

**NEW YORK MEDICAL COLLEGE
CONTRACTOR SAFETY POLICIES AND PROCEDURES**

I. Introduction

It is the expectation of New York Medical College (“NYMC”) that all work performed by contractors is provided in a safe, healthy and environmentally sound work environment for all who perform work on its premises.. The following policies and procedures are therefore critical in maintaining such an environment and must be followed by all contract personnel.

A contractor's safety record at New York Medical College will be a criterion used to judge performance and determine whether or not a contractor qualifies for future contracts at NYMC.

II. Contractor Health & Safety Responsibilities

The contractor at all times maintains full responsibility and liability for safety and environmental compliance matters. Each contractor shall take prompt action on safety concerns as expressed by project management personnel or NYMC personnel. These safety policies and procedures are intended to assist contractors in reducing the possibility of accidents and establishing minimum standards to protect NYMC employees from construction activities. These safety policies and procedures are not intended to cover the full spectrum of published safety and health standards which are mandated by law, but rather to highlight specific NYMC and regulatory requirements that are most commonly of concern. Contractors shall not assume that they are responsible only for those safety practices which are referenced in these safety policies and procedures. In the event of a conflict between the provisions of these safety policies and procedures and applicable local, state or federal safety and health laws, regulations and/or standards, or the contract documents, the strict, conservative practices shall apply. The Department of Environmental Health & Safety reserves the right to stop work on any project deemed unsafe or that poses an environmental hazard.

Note: These requirements are in no way intended to supersede the terms and conditions to any Agreement or Purchase Order between the contractor and NYMC.

III. General Information

1.0 Enforcement Policy

Each contractor is responsible for correcting safety violations and/or unsafe conditions present in his operation. New York Medical College reserves the right to periodically check to see if contractors are in compliance with the requirements outlined in this manual.

2.0 Safety Training

The contractor shall provide training for its employees, and such training shall include, but not be limited to:

- 1. Disclosure of potentially dangerous conditions in the workplace;**
- 2. Provide an explanation of how to perform the work safely;**
- 3. Provide a thorough demonstration as to the proper operation of Personal Protective Equipment;**

Adequate programs should comply with the OSHA Hazard Communication Standard, Resource Conservation Recovery Act, and other standards applicable to the contractor's work.

Documentation of training and site orientation is subject to inspection by the Department of Environmental Health & Safety. (“EHS”)

Certain projects may require proof of completion of the OSHA 10-hour Construction Safety course, or proof of current HAZWOPER certification. This requirement is project-specific; consult the NYMC project manager for more information.

3.0 Emergency Procedures

In the event of an emergency such as a chemical release, or severe injury, the Security Department should be notified immediately, at 914-594-4226. The contractor is required to keep emergency phone numbers available at the worksite. An emergency procedure handbook can be obtained from EHS.

4.0 Fire Reporting

Fire extinguishers are to be in close proximity during hot work. It is important to know where fire extinguishers are located and to be properly trained to operate them. Contractors are to provide their own fire extinguishers, which are to be current on monthly inspections. **Report all fires to Security at 914-594-4226.** State the emergency and the location of the fire.

5.0 Accident Reporting Procedures

All contractor accidents must be reported at the time of occurrence to Security and the contract supervisor must fill out the first report of injury. In the event of an injury requiring emergency medical assistance, or any vehicular accident, Security should be immediately notified at 914-594-4226, with a description of the emergency and location.

6.0 Housekeeping

It is important that the work area is kept clean at all times. Special attention must be given in maintaining clear walkways and roadways, removing or identifying slipping and tripping hazards, and safely stacking materials. Construction areas shall be clearly identified by the proper contractor-supplied barricades, signs, ropes, and fences. Chemicals required for a project must be properly transported, stored, dispensed, and contained to prevent spills, leakage, or release to the environment.

7.0 Spills

All spills of hazardous materials are to be reported immediately to the Security Department at 914-594-4226. Contractors should understand that any unreported spills are a violation of local, state, and federal laws.

