Cheyenne VAMC Safety Requirement

All work shall comply with the following Policy:

CONSTRUCTION SAFETY PROGRAM, Policy No. 00S-12-06

1. **PURPOSE:** The Construction Safety Program establishes policy for maintaining a healthy environment of care for patients, and a safe and healthy worksite for employees, visitors, and contractors as related to construction activities. The Multi-Disciplinary Construction Safety Program Committee will meet monthly and will report directly to the Environment of Care (EOC) Committee.

2. **POLICY:** This policy affects all construction activities performed by employees or contractors within structures fully managed by VHA or within the purview of VHA authority. The implementation of construction safety programs reduces the potential for injuries and illnesses to patients, employees, and visitors from unsafe construction activities conducted by contractors and VA employees, including our Maintenance & Operations employees, permanent construction crews, and temporary purchase and hire staff. Construction safety programs reduce the potential for VA liability that could result from construction accidents.

3. **DEFINITIONS:**

a. CP – Competent Person – A person who is capable of identifying existing and predictable hazards in the surroundings and working conditions which are unsanitary, hazardous or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.

b. COR – Contracting Officer Representative – A person appointed to oversee all aspects of a project from inception to completion and to coordinate all aspects of a project with Service Chiefs, fiscal, contracting, management, infection preventionist, regulatory officials and customers.

c. Multi-Disciplinary Construction Safety Team – A team of individual safety, security, construction and infection control professionals to oversee regulatory compliance aspects of a project.

d. OSHA - Occupational Safety and Health Administration.

e. AIA - American Institute of Architects.

f. ICRA - Infection Control Risk Assessment.

g. ILSM - Interim Life Safety Measures.

h. NFPA – National Fire Protection Association

i. ASTM - American Society for Testing and Materials.

4. **MEMBERSHIP:**

Chief, Facilities Management Service — Chairperson Safety Officer
Member

GEMS Coordinator/Manager	Member
Industrial Hygienist	Member
Contracting Officer	Member
Infection Preventionist	Member
Chief, VA Police or Designee	Member
Patient Safety Officer	Member
Union Representative	Member
Project Managers	Member

5. **PROCEDURES:**

a. The Multi-Disciplinary Construction Safety Program Committee will:

(1) Determine the scope and depth of safety, infection control, and security interventions appropriate for all in-house and contract construction work. The team may develop threshold criteria for each level of intervention. This should be reviewed with contractors during the pre-construction meeting which is held prior to commencement of construction work and at the monthly meetings held while the construction is in progress. After review, some projects may require only VA CP/COR (Competent Person(s)/Project Manager) surveillance to ensure employee safety and OSHA compliance, while other projects will require all disciplines to be involved.

(2) Ensure submittals for contract construction or renovation work include the names, qualifications, and training dates for the contractor's CP designated to administer the site-specific safety program, as well as the CP for other activities as required by OSHA regulation (such as scaffolds, cranes, excavations, etc).

(3) Conduct Infection Control Risk Assessments (ICRA) in accordance with Construction Infection Control Risk Assessment in EOC, Safety Management, Section 1, Chapter 21. Using the current AIA Guidelines as a guide, staff must conduct and document ICRA for all construction projects during the design or planning stage of the work. ICRAs must be documented in writing and focus on eliminating, or minimizing, the risk of infection during construction and renovation activities. The complexity of the ICRA report is determined by the complexity of the threats posed by the construction project. Assigned VA staff, including resident engineers (VA CPs) or project managers for major construction, must confirm compliance during the construction phase of the work.

(4) Ensure that facility safety, engineering staff, and VA resident engineers (CPs) implement Interim Life Safety Measures on all construction work in accordance with the Joint Commission, Environment of Care standards. ILSMs are required when Life Safety Code deficiencies or construction activities pose significant hazards.

(5) Participate in all phases of construction work from planning through completion. This includes review and approval of the construction plans, contract specifications, and contract submittals related to construction safety and health and any other documents that may assist in the implementation of an effective construction safety program.

