FACILITIES MANAGEMENT CONTRACTOR SAFETY PROGRAM

Document History

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Comments</th>
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<tbody>
<tr>
<td>0.1</td>
<td>Sept 1, 2015</td>
<td>Initial Draft</td>
</tr>
<tr>
<td>0.2</td>
<td>Sept 30, 2015</td>
<td>Internal Review</td>
</tr>
<tr>
<td>0.3</td>
<td>Jan 25, 2016</td>
<td>External Review</td>
</tr>
<tr>
<td>0.4</td>
<td>March 21, 2016</td>
<td>Final Draft – Capital Projects</td>
</tr>
<tr>
<td>1.1</td>
<td>October 25, 2016</td>
<td>Initial Revision Draft – Contractor Safety Program</td>
</tr>
<tr>
<td>2.0</td>
<td>January 20, 2017</td>
<td>Final Draft</td>
</tr>
<tr>
<td>2.1</td>
<td>January 30, 2017</td>
<td>Minor Revisions to clarify application</td>
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INTRODUCTION

Purpose
This document has been developed to be a resource for contractors conducting work for the University of Virginia Facilities Management. Its intent is to more clearly define FM expectations as they relate to compliance with regulatory policy.

UVA Facilities Management believes that effective contractor safety programs enhance projects by assisting Contractors in identifying and evaluating anticipated project specific hazards and establishing proper controls in advance of actual work. While the obvious purpose of a contractor safety program is to reduce on-the-job injuries and illnesses and to ensure compliance with standards, the interactions developed through these programs can also bring collateral benefits in the form of improved communication, documentation, and cost savings.

Application
Each department that coordinates or uses the services of a contractor to perform maintenance, repair, installation, renovation or construction-related operations is expected to designate one or more persons to coordinate this program within his or her department. These coordinators are expected to work with the contractor so that the contractor is:

- Informed of the presence of hazards in or near the work area.
- Informed about University of Virginia’s requirements related to construction safety.
- Aware of the university’s expectations regarding safety and health compliance and the control of worksite hazards.

Scope
This program applies to all University of Virginia properties in the United States, and to all work performed by Contractors, Subcontractors, and Architect/Engineering firms in or on property owned, leased or occupied by University of Virginia.

University of Virginia personnel on constructions sites, for the purposes of this program, are not considered “contractors”, “subcontractors” to the General Contractor, “visitors”, nor “vendors”. University of Virginia personnel shall be trained by University of Virginia Facilities Management – Occupational Health and Safety (FM-OHS) on relative hazards and controls and will follow university health and safety programs and policies

Contractual Obligations
Contractors performing building, facilities or equipment-related construction, repair, installation, renovation or maintenance activities shall attend a safety orientation as follows:

For non-capital construction/renovation work, the university project management team shall arrange the safety orientation with FM-OHS and the contractor prior to the start of work by contacting FM-OHS at (434) 297-6379. Contractors retained on a term contract need only attend one safety orientation prior to the award of the first project under that contract.

The contractor shall provide the university Project Representative with emergency contact phone number(s), usable 24 hours a day, for the contractor’s representative.

The contractor bears sole responsibility for the safety of his or her employees.
The contractor is expected to take all steps necessary to protect the safety and health of university employees, students, and visitors during the performance of their work by establishing, administering, and enforcing safety rules that meet federal, state, and local regulatory requirements to include, but not be limited to:

- Virginia State-Specific Programs outlined by *Virginia Department of Industry*.

Each contractor that coordinates the work of subcontractors shall ensure that they abide by the requirements outlined herein. The contractor bears sole responsibility for communication of safety-related information and requirements to their subcontractors.
GENERAL REQUIREMENTS

Submittals
Submittals, where required from the contractor by this document, shall be made directly to the university Project Representative. Submittals shall be made sufficiently in advance to avoid delay of the project.