If a spill of chemicals or unknown liquid occurs, the contractor shall submit a spill cleanup plan to NYMC or have NYMC coordinate the spill cleanup. **NYMC reserves the right to either authorize or reject the contractor's spill cleanup plan.** If the contractor's plan is rejected, NYMC may select a cleanup contractor. All waste generated by spill cleanup shall be disposed of through NYMC. All costs associated with spill cleanup shall be charged to the contractor who caused the spill.

8.0 Hazard Reporting

Workers have the right to report any job safety or healthful hazard to the United States Occupational Safety and Health Administration ("OSHA"), or another appropriate regulatory agency, without fear of discrimination or retribution. Workers can refuse to perform an unsafe or unhealthful job assignment under circumstances that can reasonably be established that they are faced with imminent danger of death or serious injury and there is no reasonable alternative or time to report the unsafe or unhealthful condition to OSHA or another appropriate regulatory agency.

9.0 New York Medical College Site Specific Hazards

9.1 Asbestos Policy

The Department of Environmental Health and Safety is responsible for asbestos surveying, monitoring, and abatement at NYMC. The College's Asbestos Survey has identified asbestos containing materials (ACM), and indicates whether it is to be abated by NYMC or remain undisturbed during the course of the project. Building materials not identified on the report shall be presumed to contain asbestos and shall not be disturbed.

The contractor is responsible in ensuring that all workers, including subcontractors on the jobsite, have received Asbestos Awareness Training prior to working in buildings constructed before 1981. **Documentation of this training is subject to inspection by EHS.** Under no circumstances will construction work be permitted to commence until an asbestos assessment has been completed by EHS and a copy of the same is given to the contractor scheduled to perform the work. Asbestos may be found in lab counter tops, doors, floor tile/sheeting, mastics, ceiling tile, plaster, chase covers, electrical wiring insulation, spray-on fire proofing, and pipe and tank insulation. The contractor is to stop work immediately and notify EHS (at 914-594-4078), if a suspect material not previously identified (as non-asbestos) is discovered during the course of the project.

9.2 Biohazards/ Infectious Materials

Contractors may need to access or contact biological materials that are potentially hazardous. Examples of these include: work on sewer lines, sumps, drain traps, or areas containing infectious waste. Any contractor working on equipment or building systems that are known or suspected of being contaminated with human blood or other biological materials, must complete an OSHA required bloodborne pathogen training program for the recognition and control of these hazards. Other contractors who are not directly working with biological materials, but may encounter these materials, shall train employees to be aware of any potential biological hazard appropriate for the work being performed.

9.3 Chemical Hazards and Hazard Communication (HAZCOM)

Hazard Communication, also known as (HAZCOM), requires an employer to make chemical hazard information readily available to all project personnel. NYMC provides Material Safety Data Sheets (MSDSs) for chemicals it uses or produces that are readily accessible to contract personnel who are working in, on, or around the chemicals. They may be obtained from the Department of Environmental Health and Safety. The HAZCOM standard places similar obligations on contractors and for training its employees in accordance with all requirements of the standard. **MSDSs must be accessible for reference on the job site prior to the material being brought on site.** These must be provided upon request and may be reviewed by the Department of Environmental Health and Safety (EHS) to determine if the materials are safe to use as intended. If EHS determines that the use of a product may cause adverse health effects or safety problems, the materials may have conditions placed upon their use, or may be prohibited from being used.

9.4 Radiation

Radioactive materials and other sources of ionizing radiation are used in research and development, and production areas throughout NYMC. The use of these radioactive materials and sources of ionizing radiation is regulated by numerous governmental agencies. A radiation sign stating "**Caution, Radioactive Materials**" will be posted on the doors of labs, doors of refrigerators containing radioactive materials, containers of radioactive material, and particular areas within a lab where radioactive materials are used. These signs and labels are posted to alert all personnel of the presence of radioactive materials. Questions regarding these areas should be addressed to EHS at 914-594-4078.

