1.0 INTRODUCTION
As part of the Weill Cornell Medical College (WCMC) Environmental Health and Safety (EHS) Program, this manual was developed to outline the minimum basic EHS requirements for all contractors working on campus and the responsibilities of both WCMC Project Managers and/or Hiring Departments who supervise or oversee activities they perform. This program is updated periodically. The newest version may be viewed on the EHS website or by requesting a copy from EHS.

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QUESTIONS?

ENVIRONMENTAL HEALTH AND SAFETY
CALL 646-962-7233 ONLINE welliCornell.edu/ehs EMAIL ehs@med.cornell.edu
Weill Cornell Medical College | 402 East 67th Street, Room LA-0020 | New York, NY 10065

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## CONTRACTOR SAFETY

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CONTRACTOR SAFETY

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3.0 OBJECTIVE
This program has been designed to provide consistent information about the minimum EHS safety requirements for contractors performing work at Weill Cornell facilities.

4.0 APPLICABILITY
This manual applies to all work performed by outside vendors (Contractors). The requirement to conduct an Infection Control Risk Assessment (ICRA) applies to all activities at WCMC that may create dust which can either cause illness and/or discomfort, which can damage or destroy research materials or equipment, or impact life safety protections such as fire detection systems or emergency evacuation routes. In addition to the requirements of this manual, contractors are expected to comply with all federal, state and local laws, codes and standards.

5.0 ROLES AND RESPONSIBILITIES

5.1 ENVIRONMENTAL HEALTH AND SAFETY (EHS)
- Develop the Contractor Safety Program, review the manual annually, and update as required.
- Assist the WCMC community in the implementation of this program.
- Provide or coordinate general training for groups on the program’s content as requested.
- Review construction, renovation, and repair projects with the Project Manager or Hiring Department and assist with completion of the ICRA to determine risk mitigation measures.
- Review and approve dust control and interim life safety measures when such controls are required prior to the start of any work.
- Periodically inspect work sites for compliance with required dust control plans and interim life safety measures.

5.2 PROJECT MANAGERS (PMS) / HIRING DEPARTMENT (WCMC SUPERVISOR OF CONTRACTOR’S WORK)
- Identify at-risk work (construction, renovation and demolition activities that will create dust or impact fire safety).
- When at-risk work is identified, submit scopes of work to EHS for review that accurately describes the location and work to be performed.
- Initiate an ICRA in the design and planning phase for such projects.
- Submit a dust control plan and interim life safety measures to EHS for approval if required by the ICRA.
- Ensure contract documents obligate contractors to implement all required dust control and interim life safety measures when required by including appropriate language in all contracts.
- Routinely monitor for contractor compliance with this program.

5.3 CONTRACTORS
- Follow guidelines, policies and procedures outlined in this program as well as all applicable health and safety requirements of the job.
- Provide equipment and materials for compliance with the risk mitigation requirements as outlined in the ICRA determination.
- Where required, perform daily inspections of dust containment and Interim life safety measures, log results and initiate corrections when deficiencies are found.
- Obtain, maintain onsite and provide copies to EHS of any FDNY permits and Certificate of Fitness that may be required.
- Maintain Safety Data Sheets onsite and make available for any and all hazardous chemicals utilized for the job/project that will be brought onto campus.
6.0 ADMINISTRATIVE REQUIREMENTS

6.1 REQUIRED NOTIFICATIONS

All safety-related incidents that involve contractors or occur in/at contractor controlled jobsites must be immediately reported to EHS (646-962-7233). Examples of such incidents that require immediate notification include but are not limited to:

- Accidents that result in injuries or damage to property
- Dust or odor release to areas outside of contractor controlled job sites
- Fires
- Gas or chemical odors
- Chemical spills
- High-hazard work in occupied areas

Contractors must notify EHS immediately of any no-notice, and in advance for, any scheduled Regulatory inspection (OSHA, FDNY, NYCDEO, etc.).

For emergencies, contractors should always follow their company and any site specific emergency procedures. For WCMC construction projects, an EHS notification process/procedure must be incorporated into all contractors’ emergency protocols.

6.2 OCCUPATIONAL INJURY/ILLNESS, INCIDENTS, AND NEAR MISSES

In most cases contractors are responsible for maintaining the OSHA 300 log for their employees; however, any incident involving an occupational related injury or illness or near miss occurring on the jobsite must be reported to EHS immediately.

The contractor is responsible for conducting a thorough investigation of every occupational injury, illness incident and near miss to determine root cause and actions to be taken to prevent recurrence. Copies of any incident report, interview or any other related documentation must be provided to EHS.

EHS may conduct its own separate investigation. If it is determined at the conclusion of this investigation that the incident may have been caused by the contractors’ negligence, then the contractor may be subject to disciplinary action by WCMC or potentially being removed from the approved contractor list, barring the contractor from bidding on any future projects.

6.3 SITE SAFETY ORIENTATION

Project Managers/Hiring Department Supervisors:

Must provide their contractor(s) with the Building-Specific Fire Safety and Evacuation Procedures found in WCMC’s Fire Safety and Emergency Action Manual. In addition, Project Managers/Hiring Department Supervisors must also provide contractors with any relevant WCMC safe work practices (i.e., Confined Space Manual, Lockout/Tagout Manual, etc.).

Contractors are required to conduct a safety orientation for their employees. This orientation must cover at a minimum:

- Specific fire reporting and evacuation procedures for the facility where the work is being performed
- Dust control plan, if required for the work/project
- Logistics plan, if required for the work/project
- Contractors’ safety programs
- Hazard Communication information if working with or in locations where hazardous materials are used/stored
- EHS Health and Safety Door signs if work is performed within or near any identified laboratory

Contractors must document all safety orientations conducted. Documentation must be available for review upon request.
6.4 SIGNAGE

6.4.1 Telephone Numbers

Contractors are responsible for addressing any emergency repairs and providing emergency response for issues that arise as a result of work being performed by the contractor on the job site during business and off-hours.

For construction projects, the contractor MUST post an accurate list of all emergency contact information, including availability and multiple contact telephone numbers. This is critical to ensure that at any time day or night, a responsible person can be contacted to address any type of emergency that may arise.

The emergency contact list MUST be permanently affixed, using durable material, on the occupant side of each entrance to the jobsite.

