**SCU Contractor Safety Rules**

Instructions: To be provided to all contractors performing “High Hazard Work” as defined in SCU Contractor Safety Program.

**Contractor**

**Information and Obligations**

- The Contractor Agent is responsible for ensuring all workers and subcontractors have read and understood these rules.
- **No High Hazard Work should be performed by the Contractor until a contract is in place.**
- **Only EHS Authorized Contractors will be allowed to start an SCU Project.**

High Hazard Work is defined as, but not limited to work activities involving any of the following:

- Asbestos Abatement or Disturbance
- Lead Abatement or Disturbance
- BAAQMD Air Permitting Required
- Laser Safety
- Confined Space Entry
- Lockout/Tagout
- Crane, Hoist and Sling Use
- Excessive Noise Exposure
- Elevator Repair
- Pesticide Use/Application
- Electrical Work
- Powered Industrial Truck(s)
- Excavation/Trenching
- Radiation
- Fall Protection Required
- Scaffold Erection and Use
- Fire System Impairment
- Storm Water Discharge
- Hazardous Materials
- Tree Trimming
- Hazardous Waste
- Wall Penetration
- Hot Work (e.g. Welding, Cutting, etc.)
- Waste Water Discharge

- Designate a "Contractor Agent" who has responsibility and authority for ensuring compliance with the Santa Clara University requirements
- Responsible Contractor Agents are required to be represented at contractor orientations
- All contractors are required to complete and return all forms in the Contractor’s Packet before work may commence
- All contractors approved to work at this site may be subject to an annual safety program review (requirements for qualified contractor)
- A site safety plan for all construction and major remodeling projects shall be available for review upon request.
Miscellaneous

- The Contractor Agent needs to do spot safety checks and be able to provide documentation when requested by your SCU Project Manager.
- Gang boxes and miscellaneous items must be removed when no longer needed.
- Good standards of housekeeping are to be maintained at all times. Work areas are to be kept free from accumulations of waste, scrap and rubbish caused by job-related activities. Also, tools, materials and equipment should not present a hazard by nature of their location or use.
- The contractor shall notify their SCU Project Manager of any hazard, or concern present on the site. The contractor is required to report the hazard regardless of the source of the hazard (SCU’s personnel, sub-contractors, contractors of other trades, etc.)

Notifications

- Stop work and notify the Project Manager upon encountering any hazards that the Contractor is not able to properly control or mitigate or was not originally anticipated and is defined as “High Hazard Work” by SCU.
- Participate in all evacuation drills should they occur in the area they are working in.
- Report all spills and releases of hazardous materials, serious accidents or injuries immediately to SCU Campus Safety at (408) 554-4444.
- Contractors are to abide by all alarms and evacuation procedures as established by SCU. Any alarm triggered by the Contractor must be reported immediately and a representative must be available to address the incident. In the event of an emergency, the Contractor should report the incident to the SCU Campus Safety Department by calling (408) 554-4444.

Responsibility and Liability

- Ensure that no contractor activities endanger other personnel working at the site.
- It is the responsibility of employees of the contractor or vendor to follow all SCU procedures. Failure to comply will result in contractor removal from site, loss of contract, and possible forfeiture of further work assignments. Sub-contractors must adhere to the same policies as contractors. It is the responsibility of the primary contractor to see that all subcontractors comply with SCU procedures.

Staff and Training

- Comply with current local, state and federal Safety and Environmental regulations and all applicable state and local laws, codes, rules, regulations or ordinances governing the work.
- Comply with all applicable SCU Environment, Health and Safety (EHS) requirements.
- Comply with SCU Cultural Resource Management (CRM) Training requirements.
- Utilize a work force that is appropriately trained in all EHS aspects of the job.
Prior to the start of a work task requiring a permit (i.e. Confined Space, Hot Work, and/or Live Electrical) to perform the task, the Contractor Agent and SCU shall agree upon the specific permits to be used

Santa Clara University Safety Rules

Admittance

- Contractors must give prior notice of their work schedule to their SCU Project Manager
- The contractor should have a process in place to account for its workers while at SCU. All contractor entrance/egress from the campus properties must be through the approved entrances and exits. These will be identified by the SCU Project Manager prior to the commencement of work
- Construction area shall be distinguished by temporary fencing or stanchions with caution tape to act as barrier to prevent unauthorized access into a construction area
- Construction area shall have a posted sign stating, “Construction Area—Authorized Personnel Only”

Archaeology (Cultural Resources Management)

Activities such as, but not limited to the following require contacting the SCU Cultural Resources Manager Linda Hylkema at 408-554-4513.

