

DEPARTMENT OF THE ARMY
U.S. ARMY MEDICAL DEPARTMENT CENTER AND SCHOOL
AND FORT SAM HOUSTON
Fort Sam Houston, Texas 78234-5014

FSH Memorandum
No. 385-1

29 May 1998

Safety
CONTRACTOR SAFETY PROGRAM

1. **PURPOSE.** This memorandum prescribes policies, procedures and responsibilities for the implementation of the Fort Sam Houston (FSH) Contractor Safety Program.
2. **APPLICABILITY.** This memorandum is applicable to all organizations seeking contract support in the performance of service, maintenance or construction projects on FSH property, to include Camp Bullis. It does not apply to purely administrative functions, such as clerical contracts; however, the contractors performing administrative functions do fall under the purview of the Occupational Safety and Health Administration (OSHA).
3. **POLICIES.**
 - a. All contractors working on FSH property will be required to comply with all safety requirements in their contractual agreement, to include the standards/requirements promulgated by the OSHA, the National Fire Protection Administration (NFPA), Department of Defense (DOD), Department of the Army (DA), and FSH. Additionally, there are specific procedures contained herein that must be followed.
 - b. When working within the Brooke Army Medical Center (BAMC) facility, the Joint Commission for Accreditation of Healthcare Organizations (JCAHO), and BAMC internal requirements must be followed. The point of contact (POC) within BAMC is the Facilities Management Branch, Logistics Division.
4. **RESPONSIBILITIES.**
 - a. Initiator/functional area personnel (requester of contractual services).
 - (1) The initiator/functional area personnel of a service, maintenance or other contract, will complete FSH Form 102-E, Health and Safety Checklist for Contracting Projects, to initiate any potential safety or health issues.

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(2) The form will be submitted along with the contract requirements to the U.S. Army Medical Command (MEDCOM), Contracting Center.

(3) One copy of the form will be provided to the Installation Safety Office (ISO) at the time of submittal to the Contracting Center.

(4) Participate in all pre-award/pre-performance and other conferences with potential contractors/awardee.

(5) Participate in the first day "Site Safety and Health Inspection," as appropriate.

(6) Periodically visit the work site to ensure safe and healthful work practices are taking place.

(7) Report all accidents, incidents, and near misses to the ISO and Contracting Officer Representative (COR), as soon as possible, but not later than 24 hours.

(8) Ensure all hazardous material used by the contractor has Material Safety Data Sheets (MSDS) available, and all residual of the material is disposed of in accordance with (IAW) current regulatory requirements. Also, verify this requirement is placed in all contracts.

(9) Report all safety and health violations to the COR.

b. MEDCOM, Contracting Center.

(1) The Contracting Officer (CO) or the COR will review FSH Form 102-E, to determine if specific requirements should be included in the contract concerning safety or health issues.

(2) Will not process contracts that do not have a FSH Form 102-E attached to the contract request.

(3) Include specific safety and health requirements in the contract, as appropriate.

(4) Participate in the first day "Site Safety and Health Inspection," as appropriate.

(5) Conduct pre-performance conferences that include safety and health personnel, as appropriate.

(6) Maintain a file that depicts the safety records of the various contractors, and provide this information, as required, for review at the Installation Occupational Safety and Health Council meetings.

(7) The *COR will respond to the results of the incidental oversight visits.

(8) The *COR will conduct routine safety and health inspections.

(9) The *COR will seek the assistance of the ISO and other support activities, such as the Fire Department or Preventive Medicine, as appropriate, involving specific safety, fire or health issues.

*In many cases, the COR will not be located within the Contracting Center, but within the using/requesting organization.

c. Installation Safety Office.

(1) Assist initiators/functional area personnel in filling out FSH Form 102-E, and in determining specific safety requirements.

(2) Participate in pre-award/pre-performance conferences.

(3) Participate in the first date "Site Safety and Health Inspections," as appropriate.

(4) Conduct unannounced incidental oversight visits of the work sites.

(5) Provide the initiator/functional area personnel (requester of contractual services) and the Contracting Center with information concerning the results of the incidental oversight visits.

(6) Establish and teach a FSH contractor safety class for vendors and contractors.

d. Building Manager.

(1) Will notify the ISO of any irregularities and/or safety hazards associated with the work being performed within their respective building.

(2) Will cooperate with the contractor on scheduling of the work, access, and parking.