For contractors performing services other than construction, a list of all emergency contact information, including availability and multiple contact telephone numbers must be provided to the WCMC Hiring Department Supervisor and updated as necessary.

6.4.2 Contractor Incident Reporting

Contractors who maintain a field office in any WCMC facility must post the Contractor Incident Reporting Bulletin found in Appendix E.

6.4.3 Construction Signage

The Project Manager or Hiring Department Supervisor will ensure that the following construction signage is posted on each entrance to a construction project. Examples of required signage can be found on Appendix B.

- Caution - No Access Authorized Personnel Only – No Smoking – Hard Hats & Safety Glasses Required
- Notice - Construction Area Emergency Contact Information (This signage must be completed by the Project Manager or Hiring Department prior to posting)

6.5 RECORD RETENTION

It is the responsibility of the contractor to maintain records of all worksite safety inspections, trainings, fire watch logs and any other record required by this program. Copies of these records must be available at the worksite for the duration of the project and be made available to the PM, Hiring Department Supervisor or EHS upon request.

7.0 Infection Control Risk Assessment (ICRA) Procedure

Contamination and disruptions to life safety protections associated with new construction, renovations, repairs, and other contractor activities are a concern due to the vulnerability of patients, occupants, research activities, and sensitive equipment near those activities.

It is the policy of WCMC that all contractor activities that may generate dust, including all painting (with the use of anything other than water-based paint), varnishing, sealing, coating, etc. and construction projects be evaluated by the Project Team or Hiring Department Supervisor to determine any negative impact to adjacent occupied spaces. The degree to which the activity or project will require dust and/or life safety hazard abatement measures is determined by conducting an ICRA. To document the assessment, an ICRA form must be completed. An example of the form can be found in Appendix A and is available to download and print on our website. EHS will assist with the assessment upon request.

Although each project is unique in terms of required work and proximity to nearby patients, research activities or sensitive equipment, certain general precautions are prudent. The objective of these guidelines and the ICRA form is to:

- Enhance the prevention of illness in patients or others who may be sensitive or otherwise allergic to materials found in or carried by dust.
- Prevent the loss or damage of sensitive research materials or equipment vital to WCMC’s medical research mission.
• **Provide** adequate temporary life safety protections where fire protection systems or emergency evacuation routes are impacted by construction activities.

Work or projects affecting multiple locations or multiple phases may require additional assessments to be completed to address all potential impacts related to the work or project. The risk mitigation measures are determined by completing the following steps:

7.1 CONSTRUCTION TYPES

Determine the construction type; examples of common activities in each group are provided on the ICRA form. Work or construction types are classified as:

- **Type A**: Inspection and Non-invasive Activities
- **Type B**: Small-scale, short-duration (<72 hours) activities, or activities which create minimal dust or fumes.
- **Type C**: Long term activities (>72 hours), or activities that generate a moderate to high level of dust or fumes.
- **Type D**: Major demolition and construction projects.

7.2 WORK/CONSTRUCTION SITE RISKS

The PM, or Hiring Department Supervisor in consultation with impacted departments, if applicable, shall determine which classification of risk is appropriate for each project based upon the type and location of the project. Work/construction site risks are classified as:

- **Low Risk**: No patient care or occupancy, no laboratory research or materials present, and no high value or critical equipment present.
- **Medium Risk**: Most active laboratories, outpatient areas, patient occupancy, and support service areas. High value or critical equipment present but can be protected in a manner acceptable to the owner.
- **High Risk**: Clean Rooms, animal housing rooms, areas with high value/critical equipment subject to damage from dust, high-risk outpatient (e.g. oncology centers) and all inpatient areas.

7.3 RISK MITIGATION MEASURES MATRIX

Match the Site Risks (Low, Medium, and High) with the planned Work/Construction Project Type (A, B, C, D) on the following matrix, to find the Class of Risk Mitigation Measures (I, II, III or IV) required.

<table>
<thead>
<tr>
<th>Area Risk Group</th>
<th>Type A</th>
<th>Type B</th>
<th>Type C</th>
<th>Type D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Risk</td>
<td>I</td>
<td>I</td>
<td>II</td>
<td>IV</td>
</tr>
<tr>
<td>Medium Risk</td>
<td>I</td>
<td>II</td>
<td>III</td>
<td>IV</td>
</tr>
<tr>
<td>High Risk</td>
<td>II</td>
<td>III/IV</td>
<td>III/IV</td>
<td>IV</td>
</tr>
</tbody>
</table>

7.4 DUST CONTROL PLAN

A written Dust Control Plan is required to be submitted to EHS for approval prior to the start of work when:

The ICRA assessment determines that Type II, III, or IV risk mitigation measures are required to be taken, or Interim Life Safety Measures are required.

7.4.1 Components of a Dust Control Plan

The Dust Control Plan will incorporate the risk mitigation and interim life safety measures (see Section 7.0) as determined by the ICRA, and will specify and locate all components of containment required including:

- Construction partitions
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- Exhaust fans
- HEPA filters
- Walk-off mats
- Self-closing door hardware
- Material delivery routes
- Debris removal routes
- Traffic patterns for contractors/construction workers. These routes are to avoid patient care areas.
- Traffic patterns of patients, visitors, and healthcare workers. These routes are to be diverted away from work/construction sites.
- Temporary life safety systems
- Any other measures deemed needed

7.4.2 Construction Partitions

- Barrier/partitions must be hard walled for class II, III, and IV work projects or construction activities lasting >72 hours.
- Fire rated separations, see Section 8.6.

7.4.3 Access to Construction/Project Areas

Access into contractor-controlled construction/project areas must be limited to authorized personnel only. The following rules must be followed at all times:

- Construction projects that open onto a common public corridor must be secured at all times. Doors leading into the worksite shall be self-closing and positive latching. Hasps and padlocks are not acceptable means of securing the work site unless approved by EHS.
- Once the space is given over to the contractor, all entrances must be immediately secured by the contractor through the installation of a unique dedicated construction lock. Keys will be distributed to: E&M, EHS, and Security upon installation.

7.4.4 Barricades and Fencing

Barricades act as warning devices, alerting others of the hazards created by construction activities. They should be used to control traffic, both vehicular and pedestrian, safely through or around the work site. Contractors must use barricades wherever necessary for the physical protection of people or property.

