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LAFAYETTE COLLEGE

Contractor Safety Program

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

Table of Contents

1.0 INTRODUCTION

This program establishes guidelines for contractor safety and accident prevention during construction, renovation, and maintenance activities at Lafayette College. It also serves as a guide for Lafayette College Project Managers who supervise service contractors working at the College.

2.0 APPLICABILITY

This program applies to all construction, renovation, and maintenance activities and is not intended to be all inclusive. This information sets forth Lafayette's expectations for all service contractors to safely provide their services while on campus.

Contractors are expected to comply with all applicable federal, state, and local laws as well as nationally recognized standards when requirements by rules and regulations do not address or apply to the scope of work. It is the responsibility of each contractor and its subcontractors to enforce these standards.

If unsafe work conditions or actions are observed by Lafayette College Project Managers or Environmental, Health and Safety (EHS), work will be stopped and the contractor will implement corrective actions to eliminate the hazards. Serious violations of this Contractor Safety Program, including work or behavior that is considered immediately dangerous to life and health and repeated violations, will result in the cessation of work and the permanent removal of the offending contractor or worker(s).

3.0 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 shall 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 this Contractor Safety Program.

3.1 Accident, Incident, or Injury Notification

If the situation is an emergency, contact Public Safety at 610-330-4444.

All work-related accidents, incidents, injuries, illnesses, and near-misses must be immediately reported to the Lafayette College Project Manager and EHS. The contractor is responsible for notifying OSHA, EPA, PA DEP or other appropriate regulatory agency of any reportable incidents.

3.2 Emergency Action Plan

All contractors shall have a plan in place to account for all workers onsite in the event of an emergency.

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 jobsite during business and

off-hours. Consequently, all contractors must provide 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, a responsible person can be contacted to address any type of emergency that may arise.

At a construction site, the emergency contact list must be permanently affixed, on the occupant side of each entrance to the jobsite. A copy of the list must also be submitted to the Lafayette College Project Manager prior to the commencement of work.

3.3 Housekeeping

The contractor shall ensure that the job site and areas immediately outside of the work zone are kept clean daily for the duration of the project and be in compliance with OSHA 1910.22 – Housekeeping and NFPA Life Safety Code. This includes proper storage of material, routes of egress, and areas leading outside the site. In order to keep up with housekeeping, contractors are encouraged to clean up and the end of every shift.

Upon completion of the project, the contractor must remove all surplus materials and equipment left over from the job, unless otherwise specified by the Lafayette College Project Manager.

3.4 Indoor Air Quality

The contractor shall take steps to ensure that dust and other air contaminants are controlled when working in or nearby occupied spaces. This will require work barriers to be installed to separate the work zone from the occupied areas of the building. This also means that substitution of products and materials and additional ventilation may be required. Air monitoring/testing may be required to ensure the safety of building occupants.

If an indoor air quality problem is discovered, work will stop until the problem can be resolved.

3.5 Inspections and Corrective Actions

The contractor is responsible for conducting regular inspections to ensure the work is being conducted in accordance with the appropriate local, state, and federal regulations and this guide. To ensure the safety and well-being of the Lafayette College community, EHS reserves the right to inspect the contractor's work area at any time and without notice.

In the event that an OSHA inspector shows up onsite, the contractor shall immediately notify their Lafayette College Project Manager and inform them of the purpose of the visit. If any violations are discovered, the contractor shall disclose those in a written report to the College as well as the corrective actions to be taken. Furthermore, the College's Project Manager shall receive copies of all correspondence or reports to or from OSHA.

3.6 Pedestrian and Occupant Safety

When working in public walkways, occupied buildings, or any other location near, on or above areas where pedestrian traffic exists, the contractor shall take all necessary precautions to ensure that pedestrians are directed away from the work area and any potential hazards.

The contractor is responsible for ensuring a safe route of travel when redirecting pedestrian traffic. The route of travel established to re-direct pedestrian traffic must be free of hazards and clearly labeled.

Acceptable equipment for redirecting pedestrian traffic may include signage and:

- Jersey barriers,
- Portable guardrails,
- Construction fencing,
- Temporary catwalks, bridges or ramps,
- Caution tape and/or cones.

If the contractor is unable to secure a safe route of travel for pedestrians, the contractor must provide overhead protection, such as a sidewalk shed, 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.