9.5 Laboratory Safety

Contractor personnel, who because of their work, may be required to enter a lab where potential exposures could occur, shall be trained in the potential hazards present. NYMC has a laboratory hazard warning sign system that provides information about specific hazards at the entry of laboratories. Prescribed personal protective equipment must be worn by all who enter the lab when the hazards are present.

10.0 Personal Protective Equipment

The contractor shall furnish and require the wearing of personal protective equipment that is customary for the job.

10.1 Eye Protection

ANSI-approved eye protection is to be worn when an eye injury hazard is present or if signs require its use. All employees working in the vicinity of chemicals must know where the nearest safety shower and eye wash facilities are located

10.2 Foot Protection

Contractor personnel shall wear footwear that is safe and proper for the specific job being performed. Open toe, canvas, and vented shoes are not permitted.

10.3 Hand Protection

Appropriate gloves shall be worn for work requiring their use (e.g. line breaking, chemical exposure, work with roof tar, etc.).

10.4 Head Protection

ANSI Z89.1 approved hard hats must be worn when the potential for head injury exists, particularly during the following conditions:

- Material falling from overhead

- Headroom restrictions and obstructions
- Electrical shock potential near the head
- Heavy material movement at head level
- Hot surfaces near the head

Tasks that require the use of hard hats include (but are not limited to):

- Demolition operations
- Work in areas that are congested with pipes, valves, etc.
- Excavating operations
- Operation of earth-moving equipment
- Crane operations

Hard hats shall be worn with the brim in front.

10.5 Hearing Protection

Hearing protection must be worn when exposed to loud noises (e.g. jackhammers, saws, lawnmowers, blowers, etc.) or when working in areas with signs stating protection is required. The hearing protection must reduce the exposure to levels required by OSHA 29 CFR 1910.95.

10.6 Respiratory Protection

Respiratory protection shall be worn as the exposure dictates. Check the Material Safety Data Sheet for the proper respirator. Workers required to wear respirators must be medically qualified and must be properly fitted for adequate protection. Workers shall be clean shaven to allow proper fit. All personnel required to use respirators must be trained in their use by the contractor. **This training must be documented and must be available for inspection by EHS.**

11.0 Permits

The following permits are used when working on NYMC sites. Any questions regarding the applicability or use of the permits at each site should be directed to the NYMC Project Manager.

11.1 Confined Space Entry Permit

A confined space has limited or restricted means for entry and exit, and is limited enough for a worker to enter and perform assigned work, and is a space which is not intended for continuous worker occupancy. Examples of confined spaces include, but are not limited to: tanks, boilers, pits, ventilation and exhaust ducts, some false ceilings, some crawl spaces, sewers, vats, manholes, steam and electrical vaults, pipelines, tunnels, interstices, and ditches. A NYMC Confined Space Entry Permit must be obtained and filled out completely. NYMC personnel will communicate all known hazards of the confined space area to contractor personnel involved in the entry. Contractors may use their own permit. **If a contractor uses their own permit, it must comply with OSHA standards.** The contractor shall assure that the necessary equipment to comply with the NYMC Permit (atmospheric monitoring devices, fall protection, rescue equipment, respiratory protection, etc.) is available for each worker involved in the confined space entry. The permit is only valid for one day. Permits must be displayed prominently at the job location, and should be returned to the NYMC Project Manager after completion of the entry. **All contractor personnel required to perform a confined space entry on NYMC property must be trained by their employer according to the applicable OSHA regulation (general industry and/or construction) and, if applicable, the NYMC Confined Space Entry Procedures.** The training shall be provided and documented by the contractor. Documentation of training must include the date of the training, name of trainee, and signature of the trainer and trainee. **Documentation of training is subject to inspection by the Department of Environmental Health & Safety.**