- Basement Demolition
- Bore Pits
- Excavation/Grading/Trenching
- Light/Fence Installation
- Site Clearance (e.g. Below Base Rock/Engineered Fill)
- Tree planting/removal

Aerial Lifts

Elevated work platforms and aerial lifts shall be inspected prior to operation. The inspection shall verify:

- The elevating platform is in safe operating condition. Units will be visually inspected by a qualified operator for damaged or defective parts before use
- The operating instructions are available or otherwise readily accessible to operators for reference.
- The surface of the elevated platform is free from clutter
- The platform is not loaded in excess of the design working load of the equipment
- Ladders or other objects are not placed on the top of elevated platforms to gain access to greater heights
- Man lifts parked overnight shall have their “bucket” stored above head height with keys removed

**Required Safety Equipment**

- A full body harness must be worn and a lanyard attached to a secure structure (capable of supporting at least 5,000 pounds per person) above the person if one or both feet leave the floor of the lift. When a body harness is used in a fall arrest system, the lanyard shall be rigged with a deceleration device to limit maximum arresting force to 1,800 pounds and prevent the person from hitting any levels or objects below the platform, and shall limit free fall to a maximum of 6 feet.
- Harnesses will be secured to a separate secure structure and not directly to the lift unless recommended by the manufacturer.

**Asbestos and Lead**

Any work that involves penetration (e.g. cutting, drill hole), modification or remodeling of building materials (e.g. ceiling, flooring, HVAC, stucco, walls) shall be approved by the Project Manager prior to start of work, who shall notify EHS.

EHS will work with the various project managers to ensure the following:

- Asbestos locations – Contact your SCU Project Manager or SCU EHS.
- All asbestos survey sampling, removal and renovation work will be performed only by contractors certified and licensed to perform this work.
  - Asbestos Survey and Sampling
    - All asbestos sampling shall be conducted by an EPA Asbestos Inspector under the direction of the Certified Asbestos Consultant (CAC)
  - Asbestos Removal (29 CFR 1926.1101) shall only be completed by individuals certified and licenses to complete. Below is a list of asbestos operations that require training/certification:
    - Class I Operations - The removal of Thermal Insulation or Surfacing Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material
    - Class II Operations - The removal of any type of Asbestos Containing Material (ACM)
    - Class III Operations - Maintenance or repair activates where workers may disturb asbestos-containing materials (ACM) in order to access another building component. The maximum amount of asbestos containing material (ACM) disturbed is
limited to the amount of that can be contained in one 60” x 60”
glove bag or waste bag

- Class IV Operations - Maintenance or custodial activities where
  workers contact asbestos containing material (ACM) or presumed
  asbestos containing material (PACM) debris from Class I, Class II
  or Class III Operations

- All pre- and post-project sampling will be completed and documented
  appropriately. Employee notifications will be completed, if required
  - All Pre and Post sampling results shall be provided to the SCU EHS
    Director or SCU EHS Manager
  - All final clearance letters shall be provided to the SCU EHS Director or SCU
    EHS Manager

- All required permits (air permits, etc.) will be obtained by the contractor and
  reviewed by SCU for completeness prior to conducting the work
  - Bay Area Air Quality Management District (BAAQMD) Notification when
    exceeding 100 square feet or linear feet
  - Department of Occupational and Safety Health Administration (DOSH)
    Registration is required asbestos fiber greater than 0.1% and exceeding
    100 square feet of removal
  - National Emissions for Hazardous Air Pollutants (NESHAP) is required
    when
    - Removing asbestos that is friable
    - Greater than 1% in concentration Area of removal is greater than
      160 linear feet or 260 square feet

- All required records will be obtained from the contractor post project and
  appropriately archived

All asbestos-containing waste materials are considered hazardous wastes
and must be handled and disposed in accordance with hazardous waste
management procedures. This involves one of the following:

- For asbestos abatement contracts, the SCU Project Manager shall ensure that
  provisions for proper asbestos waste handling, storage, and disposal are
  included in the contract specifications. The EHS Director must approve all
  asbestos transfer and disposal locations. SCU EHS will sign all asbestos related
  manifests.
Campus Protection

- Good housekeeping practices must be followed at all times
- Maintain all equipment, tools and work areas in a clean and safe manner
- Do not leave leaking equipment unattended
- Dust generation (both indoors and outdoors) must be minimized whenever cutting, grinding, drilling etc. Use wet methods, HEPA vacuums and/or other suitable means to control dust

Chemical/Hazardous Materials

- Chemicals/hazardous substances brought onto our premises must be accompanied by an MSDS prior to their introduction to the facility
- Chemicals/hazardous materials brought onto Campus must be used and disposed of properly. At no time shall these be left behind at SCU following project completion
- Chemicals/hazardous materials must be stored in containers approved for the substance. All chemical containers must be clearly marked
- Remove surplus paints, oils, and other hazardous materials at the conclusion of the project
- Whenever work is done with flammable liquids or other compounds containing flammables the Project Manager shall be notified prior to starting work, and care must be taken to ensure proper ventilation and to restrict or control sources of ignition
- The contractor is responsible for complying with all regulations pertaining to shipping, handling, storage and disposal of chemical/hazardous materials brought on Campus