Temporary cyclone fencing, plastic safety fencing, and portable manhole barricades are examples of acceptable barricading. Yellow caution tape and/or cones are not considered acceptable barricades, and should be used only until more suitable barricades can be erected. Signage and illumination should be used where appropriate.

At a minimum, contractors must barricade the following areas:

- Areas with temporary wiring operating at more than 600 volts
- Work areas for electrical equipment with exposed, energized parts
- The swing radius of the rotating superstructure of cranes
- Temporary wall or floor openings

7.5 RISK MITIGATION MEASURES

<table>
<thead>
<tr>
<th>Class</th>
<th>During Work/Construction Project</th>
<th>Upon Completion of Work/Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>1. Execute work using methods to minimize raising dust from construction operations.</td>
<td>• Contractor will conduct cleaning with WCMC</td>
</tr>
</tbody>
</table>
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| II   | I. Provide enclosure to control dust migration using portable tent (Kontrol Kubes) or sheetrock, plywood, plastic (6 mil poly) to seal area from non-work area with a HEPA vacuum continuously running to create negative pressure (Monitoring airflow direction is not required). |
|      |   2. Provide active means as described below to prevent airborne dust from dispersing: |
|      |   - Water mist work surfaces to control dust while cutting. |
|      |   - Seal unused doors with tape if high-risk site adjacent to construction site. |
|      |   - Place sticky mat at entrance and exit of work area and change sticky mat when covered with dust. |
|      |   - Provide dampen walk off mats at fixed location. If used must be kept damp. |
|      |   3. Contain construction debris (e.g. seal with plastic) prior to removal from site. |
|      |   4. Use only designated route/elevator to transport materials or construction debris. |
|      |   • Vacuum with HEPA filtered vacuum prior to removing barrier. |
|      |   • Do not remove barriers from work area until completed project is inspected by Environmental Health and Safety. |
|      |   • Contractor to clean area with HEPA filtered vacuum or wet mop as appropriate to the satisfaction of the Project Manager. |
|      |   • Remove isolation of HVAC system in areas where work was being performed. |
| III  | I. Disconnect or isolate HVAC system in area in consultation with Engineering & Maintenance where work is being done to prevent contamination of duct system or adjacent spaces. |
|      |   2. Complete all critical barriers i.e. sheetrock, plywood, plastic (6 mil poly), to seal area from non-work area, or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA vacuum for vacuuming prior to exit) before construction begins. |
|      |   3. Place dust mat at entrance and exit of work area and replace or clean when no longer effective. |
|      |   4. Maintain negative air pressure within work site (> 0.01” water) utilizing HEPA equipped air filtration units or other methods to maintain negative pressure. |
|      |   5. Re-circulating HEPA units may supplement dust control measures inside the work area. |
|      |   6. Additional HEPA filtration unit should be installed near all entrances and exits to the work area. |
|      |   7. The contractor will inspect all dust control equipment daily and log the results. |
|      |   8. Keep work area broom clean and remove debris daily. |
|      |   9. Contain construction debris (e.g. seal with plastic) prior to removal from site. |
|      |   10. Use only designated route/elevator to transport. |
|      |   • Do not remove barriers from work area until completed project is inspected by Environmental Health and Safety. |
|      |   • Contractor to clean area with HEPA-filtered vacuum or wet mop as appropriate to the satisfaction of the Project Manager. |
|      |   • Remove isolation of HVAC system in areas where work was being performed. |
| IV   | I. Disconnect or isolate HVAC system in area in consultation with Engineering & Maintenance where work is being done to prevent contamination of duct system or adjacent spaces. Complete all critical barriers i.e. sheetrock, plywood, plastic (6 mil poly), to seal area from non-work area, or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA vacuum for vacuuming prior to exit) before construction begins. |
|      |   2. Place dust mat at entrance and exit of work area and replace or clean when no longer effective. |
|      |   • Do not remove barriers from work area until completed project is inspected by Environmental Health and Safety. |
|      |   • Contractor to clean area with HEPA-filtered vacuum or wet mop as appropriate to the satisfaction of the Project Manager. |

ENVIRONMENTAL HEALTH AND SAFETY | WEILL CORNELL MEDICAL COLLEGE
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**7.6 CONTROL EQUIPMENT**

It is the responsibility of the contractor performing the work to provide, utilize and maintain all equipment and materials required by the Dust Control Plan.

- Certain specific types of dust control equipment may be required (i.e., Kontrol Kube) or equivalent.
- All HEPA filters shall have a pressure differential gauge or other indicator to show that it is functioning properly.
- The contractor shall ensure that any HEPA filtering equipment (filters, vacuums, etc.) when installed and in use are being operated in accordance with the manufacturer’s instructions.

**7.7 IMPLEMENTATION**

7.7.1 Preconstruction

- All personnel involved in the work, construction or renovation activity are to be educated and trained in the Dust Control measures by their employer. Training must be documented by the employer.
- Prior to the start of work, the contractor must submit a Dust Control Plan for all work that, based on the results of the ICRA, requires class II, III, or IV risk mitigation measures and present their internal safety protocols to be used to ensure compliance with the plan.
- The contractor shall be authorized to begin work, removals, site demolition and construction upon EHS acceptance of the site Dust Control installation and any required Interim Life Safety Measures.

7.7.2 Construction Phase

- EHS is authorized to stop work/construction if breaches in preventive measures arise on the work/construction site.
- Project Managers/Hiring Department Supervisors should routinely monitor their contractors for compliance with dust control procedures.
- All windows, doors, air intake and exhaust vents are to be sealed in areas of any facility adjacent to a building that is going to be demolished to prevent air leaks into high risk areas.
- Continuity of services and systems must be maintained to ensure the ability of the ventilation system to produce the proper air exchange rates and pressure relationships in laboratories and patient care areas which are near renovations.
7.7.3 Post Work/Construction Phase

- The contractor shall insure the work/construction site is thoroughly cleaned, including all horizontal surfaces, before any barrier is removed, and again after the barrier is removed and before patients are readmitted to the area. Allow time for all dust to settle before final cleaning is carried out.
- The PM/Hiring Department Supervisor is to conduct a final walk through to ensure that all systems are functioning properly in the work/construction site and adjacent areas.

