temporary partitions isolating the construction site will be constructed having a fire rating of one hour.
- Doors leading into the worksite shall be self-closing and positive latching using a slam lock or other locking mechanism that will remain locked at all times. Access to the construction site therefore will be accomplished by using a key. This precaution is necessary to prevent unauthorized individuals from entering the construction site.
- Signs will be conspicuously posted on each door entrance on the occupant side reading “Construction Area – Hardhats Required Authorized Personnel Only.”
- Keys to the worksite will be provided to Facilities Planning and EHS.

28.0 Asbestos Containing Material (ACM)

Any contractor who comes in contact with material that may contain asbestos must follow the protocol outlined in the Asbestos Management Plan (currently being written). Consult with your Lafayette College project manager for further details.

29.0 Emergency Telephone Numbers

Contractors are responsible for addressing any emergency repairs and providing emergency response for issues that arise as a result of work being performed by the contractor on the job site during business and off-hours. Consequently, all contractors MUST post an accurate list of all emergency contact information, including availability and multiple contact telephone numbers. This is critical to ensure that at any time day or night that a responsible person can be contacted to address any type of emergency that may arise.

The emergency contact list MUST be permanently affixed, using durable material, on the occupant side of each entrance to the jobsite. A copy of the list must also be submitted to the EHS prior to the commencement of work.

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30.0 Sidewalk Sheds

When required by law, sidewalk sheds provide overhead protection for the public during work on a building's façade or when there are construction activities overhead that present a public safety hazard. The assembling, erecting, maintenance and removal of sidewalk sheds must be closely coordinated to ensure that the risks associated with this type of activity are controlled and minimized.

The following procedure will be followed when using sidewalk sheds during construction or repair projects:

- A coordination meeting needs to be arranged between Facilities, EHS, the general contractor (if any), and the scaffolding sub-contractor to review the scope of work and preventive measures that need to be implemented. The meeting will include a brief walk through of the location.
- During the construction of the shed, a representative of the general contractor needs to be present to provide coordination at the work site.
- A flagman needs to control the flow of pedestrian movement in and around the work site as the components of the shed are assembled and erected.
- The accumulation of debris on the shed needs to be limited and controlled through an appropriate schedule of waste removal developed by the contractor.
- Removal of the debris needs to be accomplished through the use of a chute running from the top of the shed to the waste hauler in the street. At no time shall a contractor throw bags of debris into a truck below.
- Prior to dismantling, the top side of the shed needs to be swept clean as best as possible. To avoid fine particles of dirt becoming airborne, the contractor should wet the debris slightly to avoid exposure to pedestrians if possible.
- During the dismantling phase, a representative of the general contractor needs to be present to coordinate activities at the work site.
- Flagmen need to be placed at either end of the shed to prevent the flow of pedestrian movement under the shed while its components are being dismantled. If necessary to provide public safety, pedestrians should be diverted from walking under the shed until such point as boards and decking are safely removed and all overhead hazards are eliminated.

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31.0 References

Hazard Communication 29 CFR 1910.1200, Lafayette College Hazard Communication Program

Lock Out / Tag Out 29 CFR 1910.147, Lafayette College Lock Out / Tag Out Program

Occupational Noise Exposure 29 CFR 1910.95, Lafayette Hearing Conservation Program

Construction Industry Standard 29 CFR 1926

General Duty 29 Section 5

Personal Protective Equipment 29 CFR 1910.132-138

Recordkeeping 29 CFR 1904.39

Cutting, Welding and Brazing 29 CFR 1910.251-255, Lafayette College Hot Work Permit Program

Walking-Working Surfaces 29 CFR 1910.22-30

Crane, Derrick and Hoist 29 CFR 1910.179-181

Lafayette College Asbestos Management Program

NFPA 101 Life Safety Code

International Fire Code 2006