PROCEDURE

Oak Ridge Institute for Science and Education
Managed by
Oak Ridge Associated Universities

Facilities Management Section (FMS) / Facilities and Transportation Department (FTD)

Subject: Safe Subcontractor Work

I. PURPOSE

To establish operational guidelines for managing and ensuring the safe conduct of on-site subcontracted work.

II. SCOPE/LIMITATIONS:

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

III. REFERENCES:


C. ESH-110: Environment, Safety, and Health

D. ESH-115: Internal Environment, Safety, and Health Oversight

E. ESH-503: Personal Protective Equipment

IV. MATERIAL EQUIPMENT AND SUPPLIES:

None

Signature on file                  Signature on file
Manager – FMS                      Director – FTD
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V. DEFINITIONS:

VI. RESPONSIBILITIES

A. Manager – Facilities Management Section:

1. Review all FMS work requests for proper safety planning.
2. Ensure that FMS 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.

B. FMS Maintenance Team Leader

1. Review all FMS maintenance work requests for proper safety planning.
2. Ensure that FMS Maintenance Mechanics are properly trained to manage and conduct safe subcontracted work activities.
3. Review and approve maintenance project safety plans and subcontractor work permits as required.

C. FMS Maintenance Mechanics:

1. Understand and maintain familiarity with subcontractor activities occurring in your work area.
2. Manage and oversee maintenance subcontractor activities in your area 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 FMS project managers in facilitating subcontractor activities as requested.
5. Inform your supervision or management of violations of this procedure.
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 Procurement.

D. FMS Project Managers:

1. Ensure that you and your project subcontractors understand and comply with the requirements of this procedure.
2. Work with ESH to review planned project work activities for potential safety issues prior to submitting bid solicitations and prior to beginning work, as applicable.

3. Hold pre-bid meetings with potential project subcontractors to review the project scope, address known safety concerns that may be encountered on the job and to discuss the requirements of this procedure.

4. Ensure that the successful bidder’s construction superintendent signs Attachment B to this procedure, Subcontractor Certification of Understanding of ORAU Safety Requirements.

5. Ensure that a subcontractor work permit and, as required, a project safety plan is developed for all subcontracted jobs under your purview.

6. Ensure that all project safety plans are signed by project subcontractors and approved by both the Manager-FMS and ESH prior to beginning work.

7. 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 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.

8. Obtain or assist in obtaining hazardous work permits for your subcontracted projects that require them.

9. Frequently monitor safety performance throughout the duration of projects and bring any deficiencies to the attention of the subcontractor’s construction superintendent, FMS management, ESH management, and the Procurement Manager, as appropriate.

7. Work with all parties to prevent and resolve project safety issues.

8. Stop work in the immediate area if a serious hazard or dangerous situation is observed. Provide documented details of the incident to Procurement.

E. ESH:

1. Work with FMS project managers, maintenance personnel and project subcontractors to review planned work activities for potential safety issues and render recommendations and/or requirements for safely completing the work.

2. Analyze 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 on-the-job safety expectations and specific project safety requirements.

5. Review and approve project safety plans and MSDS submittals.
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6. Review and approve subcontractor work permits as required.
8. Perform on-site air monitoring and other preventive activities as required.
9. Work with all parties to prevent and resolve project safety issues.

F. Procurement:

1. Ensure that this procedure and its appendices are included as part of the contract specifications in all construction subcontracts.
2. Ensure that all FMS-requested construction bid packages contain a statement requiring bidders to complete and submit Appendix B of this procedure, Subcontractor Certification of Understanding of ORAU Safety Requirements, along with their initial bid submittal, as a necessary requirement for a technically complete bid. Ensure that a principal of the bidding firm has signed the document.
3. Participate in pre-bid meetings with potential project subcontractors.
4. Work with all parties to prevent and resolve project hazardous work issues arising in conflict with the content of the subcontract.

G. 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.
3. Ensure that you have included provisions for covering the cost of implementing all ORAU safety requirements in your bid or proposal.
4. Sign the appropriate line of Attachment B of this procedure, Subcontractor Certification of Understanding of ORAU Safety Requirements, and submit the signed attachment with your bid proposal. Understand that contract award will not proceed unless this document is included with your bid proposal.
5. As applicable, develop and submit a job-specific safety 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 employees overseeing your work, fill out and sign off on a subcontractor work permit prior to beginning work.
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8. 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 procedure and other referenced procedures.

