

**Key Elements:**

1. The Promerus Contact is responsible for being onsite when the contractor arrives, ensuring that appropriate training has occurred and that the contractor performs their job safely.
2. Contractor training requirements are determined by location (hazardous vs. non-hazardous) and supervision (escorted vs non-escorted).

- 1.0 Objective: To establish the training and permit requirements for contractors. This policy is to prevent injuries to contractors and Promerus employees, minimize the possibility of fire, explosion and environmental release and define how workplace chemical hazards will be communicated to contractors. This policy complies with OSHA 29 CFR 1910.1200 (HazCom).
- 2.0 Definitions
  - 2.1 Contractor: any non-Promerus organization or individual performing work.
  - 2.2 Contract Employee: any non-Promerus individual performing work for Promerus on a continuing basis for an extended period of time (greater than 1 month duration). Contract employees must participate in the Promerus monthly EHS training program, must comply with all Promerus EHS policy guidelines and are exempt from this policy.
  - 2.3 Exempt Contractor: any non-Promerus organization or individual performing work solely outside of the building for snow removal, lawn care, grounds maintenance or parking lot repair. Note that contractors doing other work such as roofing, fencing, and HVAC are not considered Exempt.
  - 2.4 Promerus Contact: the Promerus employee responsible for the overall activities of each contractor. Every contractor will have a Promerus Contact.
  - 2.5 Greeter: Person who answers the intercom video base station.
  - 2.6 Escorted: work in the presence of a Promerus Contact at all times.
  - 2.7 Unescorted: work in the absence of a Promerus Contact at any time.
  - 2.8 Hazardous Area: areas with potential for chemical exposure and/or physical hazards (laboratories, chemical storage areas, mechanical rooms, electrical room, liquid nitrogen bulk storage tank area, roof, spill containment tanks and the shipping dock).
  - 2.9 Non-hazardous Area: areas with little or no potential for chemical exposure and/or physical hazards (offices, hallways, restrooms, IT room and non-chemical storage areas).
  - 2.10 Outside Area: all areas outside of the building including the lawn and parking lot but not including the building itself or building utilities.
  - 2.11 Contractor Work Permit: a standard form which details the work to be performed, describes work area hazards, lists safety measures taken, details PPE and special permits needed. The permit must be signed by the Promerus Contact and all contractors that will be working in the permit designated area.

3.0 Contractor Work Categories

3.1 There are five categories, each have specific training and permitting requirements.

		<b>Contractor Work Permit</b>	<b>Contractor Safety Presentation</b>	<b>Contractor Safety Test</b>	<b>Area Specific Training</b>	<b>Chemical Specific Training</b>
<b>Hazardous Area</b>	<b>Unescorted</b>	√	√	√	√	√
	<b>Escorted</b>					
<b>Non-Hazardous Area</b>	<b>Unescorted</b>	√	√	√		
	<b>Escorted</b>					
<b>Outside Area</b>	<b>Exempt</b>					

4.0 Responsibilities

4.1 Contract Company Supervisor

- 4.1.1 Responsible for using qualified subcontractors and personnel.
- 4.1.2 Monitor their employees and subcontractor employees for compliance to ensure that all safety rules and regulations are followed.
- 4.1.3 Provide SDSs to the Promerus Contact for all hazardous chemicals brought into the facility and any non-obvious safety or health information regarding activities to be performed by their employees and subcontractor employees.

4.2 Contractor

- 4.2.1 Comply with all applicable rules and regulations (including this policy) and applicable civil laws, statutes, ordinances, regulations, and OSHA standards.
- 4.2.2 Immediately notify the Promerus Contact of any injury, illness, or incident.
- 4.2.3 Immediately notify the Promerus Contact of all damage to site property, equipment, piping, wiring and such.
- 4.2.4 Complete on-line contractor training with a score of 90% at least 1 day prior to arriving on site.
- 4.2.5 Call Promerus Contact after arriving in the parking lot.

4.3 Contractor Trainer

- 4.3.1 Respond to any questions about contractor training.