ADA Access

Access to handicap entrances must be maintained and ADA acceptable routes must be designated prior to the beginning of the project.

Emergency Egress

The contractor must ensure safe and accessible egress routes for building occupants when working in an occupied building. Contractors whose work might impede an occupant's means of egress must develop and implement alternative methods to maintain compliance with OSHA and applicable life safety and building codes. Only after the contractor has received permission from the Lafayette College Project Manager will they be allowed to shut down a building's egress route and implement alternate means of egress. Once an alternate means of egress has been implemented, the contractor must communicate these changes to building occupants.

3.7 Unsafe Working Conditions

In the event of an unsafe or hazardous condition, it is the responsibility of the contractor to stop all work until safe and normal operations can resume.

All unsafe and hazardous conditions that have the potential to impact the health and safety of the Lafayette community must be immediately reported by the contractor to the Lafayette College Project Manager and Public Safety (610-330-5330).

3.8 Use of Lafayette College-Owned Equipment

The use of Lafayette-owned equipment and tools by an outside contractor is generally prohibited.

Any use of Lafayette College-owned equipment will be done at the contractor's risk and the contractor must ensure the equipment is appropriate and in good working order for the intended use.

3.9 Site Control, Security, and Fencing

In order to maintain a safe jobsite, it is necessary for the contractor to isolate their work from any unauthorized persons. This could include fences, gates, temporary walls, or other means of protection. These should be inspected periodically to ensure the integrity of the control method.

Contractors will work with their subcontractors and the College to ensure protection is in place for the safety of the College community. These requirements will cover project fencing, pedestrian overhead protection, construction traffic control measures, and construction signage. Contractors shall also monitor the effectiveness of these controls and ensure their integrity is maintained per the requirements and throughout the project.

4.0 OCCUPATIONAL SAFETY

The following sections refer to occupational and life safety requirements for service contractors who perform work at Lafayette College. Regardless of whether or not a specific requirement is listed here, contractors must perform work in compliance with all OSHA standards, including the general duty clause.

4.1 Cranes and Hoists

Proper coordination in advance of any project involving the use of a crane must be ensured. Prior to the operation of any crane on College property, a suitable location needs to be determined. Consideration should be made to the capacity of the physical site as well as any underground conditions. A PA One Call shall be made to confirm the presence and location of any utilities that may be located under the proposed site.

All crane operators need to be certified by the National Commission for Certification of Crane Operators (NCCCO). All signal persons and riggers, at a minimum, need to be qualified in accordance with the OSHA standard. The College encourages contractors to have certified riggers and signal persons working on campus and reserves the right to request this depending on the scope of work being performed with a crane on College property.

Contractors shall develop a lift plan for any crane work being performed. Tag lines will be used on all lifts unless it is determined that the line itself will cause a greater hazard.

The contractor shall select hoisting routes that minimize the exposure of employees to hoisted loads to the extent consistent with public safety. If it is necessary to conduct a lift over an occupied building, the College

shall vacate the top two floors of the building prior to the start of such operation in accordance with New York City's Cranes and Derricks 1 RCNY 3319-01(q)(3)(v).

4.2 Concrete and Masonry Work

At no time should a contractor cut any concrete or masonry product without protecting themselves as well as others around them. This means that at a minimum, they should be using means to control the dust created from the cutting of silica containing material. Dry sawing of concrete or other silica containing material is not permitted without having adequate controls in place. This includes any other activity that could create a potential silica exposure.

Contractors are required to implement Table 1 from 29 CFR 1926.1153 regarding silica or have other controls in place, with validation of their effectiveness to ensure employee protection. The burden of proof will fall upon the contractor to prove to the College their employees are complying with the OSHA standards regarding silica containing material.

4.3 Confined Space

Contractors will comply with all applicable and pertinent confined space entry requirements of OSHA 29 CFR 1910.146, 1910.269, or 1926.1200.

The contractor is responsible for developing, implementing and maintaining a Confined Space Program, in accordance with applicable local, state and federal regulations as it applies to the work of the contract. The contractor must have a copy of their program readily available and must be able to produce a copy of the program at the request of the Lafayette College Project Manager or EHS.

Entries into "Permit Required Confined Spaces" must be approved by the Lafayette College Project Manager and contractors must review the Lafayette College Confined Space Program prior to commencing work.

