

Number: FMS-7

Issued: 8-2-1993

Reviewed: 1-21-2020

Revised: 1-18-2017

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PROCEDURE
Oak Ridge Associated Universities
Facilities Management Services (FMS) / Facilities and Transportation Department (FTD)

Subject: Safe Subcontractor Work

I. PURPOSE

To establish operational guidelines for managing and ensuring the safe conduct of onsite subcontracted work.

II. SCOPE/LIMITATIONS:

This procedure applies to all work under contract by FMS in which subcontractors supply onsite labor.

III. REFERENCES:

- A. 29 CFR 1910 and 29 CFR 1926 - Occupational Safety and Health Administration.
- B. FMS Integrated Safety Management Plan
- C. FMS-5: Hazardous Work Permitting.
- D. FMS-9: FTD Project Safety Management
- E. ORAU Emergency Preparedness Manual
- F. ES&H-100: Integrated Safety Management
- G. ES&H-112: Environmental Management
- H. ORAU Health and Safety Manual

IV. MATERIAL EQUIPMENT AND SUPPLIES:

None.

V. DEFINITIONS:

None.

Signature on file	Signature on file
Manager – FMS	Director – FTD

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VI. RESPONSIBILITIES

- A. Manager – Facilities Management Services:
1. Review all FMS work requests for proper safety planning.
 2. Ensure that ORAU Project Managers are properly trained to manage and conduct safe subcontracted work activities.
 3. Review and approve project safety plans and subcontractor work permits as required.
 4. Stop work in the immediate area if a serious hazard or dangerous situation is observed. Provide documented details of the incident to Procurement.
 5. Work with all parties to prevent and resolve project safety issues.
- B. FMS Maintenance Manager:
1. Review all FMS maintenance work requests and conduct safety planning.
 2. Ensure that FMS Maintenance Mechanics are properly trained to manage and conduct safe subcontracted work activities.
 3. Develop maintenance project safety plans and review subcontractor work permits as required.
 4. For maintenance projects requiring more than 100 man-hours of subcontractor work, ensure that a project specific safety plan is submitted by the subcontractor and approved by the Manager-FMS and Director - ES&H prior to beginning work.
 5. Work with all parties to prevent and resolve project safety issues.
- C. FMS Maintenance Mechanics:
1. Understand and maintain familiarity with all FMS subcontractor activities occurring in your work area.
 2. Manage and oversee maintenance subcontractor activities as assigned.
 3. In conjunction with maintenance subcontractors, fill out and sign off on subcontractor work permits for those subcontracted jobs under your purview.
 4. Assist ORAU Project Managers in facilitating subcontractor activities as requested.
 6. Work with all parties to prevent and resolve project safety issues.
 7. Stop work in the immediate area if a serious hazard or dangerous situation is observed. Provide documented details of the incident to FMS management.
 8. Inform your supervision or management of violations of this procedure.
- D. ORAU Project Managers:
1. Ensure that you and your project subcontractors understand and comply with the requirements of this procedure.
 2. Ensure that you understand, in detail, all aspects of the projects under your purview.
 3. Oversee security badging of subcontractor employees and provide for building access when required.
 4. Work with others in FTD and ES&H to review planned project work activities for potential safety issues prior to submitting bid solicitations and prior to beginning work.
 5. Hold pre-bid meetings with potential project subcontractors to review the project scope, address known safety hazards that may be encountered on the job, and discuss the requirements of this procedure.