Worksite Access
The contractor shall establish any necessary controls to restrict unauthorized access to the work zone and ensure that requirements for entry are clearly posted at all access points. Signs should clearly indicate required personal protective equipment that must be worn in the restricted area.

Personal Protective Equipment
For all work on UVA property the following MINIMUM PPE will be required:

- Hardhat
- Safety Glasses
- Safety Shoes

Further PPE may that may be required for the work being conducted will be supplied in adherence with all regulatory requirements (OSHA, NFPA, VDOT, etc.)

Written Safety Program
The contractor shall develop and implement a Written Safety Program, as well any required site-specific safety documentation to include, but not be limited to:

1. A project-specific Job Hazards Analysis or Job Safety Analysis (JHA/JSA) which identifies job steps, hazards, and actions to eliminate or minimize hazards, for the work required by the contract.
2. Identification and contact information for the person(s) designated as Competent Person(s) at the project site. The contractor shall be able to submit training certificates and similar documentation confirming that the person(s) received training adequate to be deemed Competent, upon request.

• The table of contents for this Safety Program shall be provided to the UVA project representative prior to the commencement of work.
• For construction work, discussion of the Program, and any site-specific safety documentation will be an agenda item for the Preconstruction Meeting.
• The Safety Program, and any site-specific safety documentation shall be available at all times at the project site.

HazCom
The contractor shall maintain, on-site, Safety Data Sheets (SDSs) for all chemicals used or stored at the job site as required by VDLI/OSHA regulations. The contractor shall provide copies of SDSs to the university Project Representative upon request.

Emergency Notification System
UVa.Alerts is University of Virginia’s emergency notification system. In the event of a campus emergency, University of Virginia will use several information delivery methods to reach personnel. To sign up for UVa. Alerts, go to the Office of Emergency Preparedness’ website at uvaemergency.virginia.edu.
Roof Access
If work will be conducted on the roof of a building, the university Project Representative shall coordinate access with the appropriate Facilities Management Zone Superintendent, the departments within the building, and FM-OHS as necessary. If fume hood exhausts are located on the roof, access shall be in accordance with FM’s Roof Access Standard Operating Procedure.

Fall Protection Systems
The university Project Representative shall inform the contractor of any fall protection system installed in the work area, or of the absence of such systems so that temporary controls may be considered. Anchor points installed on university properties may be used only with specific permission from FM-OHS, reachable at (434) 297-6379.

The contractor is responsible for providing employee protection, at least in accordance with OSHA regulations on unguarded roofs, open-sided floors, loading areas, etc.

First Aid Services
The contractor shall make all arrangements necessary to ensure adequate first aid/CPR response to the jobsite as required by OSHA.

Control of Fugitive Emissions
The contractor shall take all reasonable precautions necessary to control fugitive emissions from the job site. Fugitive emissions include, but are not limited to: nuisance dust, chemical odors/vapors/gases, hazardous materials (such as lead dust or asbestos), and noise.

Where the product(s) or material(s) to be used by the contractor has a permissible exposure limit (PEL) established by OSHA or VDLI, and where university employees or the public may be exposed to the product or material, the contractor shall take all reasonable steps to maintain exposures below the PEL where an exposure condition during use exceeding the PEL could reasonably be anticipated. In such instances where it is anticipated that the PEL could be exceeded or when building occupants report objectionable concentrations of air contaminants or possible health effects from said exposure, the contractor shall monitor, or shall contract to have monitored, these work areas and/or building 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 and in response to the building occupant concerns where applicable. If feasible control measures are not practicable to maintain exposures below the PEL, the contractor shall restrict access to all areas where exposures exceed the PEL to authorized personnel only. Copies of this air monitoring data shall be provided to the university Project Representative or their designated representative upon request.