4.4 Demolition Work

Contractors whose work will include disturbing building materials must first review the hazardous materials survey data which includes the presence of asbestos and lead paint.

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 walls, and the possibility of an unplanned collapse of any portion of the structure. Any adjacent structure where employees may be exposed must also be similarly checked. This survey should be used to create a plan for demolition. The plan should include provisions for encountering asbestos, lead, other hazardous material, dust control during the demolition phase. The contractor shall also ensure all utilities are controlled and in a safe condition prior to the start of demolition. This does not apply to demolition of a ceiling or other non-load bearing item (ceilings, some walls, and some other items).

Temporary fire system impairments, required to support demolition activities, must be coordinated with the Project Manager, Facilities Operations, and Public Safety.

4.5 Electrical Safety

All work activities involving the installation, removal, or maintenance of electrical components must be in compliance with 29 CFR 1910.301 Subpart S – Electrical, NFPA 70E, and applicable local, state, and other federal regulations. Any electricity used on a work site must be protected by either an assured grounding program or through the use of GFCIs. This includes electrical generators, welding machines, or existing building power supply. All cords will be of the heavy-duty type and have an intact ground prong and be in safe condition for use. Any electrical device shall be double insulated or grounded.

The contractor shall determine in advance if any energized equipment or electrical circuits in the work area pose a safety risk to those in the area. Electrical shutdowns with the potential to affect adjacent occupants, adjacent buildings or the Lafayette College community must be reviewed and coordinated in advance with the College's Project Manager in order to make appropriate notifications and precautions.

Work activities involving the control and isolation of hazardous energy must be in compliance with 29 CFR 1910.147 – Control of Hazardous Energy Sources (Lockout/Tagout). As stated in this standard, locks and tags must be used to control the accidental start-up of equipment that is being serviced or maintained by its employees. At no time shall the Contractor or its employees override any locks or tags that they encounter during the performance of their work.

If LO/TO cannot be implemented because of extraordinary circumstances, work practices that conform to NFPA 70E shall be followed and a job safety analysis (JSA) should be available for review in advance of the work.

4.6 Equipment Safety

The operator of any piece of mobile equipment or powered industrial trucks, shall have been properly trained in the safe use of that equipment. This includes but is not limited to forklifts, scissor lifts, aerial lifts, and other heavy equipment. The contractor shall also ensure the equipment is regularly inspected and maintained.

Specific Requirements for Aerial Lifts

- Aerial lifts used on Lafayette College property must be operated and maintained in accordance with applicable OSHA regulations and ANSI standards.
- Only trained employees are permitted to operate aerial lifts on Lafayette College property.
- Aerial lifts used on Lafayette College property must be inspected, operated, and maintained in accordance with local, state and federal regulations and the manufacturer's recommendations.
- At no time, will the Contractor position or maneuver an aerial lift above pedestrian traffic or other employees.
- Prior to operating any lift, the Contractor must install barriers, signs or other acceptable means to redirect pedestrian traffic and isolate the work area.

4.7 Excavations, Trenches, and Disruption of Soil Below Grade

Contractors who disrupt soil below grade must do so in accordance with OSHA 29 CFR Part 1926.650 through 1926.652. Contractors are required to complete a PA 1 Call prior to ANY ground disturbance or penetration regardless of method used, manual, or mechanical.

- If a contractor uncovers an unmarked utility at any time during the course of their work, work shall stop immediately and contact their Lafayette College Project Manager.
- If a contractor strikes, damages, or impacts a utility of any kind at any time, they shall notify their Lafayette College Project Manager.

The contractor's competent person is responsible for pre-excavation determination of the protective systems to be employed during all phases of excavation, including sloping/benching, shielding, and/or shoring. The competent person shall be present during all excavation activities.

Trenches and excavations shall be protected when left unattended. Acceptable protection includes 6' high fence panels surrounding the trench or by covering the trench with ¾" steel plates or equivalent. The Contractor must use barriers, fencing, signage and/or other acceptable forms of warning devices to deter pedestrians from entering the area where excavations and trenching activities are being conducted.