Confined Spaces

- Prior to entering the confined space, the Contractor Agent and SCU EHS shall agree upon the permit paperwork to be used during the project
- Contractors must supply their own ventilation and air monitoring equipment; fall protection and emergency retrieval devices; and, personnel trained to perform supervision, entry, and rescue duties
- See list of SCU Confined Spaces

Cranes/Hoists

- SCU EHS must be given advance notice of crane lifts, and be supplied with the following:
  - Area coordination
  - Occupant notification
  - Access control
  - Load
- Crane operators must be licensed and competent to perform overhead lifts
Digging & Trenching

- Permission must be obtained from your SCU Project Manager prior to digging. Care must be taken to locate underground services and comply with trenching regulations.
- Work requiring entry into trenches requires an approved excavation safety plan, including shoring and sloping information and an emergency escape plan to prevent entrapment of workers.

Dust Control

- Dust control techniques (e.g. HEPA Vacuum, saving cream, shroud, sponge) shall be used by all contractors in an effort to minimize dust generated from drilling and cutting activities.

Electrical Standards

- Contractors and vendors must comply with the latest editions of the following: Electrical Safety Code, NFPA 70E, OSHA, and any other Federal, State or local regulation.
- Lock-Out and Tag-Out procedures must be followed where the risk of a release of hazardous energy is possible; each affected individual must use his/her own personal lock.
- Live exposed parts must be de-energized prior to work on or near them. Your SCU Project Manager must be notified before de-energizing or re-energizing equipment.
- Only ‘qualified’ electricians may work on or near live electrical equipment.
- Prior to working on live electrical systems, the Contractor Agent and SCU EHS shall agree upon the permit paperwork to be used during the project.
- Any work that requires individual handling of live conductors >50 volts requires an “Energized Electrical Work Permit”; Testing, troubleshooting, voltage measuring, replacement of light bulbs, plugging/unplugging electrical power cords and quick disconnects, is permitted without a permit provided safe work practices and PPE are used by qualified persons.
- The contractor must conform to panel clearances required by regulation before installing any panel.
- The contractor shall provide direction and trouble-shooting for start-up. The contractor shall verify that the applied voltage is correct before energizing any equipment.

Elevated Work Surfaces

Fall protection equipment shall be utilized when a hazard of a fall from an elevated area exists. The following are examples of conditions or situations where fall protection is required:

- Working at heights of six (6) feet or greater where no fall protection is in place such as handrails, midrails, floor coverings and/or walls.
- On any sloped roof where catch platforms or guard railing is not provided.
- Where erecting steel or temporary scaffolding
- Leaving the confines of a lift or ladder that is six (6) feet or higher from the lower level
- Working within six (6) feet of flat roof edges without handrails

**Fire Protection**

- An “Impairment Permit” issued by the SCU Fire Technician is required prior to shutting down or disabling any fire protection or safety system (e.g. sensor, pull station, horn, sprinkler, etc.) or;
- When work to be performed that could accidentally activate the fire protection system
- All nuisance fire alarms fines from the Santa Clara Fire Marshal shall be paid by contractor to the University. In addition, the contractor shall provide in writing a corrective action within 1 business to the SCU EHS Director or SCU EHS Manager.

**Hazardous/General Waste**

- Contractor shall document the weight of construction and demolition material that is composted, landfilled, recycled, reused or otherwise disposed.
- Make arrangements in advance with the Project Manager and SCU EHS for the proper disposal of hazardous waste
- Hazardous wastes must be transported and disposed of in accordance with all applicable environmental laws and regulations
- Empty containers or drums shall not be left on site
- Contractors shall notify the SCU Project Manager of all waste streams that will be generated from site work activity so proper disposal/recycling guidelines for generated wastes can be coordinated
- Universal waste (e.g. Batteries, pesticides, mercury containing equipment, and bulbs) generated by the project shall be taken to Facilities for disposal

**Heat illness prevention**

- Ensure that sufficient water and shade is available for workers performing work outdoors in a heat environment per the Cal-OSHA Heat Illness standard

**Medical Emergencies & Treatment**

- Contractors should equip their employees with first aid supplies. Basic First Aid for injuries to contractor’s employees will be provided by the contractor. In the event of a serious injury, SCU Campus Safety should be called at (408)-554-4444
- In the event of an accident in which a worker requires medical attention to treat an injury, the Contractor should call (408) 554-4444 to notify the Campus Safety Department. All work-related accidents should be immediately reported to the Santa Clara University Project Manager and the Santa Clara University EHS Department at (408) 554-4742
Whenever a contractor’s employee is injured on Campus, a SCU Incident Investigation Report form must be completed and submitted to your SCU Project Manager within 24 hours. SCU incident report forms are available on the SCU EHS Department website at: www.scu.edu/ehs/incident-investigation/

