



WPI

Contractor Safety and Environmental Management Handbook



Last Revised May 2018

Introduction

May 2018

Worcester Polytechnic Institute is committed to hiring contractors who take safety as seriously as we do. WPI has a duty to its students, faculty, employees, and neighbors to provide a safe environment and workplace.

The information provided in this handbook is advisory and not intended to represent or replace the contractor's safety and environmental requirements. We expect that our contractors will follow and understand all local, state, and federal regulations applicable to the job they are contracted for. This handbook is meant to supplement those regulations not replace or reiterate them.

We expect that our contractors will train, supervise, and direct their employees to be mindful of the safety of WPI's students, faculty, employees, neighbors, and property when performing work on our campus. This handbook does not address or assume responsibility for the contractor's duty to its employees.

While working here, it is your responsibility to ensure that your work is performed to protect the WPI community. To fulfill this responsibility, WPI expects that you will comply with the safety information in this handbook as well as any other safety procedures that may apply, including your company's rules and local, state, and federal regulations.

The goal of this handbook is to assist the Facilities Department and contractors with assuring that the WPI community remains a safe learning, living, and working environment.

This is a living, evolving document that should be reviewed at least annually. Updates to this document will be posted at the following URL:

<https://www.wpi.edu/+ehs>

Thank you for your cooperation.

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1.0 Emergency Information

Emergencies (police, fire or medical) shall be reported to WPI Campus Police at 508-831-5555 (or dial 5555 from a campus phone). Campus Police is a 24/7/365 operation and will respond to any emergency situations and summon external emergency resources as needed. The Campus Police office is located in the basement of Founders Hall across the street from the parking lot on Boynton Street. For more information regarding WPI's Campus Police please visit the following URL:

<https://www.wpi.edu/offices/police>

1.1 Reporting Accidents

If an accident involving a contractor or sub-contractor occurs, contact Campus Police at 508-831-5555 for medical assistance. An incident report must be submitted to the WPI Project Manager (PM) within forty-eight (48) hours of the incident; however, the PM must be notified immediately of an incident. The report must include a description of the incident, indicate if medical services were needed, and include any action taken to prevent recurrence. The WPI PM will coordinate with WPI's Environmental Health & Safety office and the contractor as necessary.

1.2 Life Safety Systems

Life safety systems (including fire protection/suppression systems, fire detection/alarm equipment, emergency lighting and emergency communication equipment) must remain operational at construction sites involving occupied buildings whenever possible. Approval to shut down a life safety system must be given through the Facilities Department, 508-831-5500, or the PM. Permission will only be granted with sufficient prior notice, where there is a demonstrated need, and there is a plan to ensure that occupants are not exposed to undue risk. Provisions for a fire watch must be considered during the planning of the impairment of any life safety system. A fire watch may be required if a fire alarm or suppression system is disabled for a period of time, and puts the occupants of a building at risk.

Once permission is granted to impair a system, efforts shall be taken to protect the life safety system devices (i.e. smoke detectors) from accidental initiation, vandalism, etc.

1.3 Egress Paths

Stairwells, corridors, and elevator lobbies are intended to provide a safe means for occupants to exit a building and for emergency personnel to access a scene. The exit corridors of all areas are required to be kept clear and unblocked at all times, regardless of their width. All carts, supplies, ladders, tools, etc. must be kept out of these areas when not in use. Some projects

may require construction activities that occupy part of the corridor width. When this happens, it is important that the remainder of the corridor be clear. If an entire corridor or exit must be blocked off, the contractor must get prior approval of the PM. The contractor shall provide a written plan to the PM of how they will appropriately provide signage and communicate with the building occupants about a closure of an egress pathway.

1.4 Building Evacuations

Upon hearing a fire alarm signal or obtaining notification from Campus Police, the contractor must stop all work, secure the work area, evacuate, and move away from the building. The contractor will account for all personnel and will remain outside until Campus Police provides the clearance to re-occupy the building.

2.0 General Information

2.1 Project Notification Requirements

All project scope and activities must be clearly communicated to the WPI Project Manager. However there are times when additional notification must be made to other WPI departments. The following list describes specific scope and activities which require notification to these additional departments.