5. CONTRACTOR REQUIREMENTS. It is FSH policy that a safe place, in which to work must be provided at all times, with emphasis on prevention of accidents. All FSH employees and other employer (contractor) personnel are required to conduct themselves in a safe manner. All work undertaken must be performed in a safe manner to eliminate injury to employees and prevent property damage. The FSH Occupational Safety and Health (OSH) manager will enforce this safety program through the COR. Any unsafe conditions must be corrected as they might occur. It is every contractor's and employee's responsibility, as well as moral obligation, to do all that is possible to achieve safe job conditions. All contractors shall wear hard hats during construction work where damage from overhead objects is possible. All contractors are required to use all necessary protective equipment as required by the individual job task at hand. Failure to comply with the safety program may result in denial of access to the installation and possible contract termination.

a. General.

(1) All contractors will attend the FSH contractor safety class prior to working on FSH.

(2) All contractors working on FSH property will meet with the appropriate member of the FSH Safety Office, prior to the beginning of the project, to discuss safe operating practices during service, construction, or maintenance. During this meeting, safety and hazardous material requirements and regulations will be discussed to ensure there are no misunderstandings

concerning the interpretation of the respective laws/regulations/standards. This meeting may be the pre-award/pre-performance conference or may be a separate meeting depending on the complexities of the work to be performed.

(3) Contractors will discuss fire and safety procedures/actions with their personnel on a daily basis depending on the type of work and the area in which the work takes place.

(4) The contractors, along with the initiator/functional area personnel, will meet, as appropriate, with the building manager of the building where the project/service is to take place. This may include areas adjacent to a particular building.

(a) Duty work times and any inconvenience that may be encountered, including utilities shutdowns, will be discussed.

(b) Requirements for non-duty hours access will be coordinated.

(c) Disruption of traffic flow and/or parking changes will be discussed.

(5) The contractor's on-site supervisors will participate in the first day "Site Safety and Health Inspections," as appropriate.

(6) All buildings on FSH are smoke free; therefore, contractor personnel can only smoke in the designated locations. At construction sites, the contractor must furnish their own metal container for the disposal of smoking material.

(7) Contractors will ensure all their employees comply with security regulation (AR 190-13, The Army Physical Security Program, and FSH Reg 190-13, Security of Specific Army Property), including badging, as appropriate.

(8) Contractors will report all accidents, incidents, and near misses to the ISO. The contractor will provide the necessary information to complete FSH Form 96-E, Accident/ Incident/Near Miss Report.

b. Commencement of project.

(1) Conduct an initial safety briefing to all personnel that includes potential hazards and appropriate safety requirements.

(2) Ensure all personnel understand emergency procedures.

c. Daily. After each day's work within an occupied building, clean work area before leaving job site. Leave nothing laying around that could cause potential harm to any building occupant or visitor. Outside work areas must be properly marked (i.e., caution tape) and traffic areas restored as feasible.

d. Termination/completion.

(1) At completion of project, remove all scrap materials and equipment from the building or job site before leaving.

(2) Contact the building manager and COR for a final job site approval before leaving the premises at completion of project.

6. FIRE PROTECTION.

a. If construction conditions are deemed to interfere with the fire alarm system, the appropriate smoke/duct detector(s) must be by-passed out of service, before any construction takes place. The contractor, building manager, and initiator/functional area personnel, must ensure coordination has been effected with the Fire Department to by-pass fire devices in the work area before construction, and placed back in service at the end of the activity. Occupants will be notified of any deficiencies in the fire alarm system, as well as when the fire alarms are restored and deficiencies corrected.

b. When performing work within BAMC healthcare facilities, Interim Life Safety Measures (ILSM) will be implemented as appropriate, and totally adhered to.

c. Smoke detectors in construction areas are to be protected from dust, dirt and any construction debris.

d. Any sprinkler heads located in the construction area should be protected from dust, dirt and any construction debris. Particular care must be taken during demolitions to preclude foreign objects from coming in contact with the sprinkler head which could cause the discharge of water.

e. Any time welding, cutting, soldering or brazing is to be done, a Hot Work permit must be obtained from the FSH Fire Department, 221-2727. Permit may be issued for more than 1 day, with a maximum of 30 days during construction projects.

f. During projects, any time a path of egress, i.e. an exit corridor, hallway or stairwell is altered, the ISO or appropriate FSH fire inspector must first be consulted to make sure all paths of egress are still usable for the occupancy in the area under construction or alternative provisions are made.