7.7.4 Additional Dust Control Measures

- Special precautions must be followed during demolition of water damaged or wet vinyl or gypsum wallboard that show evidence of mold growth. Before removal of these items can take place, they must be sealed or sprayed with an approved disinfectant to prevent the release of spores.

8.0 Fire/Life Safety

The Project Manager/Hiring Department Supervisor must ensure that all work and dust control measures do not impact the life safety of occupants or building life safety systems. Step 4 in the ICRA form found in Appendix A must be utilized to perform the initial assessment of the impact from the work or construction. Where it is deemed that life safety systems or general life safety will be impacted, alternate life safety measures must be approved by EHS and implemented.

8.1 EGRESS

Where egress will be impacted by work, construction or dust control measures, the design team, or Hiring Department Supervisor must provide a plan to show approved code compliant egress reconfigurations. This must take into account providing fire-rated corridors where necessary and maintaining all required travel distances.

8.2 ADA ACCESS

Access to handicap entrances must be maintained at all times during the course of a project. Alternative routes must be designated prior to the beginning of the project. A contingency plan must be completed if routes have to be altered.

8.3 EXIT SIGNAGE

Exit signage must remain unobstructed. Where exits are redefined, new lighted exit signage must be installed on the new egress paths. Existing exit signage that is no longer appropriate must be covered until the permanent egress paths are re-opened.

8.4 SPRINKLER/STANDPIPE SYSTEM IMPAIRMENT

Sprinklers and standpipes shall be maintained in good working order at all times. All planned removal from service of existing sprinkler and standpipe systems due to demolitions, gut rehabilitations, or any other reason that renders the existing system inoperable requires submission of a letter of notification to the fire department.

FDNY filing and notification requirements are dependent on the number of contiguous floors the impairment affects. The Project Manager is responsible for ensuring such notifications are made when required. A draft of the letter of notification to the fire department must be reviewed by EHS prior to submission.

8.5 FIRE ALARM SYSTEMS

Any work or project that requires the modification or removal of an existing fire alarm system device must be able to provide equal protection or institute temporary measures such as a fire guard. The plan for temporary measures must be reviewed and approved in writing by EHS.

All temporary fire alarm devices must be designed and filed with the NYC DOB and FDNY as necessary. These systems must be maintained regularly and meet all Inspection Testing and Maintenance Requirements.
8.6 FIRE RATED SEPARATIONS

Prior to the demolition of fire rated walls between a work or construction area and an occupied building space, a rated wall of equal or higher fire rating must be installed. The occupied area must be separated from the work or construction area at all times with this fire rated partition, unless approved in writing by EHS. Fire resistant plastic cannot be used to fulfill this requirement.

8.7 ELEVATORS

If elevator discharge on a construction floor is to be sealed off, it must be done in a manner that would prevent a person from exiting the elevator and becoming stranded between a barrier and the elevator shaft.

- Materials used to create the barrier must be non-combustible
- The barrier must be constructed in such a manner that would allow the fire department to easily “push through” or otherwise pass through the barrier
- A sign must be posted on the barrier that can be read from the elevator car that explains to the fire department how to pass through the barrier (see Appendix E for example)

8.8 HOT WORK

Hot Work is defined as welding, cutting, soldering, brazing, grinding and other forms of torch operations that will introduce sparks or open flame to a work area. All hot work requires WCMC authorization, regardless if a fire department permit has been issued or the work will be performed inside or outside. Hot work authorization may also be required for non-fire causing work (e.g., work involving excessive dust).

All contractors that intend to perform hot work activities or activities that may generate or involve excessive dust at WCMC must review WCMC’s Hot Work Program prior to commencing work.

All welding, cutting, brazing, soldering and sweating will be done by permit only and with the prior knowledge and consent of EHS. Hot work being performed without the issuance of a hot work permit may result in corrective action.

8.9 FLAMMABLE/COMBUSTIBLE LIQUIDS

Storage, handling and use of flammable and combustible liquids shall be in accordance with the 2014 New York City Fire Code, FC 3406.2 and other provisions of FC Chapter 34 as may be applicable.

8.10 POWDER-ACTUATED TOOL LOADS

Small arms ammunition shall be stored, handled and used for powder-actuated tool loads at a construction site as follows:

- The main store of powder-actuated tool loads shall be kept in an approved locked metal box.
- The powder-actuated tool load storage box shall be kept away from heat and shall not be stored in the same storage area or storage facility containing compressed gases or flammable liquids.
- The storage area or storage facility in which the locked metal powder-actuated tool load box is stored shall bear a permanent sign bearing the words “DANGER-AMMUNITION” in 2-inch (51-mm) while letters on red background.
- Powder-actuated tools shall not be used in an explosive atmosphere.
- The certificate of fitness holder shall establish a safe zone behind a work area in which powder-actuated tools are to be used by evacuating the area or placing a barrier constructed of ½ inch (12.7mm) steel plate.
- At least on portable fire extinguisher having a minimum 2-A rating shall be provided in the area where powder-actuated tool loads are stored.
- Storage of powder-actuated tool loads shall comply with the requirements of NFPA 495. Storage shall be limited to not more than seven hundred fifty thousand powder-actuated tool loads per premises unless larger quantities are authorized by the fire department.
- Powder-actuated tools shall be handled, and used only by a certificate of fitness holder. PM/Hiring Department Supervisor must be provided with and maintain copy of certificate of fitness.
8.11 SMOKING
Smoking is prohibited in all WCMC buildings (including rooftops) during ALL phases of work or construction. Contractors must immediately and permanently remove any worker found smoking, including e-cigarettes, and report the incident to EHS.

8.12 GENERAL LIFE SAFETY PROHIBITIONS
At no time will a contractor be allowed to:
- Block exit access, egress or exit discharge.
- Wedge open fire or smoke doors.
- Remove or modify exit signage or emergency lighting.
- Remove fire extinguishers, smoke detectors or any other signaling device or any fire suppression equipment without the prior knowledge and authorization of EHS.
- Compromise the fire rating of a partition, door, or other barrier to smoke and fire spread.
- Leave supplies, materials, tools, equipment, ladders, ropes, scaffolding or other objects in public or common areas, outside the work site, unattended for any length of time.