Construction Scope & Activity	Notification Requirement
Disruption of service to or access to emergency equipment <ul style="list-style-type: none"> • Emergency eyewash or shower • Fume hood • First aid kits • Automated External Defibrillator (AED) 	Environmental Health & Safety
Work on Life Safety Systems (fire alarm or sprinkler)	Facilities Operations
Disruption of a utility serving WPI property (steam, gas, electric, etc.)	Facilities Operations
Modifying an egress pathway (inside or outside of a building)	Campus Police Environmental Health & Safety
Use of class 3B or 4 lasers	Environmental Health & Safety
Using licensed radioactive material sources in portable gauges, analyzers or to conduct radiography.	Environmental Health & Safety
Installing air monitoring systems	Environmental Health & Safety
Shipping of hazardous materials (hazardous waste, asbestos, etc.)	Environmental Health & Safety
Discovery of unknown hazardous materials (asbestos, lead, chemical, etc.)	Environmental Health & Safety
Work on a roof	Campus Police Environmental Health & Safety
Work requiring industrial hygiene monitoring/sampling	Environmental Health & Safety
Excavations requiring dewatering operations	Environmental Health & Safety

Work which will disrupt normal traffic or parking operations	Campus Police
Generation of Hazardous Waste	Environmental Health & Safety

2.2 Housekeeping

Contractors must maintain good housekeeping while working on WPI property. This includes keeping work areas neat, clean, orderly, free of excess trash and debris, and never blocking walkways, stairs, exits, or creating a tripping hazard. Contractors must always cover and/or place a guard rail around open holes, trenches, or excavations. Materials and tools must be kept and stored in an orderly fashion. Isolate the work area with safety markers, tape barriers, blinker lights, etc. and use police details, when pedestrian and/or vehicular traffic is impeded. Smoke detectors and sprinkler heads must be protected from dust and impact. Measures must be taken to protect adjacent areas and HVAC equipment/systems from dirt, dust, and debris. Debris shall not be allowed to accumulate within or around the work area. The worksite and surrounding area, especially stairways, corridors, and walkways, must be kept clear of obstructions, waste, and dust that may create tripping, slipping, or egress issues. Contractors must coordinate with WPI’s Custodial department to ensure cleaning standards are met throughout the project.

2.3 Trash and Non-Hazardous Waste Disposal

It is the contractor’s responsibility to ensure that construction and demolition debris is managed in a manner consistent with applicable local, state, and federal regulations. Disposal of debris material in a campus trash dumpster is prohibited. All trash generated in the construction area must be disposed of each day by the contractor.

2.4 Contractor Employee Conduct

The contractor shall ensure that their employees and their sub-contractor employees conduct themselves in an appropriate and professional manner while on campus. Inappropriate gestures, remarks, whistling, vulgarity, or anything deemed derogatory will not be tolerated. Work that is performed unsafely can put others at risk and is unacceptable.

2.5 Lighting

All hallways, stairwells, etc. must remain lighted for pedestrian safety. When construction activity impacts the lighting of the surrounding area, the contractor must provide temporary lighting to compensate for the loss.

2.6 Noise

The contractor shall keep the work area as quiet as possible. If power-actuated tools, nail guns, or other such devices must be used to accomplish the work, the contractor shall notify the PM and advise of the type of equipment to be used and the duration of the work to be done. At

times, it may become necessary to stop the work immediately when advised by the PM because the work is adversely affecting the building's occupants. Making alterations to the work schedule may be necessary and will be considered on a case by case basis.

2.7 Working in Occupied Areas

When building occupants are present during work activities, additional safe guards must be implemented to eliminate exposures and complaints. Dusts and odorous activities from construction tasks shall be controlled by effective containment/barrier techniques such as negative air ventilation systems. Additionally contractors must take measures to ensure that existing HVAC systems are not contaminated with dirt/debris during their work.

2.8 Parking

Parking on the WPI campus is limited and all contractors must abide by the parking and traffic requirements of the WPI Campus Police Department. Each construction project may have unique parking requirements and a thorough parking plan must be discussed with the PM prior to the project start date. There may be projects that do not allow contractor parking on site, and alternate off-site parking may be necessary as advised by the PM.