(1) The OSH manager, fire inspector and building manager, should be in agreement on an alternate path of egress or exit, before construction begins; however, the final authority having jurisdiction is the Fire Department.

(2) Alternative exit paths of egress must contain fire extinguishers and exit signs, depending on the type of construction project.

(3) The fire extinguishers and exit signs must be provided by the contractor.

g. The building manager must provide a path of travel plan for the contractor throughout the facility during construction projects.

(1) The contractor is to use the designated path for entering and leaving the facility on a daily basis.

(2) The contractor is to use the designated path for removal of demolition debris from the construction area.

(3) The contractor is responsible for informing the building manager and the Directorate of Public Works (DPW) any time utility services need to be interrupted during a construction or maintenance project.

(4) Building managers and DPW need at least 14 days notice before any utility services are interrupted. This notice is needed so it can notify those departments affected by the interruption or shutdown of utility services.

(5) After the work affecting the utility shutdown is completed, the contractor, building manager, and DPW, will work together on restoration of utilities.

h. Fort Sam Houston Reg 420-5, Fire Prevention and Protection, should be consulted for additional information.

7. WELDING, CUTTING OR OTHER HOT WORK.

a. Any time welding, cutting, soldering or brazing is to be done on FSH, a Hot Work permit must be obtained from the FSH Fire Department, 221-2727. Permits may be issued for more than one day, with a maximum of 30 days during construction projects.

b. Notify the building manager, DPW, and the Fire Department, to take action as indicated below.

(1) The fire alarm system in the area must be programmed out of service during the welding, cutting, soldering or brazing.

(2) A fire watch must be present at all times when open flames are used, and must remain posted for a minimum of 30 minutes after the work is completed.

(3) At the end of the 30 minutes, the fire alarm system will be re-set by the Fire Department.

(4) The NFPA 241, Construction, Alterations, and Demolition Operations, contains additional requirements that must be followed.

(5) The contractor shall furnish its own portable fire extinguisher.

c. Notify the fire inspector/OSH manager to inspect the location of the proposed work.

d. Fort Sam Houston Memo 385-14, Hot Work Permit, should be consulted for additional information.

8. HAZARD COMMUNICATION.

a. The goal of the OSHA Hazard Communication (HAZCOM) standard is to create a safer and healthier work site for everyone. When working with chemicals, all workers have the right and need to know what they are, the associated hazards, and how to protect themselves.

b. An inventory of all hazardous chemicals or materials used in the performance of the work must be provided to the building manager and supervisor of the workplace, and the FSH ISO.

c. Copies of the MSDS for all hazardous chemicals or materials must be on site.

d. If special spill control and/or clean-up procedures are required, the contractor must have the equipment and trained personnel to perform the functions as necessary.

e. All contractor personnel are required to have HAZCOM training, if they work with hazardous chemicals, in accordance with 29 CFR 1910.1200, Hazard Communication.

f. A copy of the inventory and MSDS of hazardous chemicals will be made available to the contractor, if requested, prior to entry into an area within FSH.

g. Fort Sam Houston Reg 385-3, Hazard Communication Program, should be consulted for additional information.

9. ELECTRICAL SAFETY.

a. Many of the circuits within FSH activities, particularly the hospital, may be ground faulted. Therefore, the use of portable ground fault interrupters/ground fault circuit interrupters (GFI/GFCI) on these systems will cause the circuits to "trip." However, the circuitry should always be checked and a GFI/GFCI used, as appropriate.

b. The installation or removal of circuits/lines to a breaker box requires appropriate identification. If a circuit is identified during work but not labeled, the electrical "authority having jurisdiction" (FSH DPW) should be notified.

c. All electrical tools will contain ground plugs or be double insulated.

d. Employees working near exposed live circuits or parts shall be provided with and use protective shields, barriers or insulating materials.

e. Electrical Safety, FSH Memo 385-7, should be consulted for additional information.

10. LOCKOUT/TAGOUT.

a. Lockout/Tagout (LO/TO) procedures will be used when servicing, maintaining, installing or removing equipment, machines or lines.

b. Locking is the preferred method within the FSH activities.

c. The authorized personnel operating under LO/TO must be trained per 29 CFR, section 1910, subpart S, (Electrical).

d. Whenever LO/TO is used, the building manager and workplace supervisor will be notified so affected personnel can be alerted.

e. The ISO is the proponent for the FSH Memo 385-2, Lockout/Tagout. However, the various directorates and/or organizational elements have specific procedures as required under OSHA; therefore, appropriate coordination must be effected.