(6) Ensure that the construction safety program includes periodic construction site hazard surveillance activities with appropriate membership, scope, and frequency for each project as determined by the VA CP and the ICRA report. Hazard surveillance activities must be

documented as to date, time, membership of the inspection team, deficiencies, type of corrective action, and time and date of correction.

(7) At the pre-construction meeting held prior to commencement of construction, the COR and the CP will review and ensure that the general contractors exercise their responsibilities for ensuring subcontractors comply with VHA safety and health policies and procedures, and contract requirements.

(8) The PM will also ensure all contractors entering VHA property comply with the security management program. As a minimum, contractors must notify and obtain permission of the VA Police, be identified by project and employer, and be restricted from unauthorized access.

(9) The Multi-Disciplinary Construction Safety Team will evaluate the effectiveness of the construction safety program in an annual report to the facility Safety and/or Environment of Care committee, or equivalent committee.

(10) The contractor CP will implement and maintain an effective safety program that identifies and controls hazards that may cause injury or illness to VA patients, staff, visitors, and contractor employees.

b. Facilities Management Service's Staff and the Safety Officer will utilize the attached Interim Life Safety Measures Checklist (Attachment A) for conducting inspections of contractor areas.

c. During construction, the COR will conduct a daily walk-through of construction areas for assigned projects. In addition to the identification of construction management deficiencies, Life Safety requirements will be reviewed. Routine deficiencies will be corrected at the site and serious Life Safety deficiencies will be documented by memorandum to the Contracting Officer. The Contracting Officer will immediately notify the Contractor in writing of any deficiencies noted during the inspections and require that the deficiencies be corrected within a specified time. The Contracting Officer will immediately notify the Contractor in writing of any deficiencies noted during the inspections and require that the deficiencies be corrected. All noted deficiencies will be corrected immediately.

d. Fire protection activities will be discussed at the pre-construction meeting and a copy of the Construction Safety Checklist (Appendix A) given to the contractor.

e. The Supervisor, Facilities Management Service, will make available the Construction Safety Checklist (Appendix A) for employees to consult and will enforce the standards in the checklist for VA personnel under his/her supervision. Appendix A will be made available to all employees upon their request.

f. The Safety Officer will report to the medical center's EOC Committee regarding construction safety.

6. **RESPONSIBILITY:**

a . The Medical Center Director is responsible for:

(1) Establishing and monitoring an effective facility construction safety program utilizing a multi-disciplinary team with representatives from the following program areas: Infection Control, Patient Safety, Occupational Safety and Health, VA Police, Facilities Management Service, Local Union Safety Representatives and Contracting.

(2) Ensuring appropriate staff receives training in construction safety.

b. The Multi-Disciplinary Construction Safety Team will be responsible for overseeing the following:
(1) Protection of patients, visitors, and employees from traumatic injury, as well as occupational and facility-associated infections.
(2) Compliance with OSHA and State construction safety regulations.
(3) Compliance with EPA and State environmental regulations.
(4) Ensuring that VA staff receives training as follows:
(a) Appointed CPs, resident and/or project engineers and Members of the Multi-Disciplinary Construction Safety Team will complete OSHA's 30-hour construction safety course per VHA Directive 2011-036. Every two years after taking the 30-hour course members will need to take the 10-hour refresher.

a. The Contracting Officer will ensure that all construction specification packages issued will specify that on-site general and sub-contractor's construction workers will be required to complete the OSHA 10-hour construction worker course, or the 30-hour construction course and other relevant competency training, as determined by the COR. Contractors will be required to submit proof that their employees and sub-contractor employees have completed this mandatory training prior to commencement.

(1) The COR will have the responsibility of informing contractors of all safety and environmental requirements, conducting daily and monthly fire and safety inspections of contractor construction areas, and coordinating with the Safety Officer for the establishment of required interim life safety measures.