2.9 Project Site Delineation

All projects must have clear boundaries delineated. This can be accomplished through a variety of means including signage, physical barriers, etc. which are appropriate for the location, hazards, and nature of the work taking place. When used, signage must be clearly and deliberately displayed in order to establish a clear work zone. All signs must be reviewed with and approved by the WPI PM. On larger projects, site logistics plans should be developed to propose how the site will be delineated and describe the type and scale of physical barriers to be utilized.

2.10 Smoking

Smoking is not permitted on WPI property. This includes all interior and exterior spaces. No exceptions.

2.11 Security and Keys

Access to construction sites is authorized by the PM. Once approved keys can be signed out at the Facilities Customer Service Center at 37 Lee Street. All keys must be picked up at the beginning of each day and returned at the end of each day unless specific arrangements have been made. If electronic card access is needed, the PM will communicate with the WPI Card Access Group so access is provided for the contractor. The contractor will need to report to the Campus Police office located in the basement of Founders Hall to pick up their ID badge. The

contractor shall be responsible for security of the site and the return of all keys and access cards at the end of the workday.

2.12 Ceiling, Floor, or Wall Penetrations

If a contractor makes a penetration in a ceiling, floor, or wall in a building on campus, the penetration must be filled using an appropriate fire rated sealant. If a contractor discovers a penetration that is not sealed, and was not done by the contractor, the contractor shall notify the PM of the location and size of the unsealed penetration.

2.13 Inspections

At any time, the WPI Project Manager and/or Environmental Health and Safety may conduct an unannounced safety inspection of the job site with the site superintendent, foreman, or supervisor. The purpose is to review the site for safe working conditions, to assure that the area near the site is clean and safe for the building occupants, and to verify that the contractor is complying with the requirements of this handbook.

2.14 Contractor Orientation

Contractors will be responsible for conducting their own site specific safety orientation for their employees. Contractors shall include WPI specific information, included in this document, to their employees. Contractors who wish to review their site specific safety orientation materials with WPI shall contact Environmental Health & Safety at ehs@wpi.edu. Contractors have the responsibility to provide the information in this handbook to all of their subcontractors.

3.0 OSHA Occupational Safety Information

The Occupational Safety and Health Administration regulates a wide range of workplace safety issues and has developed numerous standards. It is the responsibility of each contractor to develop, implement and maintain programs that comply with these standards. These written programs shall be made available to WPI upon request. This section is not intended to assist the contractor with OSHA compliance, but rather to provide clarity on WPI expectations related to the specific subject matter. For additional assistance, Massachusetts based contractors may contact the Department of Labor Standards (DLS) "On-Site Consultation Program" for help with OSHA compliance. Please visit the MA DLS website at the following URL for more information:

<http://www.mass.gov/lwd/labor-standards/on-site-consultation-program/>

3.1 Hazard Communication

For every hazardous material brought to WPI property contractors must be able to provide a copy of the Safety Data Sheet (SDS) in a timely manner for each material used on campus, assure that containers are labeled at all times, and that all hazardous materials are removed from the campus at the completion of the work. The contractor may request from WPI a copy of an SDS for any hazardous material that is encountered on the WPI campus during the performance of their work by requesting it from the Project Manager.

3.2 Personal Protective Equipment (PPE)

All required PPE to be used by contractor employees and training on proper use will be supplied by the contractor. Contractors may not utilize WPI supplied PPE. Where PPE use is required, the enforcement of its use is the responsibility of the contractor. The contractor's supervisor shall ensure that employees wear protective equipment, clothing and gear that will provide adequate protection from hazards associated with the job task.

3.3 Electrical Safety

Only licensed and qualified electricians are permitted to work on electrical systems and equipment. All work is to be conducted in accordance with applicable standards and codes. Do not operate electrical tools or equipment in wet areas or where potentially flammable dusts, vapors, or liquids are present. Should a circuit breaker "trip", the contractor must ensure that a qualified electrician checks the circuit and equipment, and corrects the problem before resetting the breaker. Report hazards (lack of protective guards or covers, damaged equipment, etc.) to the PM for repair work. Do not leave electrical boxes, switch gear, cabinets, or electrical rooms open when not directly attended. Extension cords must be in good condition and must not create a trip hazard. Cords that stretch across walkways must be entirely covered and secured so as not create a trip hazard.