4.8 Fall Protection

All contractors must implement fall protection at 6' or higher and there may be circumstances where there is a requirement to protect workers when a hazard exists less than 6' below a lower level. The College discourages the use of a safety monitoring systems for fall protection unless other means are determined to be infeasible or impossible. Contractors whose job duties require them to implement fall protection must be in compliance with applicable sections of 1910 Subpart D – Walking and Working Surfaces and 1926 Subpart M – Fall Protection.

Each Contractor will provide their own fall protection equipment including but not limited to:

- Portable Guardrail System
- Designated Area Warning Line Systems
- Safety Net Systems
- Personal Fall Protection Systems, such as fall arrest, travel restraint or positioning systems

Anchorage points intended to be used by the Contractor must be capable of supporting a minimum of 5000 lbs. Holes, openings, unprotected sides and edges and any other fall hazard must be covered, guarded, or protected in accordance with CFR 1910 Subpart D and applicable regulations in CFR 1926. Under no circumstances may a Contractor leave an exposed fall hazard unattended or unguarded.

4.9 Fire Prevention and Hot Work

Contractors shall follow Lafayette College's Hot Work Program while on campus unless their program is more stringent. 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.

At no time should a contractor rely upon any College-owned fire protection equipment as their primary means. They should provide their own fire extinguisher(s) or other acceptable equipment. Contractors shall ensure that fire watch times are adhered to.

Temporary fire system impairments, required to support work activities, must be coordinated with the Lafayette College Project Manager, Facilities Operations, and Public Safety.

4.10 Hazard Communications

Contractors shall have in place a program that complies with OSHA 1910.1200 to train and instruct employees in the proper use and cleanup of any chemical or material on site.

It is the contractor's responsibility to communicate hazards associated with chemicals/products they use to their Lafayette College Project Manager and EHS.

Specific Requirements

- The contractor must submit an inventory of chemicals/products to be used prior to starting work.
- Safety Data Sheets (SDS) for any hazardous materials shall be onsite and provided to the College upon request.
- Chemical containers, either permanent or temporary, must be labeled.
- Compressed gasses, fuel, and other hazardous materials shall be stored and inspected in accordance with applicable standards.
- *The contractor must remove chemicals/products that it brings onsite when the work is complete (unless otherwise directed by the College).*

4.11 Hazardous Materials

Contractors who work with hazardous materials must do so, in compliance, with applicable OSHA regulations, as well as local, state and other federal regulations.

- The use of solvents, paints, or similar flammable, toxic, or irritating materials is prohibited in areas occupied by College employees, faculty or students, unless specifically approved, by their Lafayette College Project Manager.
- Contractors must maintain adequate ventilation in areas when paints or solvents are used.
- Flammable paints and solvents must be stored in approved flammable liquid storage cabinets when kept inside buildings.

4.12 Job Hazard Analysis

The contractor shall outline high frequency/high risk and low frequency/high risk activities using some type of analysis to identify, evaluate, and control hazards. The analysis tool must list any measures that will be taken to mitigate any safety issues. Examples of high risk work includes but is not limited to; crane picks, scaffolding, confined space, utility shut-downs, hazardous material abatement, hot work, trenching, etc.

4.13 Ladders and Scaffolding

Contractors shall ensure that any ladder being used on their site has been inspected for damage prior to and during use. Any ladder that is identified as being damaged or defective shall be removed from use immediately. Ladders shall be used in accordance with the OSHA requirements for ladders.

- 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.
- 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.

All scaffolding must comply with OSHA requirements and contractors shall implement some type of inspection system that will be maintained on the scaffold.

4.14 Personal Protective Equipment (PPE)

Contractors whose work activities present a physical and/or health hazard that cannot be eliminated by engineering or administrative controls must provide their employees with personal protective equipment (PPE). The management, training, and distribution of PPE must be done in compliance with applicable OSHA regulations. 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 gasses 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.**

5.0 ENVIRONMENTAL

5.1 Asbestos

Asbestos was used in various building materials and Lafayette College buildings constructed prior to 1980 are assumed to contain asbestos-containing materials until proven otherwise by EHS. Disturbing, handling,

abatement, and disposal of asbestos-containing materials is highly regulated and shall only be conducted if such activities are part of contracted work and employees are specifically trained and licensed to perform such activities. **All projects involving asbestos abatement, or potential for disturbance of ACM, shall be coordinated through the Asbestos Coordinator**.