9. 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 ORAU/FMS safety procedures.

10. Ensure that your employees and all lower tier subcontractor employees are fully competent to safely and efficiently carry out their assigned tasks.

11. 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.

12. Provide personal protective equipment (PPE) as required to safely perform the work.

13. Conduct lockout / tagout operations in accordance with FMS-2, Lockout / Tagout.

14. Obtain hazardous work permits in accordance with FMS-5, Hazardous Work Permitting.

15. Assume full responsibility for enforcing all on-the-job safety requirements and for implementing corrective actions necessary to mitigate safety related deficiencies.

16. Conduct daily “toolbox” safety meetings to discuss the day’s work and the mitigation of potential hazards.

17. Continuously monitor safety performance throughout the duration of the project and correct deficiencies immediately.

18. Work with all parties to prevent and resolve project safety issues.

19. Stop work in the immediate area if a serious hazard or dangerous situation is observed.

VII. PROCEDURE

A. Subcontract Pre-Bid Phase

1. Develop engineering designs and construction specifications to meet or exceed applicable building codes and safety regulations.

2. Obtain sign-off on engineering drawings from Maintenance, ESH and the Manager-FMS.

3. Structure request for proposal (RFP) solicitation packages to include the requirements of this procedure.

4. Hold pre-bid meetings to review the project scope, address known safety concerns that may be encountered on the job, discuss the requirements of this procedure and ensure that all potential subcontractors fully understand the scope of work, the
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requirements of this procedure and its references and the requirements for safely conducting the work.

5. Ensure that a principal of each bidder firm signs the appropriate line of Appendix B to this procedure, Subcontractor Certification of Understanding of ORAU Safety Requirements, and submit the signed attachment with their bid proposal.

B. Subcontract Pre-Work Phase

1. Review and approve project safety plans prior to beginning work.
2. Complete a Facilities Management Subcontractor Work Permit and obtain all necessary approvals prior to beginning work.
3. 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.
4. Ensure that the subcontractor’s construction superintendent signs Appendix B to this procedure, Subcontractor Certification of Understanding of ORAU Safety Requirements.

C. Work-In-Progress Phase

1. Obtain hazardous work permits as required.
2. Submit a MSDS 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 – Subcontractor Certification of Understanding of ORAU Safety Requirements.
C. Appendix C – 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 Section (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 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 or proposal and to guide you in conducting your work at ORAU safely. 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 FMS Project Manager or a representative of the Environmental, Safety and Health Department (ESH). For further clarification on contract matters, contact the ORAU Procurement Manager.

- The regulations set forth have broad application. It will be necessary to supplement them with additional safety measures specific to a particular job. It is not possible in this document to specify all the safety rules and practices required in OSHA regulations and the FMS safety procedures. 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 FMS Project Manager and ESH, shall thoroughly assess and plan for new or different hazards as they arise. Unforeseen hazards may be mitigated satisfactorily by alertness, awareness, and good judgement 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 Construction Superintendent who is fully responsible for:
  - The safety of all his employees and lower tier subcontractor employees,
  - Ensuring that each individual on the job is adequately trained and fully competent to safely and efficiently carry out his/her assigned duties.
  - 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.
  - 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 though the FMS Project Manager.

- Hold short daily “tool box” safety meetings to discuss the day’s work and to plan for conducting the work safely.

- Arrange with the FMS Project Manager for access to parking, equipment storage, utilities, toilets, break
- 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.

- Horseplay, possession of illegal drugs or alcoholic beverages or failure to follow ORAU safety regulations may provide cause for the FMS 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 to complete all hot work safely.

- Know the location of the nearest portable fire extinguisher at all times.

- Erect barricades when conducting all 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 defective items or remove them 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 metal non-current carrying parts of all electrical appliances are grounded or double insulated.

- Ensure that all extension cords are GFCI-equipped.

- 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 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 designated smoking areas.
sturdy work shoes. Work shoes with steel or otherwise reinforced toes may be required. Variance from this requirement may only be approved by the FMS Project Manager in conjunction with ESH.