3.4 Lockout/Tagout (LOTO)

WPI Project Managers who arrange for outside contractors to service and maintain WPI owned equipment/systems must ensure that the contractor is familiar with WPI LOTO Program. To avoid serious injury, managers and contractors must share information on their respective lockout/tagout procedures and work together to notify all affected personnel of the upcoming work activity. WPI employees must comply with restrictions & prohibitions of contractor's energy control program.

Contractors hired to service and maintain WPI equipment/systems will be responsible for assessing energy sources and hazards and implementing their own lockout/tagout procedures. As a resource for implementing their own lockout/tagout procedures, contractors shall also

review WPI's Equipment Specific Lockout/Tagout Procedures. The contractor's energy control program can be more restrictive than WPI's program but shall not be less restrictive

In addition, contractors must coordinate with WPI Project Managers to identify all hazardous energy sources and to notify all affected personnel.

3.5 Confined Space Entry (CSE)

The WPI campus contains both permit and non-permit required confined spaces – tanks, manholes, tunnels, etc. – that could be hazardous work spaces. Contractors must coordinate with the WPI project manager to identify any potential hazards of the confined spaces that will be entered. The contractor is responsible for providing their own personnel and equipment including monitoring and rescue equipment to ensure safe entry. If work requires both contractor and WPI employees to perform an entry the PM must ensure that a specific entry plan is developed and reviewed with EHS well in advance of the entry.

3.6 Fall Protection

Contractors are responsible for evaluating and ensuring that fall hazards within their scope of work is protected at all times. Contractors shall not only consider their employees, but also WPI faculty, staff and students who may become exposed to fall hazards during their work. Contractors shall select fall protection measures that are compatible with the type of work being performed. Fall protection can be provided through the use of guardrail systems, safety net systems, personal fall arrest systems, positioning device systems and warning line systems among others. When contractors provide its employees with personal fall arrest systems they must ensure the harness is worn and properly anchored when the work requires it.

3.7 Excavation Safety

At least 72 hours prior to any excavation work the WPI PM and Dig-Safe must be notified. Information on how to notify Dig-Safe can be found at the following URL:

<http://www.digsafe.com/>

The PM will review any proposed excavation work with WPI staff regarding any WPI owned utilities and provide markings as necessary. Excavation cannot begin until the WPI PM and Dig-Safe approval is given and all utility companies have marked existing utilities in the field.

All excavation five (5) feet or more in depth must be shored or sloped. Ladders must be provided for access and egress to the excavation. Guard rails or some other appropriate means of protecting people from falling into the trench/excavation should be installed around the perimeter of the exposed area.

3.8 Compressed Gas Cylinders

Contractors are responsible for obtaining any permits related to the use and/or storage of compressed gasses as part of the contracted work.

Compressed gas cylinders can pose a severe hazard, and contractors must take measures to protect individuals and property. Valve protection caps must be in place when cylinders are transported, moved, or stored. Secure cylinders in an upright position to a solid object using a chain or rugged strap. Keep cylinders at a safe distance or shielded from welding or cutting operations. Do not place cylinders where they can contact an electrical circuit. Use only approved spark igniters to light torches. Remove all gas cylinders from the work site at the completion of the work.

3.9 Welding Safety and Hot Work

Prior to commencing any hot work operations, the contractor must notify the WPI PM and explain the need to perform the work. The contractor shall be prepared to justify the need to perform hot work and explain why other methods that don't involve hot work would not be sufficient. If the hot work is necessary, two (2) Hot Work Permits must be acquired, one from the City of Worcester and the second from the Facilities Customer Services Center (located at 37 Lee Street). The City of Worcester permit must be obtained first. Details on how to acquire one from the City of Worcester are provided at the following URL:

<http://www.worcesterma.gov/fire/prevention/permits-licenses>

Contractors are responsible for determining appropriate fire watch staffing needs. The Contractor shall review those needs with the WPI Project Manager prior to the hot work activities.