9.0 Housekeeping

9.1 HOUSEKEEPING PRACTICES – ALL CONTRACTORS
Contractors must comply with the following housekeeping regulations:
- Maintain the jobsite in a clean, uncluttered and organized condition free of the accumulation of unnecessary combustible material.
- Floor surfaces and corridors will remain free of any slip, trip and fall hazards, with exits maintained clear and unobstructed.
- Areas leading to and from the jobsite will be protected from damage and remain clean on a daily basis.
- Contractors and their employees will not be allowed to walk through occupied areas of the building wearing dirty clothing and work shoes.
- Transport should be directly to and from the jobsite, preferably through the receiving area if the building has a receiving area / loading dock.
- Debris will be removed from the jobsite on a daily basis especially during demolition operations.

9.2 WASTE GENERATION & DISPOSAL

9.2.1 Non-Hazardous Waste
Contractors are responsible for the disposal of all non-hazardous construction waste.

9.2.2 Hazardous Waste
All hazardous waste, as defined by the Environmental Protection Agency (EPA), will be reviewed on a case by case basis to determine whether the contractor or WCMC will handle, prepare shipment, and dispose of hazardous waste.

All contractors are required to comply with all laws governing the protection of the environment and proper handling, transporting and disposal of all regular and hazardous waste. All contractors are required to maintain all applicable permits and licenses required by federal, state and local laws governing the collection, packaging, transportation and disposal of all regular and hazardous waste.

The contractor is responsible for immediately contacting the EHS office whenever he comes in contact with any hazardous material on the job site. The contractor shall not handle the material until it is evaluated by EHS.
9.2.3 Recyclable Waste
The collection and disposal of batteries, light bulbs, ballasts, film containing silver, lead and mercury devices (Manometers, thermometers, Thermostats) is managed by EHS.

Bulbs and Ballasts: Project Managers/Hiring Department must contact EHS to request containers for bulbs and ballasts and pickup.

For all other recyclable waste described above, project managers or hiring department must submit a request for pickup on the EHS website.

9.2.4 Computers and Other Electronics
For locations serviced by WCMC Engineering & Maintenance (E&M), Project Manager/Hiring Department supervisor must submit a work order to WCMC E&M to have electronics collected for recycling.

For locations not serviced by WCMC E&M, contact EHS to arrange for the removal of electronics.

9.3 LABORATORY CLEANOUT
Laboratories that will be renovated or that are adjacent to renovations must be surveyed to determine the FDNY laboratory type (i.e., fire rating and sprinklers). The fire rating of laboratories adjacent to renovation projects must be maintained.

Lab Clearance
Areas that were previously laboratories must be cleared and closed out by EHS prior to the start of any demolition work pursuant to the existing laboratory closeout procedure. Clearance involves a complete site inspection followed by the issuance of a Laboratory Clearance Form by EHS. Principal Investigators currently occupying laboratories are responsible for leaving the laboratory in a state that clearance can be granted. Prior coordination with existing laboratory occupants is critical to the clearance.

10.0 Safety Practices
It is the policy of WCMC to comply with all OSHA standards including the general duty clause. We expect all contractors, subcontractors and their employees to comply with these regulations, and it is the responsibility of all contractors to enforce these standards and practices.

EHS is responsible for monitoring and enforcing compliance with all elements of the contractor safety program. EHS is vested with the authority to intervene when construction activities cause conditions that pose a danger to the health and safety of workers, WCMC staff, visitors and the general public, or damage to WCMC property.

When non-compliance issues are identified during monitoring activities, EHS staff will take all necessary steps to ensure that all violations are immediately corrected. Gross violations of the contractor safety program, including activities or behavior that is considered immediately dangerous to life and health, or repeat violations will result in the cessation of contractor activities and the permanent removal of the offending contractor or worker(s).

10.1 ASBESTOS-CONTAINING MATERIAL
Non-Asbestos Contractors
Any contractor who comes in contact with material that may contain asbestos must

- Alert Project Manager/Hiring Department Supervisor immediately of potential asbestos situations discovered in the course of their work.
- Prevent the disturbance or removal of potential ACM material until verified as non-ACM by EHS
- Contractors should consult with their WCMC Project Manager/Hiring Department Supervisor for further details.
10.2 CRANES/MATERIAL HOISTS

Proper coordination in advance of any project involving the use of a crane must be ensured. The use of flagmen, street and sidewalk permits, sidewalk closures, evacuations, etc. are all issues that need to be coordinated. A logistics plan that addresses these concerns must be submitted to EHS for review.

- Inspection/maintenance reports, yearly inspection certificate and the operator’s license must be on site with the equipment and available for review.
- Accessible areas within the swing radius of the body of a revolving crane must be physically guarded or other equally effective means must be taken during operations.

10.3 CONFINED SPACES

Contractors are prohibited from entering “Permit-Required” confined spaces without approval from EHS. An inventory of all confined spaces classified by EHS as being “permit-required” can be found in WCMC’s Confined Space Manual.

Project Manager/Hiring Department Supervisor must provide advanced notice to EHS of any intent to enter such a space for any reason and ensure that contractors, whose work will require entry into a permit-space, comply with Section 12.0 of WCMC’s Confined Space Manual.

10.4 CONTROLLED ACCESS SPACES

Engineering spaces on campus that do not fit the definition of a confined space but pose unique hazards to personnel working within the space have been classified as “Controlled Access Spaces.” Controlled Access Spaces will be identified by signage.

- Belfer Research Building (BRB)
  - B2M
  - B3M
- Throughout on- and off-campus buildings
  - Vertical utility shafts

10.4.1 Two Person Policy

A minimum of two persons/employees are required to be present at the job site at all times when performing any of the following tasks or when any of the following conditions exist:

- Work that requires control of energy sources (Lockout/Tagout)
- Work on chemical feed system
- Work on piped gas systems
- Hot Work
- When fall protection is required
- Where catwalks are present, any work that cannot be fully performed from the catwalk
- When guard rails or catwalk gratings must be removed and the removal of such creates the potential to fall off the catwalk and into the surrounding space
- When there is no means to communicate or summon help in the event of an emergency without leaving the space
- When entry has to be made into any vertical utility shaft

The purpose of having a second person present is to provide manpower that can provide immediate assistance or summon help in the event of an emergency. When work is to be done in a vertical utility shaft, the second person should remain outside the space.
10.4.2 Hazard Assessment

Prior to commencement of work in a controlled access space, contractors are required to provide EHS with a written hazard assessment for review. The assessment must address:

- The hazards of the space and of the work to be done within the space.
- For each hazard identified, a means of controlling or eliminating the hazard.
- The means to be used to summon assistance in the event of an emergency.