- Provide and wear personal protective equipment (PPE) commensurate with the work at hand and in accordance with applicable laws, regulations, and ORAU policies and 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 MSDS for approval for each chemical used. Do not bring chemicals on site until approval from the FMS Project Manager and ESH has been received.
- Maintain an up-to-date MSDS 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 FMS Project Manager and ESH.
- Store and transport flammable liquids only in approved containers. Flammable liquids must be stored and transported in standard safety cans that are U.L.-labeled or F.M.-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 FMS Project Manager will designate approved storage locations.
- Keep compressed gas cylinders securely restrained at all times. The FMS 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:
  - Hoisting and rigging jobs requiring a lift of more than 1000 lbs. or the use of a powered crane.
  - Entry into confined spaces.
  - Torch cutting or burning and arc welding.
  - Work in radiological labs or in radiologically contaminated 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.
- 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.
- Provide the FMS Project Manager with reports of all on-the-job injuries and near-miss incidents immediately following the incident.
FMS-7: Safe Subcontractor Work

APPENDIX B

SUBCONTRACTOR CERTIFICATION OF UNDERSTANDING OF ORAU SAFETY REQUIREMENTS

(Required certification for all ORAU construction subcontracts)

I hereby certify that:

- I have read and fully understand the requirements of FMS-7: Safe Subcontractor Work and its attachment, Appendix A – General Requirements for FMS Subcontractors.

- I have read and fully understand the requirements of other FMS safety and administrative procedures as they apply to this project (denoted by check mark) as follows:
  - [ ] FMA-4: Environmental Control of Refrigerants and Lubricating Oils
  - [ ] FMA-8: Working After Hours
  - [ ] FMS-1: Safe Electrical Work Practices
  - [ ] FMS-2: Lockout / Tagout
  - [ ] FMS-5: Hazardous Work Permitting
  - [ ] FMS-6: Safe Elevated Work Practices

- I am fully aware and familiar with the requirements contained in the Code of Federal Regulations (CFR) 29 CFR 1910 and 29 CFR 1926, Occupational Safety and Health Administration (OSHA), as they apply to the work on this project.

- I am fully aware and familiar with the requirements contained in other federal, state, and local occupational safety regulations as they apply to the work on this project.

- I will ensure that my employees and all lower tier subcontractor employees fully comply with the safety regulations above.

- I have been informed by ORAU to my satisfaction of any known hazards and unusual working conditions, if any, likely to be encountered during the course of this project.

Signatures

_________________________________________  ________________________________________
Principal of Bidder’s firm                      Subcontractor’s Construction Superintendent
(Pre-Award)                                      (Post-Award)

_________________________________________  ________________________________________
Director – ESH                                    FMS Project Manager

_________________________________________
Manager – FMS

APPENDIX B

SUBCONTRACTOR CERTIFICATION OF UNDERSTANDING OF ORAU SAFETY REQUIREMENTS

(Required certification for all ORAU construction subcontracts)
FACILITIES MANAGEMENT SUBCONTRACTOR WORK PERMIT

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

Subcontractor Company:  
Job / Task Description:  
Site / Work Location:  

Work Areas:  
- Office / Common Areas  
- Attics  
- Roofs  
- Boiler / Mechanical Rooms  
- Laboratories  
- RAD Controlled Areas  
- Secured Areas  
- Exterior / Grounds  
- Other (specify ______________________________)

Hazardous Work Permits Required:  
- Excavation ***  
- Hazardous Lift *  
- Hot Work *  
- Hazardous Laboratory Work *  
- Confined Space *  
- Radiation Work *  
- Asbestos Work *  
- Lead Work *  
- Lockout/Tagout (by ORAU only)

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 ***  
- Refrigerant Recovery Unit  
- Chemicals / Oils / Lubricants (MSDS required)  
- Refrigerants  
- Other (specify ______________________________)

PPE Required (minimum - 29 CFR 1910/1926 – OSHA):  
- Safety Glasses  
- Goggles  
- Face Shield  
- Hard Hat  
- Gloves (specify _____________________________)  
- Dust Mask  
- Steel Toe Shoes  
- Respirator *  
- Tyvek Coveralls *  
- Harness / Fall Protection (specify ____________)  
- Other (specify ____________)  

Utilities Provided / Access Approved:  
- Electric Power  
- Domestic Water  
- Phone  
- Kitchen / Break Areas  
- Restrooms  

Restrictions / Other Requirements (specify):  
- Work Days  
- Work Hours  
- Escort  
- Utility Access  
- Other

Approval & Signature (additional signatures required:  • SEPD,   • ORAU Security Manager,   •• FMS Engineering)

Subcontractor Representative  
Maintenance Mechanic / Project Mgr.  
FMS Engineering

ORAU Site Security Officer  
ESH

Original: Post on job site  
Copy: FMS Maintenance Service Desk (MS-01)