Accidental Spills and Releases
In the event of an accidental release or spill of chemicals or other hazardous materials by the contractor, the contractor shall:

- Immediately take action as appropriate to contain the spill if this action can be taken without jeopardizing the health or safety of employees,
- Notify the rescue squad, fire department, or other entities as needed or required,
- Call Environmental Health & Safety at 434-982-4911
- Contact the university Project Representative.
**Compressed Gases**

Compressed gases shall be stored, used and transported in accordance with the requirements of the Virginia Statewide Fire Prevention Code (SFPC), and OSHA. New compressed gas installations shall comply with the SFPC.
SPECIFIC PROGRAM REQUIREMENTS
The following are safety program elements that have special requirements for work on UVA properties. This is not a list of all required programs.

Asbestos and Suspect Asbestos Containing Building Materials
It is the responsibility of the contractor to provide the appropriate level of asbestos awareness training required for their employees; as needed. This training must meet OSHA/VDLI requirements. Verification that this training has been conducted shall be supplied to the university upon request.

Contractors employed by the university to perform building or facilities-related maintenance, repair or renovation shall be informed by the university Project Representative of the location of suspect and known asbestos-containing materials (ACM) in the work area(s) to which they are assigned, and the scope of work shall be reviewed and pre-approved by University of Virginia Environmental Health and Safety (EHS).

Contractors shall, under no circumstances, damage or disturb suspect or known ACM unless they are a licensed Virginia Asbestos Abatement Contractor and have been specifically employed to perform asbestos repair or removal. If suspect asbestos materials are discovered during the course of the work, the contractor shall stop work immediately and notify the university Project Representative or other person as indicated in the contract documents.

The contractor shall not proceed with any change in work which requires a material to be disturbed that the Asbestos and Lead Survey Report, or construction documents show has not previously been tested (e.g. "suspect" ACM). If a change in the scope of work becomes necessary, the revised scope of work shall be reviewed and pre-approved by University of Virginia Environmental Health and Safety (EHS).

Asbestos materials may not be used or installed in university facilities.

Lead-containing Building Materials
Contractors employed by the university to perform building or facilities-related maintenance, repair or renovation work shall be informed by the university Project Representative of the location of lead-containing building materials in the work area(s) to which they are assigned.

Contractors who will disturb lead-containing building materials during the course of work shall take all necessary precautions to protect university employees and the public from exposure to lead dust or contamination. These measures shall conform, at a minimum, to the OSHA requirements, and all applicable local, state and federal regulations related to health, safety, transportation, and disposal of lead-containing building materials. The contractor shall also maintain a copy of his or her lead compliance program, as required by OSHA.

Laboratory Safety Hazards
Laboratories at the University of Virginia contain many unique hazards. If any work will be conducted inside a laboratory building, the university Project Representative shall, through coordination with Environmental Health and Safety (EHS), inform the contractor of the following:

- Known hazards and any required safety procedures that must be followed in the contractor’s work area;
- PPE required to be worn while working in the area; and
- Emergency procedures that the contractor is to follow in the event of accidental exposures or releases of hazardous materials or energy during the course of work.
Chemical Hazards
Chemicals are used extensively on the University of Virginia campus. Given the number of chemicals used, and changing work within chemical laboratories, it is impractical for the university to provide the contractor with a SDS for any chemical potentially in-use within any given laboratory. However, SDSs are required to be maintained and to be accessible to employees in each work area. Chemical use and/or storage is routine in, but is not limited to, laboratories, fume hood exhausts on the roofs of laboratory buildings, chemical stock rooms, chemical waste accumulation areas, and custodial closets.

When work will be performed in areas with chemical hazards, the university Project Representative shall inform the contractor of the following:

• Known hazards and any required safety procedures that must be followed in the contractor’s work area.
• Methods for obtaining access to Safety Data Sheets (SDS) for hazardous chemicals present in the contractor’s work area.
• Information about the labeling system used in the work area.
• Emergency procedures that the contractor is to follow in the event of accidental exposures or releases of hazardous chemicals.

Access to building roofs with fume hood exhausts must be in accordance with FM’s Roof Access Standard Operating Procedure. This information may be obtained by contacting FM-OHS at (434) 297-6379.