10.5 ELECTRICAL POWER REQUIREMENTS

- All electrical connections, materials and hook-ups shall conform to all federal, state and local standards.
- All temporary lighting and services required for the project shall be provided and maintained by the contractor. Upon completion of the project, the contractor shall remove all temporary services and restore tie-in points to original condition.
- All electrical equipment, including portable tools, shall be grounded or double insulated.
- All power hand tools and extension cords connected to temporary electricity are required to be GFCI protected.

10.6 ENERGY CONTROL (LOCKOUT/TAGOUT)

Energy control (Lockout/Tagout) is a program intended to prevent the unexpected energizing or the release of stored energy in machines or equipment on which servicing and maintenance is being performed by employees.

Outside personnel or contractors involved in service, maintenance, or construction operations that require control of hazardous energy sources must review the WCMC Energy Control Program prior to work activities beginning and adhere to the following requirements:

- Coordinate the lockout with Engineering & Maintenance (E&M) or the affected department.
- Contractors must provide their own multiple lockout device(s), keys and tag(s).
- WCMC machinery, equipment, processes, or utilities shall only be de-energized and re-energized by WCMC E&M personnel.
- When lockout of WCMC operated machinery, equipment or utilities is performed, a WCMC lock installed by WCMC E&M personnel, will be placed first on the contractor’s multiple lockout device.
- Upon returning the machinery, equipment or utility to service, WCMC E&M personnel shall be the last to remove their lock.

10.7 FALL PROTECTION

Fall protection must be implemented by contractors when work is performed on elevated surfaces that are four feet (General Industry) or six feet (Construction Standard) or more above the surrounding area without adequate guard rail systems or within six feet of an unprotected floor opening, wall opening, suspended platform sloped roof, or roof edge. (Exception - Scaffolding, fall protection is required for each worker on a scaffold more than 10 feet above a lower level).

The contractor must analyze the work site, the potential hazards and the magnitude of possible injury to workers in assessing which type of fall protection system should be used.

When using a personal fall arrest system, the contractor worker must, at all times, be anchored off by at least one connection between his/her body harness and a secured anchor. The anchor or fall protection device must meet all OSHA and other applicable regulatory requirements.

10.8 HAZARD COMMUNICATION (RIGHT-TO-KNOW)

All contractors must comply with the WCMC Hazard Communication Program and review the program prior to commencing work. If hazardous materials are being used on the work site contractors are required to:

- Maintain an inventory of all hazardous chemicals used on the job site.
- Maintain SDSs on-site and have readily accessible for all hazardous chemicals listed on the inventory.
8.1 CONSTRUCTION

- Clean up any spills created or caused. Contractors must alert EHS immediately upon discovering a spill or contact Security during off hours.

10.9 LADDERS/ELEVATED WORK PROGRAMS

Use of WCMC owned ladders is prohibited. Contractor is responsible to provide all ladders necessary to complete the task or job. The use of WCMC elevating work platforms (Genie or Scissor Lifts) is prohibited unless the lift is operated by trained WCMC personnel.

10.9.1 Ladders

All ladders shall be, as a minimum, Type 1 or Type 1A construction made of fiberglass or wood suitable in size and rating for the application. All ladders shall comply with all OSHA requirements. Metal ladders are prohibited.

Compliant Ladder Sizes:
- Portable stepladders longer than 20 feet are not allowed.
- Single ladders must not be longer than 30 feet.
- Extension ladders must not be longer than 60 feet.

10.9.2 Elevating Work Platforms

- Contractors must keep both feet firmly positioned on the platform floor when working from an elevating work platform.
- The use of ladders, boxes, steps, planks or similar items on an elevating work platform to provide additional reach is prohibited.

10.10 LEAD MANAGEMENT

Project Manager/Hiring Department Supervisor must notify EHS of all work which may affect materials containing lead or of potential lead generating activities when developing reviewing or assessing construction plans and/or activities.

Further requirements can be found in WCMC’s Lead Management Program.

10.11 SCAFFOLDING AND SIDEWALK SHEDS

10.11.1 Scaffolding

The contractor must provide all scaffold components and ensure erection and dismantling is only performed by trained competent personnel.
- All scaffolds with wheels shall have locking devices
- All scaffolds greater than 10 feet in height must be equipped with toe boards, mid and upper rails on each working level
- All supported scaffolds must be inspected on a daily basis and the results of these inspections must be recorded in a maintenance log, readily available on-site at all times.
- Contractors must ensure that all workers on a supported scaffold have a current Supported Scaffold User Certificate.
- Contractors must ensure that anyone not having such a certificate is prohibited from accessing or working on a supported scaffold
- A user certificate must be obtained from OSHA, an OSHA-trained or certified provider, or a provider of a four-hour training course that has been reviewed by the New York City Department of Buildings

10.11.2 Sidewalk Sheds

Sidewalk sheds provide overhead protection for the public during work on a building’s façade or when there are construction activities overhead that present a public safety hazard. The assembling, erecting, maintenance and removal of sidewalk sheds must be closely coordinated to ensure that the risks associated with this type of activity are controlled and minimized.
8.1 CONSTRUCTION

The following procedure will be followed when using sidewalk sheds during construction or repair projects:

- A coordination meeting needs to be arranged between Facilities, EHS, and the general contractor. The meeting will include a brief walkthrough of the location.
- Appropriate fall protection is required to be utilized during all phases of assembly and disassembly of the shed.
- During the construction and dismantling of the shed, a representative of the general contractor needs to be present to provide coordination at the work site.
- Materials should not be hoisted near or over pedestrian street crossing.
- Flagmen are required to control the flow of pedestrian movement in and around the work site as the components of the shed are assembled and erected and dismantled. If necessary to provide public safety, pedestrians should be diverted from walking under the shed until shall time as boards and decking are installed or removed and all overhead hazards eliminated.
- Lighting must be installed and operational before the shed is decked. If decking is required in order to install the lighting, the lighting must be installed and operational on the first day of construction at all points beneath the shed that has been decked.
- The accumulation of debris on the shed needs to be limited and controlled through an appropriate schedule of waste removal developed by the contractor.
- Removal of the debris needs to be accomplished through the use of a chute running from the top of the shed to the waste hauler in the street. At no time shall a contractor throw bags of debris into a truck below.
- Prior to dismantling, the top side of the shed needs to be swept clean as best as possible. To avoid fine particles of dirt becoming airborne, the contractor should wet the debris slightly to avoid exposure to pedestrians if possible.