4.4 Promerus Contact

- 4.4.1 Send contractor the Contractor Safety Training Email found on the ProLink homepage under Quick Links if needed.
- 4.4.2 Verify that contractors have received required training to perform their job safely and that the training occurred within the past 12 months. The Contractor Training log can be found on ProLink under Quick Links. Contractor training is not required for escorted contractors or exempt contractors.
- 4.4.3 Review SDSs for all hazardous materials that contractor plans to bring on-site beforehand. Determine the following for each such hazardous material:

- 4.4.3.1 Can it be brought onsite and where will it be stored?
    - 4.4.3.2 What safeguards and PPE will be required?
    - 4.4.3.3 How will it be removed from site or disposed?
  - 4.4.4 For unescorted contractors, prepare a Contractor Work Permit which describes the work to be performed and provide this work authorization to the contractor daily. Contractor Work Permit must be completed and posted in the area where the work will be performed. If contractor will be moving to different labs, they should keep it with them. Complete all applicable sections of the permit.
  - 4.4.5 Ensure that all special permits (hot work, vertical mast list daily pre-use checklist, lockout/tag out, confined space, other) are obtained.
  - 4.4.6 Thoroughly review with contractor(s) all applicable information and requirements listed on the Contractor Work Permit and all special permits.
  - 4.4.7 Keep all issued work permits on file in the Safety Cabinet for one year.
  - 4.4.8 For unescorted contractors, be available onsite for the duration of the contractor's stay. Transfer responsibility to another Promerus employee if you must leave the site.
  - 4.4.9 For escorted contractors, be within sight for the duration of the contractor's stay. Transfer responsibility to another Promerus employee if you must leave the area.
  - 4.4.10 Ensure that contractors comply with this policy at all times.
  - 4.4.11 Resolve any questions or issues regarding this policy.
- 4.5 Greeter
- 4.5.1 Answer the video intercom base station, ask who the contractor's Promerus contact is and have the contractor wait in the vestibule until the contact arrives.
  - 4.5.2 Notify via phone or locate contractor's Promerus contact and "hand off" the interaction to them. If the Promerus contact is not here, locate the manager for the Promerus contact's group and seek guidance on how to proceed.
  - 4.5.3 It is possible that the contractor may be turned away if the Promerus contact is not on site. This communication should also be done through the intercom base station.
  - 4.5.4 If the greeter lets the contractor in the building, they must ensure that the contractor is escorted at all times until "handed off" to the Promerus contact.
  - 4.5.5 Several employees will be assigned weekly to the greeter role. If none of the assigned employees are in the office area when a contractor arrives, any available employee should act as the greeter.

5.0 Delivery Drivers

- 5.1 Delivery drivers will be let into the building by a Promerus employee and must be monitored at all times (via the video intercom base station) while in the building.
- 5.2 For Contractor deliveries, notify the Contract Company Supervisor or the Promerus Contact who will meet the delivery driver.

6.0 Failure to Comply

- 6.1 If a contractor fails to comply with any laws, statutes, regulations or Promerus Safety rules or requirements, the individual will be immediately removed and prohibited to return until the Promerus Contact is satisfied that compliance will be achieved.
- 6.2 If the contractor's failure to comply warrants more severe actions, the contractor's entire work force may be removed from the site pending investigation of the incident. Follow-up action may include cancellation of the work contract.

**Appendix A: Contractor Rules and Regulations**

A1. Cardinal Rules: The 4 Cardinal Rules are the cornerstones of the Site Safety policy. Adherence to these rules is vital to the safety of personnel within the facility. Failure to comply with these Cardinal Rules can result in dismissal or permanent removal.

A1.1 Hot Work

A1.1.1 Hot Work includes work performed under any of the following conditions:

1.1.1.1 using open flames or any device that has the potential to disperse sparks or embers **anywhere**

1.1.1.2 using any ignition source device that is not intrinsically safe in an electrically classified area

1.1.1.3 using any ignition source device for cutting or grinding in a laboratory, flammable storage area or the warehouse

A1.1.2 Types of Hot Work Devices:

<b>Open Flame Hot Work Devices.</b> Examples include but are not limited to:
all welders, gas burners and torches, metal cut-off wheels, angle grinders, plasma cutters, chafing dishes (sternos), grills, birthday candles
<b>Non-Open Flame Hot Work Devices.</b> Examples include but are not limited to:
Electric motors, corded and battery powered tools (e.g. drill, reciprocating saw, Dremel), combustion engines, heat (hot air) gun

**A1.1.3 Hot Work Permit/Exemptions Examples:**

<b>Electrically Classified Hazardous Area Activities</b>	<b>Hot Work Permit Required or Exempt</b>
Any activity with non-intrinsically safe rated devices/equipment	Hot Work Permit Required

<b>Non-Electrically Classified Hazardous Area Activities</b>	<b>Hot Work Permit Required or Exempt</b>
Using a flashlight to illuminate a dim area	Exempt
Vacuuming up non-hazardous materials (vacuum or shopvac)	Exempt
Drilling/Cutting into any material using an electric or battery powered tool	Hot Work Permit Required
Using handheld instruments that do <b>not</b> produce an open flame or disperses sparks/embers	Exempt
Using computers, monitors, printers, tablets, laptops, cell phones, cameras	Exempt
Using a handheld power tool to remove screws from an instrument or crate	Exempt
Heating items using a heat gun ( <b>previously covered</b> by an approved safety review)	Exempt
Heating items using a heat gun ( <b>not</b> covered by a safety review)	Hot Work Permit Required
Any activity other than those listed above	Discuss with Hot Work Permit Issuers