Confined Spaces
When the university arranges to have a contractor perform work that involves entry into a confined space, the university Project Representative shall:

• Inform the contractor that the workplace contains confined spaces and that entry is allowed only through compliance, at a minimum, with a confined space program meeting the requirements set forth by VDLI, and OSHA.
• Apprise the contractor of the elements, including the hazard(s) identified and the university’s experience with the space.
• Apprise the contractor of any precautions or procedures that the university has implemented for the protection of university employees in or near confined spaces where contractor personnel will be working.
• Debrief the contractor at the conclusion of the entry operations regarding any hazards confronted or created in confined spaces during entry operations.

Each contractor who is retained to perform work that will require permit-required confined space entry operations shall:

• Provide at least 24-hours advance notice to the university Project Representative when both university personnel and the contractor’s personnel will be working in or near confined spaces.
• Coordinate entry operations with the university Project Representative when both the contractor and university personnel will be working in or near confined spaces;
• Inform the university Project Representative of any hazards confronted or created in confined spaces during entry operations;
• Provide a copy of the contractor’s Confined Space Program to the university upon request;
• Inform the university Project Representative in writing of the rescue services/team they will be using during permit entry; and,
Where both contractor and University of Virginia personnel will be entering the same confined space, each shall independently assess, test and issue permits for confined space entry; neither entity shall rely upon the other to perform required assessments or tests.

**Hazardous Waste**
The contractor shall ensure that all hazardous chemicals or materials are handled and disposed of in accordance with federal and state regulations.

**Electrical Safety**
When the contractor will be performing work that involves existing electrical systems and/or equipment, work must be effectively coordinated and pertinent information shared with all involved parties. The contractor shall be informed if the worksite contains energized electrical systems over 600 volts during the pre-bid process so that qualified personnel and appropriate protective equipment can be considered in the bidding process.

Each contractor who is retained to perform work that will involve work on or near energized electrical systems or equipment greater than 50 volts shall:

- Ensure the “Limited Approach Boundary” for energized electrical equipment is established and that the area is restricted to authorized personnel only.
- In the case that energized work must be performed, the university Project Team must be notified and a copy of the contractor’s Energized Electrical Work Permit must be posted and made available upon request.

**Lockout/Tagout**
If employees of either University of Virginia and/or the contractor will be performing work that requires the use of lockout/tagout devices, the following requirements shall apply:

University personnel conducting work on a system locked and tagged out must add their unique lock to the hasp locking out the equipment involved. FM Lockout/Tagout procedures must be followed by all FM personnel engaged in such activity.

The university Project Representative shall also inform the contractor of any equipment-specific Lockout/Tagout procedures for equipment or energy sources in the planned work area, or effecting the work area.

The contractor shall:

- Provide a copy of their Lockout/Tagout Program to the university upon request.
- Assure that its personnel understand the energy control procedures that are to be followed on the project site.

In cases where the same power source must be locked out by multiple parties proper equipment (i.e. multi-hasps) must be used to insure that the energy source remains locked out until both parties have removed their lock.

**Trenching and Excavations**
All excavation areas must be white lined before VA 811 ticket is called in, in addition, the contractor shall:

- Call in a valid VA 811 ticket before excavation is to start.
- Have a valid VA 811 ticket on the job site
- Allow the required time for utility marking
Read and understand all response codes from VA 811 tickets before excavation.

Know and understand the difference between an emergency ticket, a 3-hour notice ticket, and a normal ticket per the Professional Excavators Manual.

Look for unmarked utilities on site before excavation.

Do a site walk through before excavation to understand utility markings within excavation area

Call VA 811 for a utility remark when utility marks are disturbed by weather or construction

Respect and preserve the utility marks

Not excavate within two feet of a utility with mechanized equipment.

Plan and excavate carefully

Pot hole and protect all utility crossings and exposed utilities

- The design of sloping and benching systems, support systems, shield systems or other protective systems shall conform, at a minimum, to VDLI requirements specified in 1926.650 Virginia Excavation Standard, Construction Industry.