11.0 Program Revisions

EHS will review this Program manual annually and revise as needed to reflect any changes or issues identified.

12.0 References

- WCMC Asbestos Management Program
- WCMC Confined Space Program
- WCMC Control of Energy (Lock Out / Tag Out) Program
- WCMC Hazard Communication Program
- WCMC Hot Work Permit Program
- WCMC Lead Management Program
Appendix A – Example Infection Control Risk Assessment (ICRA) Form

This form is available to download and print at:
http://weill.cornell.edu/ehs/static_local/word/ICRA.docx

Project Name: __________________________________________

Project Location: _________________________________________

Project Manager: _________________________________________

Step 1: Determine Type of Construction Project

<table>
<thead>
<tr>
<th>Type</th>
<th>Description</th>
<th>Example Activities</th>
</tr>
</thead>
</table>
| Type A | Inspection and Non-Invasive Activities that does not generate dust or fumes, short term work only. | • Visual inspections including above the ceiling  
• Painting (but not sanding)  
• Minor electrical work  
• Minor plumbing repairs |
| Type B | Small scale, short duration (<72 hours) activities which creates minimal dust or fumes. | • Installation of telephone, electrical and computer cabling including within ceiling.  
• Access to chase spaces (i.e. a vertical shaft in a building or duct which connects floor to floor.  
• Cutting of walls or ceiling if dust migration can be controlled (e.g. HEPA Vac or wet sand) |
| Type C | Longer term activities (>72 hours) or activities that generate a moderate to high level of dust or fumes. | • Sanding of walls for painting or wall covering  
• Removal of floor coverings, ceiling tiles and casework  
• New wall construction  
• Duct work  
• Prolonged activities meaning demolition or removal of fixed building component or assembly if dust migration cannot be easily controlled |
| Type D | Major demolition and construction projects. | • Extensive demolition  
• New construction or extensive renovation |

Step 2: Identify the Area Risk Group

Identify the locations of all groups/spaces that are potentially impacted from the project. This should include all areas surrounding the project. If there is more than one risk group that will be affected, use the higher risk group.

- **Low Risk:** No patient care or occupancy, No laboratory research or materials present.
- **Medium Risk:** Most active laboratories, outpatient areas, patient occupancy and support service areas.
- **High Risk:** Clean Rooms, areas with high value equipment subject to damage from dust, High Risk Outpatient and all inpatient areas.
Step 3: Determine Class (I – IV) of Risk Mitigation Measures Required

<table>
<thead>
<tr>
<th>Construction Project Type</th>
<th>Area Risk Group</th>
<th>Type A</th>
<th>Type B</th>
<th>Type C</th>
<th>Type D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Risk</td>
<td>I</td>
<td>I</td>
<td>II</td>
<td>IV</td>
<td></td>
</tr>
<tr>
<td>Medium Risk</td>
<td>I</td>
<td>II</td>
<td>III/IV</td>
<td>IV</td>
<td></td>
</tr>
<tr>
<td>High Risk</td>
<td>II</td>
<td>III/IV</td>
<td>III/IV</td>
<td>IV</td>
<td></td>
</tr>
</tbody>
</table>

All work/construction projects that require Class II, III or IV risk mitigation measures will require approval of a dust control plan prior to the start of work.

Step 4: Risk Mitigation Measures

<table>
<thead>
<tr>
<th>Class</th>
<th>During Construction Project</th>
<th>Upon Completion of Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>1. Execute work using methods to minimize raising dust from construction operations. 2. Immediately replace a ceiling tile displaced for visual inspection.</td>
<td>• Contractors will conduct cleaning with WCMC approved disinfectant.</td>
</tr>
<tr>
<td>II</td>
<td>1. Provide enclosure to control dust migration using portable tent (control cubes) or sheetrock, plywood, plastic (6 mil poly) to seal area from non-work area with a HEPA vacuum continuously running to create negative pressure (Monitoring airflow direction is not required). 2. Provide active means as described below to prevent airborne dust from dispersing: • Water mist work surfaces to control dust while cutting. • Seal unused doors with tape if high risk site adjacent to construction site. • Place sticky mat at entrance and exit of work area and change sticky mat when covered with dust. • Provide dampen walk off mats at fixed location. If used must be kept damp. 3. Contain construction debris (e.g. seal with plastic) prior to removal from site 4. Use only designated route/elevator to transport materials or construction debris.</td>
<td>• Vacuum with HEPA filtered vacuum prior to removing barrier.</td>
</tr>
<tr>
<td>III</td>
<td>1. Disconnect or isolate HVAC system in area in consultation with Engineering &amp; Maintenance where work is being done to prevent contamination of duct system or adjacent spaces. 2. Complete all critical barriers i.e. sheetrock, plywood, plastic (6 mil poly), to seal area from non-work area, or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA vacuum for vacuuming prior to exit) before construction begins. 3. Place dust mat at entrance and exit of work area and replace or clean when no longer effective.</td>
<td>• Do not remove barriers from work area until completed project is inspected by Environmental Health and Safety. • Contractor to clean area with HEPA filtered vacuum or wet mop as appropriate to the satisfaction of the Project Manager.</td>
</tr>
</tbody>
</table>
4. Maintain negative air pressure (>0.01” water) within work site utilizing HEPA equipped air filtration units or other methods to maintain negative pressure.
5. Re-circulating HEPA units may supplement dust control measures inside the work area.
6. Additional HEPA filtration unit should be installed near all entrances and exits to the work area.
7. The contractor will inspect all dust control equipment daily and log the results.
8. Keep work area broom clean and remove debris daily.
9. Contain construction debris (e.g. seal with plastic) prior to removal from site
10. Use only designated route/elevator to transport.