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6. Ensure that the successful bidder's construction superintendent understands all applicable ORAU safety requirements.
 7. Issue a subcontractor work permit for all subcontracted projects under your purview.
 8. For subcontracted construction projects requiring more than 100 man-hours of subcontractor work, ensure that a project specific safety plan is submitted by the subcontractor and approved by the Manager-FMS and Director - ES&H prior to beginning work.
 9. Prior to beginning subcontracted construction projects, hold a pre-construction safety meeting with the subcontractor's construction superintendent and all available lower-tier subcontractors. Discuss ORAU on-the-job safety expectations and the requirements of this and other applicable FMS safety procedures. Discuss the safety aspects of the work at hand, review the project safety plan in detail, and clarify the steps and details required for safely completing the work.
 10. Assist in obtaining hazardous work permits.
 11. Periodically (weekly or more often) monitor safety performance throughout the duration of projects and bring deficiencies to the attention of the subcontractor's construction superintendent, FMS management, ES&H management, and the Procurement Contract Manager, as appropriate. Document project inspections on a standard FMS Construction Project Safety Inspection Form.
 12. Work with all parties to prevent and resolve project safety issues.
 13. Coordinate all details of your projects with a designated substitute project manager(s) when you are scheduled to be away from the work place.
 14. Stop work in the immediate area if a serious hazard or dangerous situation is observed. Provide documented details of the incident to Procurement.
- E. ES&H:
1. Work with ORAU Project Managers, maintenance personnel, and FMS subcontractors to review planned work activities for potential safety hazards and render recommendations and/or requirements for safely completing the work.
 2. As requested, review and approve FMS engineering designs for safety compliance.
 3. Participate in project pre-bid meetings to discuss and review project safety and hazardous work concerns.
 4. Participate in project pre-construction meetings. Communicate ORAU on-the-job safety expectations and specific project safety requirements.
 5. Review and approve project safety plans and SDS submittals.
 6. Review and approve or issue subcontractor hazardous work permits as requested.
 7. Visit subcontracted job sites frequently to monitor and document safety performance.
 8. Perform onsite air monitoring and other preventive activities as required.
 9. Work with all parties to prevent and resolve project safety issues.
- F. FMS Subcontractors:
1. Attend pre-bid meetings to review the project scope, address known safety concerns that may be encountered on the job, and discuss the requirements of this procedure.
 2. Prior to submitting bids or proposals ensure that you and your lower tier subcontractors fully understand the scope of work, the requirements of this procedure and its references, and the requirements for safely conducting the work.

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3. Ensure that you have included provisions for covering the cost of implementing all ORAU safety requirements in your bid or proposal.
4. Understand that contract award is contingent upon your fully understanding the safety requirements of the project.
5. As applicable, develop, submit, and have approved a job-specific safety plan prior to beginning work.
6. As applicable, ensure that your construction superintendent and a representative of each of your lower-tier subcontractors attends a pre-construction safety meeting to further review on-the-job safety expectations and the requirements of this and other FMS safety procedures. Discuss the safety aspects of the work at hand and clarify the steps and details required for safely completing the work.
7. In conjunction with the ORAU Project Manager, fill out and sign off on a subcontractor work permit prior to beginning work.
8. Subcontractor Construction Superintendents - Ensure that you understand, in detail, all aspects of the project you are managing, particularly the details of projects containing electrical work and other hazardous work activities.
9. Ensure that your employees and all of your lower tier subcontractor employees are fully aware of the details contained in the approved project safety plan and/or the Facilities Management Subcontractor Work Permit and the requirements of this and other referenced safety procedures.
10. Ensure that your employees and all of your lower tier subcontractor employees are sufficiently trained in all applicable safety codes and regulations, including 29 CFR 1910 – OSHA, 29 CFR 1926 - OSHA, and applicable FMS administrative and safety procedures
11. Ensure that your employees and all lower tier subcontractor employees are fully competent to safely and efficiently carry out their assigned tasks.
12. Adhere to safety requirements contained in the project construction specifications and to the requirements in Appendix A, General Guidelines for Subcontractors while conducting your work.
13. Provide personal protective equipment (PPE) as required to safely perform the work.
14. Conduct lockout / tagout operations in accordance with FMS-2, Lockout / Tagout.
15. Obtain hazardous work permits in accordance with FMS-5, Hazardous Work Permitting.
16. Assume full responsibility for enforcing all on-the-job safety requirements and for implementing corrective actions necessary to mitigate safety related deficiencies.
17. Conduct and document daily “toolbox” safety meetings to discuss safety aspects of the day’s work and the mitigation of potential hazards.
18. Continuously monitor safety performance throughout the duration of the project and correct deficiencies immediately.
19. Work with all parties to prevent and resolve project safety issues.
20. Stop work in the immediate area if a serious hazard or dangerous situation is observed.

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VII. PROCEDURE

A. Subcontract Pre-Bid Phase

1. Develop engineering designs and construction specifications that meet applicable building codes and safety regulations.
2. As applicable, obtain sign-off on engineering drawings from Maintenance, ES&H, and the Manager-FMS.
3. Provide this procedure to Procurement for inclusion in all construction solicitation packages.
4. Hold pre-bid meetings to review the project scope, address known safety concerns, discuss the requirements of this procedure and ensure that all bidding subcontractors fully understand the scope of work, the requirements of this procedure and its references and the requirements for safely conducting the work.
5. Ensure that a principal of each bidding firm acknowledges their understanding of the project's potential safety hazards and the safety requirements for the project.