3.10 Tools & Equipment

Contractors must come to WPI prepared with all tools and equipment that they need to perform the contracted work. Borrowing or using WPI owned tools and equipment will not be allowed without good justification and approval from the PM. Power tools shall be maintained in a safe working condition and be designed with safety features such as guards and interlocks which have not been removed or disabled. Tools shall be tied off when used overhead. Tools powered by gasoline shall not be used indoors unless prior permission has been granted by EHS and appropriate controls are in place.

3.11 Cranes and Hoists

All operators must have applicable licenses to operate this equipment. Operators are responsible for the proper operation and placement of the crane in relationship to the load to be handled and the landing area so as to obtain the best rated lift capacity. Each crane or hoist

brought on WPI property must have a current annual inspection performed by a certified testing agency and the documentation for this inspection and employee training must be available for on-site PM or EHS review.

3.12 Scaffolding

All scaffolding must be erected and maintained in compliance with applicable standards and the manufacturer's requirements. The contractor shall be responsible for designating a competent person and ensuring of all the necessary inspections of any scaffold setup. All scaffold platforms must be equipped with compliant handrails, mid-rails, toe boards and completely decked with safety plank or manufactured scaffold decking. Scaffolds must be secured to the building at proper intervals as determined by an engineer or competent person. Scaffolding left in place must be protected up to 12 feet from grade to prevent unauthorized access. If the scaffolding creates darkened areas the contractor shall provide temporary lighting.

4.0 Environmental Management Information

At the local, state, and federal level, there are environmental regulations which impact construction and renovation operations at WPI. It is the responsibility of the contractor to be aware of the regulatory requirements and have compliance programs in place. Contractors shall review any potential impacts to any of the following topics in Section 4 with WPI's Environmental Health and Safety as there may be some environmental permitting that WPI may be responsible for complying with as part of the project.

4.1 Asbestos

Prior to work beginning on a project, a WPI PM must first hire an industrial hygiene consultant to conduct an asbestos inspection and develop a report on all suspect asbestos containing materials that will be impacted during the project work. Only approved asbestos abatement contractors are allowed to impact asbestos-containing materials.

Contractors whose work has the potential to impact suspect asbestos-containing building materials have regulatory obligations to provide asbestos awareness training for their employees. This is intended to provide an awareness about asbestos and prevent accidental releases. The contractor shall not disturb or impact and suspect asbestos-containing materials. Any newly discovered suspect asbestos-containing material that is observed by the contractor shall be reported to the PM.

All records related to asbestos activities must be sent to EHS (ehs@wpi.edu). These records include waste shipment records, sampling results, reports, state notifications, etc.

4.2 Lead Paint

Unless the PM provides a specific lead paint inspection, contractors should assume that any painted surface they come in contact with is coated with lead-based paint in buildings constructed before 1978. No intrusive, dust-generating work on painted surfaces is allowed unless the contractor is a certified lead paint abatement contractor. Lead paint awareness training may be necessary where lead paint could be encountered. See the Hazardous Waste section of this handbook for details on how to dispose of lead paint or and debris associated with lead paint removal.

4.3 Poly Chlorinated Biphenyls (PCB's)

Any work (including sampling) involving materials suspected or known to be containing PCB's should be reviewed with EHS well in advance of the project initiation. Specialized consultants may be used to review the project scope and guide the project through completion.

4.4 Hazardous Waste

The Contractor and PM should discuss the management of all potential Hazardous Wastes with EHS prior to the project initiation.

Proper management of Hazardous Waste generated by a contractor as part of its work is the responsibility of the contractor. Contractors must ensure that their hazardous waste is properly identified and stored in accordance with all applicable regulations. The contractor's employees must be appropriately trained to manage hazardous waste safely.

The contractor is responsible for generating all disposal documentation and submitting it to EHS for review prior to transportation for disposal. The contractor will ensure that WPI is designated as the "Generator" on all manifests and that only EHS staff members are allowed to sign the hazardous waste manifest. All hazardous waste documentation must be directly sent to EHS in a timely manner to comply with federal and state regulations.