(2) The Contracting Officer and COR will ensure that the contractor's submittals include a written site-specific safety plan. The plan will be approved by the Safety Officer and the COR. The general contractor will identify their Competent Person in the site specific safety plan and will submit evidence that the Competent Person has the proper qualifications and authority to identify hazards, stop work and fix problems. The site specific safety plan will identify when the contractor's Competent Person must be on site and how to contact the Contractor Competent Person if problems arise. The site specific safety plan must be reviewed by the Safety Officer.

d. The Chief Facility Manager Service ensures compliance with construction safety for station level maintenance projects. This person will ensure that construction areas are secured from the general public, and that Interim Life Safety Measures are implemented when fire safety devices, i.e. sprinklers, pull stations, fire and exit doors, and emergency egress, are affected by construction activities. Facilities Management Service will ensure that fire warning and safety systems are tested and inspected as required.

e. The Safety Officer has the responsibility for maintaining and updating the Construction Safety Checklist and for providing recommendations for compliance with referenced standards. The Safety Officer will conduct fire drills in accordance with Center Directive 00S-09-1 Interim Life Safety Measures (ILSM) whenever interim life safety measures are implemented.

7. **REFERENCES:**

a. Center Directive 00S-09-1 Interim Life Safety Measures.

b. OSHA 29 CFR 1910.

c. OSHA 29 CFR 1926.32(f).

d. NFPA 241.

e. NFPA 51b.

8. . **RESCISSION:** Center Directive 138-08-06.

9. **ATTACHMENTS:**

Appendix A – Construction Safety Checklist

10. **EXPIRATION DATE:** May 2015

//ES//Original Signature on File
CYNTHIA MCCORMACK
Medical Center Director

CONSTRUCTION SAFETY CHECKLIST

(For protection of VA property, patients, visitors, and personnel)

A. Fire extinguishers (OSHA 1926.150(c))

_____ 1. Extinguisher available within 100 feet. Extinguisher rated not less than 2A.

_____ 2. If flammable liquids or gases present, a fire extinguisher rated not less than 10B within 50 feet.

B. Ignition Hazardous (OSHA 1926.151(a))

_____ 1. Internal combustion engines located away from combustibles.

_____ 2. Smoking is prohibited in construction areas. Work staff are knowledgeable of approved areas.

C. Indoor storage (OSHA 1926.151(d))

_____ 1. Site kept free from accumulation of unnecessary combustibles.

_____ 2. Storage will not obstruct means of exits.

_____ 3. Clearance maintained around lights and heating units.

D. Flammable and combustible liquids (OSHA 1926.152)

_____ 1. Approved containers.

_____ 2. No storage in areas of exits, stairways or people traffic areas.

_____ 3. Max. 25 gallon in a room - otherwise approved storage cabinet.

E. Temporary heating devices (OSHA 1926.154)

_____ 1. Adequate ventilation for workmen and heater combustion.

_____ 2. Clearance combustibles from heaters (3 foot minimum).

_____ 3. Stability of heater.

_____ 4. All Space heaters approved for use by Fire Department

F. Signs and barricades (OSHA 1926.200)

_____ 1. Danger signs where immediate hazard exists.

_____ 2. Caution signs where potential hazard exists.

_____ 3. Safety instruction signs where necessary.

_____ 4. Barricades per Site Standards where necessary to protect persons from hazards.

G. Welding and cutting - Hot work permit required (NFPA-51B and OSHA 1910-252)

_____ 1. Inspection of area before permit given.

_____ 2. Distance from combustibles 35 feet.

_____ 3. Fire extinguisher in immediate area.

_____ 4. Wall and floor openings covered.

_____ 5. No flammable liquids present.

_____ 6. Inspection after work is complete.

H. Electrical (OSHA 1924.400-2 and NFPA 241-4)

_____ 1. All temporary wiring grounded and in accordance with National Electric Code.

_____ 2. Precautions taken to make any open wiring inaccessible to other than authorized personnel.

_____ 3. Temporary lighting bulbs equipped with guards, use heavy-duty cords, and not suspended by their cords unless specifically designed for that use.