B. Subcontract Pre-Work Phase

1. Develop and approve project safety plans prior to beginning work.
2. FMS projects that will be worked during off-hours require an FMS oversight plan. Work with FMS management and ES&H as required to define FMS on-the-job oversight requirements – daily checks, less frequent periodic checks, full-time attendance, etc. Note that on-the-job oversight requirements will be determined on a case-by-case basis and will depend on the type of work, the hazards involved, and may evolve over the course of an extended subcontracted project.
3. Ensure that qualified and competent employees are scheduled to oversee and check on subcontracted projects or otherwise function as project site gatekeepers. In almost all cases, this will require FMS Maintenance or ES&H employees as, generally, program staff are not qualified to provide oversight or gate keeping functions for FTD subcontracted projects.
4. Develop a critical information sheet for each large subcontracted project that contains important ORAU and subcontractor contact and instructional safety information. A standard FMS form exists for this purpose. Post a copy of this form at the job site and keep another copy in the facilities administration offices.
5. Complete a Facilities Management Subcontractor Work Permit and obtain all necessary approvals prior to beginning work.
6. Prior to beginning subcontracted construction projects, hold a pre-construction safety meeting with the subcontractor's construction superintendent and all available lower-tier subcontractors. Reiterate ORAU on-the-job safety expectations and the requirements of this and other applicable FMS safety procedures. Discuss the safety aspects of the work at hand, review the project safety plan in detail, and clarify the steps and details required for safely completing the work.
7. Ensure that the subcontractor's construction superintendent fully understands the safety requirements of the project and that this information has been transferred to all lower tier subcontractor employees.

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- C. Work-In-Progress Phase
 - 1. Obtain hazardous work permits as required.
 - 2. Submit an SDS for each chemical used. Obtain ORAU approval before bringing the chemical on site.
 - 3. Monitor the job site to ensure full compliance with all safety requirements and to document subcontractor safety performance.
 - 4. Take necessary actions to prevent and correct safety related deficiencies.

VIII. ATTACHMENTS

- A. Appendix A – General Requirements for FMS Subcontractors.
- B. Appendix B – Facilities Management Subcontractor Work Permit

FMS-7: Safe Subcontractor Work

APPENDIX A

GENERAL REQUIREMENTS FOR FMS SUBCONTRACTORS

Introduction

- This document is for use by ORAU Facilities Management Services (FMS) subcontractors performing work at ORAU. It contains guidelines and regulations for safe work conduct by you and your lower tier subcontractors while on ORAU/ORISE property. The purpose for the requirements contained in this document and in FMS-7, Safe Subcontractor Work, is to inform you of ORAU safety regulations prior to submitting your project bid and to guide you in safely conducting your work at ORAU. **Ensure that the cost of complying with these requirements is included in your contract bid price.** ORAU will not consider claims for added compensation arising from complying with these regulations after the contract is awarded. For further clarification or counsel on safety matters, contact the ORAU Project Manager or a representative of the Environmental, Safety and Health Department (ES&H). For further clarification on contract matters, contact the ORAU Contract Manager.
- The safety requirements set forth have broad application. It may be necessary to supplement them with additional safety measures specific to a particular job or safety hazard. It is not possible in this document to specify all of the safety rules and practices required to address all potential safety hazards and to conduct the work safely. Each job, regardless of the type of work involved, presents unique safety concerns that call for special consideration and methods. The subcontractor, in conjunction with the ORAU Project Manager and ES&H, shall thoroughly assess and plan for new or changing hazards as they arise. Unforeseen hazards may be mitigated satisfactorily by thorough planning, alertness, and good judgment on the part of all involved.