4.5 Universal Waste

Certain wastes, such as some batteries, fluorescent bulbs and some mercury containing devices are categorized as "Universal Waste" and have unique regulatory requirements if they are to be shipped for recycling. Like hazardous waste the Contractor and PM should discuss the management of all potential Universal Wastes with EHS prior to the project initiation.

4.6 Transport of Hazardous Materials

All transportation of hazardous materials while on or off WPI property shall be conducted in accordance with USDOT Hazardous Material Regulations.

4.7 Spill Prevention and Response

The contractor shall have available equipment and control products that are suitable and sufficient to control a potential spill/release and use appropriate protective procedures to minimize the potential of a spill such as double containment, overflow protection, etc. All contractor employees must be trained on adequately responding to a hazardous material spill. The contractor is responsible for notification of WPI Campus Police and all appropriate regulatory agencies if necessary.

4.8 Storm Drains and Sanitary Sewers

Contractors performing planned work that will create potential runoffs from water blasting, wet method surface removal, etc. will take measures to adequately prevent such releases from occurring.

4.9 Storm Water

Projects that disrupt over one acre of land (or less in some instances when part of a larger common plan of development) must adhere to EPA's storm water management requirements. These projects are required to obtain a permit and develop a storm water pollution prevention plan that outlines best management practices to be implemented to minimize pollutants contained in on-site storm water runoff. The contractor shall be responsible for compliance with these EPA requirements.

4.10 Waste Water

The contractor shall identify all waste water streams and obtain approval for any drain discharge if required. The contractor shall provide all necessary information to the local sewer authority serving WPI, the Upper Blackstone Water Pollution Abatement District.

4.11 Air Emissions

Contractors shall ensure compliance with all applicable local, state, and federal air emission regulations pertaining to the operation of their on-site equipment. This includes combustion units such as boilers, heaters, emergency generators, etc. The contractor shall notify the PM of any release of ozone depleting refrigerants, including CFC's, etc.

4.12 Mold

A contractor shall take measures to prevent mold growth. This includes the prevention of moisture from impacting an area before installing insulation, drywall, or other materials that support mold growth. These areas shall be dry for the installation of such material. Temporary measures, including the use of tarps and dryers, may be necessary. If a contractor discovers the

presence of mold, the PM should be contacted immediately. Any sampling efforts should be reviewed with EHS prior to performing the sample.

4.13 Pest Control

The contractor shall not use any insecticide, pesticide, or other agent on WPI property unless such usage is part of the contracted work that they are trained and licensed to do. If a contractor sees evidence of cockroaches, mice, ants, or other pests during the course of their work, they must notify the PM.

5.0 Facilities Department Main Office and Contact Information

The Facilities Department is located at 37 Lee Street. This location contains the offices of the Assistant Vice President of Facilities and the department’s directors, managers, supervisors, administrators, customer service center, trade shops, warehouse, and building plan library. It is a full service resource center to be utilized by all contractors. Please visit the following websites for more information:

<https://www.wpi.edu/offices/facilities-office>

http://www.wpi.edu/+ehs Department of Facilities Contacts		
<i>Office</i>	<i>Phone #</i>	<i>Email</i>
Customer Service Center	508-831-5500	Facilities@wpi.edu
Projects	508-831-5281	
Environmental Health & Safety	508-831-5216	ehs@wpi.edu

Definition of Terms

Project Manager (PM) –

This term refers to the person overseeing a particular project, not to the person's job title. These could overlap, but there are many cases where the PM is not a member of the Facilities Project team.

Summary and Sign-Off

As stated in the Introduction, the goal of this handbook is to assist the Facilities Department and contractors with assuring that the WPI community remains a safe learning, living, and working environment. Working together, we can achieve this important goal.

Please fill in the following information, including signature, and forward a copy of this page to:

ehs@wpi.edu

or

WPI Facilities Department
Attention: EHS Office
37 Lee Street
Worcester, MA 01602

The person signing this sheet represents the contractor, and agrees to abide by all of the requirements in the WPI Contractor Safety & Environmental Management Handbook.

Company Name: _____ Date: _____

Address: _____ Phone #: _____

Signature: _____ Printed Name: _____