_____ 4. Runs of open conductors located away from possible damage and fastened at intervals of no greater than 10 feet.

_____ 5. Outlets in construction sites have GFCI or assured equipment grounding.

_____ 6. Extension cords protected from damage.

- No worn or frayed cables
- Not hung from nails or suspended by wire

_____ 7. Fuses or circuit breakers provided for each feeder or branch circuit.

I. Guarding of trenches and excavations (OSHA 1926.651)

_____ 1. Shoring system if over 5 feet deep - designed by qualified person.

_____ 2. Excavations inspected after rainfalls.

_____ 3. Protection of adjoining buildings.

_____ 4. Water will not be allowed to accumulate in an excavation.

_____ 5. Adequate barriers or coverings provided.

_____ 6. Dust conditions kept to a minimum by water, oil, etc.

_____ 7. Review of adjacent underground utilities before excavation starts or DIG-SAFE licensed contractors utilized for on-and off site site verification.

J. Demolition (OSHA 1926.850-858 and NFPA 241, Ch 7)

_____ 1. Electric, gas, water, steam, etc. shut off prior to work.

_____ 2. Any utilities that are necessary to be maintained need protection.

_____ 3. Masonry walls will not be permitted to fall on floors such that it would exceed the safe carrying capacity of the floor.

_____ 4. Floor openings within 10 feet of any wall being demolished will be planked solid - except when no one below.

_____ 5. The storage of waste material and debris will not exceed the floor-loading limit.

_____ 6. Construction of dust barriers as needed. (Not OSHA).

_____ 7. Notification to shut off and protect smoke detectors, etc. during daytime only. (Not OSHA Construction Safety Checklist)

_____ 8. Precautions if floors are soaked with oil or flammable liquids, if dust accumulation is present or other combustibles are present and hot work is being performed.

_____ 9. Smoking is prohibited throughout demolition (NFPA 241, 704.2).

_____ 10. Flammable and combustible liquids removed from area.

_____ 11. Water supplies must still be available from fire hydrants in the vicinity of the structure or area.

_____ 12. All ventilation returns shared with adjacent areas are blocked off to prevent contaminating occupied areas during construction. Exception for non-recirculating return air.

_____ 13. Personal Protective Equipment (PPE) being used by staff as required.

K. Temporary buildings, trailers (NFPA 241, Ch 2)

_____ 1. Temporary offices, trailers, sheds, etc. of combustible construction at least 30 feet from permanent buildings.

_____ 2. Only safely installed, UL rated approved heating devices used. Ample clearance - around stoves, heaters, and chimneys per NFPA 211.

L. Roofing operations (NFPA 241, Ch 6)

_____ 1. Asphalt and tar kettles located outside the building or on a non-combustible roof away from combustibles. Kettles must have gravity lids, tight fitting.

_____ 2. Torch applied roofing systems will be installed using extreme caution. Follow manufacturers' instructions. Caution around roof openings, penetrations or flashings.

_____ 3. Fire extinguisher, 20-B minimum, within 30 feet of roof kettle. At least one extinguisher 2A:20-B:C on the roof being repaired; also, one within 30 feet of torch applied roofing equipment.

_____ 4. Fuel containers at least 10 feet away from burner flame.

_____ 5. Notify building occupants who might be affected.

_____ 6. Investigate location of supply air intakes. Coordinate shutdowns as necessary.

M. Exit pathways (NFPA 241, Ch 5)

_____ 1. Every building and area will remain accessible to fire department apparatus and personnel. Roadways will be maintained within 20 feet of all buildings.

_____ 2. Adequate egress paths including stairs and corridors will be maintained at all times. Exits may only be blocked temporarily if unavoidable and when adequate alternate measures are provided (signage, temporary fire detection, training, etc.) to warn personnel.

N. Temporary partitions (General Requirements, Sec. 010.10; and JCAHO requirements)

_____ 1. Temporary partitions will be constructed of non-combustible materials (typically sheet rock and steel studs). When required for strength, the inside (side toward construction) of the partitions may be lined with fire retardant materials such as fire treated plywood.

_____ 2. Temporary partitions will be continuous between floor slabs

_____ 3. Ceiling adjacent to the temporary partitions will be in place.

_____ 4. Construction areas are kept secured from access by the general public.

END POLICY