IV
1. Disconnect or isolate HVAC system in area in consultation with Engineering & Maintenance where work is being done to prevent contamination of duct system or adjacent spaces.
2. Complete all critical barriers i.e. sheetrock, plywood, plastic (6 mil poly), to seal area from non-work area, or implement control cube method (cart with plastic covering and sealed connection to work site with HEPA vacuum for vacuuming prior to exit) before construction begins.
3. Place dust mat at entrance and exit of work area and replace or clean when no longer effective.
4. Maintain negative air pressure (>0.01” water) within work site utilizing HEPA equipped air filtration units or other methods to maintain negative pressure.
5. Re-circulating HEPA units may supplement dust control measures inside the work area.
6. Additional HEPA filtration unit should be installed near all entrances and exits to the work area.
7. The contractor will inspect all dust control equipment daily and log the results.
8. Keep work area broom clean and remove debris daily.
9. Contain construction debris (e.g. seal with plastic) prior to removal from site
10. Seal holes, pipes, conduits, and punctures appropriately.
11. Construct anteroom and require all personnel to pass through this room. Wet mop or HEPA vacuum the anteroom daily.
12. During demolition, dust producing work, or work in the ceiling, disposable shoe covers and coveralls are to be worn and removed in the anteroom when leaving the work area.
13. Use only designated route/elevator to transport materials or construction debris.

- Remove isolation of HVAC system in areas where work was being performed.
- Do not remove barriers from work area until completed project is inspected by Environmental Health and Safety.
- Contractor to clean area with HEPA filtered vacuum or wet mop as appropriate to the satisfaction of the Project Manager.
- Remove isolation of HVAC system in areas where work was being performed.
- Housekeeping Service will conduct cleaning with WCSC approved disinfectant before re-occupation of the area.
### Step 5: Life Safety Assessment

<table>
<thead>
<tr>
<th>Life Safety Assessment</th>
<th>Answer</th>
<th>Alternative Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Will any existing required path of egress be obstructed or impacted by planned work or construction?</td>
<td></td>
<td>If “YES” is answered for any questions in the life safety assessment, alternative life safety measures must be indicated</td>
</tr>
<tr>
<td>2. Will any existing exit signs need to be covered; removed or relocated?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Will new exit signage be required due to rerouting of a path or egress?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Will fire suppression system (wet/dry/pre-action sprinklers) be impaired during any part of planned work or construction?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Will any component of a fire alarm system be impaired during any part of planned work or construction?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Will any existing fire/smoke rated separation be impacted by planned work or construction?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Will existing fire extinguishers be removed from the space during planned work or construction?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Step 6: Sign-Off:

Project Team/Hiring Department Supervisor must complete this form to document the results of the assessment of the planned work/construction project. The completed form must be submitted to EHS.

**PROJECT NAME/DESCRIPTION:**

Construction Project Type (A-D):

Risk Group Classification (Low-Medium-High):

Risk Mitigation Measures Class (I – IV):

Have any life safety issues been identified through the Life Safety Assessment? ___Yes ___No

The Project Team / Hiring Department Supervisor must submit a written plan detailing how dust/fume control and Interim Life Safety Measures (ILSM) if required, will be achieved to Environmental Health and Safety for any work:

1. That requires Class II, III, or IV risk mitigation measures, and/or
2. That requires interim life safety measures

Work cannot commence until the plan is approved by both EHS and the Project Manager.

Sign-Off:

Project Manager/Supervisor: ____________________________ Date: ____________

Environmental Health and Safety: _______________________ Date: ____________
Appendix B – Example Contractor Incident Reporting Bulletin

This sign is available to download and print at:
http://weill.cornell.edu/ehs/static_local/pdfs/ConstIncident.pdf

CONTRACTOR INCIDENT REPORTING

All safety-related incidents that occur on any Contractor controlled jobsite at WCMC must be immediately reported to Environmental Health and Safety (EHS):

646-962-7233

Examples of EHS related incidents that require immediate EHS notification include:

- Accidents
- Injuries
- Fires
- Gas odors
- Chemical odors
- Chemical Spills
- Dust or odor release to areas outside construction site
- Smoke conditions
- Destruction of property
- High hazard work in occupied areas
- Regulatory inspections (OSHA, FDNY, NYCEP, etc.)
- Other EHS and/or safety issues

EMERGENCY NOTIFICATION

For emergencies, contractors should always follow their company and site specific emergency procedures. An EHS notification must be incorporated into all contractors’ emergency protocols for WCMC construction projects.

OFF HOURS EHS NOTIFICATION

All accidents or incidents that occur at the site must always be reported immediately to an EHS staff member. If you call the main EHS number and get the department voicemail for any reason (nights, weekends, holidays, etc.), one of the following members of the Environmental Health and Safety staff must still be contacted.

Contact EHS in this order until a staff member is reached.

1) Scott Bystrak (Fire and Occupational Safety Manager) 718-500-9610
2) Erik Talley (Director, Environmental Health and Safety) 347-880-0100
3) James Crandall (Asst. Director, Environmental Health and Safety) 347-880-0154

UTILITY INTERRUPTION OR DAMAGE

Contractors must report any utility interruption or damage issues to WCMC Engineering & Maintenance at: 212-740-2250.
Appendix C – Example Construction/Project Emergency Contact Signage

This sign is available to download and print at:
http://weill.cornell.edu/ehs/static_local/word/ConstEmerg.docx

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**NOTICE**

CONSTRUCTION AREA

PROJECT NAME

LOCATION

Site Contacts
WCMC Project Manager: PM NAME – PHONE NUMBER
General Contractor: CONTRACTOR NAME
Site Superintendent: SUPER NAME – PHONE NUMBER
Off-Hours Contact: CONTACT NAME – PHONE NUMBER

Capital Planning: 212-746-4700
Environmental Health and Safety: 646-962-7233
Engineering and Maintenance: 212-746-2288

*For all questions or issues with this construction project, contact the WCMC Project Manager.*

*To report an accident, or safety issue contact Environmental Health and Safety.*
Appendix D – Example Construction No Access/PPE Signage

This sign is available to download and print at: http://weill.cornell.edu/ehs/static_local/pdfs/ConstAccess.pdf

CAUTION

NO ACCESS: AUTHORIZED PERSONNEL ONLY

HARD HATS SAFETY GLASSES REQUIRED

NO SMOKING
Appendix E – Example Elevator Barrier Signage

This sign is available to download and print at:
http://weill.cornell.edu/ehs/static_local/pdfs/ConstElev.pdf

NOTICE
No Access to This Floor
FDNY Access through this panel