<b>General Purpose Area Activities</b>	<b>Hot Work Permit Required or Exempt</b>
Any activity involving open flame hot work	Hot Work Permit Required
Any activity involving non-open flame hot work	Exempt

- A1.1.4 Promerus Contact must be advised of all Hot Work requirements in advance.
- A1.1.5 Hot Work may not be started until the Contractor obtains a Hot Work Permit issued by a Promerus Hot Work Permit issuer.
- A1.1.6 Appropriate firefighting equipment shall be on hand before beginning any Hot Work. Promerus will furnish any special equipment needed due to specific facility hazards.
- A1.1.7 Hot Work Permits are valid for only one job at one location for a 4-hour shift. A Hot Work Permit must be reauthorized if an emergency alarm occurs or there is a change in area personnel (i.e. person performing work or serving as fire watch). Permits may be cancelled due to any changes in the work environment that may create a hazard.
- A1.1.8 Contractor is responsible for verifying that a Hot Work Permit has been issued or reauthorized if needed prior to commencing or resuming hot work

activities.

#### A1.2 Lockout/Tag Out

- A1.2.1 Contractors performing servicing or maintenance on equipment with the potential for release of hazardous energy must adhere to Promerus Lockout/Tagout (LOTO) policy (EHS 13).
- A1.2.2 A group lockout is required when any Contractor is on-site servicing equipment that must be locked out. The Promerus authorized employee is responsible for the group members working under the group lockout.
- A1.2.3 Promerus authorized employee must show group members each equipment isolation point and perform LOTO verification with each group member. Group members must sign off on LOTO permit.
- A1.2.4 Promerus authorized employee is to ensure protection by being the first to affix his/her individual lockout device to the group lockout device and the last to remove.
- A1.2.5 Group members must affix their individual lockout device(s) to the group lockout device when work begins and remove when completed.
- A1.2.6 If more than one contractor is working on the equipment, each worker must have a separate lock and tag on the device.
- A1.2.7 No work shall proceed on any equipment until the equipment has been locked out, tagged out, verified and the permit authorized.

#### A1.3 Confined Space Entry

- A1.3.1 No permit-required confined space (indicated by signage reading: "DANGER, PERMIT SPACE, DO NOT ENTER") shall be entered until a Confined Space Entry (CSE) Permit has been authorized. (EHS-21).
- A1.3.2 During excavation, a permit-required confined space may exist. Promerus Contact should inform Safety Manager of all excavation work so determine if a CSE permit is required.
- A1.3.3 A contractor who will be working in a permit space must inform the Safety Manager of the written permit space program that they will follow. This program must be reviewed and approved by the Safety Manager prior to the work. The contractor's permit space program must meet all requirements of OSHA Standard 1910.146.
- A1.3.4 A debrief must occur between the contractor and the Safety Manager after the permit space work. This debrief must include any hazards confronted or created in the permit space.

#### A1.4 Trailer Entry

- A1.4.1 No contractor is permitted to enter a trailer with a forklift.

**A2. Vertical Mast Lift Operation**

- A2.1 A contractor who has been trained to operate a vertical mast lift within the last 3 years may operate the Promerus lift. Training documentation must be provided.
- A2.2 EHS-18 (Vertical Mast Lift Operation) must be followed including the completion of the Daily Pre-Use Checklist.

**A3. Special Permits and Permissions**

- A3.1 No work shall be done by contractors on piping, tanks or equipment before the installation of isolation blanks as required by the Promerus Contact for all piping and line tie-ins. Contractors shall stop work and notify the Promerus Contact immediately of any evidence of unanticipated liquids or vapors.
- A3.2 Permission must be obtained from the Promerus Contact, **in advance** for:
  - A3.2.1 service tie-ins (electrical, utilities, piping, computer control, HVAC)
  - A3.2.2 work on alarms and fire protections systems
  - A3.2.3 equipment removal from the site
  - A3.2.4 entry into specific areas (roof, chemical storage, mechanical room, electrical room, IT room)
  - A3.2.5 excavation work

**A4. Site Entry**

- A4.1 Contractors shall enter the main/front entrance vestibule or as directed by their Promerus Contact
- A4.2 All contractors must sign in and out on the Contractors Log posted on the door of the Electrical Room

**A5. Security**

- A5.1 Contractors are restricted to the areas where they are authorized to perform work. Restroom and break facilities will be specified by the Promerus Contact. All other areas are considered "Off Limits" unless accompanied by an employee.
- A5.2 No person possessing or suspected of being under the influence of **Intoxicants, Drugs or Behavior Modifying Substances** will be permitted on site.
- A5.3 No person possessing **Weapons** will be permitted on site. Possession means on an individual's person or within their property (e.g., tool boxes, gang boxes, vehicle) Exception: Contractors with a valid concealed handgun license may transport and store a firearm and/or ammunition in their personal vehicle as long as it is in accordance with all concealed weapon carry laws.
- A5.4 Horseplay, practical joking, fighting, and gambling are not permitted while onsite.
- A5.5 Anyone found guilty of destruction or unauthorized removal of Promerus property will be expelled from the site and will be subject to legal prosecution.