If there is a danger of contamination from any blood or other body fluids, notify your SCU Project Manager

**Personal Conduct**

- Alcoholic beverages or illicit drugs shall not be brought onto any campus property. Violators of this rule will be immediately expelled from the campus and prosecuted, if appropriate. The use of medicinal marijuana is prohibited even with a prescription
- Horseplay, fighting, firearms, are prohibited on campus property
- Sexual harassment and/or discrimination will not be tolerated under any circumstance.
- **Santa Clara University is a 100% tobacco-free and smoke-free campus.** Smoking and tobacco are prohibited anywhere on campus property effective July 1, 2015.

**Personal Protective Equipment (PPE)**

- The Contractor shall determine the appropriate PPE for the work they are to perform. Additionally, the following may be required:
  - Wear reflective safety traffic vests when working in SCU parking lots and SCU roadways while on foot
  - Where specifically posted at SCU, wear protective equipment or clothing (such as safety goggles, respirators, gloves, hearing protection, safety shoes, etc.), all contractor personnel must comply
  - Post a copy of the PPE Requirements for the construction area (e.g. Hard Hat, Safety Glasses, Safety Shoes, etc.)
- All PPE is to be provided by the contractor and inspected per OSHA and ANSI Standards as required

**Powered Industrial Truck**

Powered industrial trucks shall be inspected prior to operation. The inspection shall verify:

- The forklift is in safe operating condition. Units will be visually inspected by a qualified operator for damaged or defective parts before use
- The operating instructions are available or otherwise readily accessible to operators for reference.

The seatbelt shall be used per the OSHA Duty Clause and all OSHA Safety Rules shall be followed.
An unattended forklift shall:
- Have its forks placed flat on the ground with the mast tipped forward
- Forklift keys removed from the ignition

**Scaffold**

All scaffolding materials must be inspected prior to installation to ensure structural soundness.
- When erecting scaffolds, a trained and competent person must inspect the scaffold design and installation to ensure it is safe and secure before use. The scaffold must bear a label indicating that the scaffold is safe to use. Because construction of scaffolding is an unusual event, the competent person will produce a Scaffold Inspection
- In situations where handrails cannot be installed, spotters will be assigned to ensure safety of employees working at heights above 6 feet.
- A full body harness must be worn along with a lanyard rigged with a deceleration device attached to a secure structure or safety line when working above 6 feet on scaffolds without adequate handrails and midrails
- The surface of the scaffold will be free from clutter at all times
- Scaffolding units will not be loaded in excess of the design working load of the equipment
- Ladders or other objects will not be placed on the top of scaffold planks to gain access to greater height

**Spill/Storm Water Pollution Prevention**
- Any contractor bringing on-site 55 gallons or more of oil, fuel oil, paints, lubricants, glues, tars or other hazardous materials either in bulk containers or equipment, must provide secondary containment
- The release of chemicals or waste material down any storm drain is illegal and not permitted
- Any release must be communicated to Campus Safety at **(408)-554-4444**
- The washing of vehicles or equipment is not permitted on Campus unless permission has been specifically granted by the EHS Director
- Owners or operators of vehicles/equipment leaking significant quantities of fluid onto the pavement shall report such leaks and repair or remove leaking vehicles/equipment from the property immediately
Unauthorized Areas

- Contractors must abide by all access requirements prior to entering identified spaces such as labs, shops, studios, etc.

Use of Equipment

- Contractors are prohibited from operating SCU vehicles and equipment including, but not limited to: forklifts, electric vehicles, boom lifts, scissor lifts, fall protection equipment, ladders, power tools, personal protective equipment, etc.
- Contractors shall use spotters when operating mobile equipment outside of the work site
- All tools must be maintained in a safe operating condition, current with maintenance, calibration, etc.

Vehicle Regulations

- Extra caution shall be taken due to methods of transportation (e.g. Bicycles, skateboards, razor scooters, etc.) and unexpected actions of motorists
- Large vehicles with potential blind spots are required to have a spotter
- Stop signs and speed limits (10 mph if not posted) will be obeyed
- Never block normal passage or access to areas

Welding & Cutting Regulations

- Welding, burning or use of an open flame is restricted without a “Hot Work Permit” issued by SCU EHS
- Prior to starting the welding/cutting task, the Contractor Agent and SCU EHS shall agree upon the hot work permit paperwork to be used during the project
- A Hot Work Permit must be obtained from the Fire Technician, completed, approved and posted at the work site
- The hot work area must be posted with the warning signage provided with the Permit
- Notify SCU Fire Technician prior to impairment of fire systems