- The contractor’s designated competent person shall conduct daily inspections of the excavation, the adjacent areas, and protective systems for evidence of a situation that could result in possible cave-ins, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions.

- Where evidence of such situations is detected, the contractor shall remove exposed employees from the hazardous area until necessary precautions have been taken to ensure their safety.

- 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 make a copy of the completed review available to the university Project Representative.

Where university personnel must enter a contractor’s excavation, the university Project Representative shall:

- Coordinate a pre-inspection of the excavation with a University Competent Person prior to university personnel entering.

Hot Work

Contractors performing hot work, such as welding/cutting or torch-applied roofing, shall maintain a Hot Work Permit Program and employee-training program that at least meets the requirements of OSHA and the NFPA. Examples of hot work include, but are not limited to, use of open flames, compressed gases or supplied fuel burning, brazing, cutting, grinding, soldering, thawing pipe, torch applied roofing, and welding.

A copy of the canceled permit(s) shall be provided to the university Project Representative upon request.

Work Zone Safety

Contractors performing work on any public thoroughfare which will inhibit the flow of traffic, shall perform all work in accordance with all MUTCD and VDOT regulations.

- Coordination should be made between adjacent or overlapping projects to check that duplicate signing is not used and to check compatibility of traffic control between adjacent or overlapping projects.

- It is especially important to ensure effective continuity of accessible paths for pedestrians.

- A copy of the Traffic Control Plan shall be maintained, and provided to the university Project Representative upon request.
Scaffolding
Contractors utilizing scaffold on University projects shall maintain a Scaffold Safety Program, including inspections, and employee training which, at least, meets the requirements of the OSHA standard. Daily, weekly, monthly (i.e. periodic) and annual inspections must also be made available to university personnel, upon request.

In any case where an engineer is required for the design of a scaffold, a copy of the stamped drawings must be made available to the university Project Representative, upon request.

Where university personnel must access contractor scaffolding for purposes of inspection or work activities, they must be informed/trained by the contractor before accessing the particular type of scaffolding. Proper access and use, any special requirements, and verification of scaffold condition should be reviewed by the contractor’s Scaffold Competent Person.

Mobile Cranes
A Notice of Proposed Construction or Alteration may be required for cranes located in the vicinity of the University of Virginia Medical Center, or where the type of structure exceeds a certain height. It is the property owner’s responsibility to complete this form and return it to the FAA at least 48 hours before the start of the construction or alteration work activities. For more information on this requirement, visit the Federal Aviation Administration’s website at http://www.faa.gov/forms/index.cfm/go/document.list/parentTopicID/223.

The university Project Representative shall:

- Coordinate temporary removal of personnel from occupied offices/spaces located beneath the load during lifting operations where there is a risk of the object being handled entering the building envelope if it is mishandled or dropped.
- Coordinate who will provide notice to the FAA, where applicable.

The contractor shall:

- Assure that notification to the FAA is filed in a timely manner, if applicable.
- Coordinate activities involving mobile cranes with the university Project Representative where work will involve occupied buildings and/or public spaces.
- Barricade the accessible area within the swing radius of the rear of the rotating structure of the crane in such a manner as to prevent personnel from being struck or crushed by the crane.
- Barricade the lift path of the crane to keep personnel clear of loads about to be lifted, and of suspended loads.
DEFINITIONS

**Competent Person:** 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.

**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.

**Contracting Department:** The Department at the university that has contracted for work to be performed by a Contractor. In regards to agencies/firms conducting work on University of Virginia property, where no formal contractual relationship exists between University of Virginia and the agency/firm, the department that is coordinating or approving the work of the agency/firm is the Contracting Department.

**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 university property, or that provides services to the university on university property including, but not limited to, vending and the supply and erection of tents.

**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).

**Permit-Required Confined Space:** 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 to assure the safety of those employees performing the work.

**University Project Representative:** The representative from the University of Virginia that coordinates the work of the contractor.