General Requirements

- For FMS construction projects, the highest tier subcontractor shall appoint a representative of his firm to be designated as the Subcontractor Construction Superintendent who is fully responsible for:
 - The safety of all his employees and lower tier subcontractor employees,
 - Meeting with all employees and lower tier subcontractors to apprise them of all applicable ORAU safety requirements and to communicate hazards that may potentially be encountered on the job.
 - Ensuring that each individual on the job is adequately trained and fully competent to safely and efficiently carry out his/her assigned duties.
 - Communicating hazards that arise on the job to all affected employees.
 - Enforcing safety compliance on the job,
 - Ensuring that appropriate measures are taken when substandard safety practices or conditions are observed.
- Coordinate all safety concerns through the ORAU Project Manager.
- Submit a project specific safety plan for projects requiring more than 100 man-hours of onsite subcontractor work. Detailed information requirements will be provided by the ORAU Project Manager. Ensure that onsite work does not begin until the safety plan has been approved by the Manager-FMS and Director - ES&H.
- Hold daily "tool box" safety meetings to discuss the day's work and to plan for conducting the work safely. Document each meeting with the date, topic(s) covered, and the name of each individual attending.
- Arrange with the ORAU Project Manager for access to parking, equipment storage, utilities, toilets, break areas, and designated smoking areas.
- Arrange with the ORAU Project Manager for conducting work and accessing buildings during off-normal business hours and/or during non-assigned work hours.
- Ensure that all required inspection certificates for cranes, shovels, elevators, electrical tools, ladders, power cords, hoists and other equipment have been obtained and are kept current.

- Remain in your assigned work area.
- Use your own tools. ORAU will not furnish tools or equipment of any kind. Ladders for accessing inspection areas may be provided for design-only projects.
- Horseplay, possession of illegal drugs or alcoholic beverages, or failure to follow ORAU safety regulations may provide cause for the ORAU Project Manager to insist upon permanent removal of offending individuals from the job site.
- Keep your work area clean and orderly. Remove all scrap and debris from your work area daily.
- Cover ORAU office equipment and furniture with sheets to protect them from settling dust and debris.
- Vacuum or dust mop work areas daily where construction dust or debris has settled.
- Provide an adequate number of fire extinguishers with current inspection certification to complete all hot work safely.
- Ensure that your employees know the location of the nearest portable fire extinguisher at all times.
- Erect barricades when conducting excavation and overhead work or as necessary when moving large equipment.
- Inspect and certify ladders as being safe and in good condition prior to bringing them to the job site. **All ladders shall be tagged and dated to demonstrate proof of inspection and certification.** Ensure that all ladders used at ORAU conform to OSHA regulations 29 CFR 1910 Subpart D and 29 CFR 1926 Subpart X.
- Inspect ladders, scaffolds, and electric power tools for defects each day. Repair, permanently disable, or remove defective tools from the job site immediately.
- Ensure that all scaffolding and scaffold components conform to and are erected in accordance with OSHA 29 CFR 1926 Subpart L.
- Ensure that non-current carrying metal parts of all electrical appliances are grounded or double insulated.
- Ensure that all extension cords are GFCI-equipped and that all electric tools are connected to GFCI protected power sources.
- Ensure that powder-actuated tools are operated only by employees who have been trained in the operation of these tools. Inspect each powder-actuated tool daily to ensure that safety devices are in proper working order.
- Keep factory installed tool and equipment safety devices in place and fully operational. Tools or equipment found with factory installed safety devices disconnected, bypassed, or otherwise rendered non-operational will be permanently removed from the job site.
- Minimum clothing requirements at ORAU include long pants, shirt with at least ¼ length sleeves, and sturdy work shoes. Work shoes with steel shanks and reinforced toes may be required. Variance from this requirement may only be approved by the ORAU Project Manager in conjunction with ES&H.
- Provide and wear personal protective equipment (PPE) commensurate with the work at hand and in accordance with applicable laws, regulations, and ORAU safety procedures.
- Wear hard hats when the potential for falling objects is present and at all times during overhead work operations and when working on and around scaffolding.
- Keep drives and roadways clear at all times.
- Keep building corridors and passageways clear of blockage and stumbling hazards.
- Do not locate equipment in a manner that will encumber access to doors, fire-fighting equipment, fire alarm pull stations, electric switches, or electric panels and disconnects.
- Submit a SDS for approval for each chemical used. Do not bring chemicals on site until approval from the ORAU Project Manager and ES&H has been received.
- Maintain an up-to-date SDS notebook on site that is readily available to all subcontractor employees.
- Ensure that all cans, bottles, and other containers are properly labeled as to the container's contents.
- Ensure that all waste oils and chemicals are disposed of in accordance with EPA regulations.
- Ensure that all subcontractor employees are informed of work site hazards, including chemicals, they may encounter on the job site.
- Take care to avoid oil and chemical spills. Clean up and report all spills immediately. Do not allow spills to enter drains.
- The use of gasoline and diesel operated equipment inside buildings is prohibited without prior approval from the ORAU Project Manager and ES&H.
- Store and transport flammable liquids only in approved containers. Flammable liquids must be stored and transported in standard safety cans that are UL or FM labeled. Keep oily, greasy or paint soaked rags in closed safety containers and in a designated area away from buildings and flammable material

storage. The ORAU Project Manager will designate approved storage locations.