11.2 Hot Work Permit

A Hot Work Permit must be issued before anyone conducts any procedure on-campus utilizing heat or spark producing devices, including but not limited to welding, cutting, grinding, soldering, brazing or open flame. The only exceptions are processes performed in designated shop areas. The NYMC Hot Work Permit must be used. Trained fire watchers are required to be present during the work, armed with portable fire extinguishers. Contractors are required to provide their own fire watchers and the appropriate fire extinguishers. Hot Work Permits are also required when using an explosion proof outlet in a hazardous area for temporary power. The supervisor who authorizes the job must issue a Hot Work Permit prior to any work beginning. All Permits must be prominently displayed at the job location. NYMC personnel will evaluate the need to disarm any portions of the building fire protection system. Once the hot work is completed, the fire watcher remains in the area for at

least one hour to inspect the work and make certain that there is no smoldering combustion taking place. Part Two of the Permit must be signed and returned to the NYMC project supervisor. (See Section 18 for further Hot Work guidelines).

11.3 Storm Sewer Discharges and Special Permit Discharges

All discharges to University storm sewer lines are to be made in accordance with the Westchester County Department of Public Works. Discharges are to be closely monitored. Only clean, non-chemically contaminated water may be discharged to storm sewers. Special discharge permits from the Westchester County DEP may be required for the discharges of project-related waste waters to the County sanitary sewer system. Examples projects where special discharge permits are required include:

- Treatment and flushing of chilled-water circulation lines.
- Large-scale, aqueous degreasing procedures in preparation of painting operations.

11.4 Floods

All floods or flooding caused by or due to any work performed by a contractor must be reported immediately to the NYMC Project Manager and Security Department. Contractor shall immediately take all necessary actions in containing, controlling and clean-up of such flooding and in assisting NYMC to identify remediation contractors if damaged building materials need to be removed or dried and disinfected or when the water is hazardous or bio-hazardous to determine appropriate remediation procedures and ensure the remediation procedures are followed. All remediation and clean-up costs associated with the flooding shall be charged to the contractor who caused the flooding.

12.0 Shutdown Procedures

Shutdown requests must be provided any time any service or utility will be disrupted or out of service. Examples include the following:

- Fire Alarm Systems and components
- Sprinkler systems
- Special Suppression Systems
- Access to Buildings
- Any obstruction of exits (corridors, stairs, doors, etc.)
- Emergency lighting/ exit lighting
- Water mains
- Portable fire equipment (hose, extinguishers, etc.)
- Elevators

Before performing work which requires systems to be shutdown in order to perform or safely execute the work, the contractor shall request the shutdown through the Facilities Department.

13.0 Air Quality Issues

The use of hazardous or irritating materials must be properly controlled where it may affect individuals. Measures shall be taken to ensure that dusts, fumes, mists, gases and vapors of these materials are eliminated, isolated, or captured. Primary methods of control include the following:

- **Isolation of construction areas in occupied buildings.** This is commonly accomplished using plastic sheeting materials or dry wall.
- **Ventilation of construction areas to create negative pressure.** The use of fans and negative pressure machines can contain airborne materials to the construction zone. Exhaust of airborne materials to the outside of the building must be done carefully so that it doesn't affect individuals in the same building or in adjacent buildings.
- **Scheduling the use of hazardous and irritating materials.** Work planning must include the scheduling of material use that creates hazardous or irritating conditions to times when buildings are less occupied (evenings, nights, holidays, and weekends). This includes the spraying of external building materials (such as sealants).
- **Use safer, low-emitting materials.** Many paints and other building materials are available with safer or non-solvent formulations.

Air Quality Considerations

- Schedule work during periods of low building occupancy if possible.

- Isolate work areas from occupied areas using critical barriers, air pressure control and high-efficiency particulate air (HEPA) filtration.
- Modify HVAC operations prior to and during renovation activities to ensure isolation of renovation areas from occupied spaces.
- Increase housekeeping activities in adjacent occupied areas during renovation activities that create dust.

Work Practice Measures for Air Quality Assurance

- Employ local exhaust when dust, hazardous vapors, fumes, or gases are generated. If local exhaust is not feasible, portable air cleaning devices (such as the use of HEPA-filtration) may be used.
- Minimize dust generation by using wet methods for cutting or sanding.
- Locate dumpsters for debris away from operating HVAC outdoor air intakes and exterior doors where possible.