Contractors and the Lafayette College Project Manager are responsible for notifying EHS prior to contracting outside work that may disturb asbestos-containing materials. All outside contracted employees shall be notified, in writing, of the presence and location of asbestos-containing materials in the area where the work is to be performed, or of the absence of asbestos-containing materials and an "all clear" designation.

Lafayette College departments may obtain information about asbestos-containing materials in their buildings by contacting EHS. Survey reports identifying the location, quantities, and types of asbestos-containing materials in existing campus facilities and off-campus housing facilities are available. Each survey report (one for each campus building that was inspected) includes a list of homogenous materials, assessment of condition, and hazard potential of asbestos-containing materials, approximate square or linear footage, and associated bulk sample lab reports.

Other than Pennsylvania-licensed asbestos abatement contractors, no outside contractors shall disturb any suspect or known asbestos-containing materials. If suspect asbestos-containing materials are noted in the area of work, and were not identified in the asbestos documentation, the contractor shall immediately notify EHS.

5.2 Biological, Chemical, and Radioactivity Hazards

Some Lafayette College operations involve the use of biological, chemical, or radioactive material that can be hazardous if not handled safely. Areas where work with biological, chemical, or radioactive materials is being performed will be marked with appropriate signs. Contractors are prohibited from entering these areas without prior approval and shall not handle hazardous biological, chemical, or radioactive material unless it is part of the contracted work and workers are specifically trained to do so.

5.3 Hazardous Waste Management

Hazardous waste generated by a contractor as part of their work must be properly identified, stored, and disposed of. The contractor must provide their Lafayette College Project Manager a list of hazardous wastes that will be generated and coordinate a suitable location for storage. The Contractor must also ensure, at a minimum, proper labeling, adequate secondary containment, segregation of incompatible materials, and routine inspection of storage areas.

Contractor employees must be properly trained in hazardous waste procedures. In the event a Contractor encounters previously unidentified material that is reasonably believed to be hazardous (i.e. infectious, biomedical, radioactive, corrosive, flammable, toxic, explosive, oil-based, or asbestos containing) the Contractor shall immediately stop work and report the condition to their Lafayette College Project Manager or EHS.

5.4 Lead

Construction workers are exposed to lead during the removal, renovation, or demolition of structures painted with lead paint. All building surfaces painted before 1978 shall be assumed to contain lead-based paint, even if only a single layer of many contains lead.

A lead-based paint inspection of surface coatings has been conducted of all Lafayette College owned property constructed prior to 1980. The inspections were conducted in accordance with the U.S. Department of Housing and Urban Development (HUD) "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing". The corresponding reports and lead-based paint inventory is maintained by EHS. Lafayette College Project Managers are required to do the following.

- Notify EHS of any renovation or maintenance projects within target housing or child-occupied facilities that may involve disturbance of painted surfaces.
- Notify EHS of paint surface preparation and removal projects or other dust/fume generating construction or maintenance projects that could be reasonably anticipated to create dust/fumes that could impact occupied areas.
- Ensure that EHS receives a copy of all contractor records for work performed in target housing and child-occupied facilities under the EPA's RRP rule.

Unless the Contract Coordinator provides a specific lead paint inspection, Contractor's should assume that any painted surface they come in contact with is coated with lead-based paint.

Contractors who will disturb lead-containing building materials during work shall take all necessary precautions to protect College employees and the public from exposure to lead dust or contamination. These measures shall conform, at a minimum, to OSHA requirements detailed in 29 CFR 1926.62 and applicable local, state, and federal regulations related to health, safety, transportation, and disposal of such materials.

5.5 Spill Prevention and Control

Lafayette College's Spill Prevention Control and Countermeasures (SPCC) Program establishes procedures for the prevention and detection of spills and/or releases of oil or hazardous materials. The Contractor is responsible for the following.

- Identifying environment pathways (e.g., sumps, storm/floor drains, etc.), developing plans to minimize potential and address spills that may reach or impact these pathways.
- Having available equipment (e.g., secondary containment pallets, absorbent pads, absorbent booms) that is able to control a potential spill/release of any oil or hazardous chemicals brought on campus.
- The proper storage of all flammable and combustible chemicals that are brought and are stored on campus. Such storage may require the use of safety containers, safety cabinets, and/or secondary containment. 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.