**A6. Smoking**

- A6.1 The building and grounds (including personal vehicles) are "Smoke and Vaping Free". The lighting of matches or lighters is strictly forbidden onsite. Smoking and vaping are permitted on the sidewalk along Pier Drive or W. Bartges Street.

**A7. Items Brought on Site****A7.1 Tools/Equipment**

- A7.1.1 Contractor tools must be in good working condition, properly grounded or double insulated, with no cord splices or frayed lines. Power tools must be powered through a contractor's Ground Fault Circuit Interrupter (GFCI).
- A7.1.2 Ladders and scaffolding must be in good condition and used properly at all times. Nonconductive ladders are required in areas where potential contact with electricity exists. Extension ladders must be properly tied-off.

**A7.2 Electrical Devices**

- A7.2.1 Devices such as cellular phones, pagers, computers, instruments, and other battery-powered devices are not permitted in electrically classified areas unless stamped intrinsically safe.
- A7.2.2 Any power tools used for cutting/grinding/drilling in a non-electrically classified hazardous area requires a Hot Work Permit.

**A7.3 Cameras**

- A7.3.1 Cameras of any type, including cell phone cameras, cannot be used without permission from the Promerus Contact.

**A7.4 Gas Cylinders**

- A7.4.1 Compressed gas cylinders must be stored, handled and used in accordance with the pertinent provisions of the OSHA standard, including but not limited to proper securing and guarding of cylinders at all times and the placement of protective caps when they are not in use.

**A7.5 Chemicals**

- A7.5.1 Hazardous chemicals needed to complete work requires approval in advance from the Promerus Contact. Present the Promerus Contact an updated SDS for review
- A7.5.2 Any spill or release of any chemical substance must be reported **immediately** to the Promerus Contact. Contractor is not permitted to pour any waste materials on the ground, down sewers, or release to the atmosphere. Promerus Contacts may give special approval to pour materials down the sewer. Each contractor is responsible for the cleanup and proper disposal of all scrap and hazardous waste from the operation (i.e., empty containers, paint cans, left over materials, construction debris, etc.).

**A8. Emergencies and Evacuations**

- A8.1 Medical only emergencies (i.e. heart attack), call 911 and notify Promerus Contact.
- A8.2 All other emergencies (threat of fire, large spill, accidents, etc.), activate the

evacuation alarm and report to the designated area for head count.

#### A9. Proper Attire

- A9.1 Appropriate attire is required at all times while on site. No tank tops, open shirts or shorts are permitted while on site.
- A9.2 The wearing of contact lenses in hazardous work areas is prohibited.

#### A10. Personal Protective Equipment (PPE)

- A10.1 Hazardous work areas: must wear safety glasses (meet ANSI Z87 standard), ANSI approved safety shoes (no sandals, open-toed, high heel or porous shoes), long pants, long sleeves or lab coat and other protective equipment as required by Promerus or OSHA. All equipment will be provided by the contractor, except in special circumstances as deemed by Promerus.
- A10.2 Outside work areas: must wear safety glasses (meet ANSI Z87 standard), ANSI approved safety shoes, long pants and other protective equipment as required by Promerus or OSHA.

#### A11. Roof work

- A11.1 When work is performed less than 6 feet from the roof edge, the contractor must use a guardrail system, safety net system, travel restraint system, or personal fall arrest system.
- A11.2 When work is performed at least 6 feet but less than 15 feet from the roof edge, the contractor must use a guardrail system, safety net system, travel restraint system, or personal fall arrest system. If the work is both infrequent ( $\leq 4$  times/year) and temporary (<2 hours duration), then a designated area with warning line may be used instead.
- A11.3 When work is performed 15 feet or more from the roof edge, the contractor must use a guardrail system, safety net system, travel restraint system, personal fall arrest system or a designated area with warning line. If the work is both infrequent ( $\leq 4$  times/year) and temporary (<2 hours duration), the contractor is not required to provide any fall protection, but the contractor is strictly prohibited from going within 15 feet of the roof edge without using fall protection.