- Keep compressed gas cylinders securely restrained at all times. The ORAU Project Manager will designate approved gas cylinder storage locations.
- Keep compressed gas cylinders (consumer size propane cylinders excepted) at grade or floor level and out of overhead spaces.
- Obtain ORAU hazardous work permits for the following:
 - Hazardous lifts (refer to FMS-5, Hazardous Work Permitting for hazardous lift criteria)
 - Entry into confined spaces.
 - Torch cutting or burning and arc welding. Grinding where a constant stream of sparks may cause ignition of a flammable material.
 - Work involving the use of powder operated tools.
 - Work in radiological labs, radiologically contaminated areas, and specific radiologically controlled areas.
 - Work involving the removal of lead or lead impregnated paint.
 - Asbestos work.
 - Excavation work, whenever the soil or grade surface is penetrated to a depth of more than one foot.
 - Other work activities as deemed sufficient to require a hazardous work permit as directed by the ORAU Project Manager, Manager-FMS, or ES&H.
- Conduct all lockouts and other hazardous work activities in strict accordance with FMS safety procedures.
- Provide first aid supplies and keep them stocked and readily available throughout the course of the job. Ensure that all subcontractor employees are familiar with their location.
- Provide the ORAU Project Manager with a report of all on-the-job injuries and near-miss incidents immediately following the incident.
- Maintain immediate access to the telephone number of ORAU points of contact, including the ORAU Project Manager, ES&H, and Procurement.
- Know and understand the emergency procedures for each project, including the location of first aid kits, the location of the nearest emergency medical facility, and the telephone numbers of the local police, fire department, and ambulance service.

FACILITIES MANAGEMENT SUBCONTRACTOR WORK PERMIT

Date Issued: _____ Work Start: _____ Permit Valid Through: _____

Subcontractor Company: _____ Project / Task No. : _____

Work Description: _____

Work Site / Location: _____

Work Areas:

- Office Areas
- Attic
- Boiler / Mechanical Room
- Roof
- Laboratories *
- Secured Areas **
- RAD Controlled Areas *
- Exterior / Grounds
- Other (specify) _____

Hazardous Work Permits Required:

- Excavation ***
- Confined Space *
- Hazardous Lift *
- Radiation Work *
- Hot Work *
- Asbestos Work *
- Lead Work *
- Hazardous Laboratory Work *
- Other (specify) _____

Restrictions / Other Requirements (specify):

- Work Days (specify) _____
- Work Hours (specify) _____
- Escort (specify) _____
- Lockout/Tagout (by ORAU only)
- Other (specify) _____

PPE Required (minimum - 29 CFR 1910/1926 – OSHA):

- Safety Glasses
- Goggles
- Face Shield
- Hard Hat
- Respirator *
- Tyvek Coveralls *
- Dust Mask
- Steel Toe Shoes
- Gloves (specify) _____
- Harness / Fall Protection (specify) _____
- Other (specify) _____

Tools & Equipment Used:

- Hand Tools / Electric Hand Tools (GFCI required)
- Gasoline Powered Tools
- Powder Operated Tools *
- Cranes / Hoists / Lifts / Boatswain's Seat
- Ladders / Scaffolds
- Torch / Arc Welder *
- Digging / Trenching Equipment ***
- Refrigerants / Refrigerant Recovery Unit
- Chemicals / Oils / Lubricants (SDS required)

Electrical Safety PE (minimum NFPA 70E):

- Long-Sleeve Cotton/FR Clothing or Coveralls
- Hood
- Face Shield
- Insulated Shoes
- Insulated Gloves
- Electrically Insulated Hand Tools
- Other (specify) _____

FMS Oversight Required:

- Periodic (Daily)
- Full Time
- Periodic (Extended)
- Other (specify) _____

Utilities Provided / Access Approved:

- Electric Power
- Domestic Water
- Phone
- Restrooms
- Kitchen / Break Areas

Approval & Signature (additional signatures required: * ES&H, ** ORAU Security Manager, *** FMS Engineering)

Subcontractor Representative

Maintenance Mechanic / Project Mgr.

FMS Engineering

ORAU Site Security Officer

ES&H

Original: Return to Facilities Help Desk

Copy: Post at the Job Site