Outdoor Work with Hazardous or Odorous Materials near Air Intakes

- Locate portable toilets away from air intakes.
- Use or application of chemical/odorous materials shall be located at least 25 feet away from all outside air intakes (if feasible).
- When work including chemical/odorous materials must be done at or near air intakes, outside air intake should be minimized or the task should be performed when the building is not occupied (such as evenings or weekends).

14.0 Removal and Disposal of Hazardous Materials

14.1 Overview

NYMC has the responsibility of providing technical assistance in the identification, packaging, handling and disposal of hazardous materials. Contact the Department of Environmental Health & Safety at 914-594-4078 for additional assistance. NYMC retains the right to review all transportation and disposal facilities that are proposed to be utilized for the disposal of hazardous materials generated at NYMC, and retains the right to approve or deny all interim and/or final disposal sites proposed to be used in conjunction with the project. **Furthermore, NYMC retains the right to request complete documentation of the proper disposal of hazardous materials originating at NYMC.**

14.2 Contractor Responsibilities

Unless agreed upon by contract or other binding agreement, the contractor will be responsible for:

- Acquiring all necessary permits and/or licenses required for the packaging, transportation and disposal of environmentally-hazardous materials.
- Completing all arrangements necessary for the packaging, transportation and disposal of environmentally-hazardous materials.
- All costs incurred in the permitting, licensing, packaging, transportation and disposal of hazardous materials.

The contractor has the responsibility of providing the Department of Environmental Health and Safety with complete documentation of the proper disposal of hazardous materials originating at NYMC. Such documentation may include but is not limited to:

- Copies of all manifests or chain-of-custody records.
- Copies of all bills of lading.
- Copies of all disposal receipts.
- Copies of any certificates of disposal or destruction.

15.0 Hazardous Material Guide/Storage

All materials shall be stored and handled in a manner to minimize the potential for spills to the storm or sanitary sewers. Secondary containment shall be provided for hazardous materials for all containers with a volume greater than forty (40) gallons, or if deemed necessary by NYMC EHS. Secondary containment shall be constructed of materials compatible with the hazardous material and have a volume capacity equal to 110% of the largest container to be contained, and designed to

prevent rainwater accumulation. Hazardous materials that are required to be stored outside shall be protected from precipitation.

16.0 Compressed Gas Cylinders

Contractors must seek prior approval from NYMC before bringing compressed gas cylinders onsite. Compressed gas cylinders are to be stored in an area approved by the NYMC. They shall be clearly marked for the type of gas contained. Oxygen and acetylene cylinders are to be stored at least twenty feet apart or separated by a five (5) foot, one (1) hour minimum firewall, and flashback arrestors are required. All cylinders are to be stored and transported in a secured, upright position, with their caps secured.

17.0 Electrical Safety

When using temporary power, Ground Fault Circuit Interrupters (GFCIs) are required. Only extension cords meeting ANSI standards may be used. Poorly ventilated areas containing flammable materials and other hazardous areas shall require explosion proof equipment and equipment connections. (See Section 18.0, Lockout/Tagout Procedures.) The installation and use of all temporary wiring shall comply with National Electric Code (NEC) and OSHA requirements. Temporary wiring shall be de-energized when not in use.

18.0 Lockout/Tagout

Before working on a process, all energies (electrical, mechanical, thermal pneumatic, chemical, hydraulic, etc.) shall be purged, dissipated and locked out. Training on the recognition and proper control of energy sources must be completed as required by OSHA. Appropriate Lockout/Tagout procedures shall be followed. A copy of NYMC's Lockout Policy may be obtained by contacting the Department of Environmental Health and Safety or Facilities

19.0 Equipment Safety

Heavy equipment, such as backhoes, dump trucks, dozers, articulating boom lifts, and cranes, shall only be operated by individuals who are trained and qualified by their contractors. All mobile crane operators shall be licensed by the State of New York for the type of equipment they are operating. All certifications and licenses shall be provided to the Facilities Department, along with the annual and monthly crane signed inspection sheets. Manufacturer safety recommendations shall always be followed while operating equipment. Portable electric power tools shall be inspected before use. Defective or damaged tools (including those with damaged cords) shall not be used. **Documentation of training is subject to inspection by the Department of Environmental Health & Safety.**