11. FALL PROTECTION.

a. The revised OSHA fall protection standard, 29 CFR, section 1926, subpart M (Fall Protection), became effective in February 1995, and other portions thereafter. Significant changes include the requirement to use full body harnesses in lieu of belts, demarcation barriers on roofs, and specific tie-off requirements.

b. All users of fall protection equipment must be trained in its use, to include limitations, inspection and maintenance. The training must be documented.

12. LADDERS.

a. All portable ladders must be inspected by the contractor prior to use, and those that fail taken out of service.

b. Fort Sam Houston facilities contain significant amounts of electrical equipment and systems; therefore, only insulated and/or non-conductive ladders should be used.

c. All ladders will be of sufficient length to all access areas without excessive stretching and without standing on the top step or rest top.

d. Leaning ladders will be tied off if used for long periods of time, to gain access or extended work from the ladder.

e. The 4 to 1 ratio (height to distance) from vertical will be maintained. If the ratio cannot be maintained because of space limitations, then a different size ladder will be used.

f. Three point contact must be made with the ladder during climbing at all times. Tools and equipment should be raised and lowered by means other than carrying that interferes with three points of contact.

g. The requirements in 29 CFR, subpart X (Stairways and Ladders), will be adhered to.

13. RESPIRATORY PROTECTION.

a. It must be recognized that respiratory protection is a form of personal protective equipment and its use is the last desirable control mechanism within the hierarchy of controls. Therefore, only when the other controls (elimination/ substitution, engineering, and administrative) are not feasible, respirators will be required to eliminate an exposure.

b. When respiratory protection is required, the contractor shall have a respiratory protection program and assign a responsible person to ensure that appropriate equipment is provided and used.

c. The program must include the following program elements: Written policy, written procedures, administrator, selection criteria, medical evaluations, training, fit testing, inspection/maintenance, cleaning/storage, exposure surveillance, and program evaluation.

d. Fort Sam Houston Memo 385-3, Respiratory Protection, should be consulted for additional information, as well as 29 CFR, section 1910, subpart I (Personal Protective Equipment).

14. HEARING CONSERVATION.

a. When entering an area that requires hearing protection or while assigned to a task that requires hearing protection, use the appropriate hearing protective equipment, such as ear plugs or ear muffs.

b. Individuals who are exposed above the criteria specified in 29 CFR 1910.95, must be included in a Hearing Conservation Program that includes all of the required elements.

15. CONFINED SPACE.

a. Before entering a "permit required confined space," notify the FSH OSH manager for coordination with the FSH Fire Department to initially monitor for any potential hazards. The on-going monitoring and monitoring for other confined spaces is the responsibility of the contractor.

b. A copy of the contractor's written Confined Space Program must be on site, and documentation that shows entrants, monitors, and entry supervisors have been appropriately trained in accordance with 29 CFR, section 1910.146 (Permit Required Confined Spaces), and FSH Reg 420-8, Permit Required Confined Space.

c. Specific instrumentation for the potential hazard must be available to monitor the confined space.

d. Non-entry rescue is the most desired. All equipment must be available outside the entrance to the confined space to perform confined space rescue.

e. Contractors must supply their own trained rescue personnel.

16. HEAT RELATED INJURIES.

Avoid prolonged exposure to excessive temperatures that may produce symptoms of heat-related injuries. Work rest cycles and drinking of water must be stressed.

17. EXCAVATION AND TRENCHING.

a. Before digging, excavating, or trenching in or around FSH, a digging permit must be obtained from DPW, Engineering Services Branch, Work Control Section.

b. If utilities are in the area, they will be isolated through LO/TO. Additionally, if excavation or trenching creates a situation where a utility (pipe, electrical cable, etc.) is unsupported, it will be provided temporary support.

c. All requirements of 29 CFR, subpart P (Excavations), must be adhered to.

The proponent of this memorandum is the Directorate of Public Safety. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the Commander, U.S. Army Medical Department Center and School and Fort Sam Houston, ATTN: MCGA-DPS, Fort Sam Houston, TX 78234-5014.

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