20.0 Fall Protection

Fall protection is required when an individual's feet are more than six (6) feet above the floor or grade level. "Platform" ladders are considered fall protection when performing activities that are not physically demanding at heights over six (6) feet. **Full body safety harnesses and shock absorbing lanyards are required for fall protection when fall protection cannot be provided by other means (i.e. proper scaffold, platform ladder).** Refer to the OSHA Fall Protection Standard for Construction (29 CFR 1926.501) for additional information. In areas of fall exposure, guardrails shall be constructed according to OSHA standards. Handrails on temporary stairs and walkways shall also be constructed according to OSHA standards. Contractor personnel involved in roofing operations will be required to follow pertinent OSHA Regulations.

21.0 Ladders

The use and design of ladders shall follow all federal, state, and local requirements, including OSHA 29 CFR 1910.25, 1910.26, and 1926.1053, as applicable. All ladders shall be heavy duty industrial strength and in good working condition. The user is responsible for visually inspecting a ladder.

Ladders should not have:

- Loose or broken steps
- Cracks
- Missing or damaged safety feet
- Broken, frayed, or worn ropes
- Inoperable extension devices

Ladders made of conductive material may not be used when working with or around exposed electrical circuits. A rope and bucket should be used for raising and lowering tools and materials. Only one person is permitted to climb a ladder at a time. Step ladders are to be fully opened when in use and are never to be used as straight ladders. The top rung and top step are not to be used. All straight and extension ladders are to extend three rungs above the supporting object when used as an access to elevated work areas and shall be secured at the top. All straight and extension ladders must be equipped with non-skid feet. Straight and extension ladders shall be placed at an angle so as the base is one-fourth of the working length.

22.0 Scaffolding

Scaffolding shall be erected on a solid footing rigid and capable of carrying the maximum intended load without settling or displacement. No scaffold shall be erected except under the supervision of a qualified person (as defined by OSHA). No scaffold shall be moved, dismantled or altered except by the contractor who designed and erected the scaffold. When allowable, all scaffolds shall have guardrails consisting of a forty-two (42) inch high top rail, a mid-rail and toe boards. All handrails, posts and assembly shall be able to withstand a two-hundred (200) pound force in any direction with a minimum of deflection. All elevated platforms shall have a ladder access. All planking shall be scaffold-grade as recognized by grading rules for the species of wood used. Scaffold planks shall extend over their end support not less than six (6) inches, and no more than twelve (12) inches. Employers shall not permit employees to ride manually propelled scaffolds unless the floor is level and free from holes or obstruction, the platform height does not exceed twice the minimum base dimension, the wheels are rubber or similar material and all tools and materials are secured or removed.

23.0 Excavations

Before opening any excavation, New York State law requires that efforts shall be made to determine if there are underground utilities in the area; if utilities are located, they must be protected during the excavation operations. **Call Dig Safely NY at 1-800-962-7962 at least two full working days before excavation is scheduled to begin. Dig Safely New York will notify all member utilities of the pending excavation so that that they can mark the location of their underground lines.** Before starting excavation, confirm that all utilities have responded to NYMC indicating they have marked the property or they have no facilities present. All excavations must be identified by using barricades. Stairway, ladder, ramp, or other safe means are required for access into all excavations greater than four (4) feet in depth and must be within twenty-five (25) feet of the work area. All excavations greater than five (5) feet in depth must be evaluated and constructed under the supervision of a competent person as identified in OSHA standards. Excavations greater than five (5) feet must be shored, braced, or sloped. Excavations shall be inspected by the contractor's competent person prior to the beginning of work each day and during the day as warranted by the weather conditions.

Working in an unprotected trench is not tolerated by NYMC and is a violation of OSHA standards.