



Section 3: Safety Program Administration

1. General Information

- 1.1 The purpose of the contractor safety program is to establish, implement, and execute a practical and effective method for preventing accidents, illnesses, and injuries and protecting the environment.
- 1.2 The *Contractor Safety Manual* will help contractors and their management to recognize, to evaluate, and to control hazardous activities or conditions within their areas of contract responsibility. EQ will not assume or relieve contractors of the responsibility for employee and public safety or regulatory compliance.
- 1.3 This manual defines how the safety program will be administered, identifies responsibilities, and ensures control of work area safety.
- 1.4 Relevant provisions of this manual apply to all contractors. Contracts signed with contractors and the provisions of this manual are intended to complement each other; however, in the event of a conflict between the provisions of this manual and the terms of a specific contract, notify the EQ project representative immediately.
- 1.5 The provisions of this manual apply to all EQ sites; however, each site may have specific safety rules and regulations that apply when a contractor performs work on that site. The EQ representative will define applicable site rules. Contractors are responsible for following the rules and regulations applicable to the site.
- 1.6 Visitors must be escorted by an EQ employee and must follow the safety directives of the employee.

2. Safety Program Administration

- 2.1 The effectiveness of the safety program depends on establishing and maintaining a safety culture through the participation and cooperation of employees and coordination of their efforts in carrying out the following basic responsibilities:
 - A. Plan and coordinate work to avoid personal injury, property damage, environmental risk, and the loss of production.
 - B. Establish and maintain a system for early detection and correction of unsafe practices and conditions.
 - C. Provide adequate protection of public and private properties and the environment and ensure the safety of the public.
 - D. Establish and conduct safety education programs.
 - E. Develop an emergency plan for the work
- 2.2 Safety Program Implementation
 - A. Contractors are responsible for establishing and implementing a safety program for their employees. This program will include maintaining and auditing safety performance for compliance with applicable federal, state, local regulations and

The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

with established safety and environmental requirements, including but not limited to the contractor's safety and hazard communication programs.

- B. Contractors are to conduct regularly scheduled safety inspections of the work being conducted by the contract and subcontract personnel. The scope or duration of work may regulate the frequency of these inspections.
- C. Contractors must take immediate corrective action when a violation of job safety, fire, or environmental safety hazard is observed.
- D. Contractors are to regularly review their safety performance. Failure to correct a problem may result in work stoppage in the related area, and work will not be permitted to resume until the problem is corrected. Work stoppages need to be communicated within EQ between the project manager and Environmental, Health and Safety (EHS) manager.
- E. If a contractor fails to correct the problem within a reasonable timeframe, EQ will typically provide written notification and then take corrective action. The cost will be the responsibility of the contractor.
- F. Contractors are required to administer their own safety activities and are responsible for the safety of their employees. If requested by EQ, contractors will submit a written copy or description of their company's safety program.
 - 1. The contractor's safety program must meet federal, state, and local regulatory requirements and be equivalent to or more stringent than EQ's program.
 - 2. Where the programs are in conflict or the contractor's program does not address an issue, the EQ safety program as defined in this manual will govern.
 - 3. If required by the project, contractors and their safety manager or designee must attend a pre-work safety conference with EQ prior to beginning work. The conference is to review procedures, forms, record keeping and reporting, and to ensure a clear understanding of the safety program relevant to the work being performed. The "Contractor Pre-Job Checklist" (QES-FM-071-ALL) will be reviewed during this meeting.

3. Contractor Duties and Responsibilities

- 3.1 Contractors are responsible for ensuring that their employees adhere to the directives of the safety program when performing work for EQ. The contractor will submit to the EQ representative a list of individuals and their respective responsibilities.
- 3.2 The contractor's responsibility as it relates to this manual cannot be delegated to subcontractors, suppliers, or others without written approval from EQ.
- 3.3 Contractors are required to designate a qualified safety manager who is knowledgeable in safety, health, environmental protection, and fire prevention. Contractors are also required to designate a competent person for certain tasks, such as scaffolding, fall protection, trenching, hazardous energy control (lockout/tagout).
- 3.4 If requested by EQ, contractors will submit a history of experience and qualifications for the person who is to manage the contractor's safety functions.

Contractor Environmental, Health & Safety Manual

- 3.5 Safety violations by contract employees constitute non-compliance with provisions of the contract and may result in immediate removal from EQ premises.
- 3.6 Contractors are to train their employees on the safety, health, environmental, and fire prevention requirements for the work they are to perform and enforce adherence to safe work practices and procedures.
- 3.7 Contractors are required to maintain a safety training program designed for employees. At minimum, such programs are to provide employees with information on the following topics:
 - A. Hazards present in their work assignment and surrounding area.
 - B. Personal protective equipment requirements.
 - C. Proper procedures for safe work and for reporting unsafe work conditions.
 - D. Waste disposal and environmental release requirements.
- 3.8 Contractors are responsible for planning and executing work according to the stated objectives of the safety program.
- 3.9 Contractors are to arrange for the proper use, maintenance, and repair of work equipment.
- 3.10 The contractor's manager, supervisor, or other person in charge who directs or allows employees to perform unsafe acts or to work in or around unsafe conditions will be immediately removed from EQ premises.
- 3.11 EQ requires that the following functions are assigned. More than one function may be assigned to an individual.
 - A. The **manager** is responsible for implementing and maintaining the safety program.
 - B. The **supervisor** is responsible for implementing and maintaining the safety program for areas under the supervisor's control. Responsibilities include administration and coordination of the following activities:
 - 1. Thoroughly reviewing accident investigations and initiating corrective action.
 - 2. In the event of an accident, preparing and submitting a written report, and assisting in the investigation according to the requirements.
 - 3. Holding safety meetings.
 - 4. Reviewing safety performance and taking action as necessary within the areas of responsibility.
 - 5. Maintaining effective and prompt communication of safety matters.
 - 6. Monitoring compliance with established environmental and pollution control standards and regulations.
 - 7. Assigning duties to subcontractors, checking work areas, making housekeeping inspections (accompanied by a subcontractor supervisor), and keeping records of conditions found and corrective actions taken.

The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

8. Requiring employees to use personal protective equipment such as safety glasses, body harnesses, head and eyewear protection, and ventilation equipment.
 9. Maintaining effective communication of safety matters to employees.
 10. Instilling in personnel, by action, example, and training, an attitude toward safety so workers develop a better awareness of accident prevention.
 11. Assisting in the development and communication of safe work procedures for unusual or hazardous operations.
 12. Maintaining compliance with the requirements of federal, state, local, and other agencies, and with the requirements of the general contractor's and EQ's safety manuals.
- C. The ***contractor's safety manager*** serves as a technical advisor to the contractor's management on health and safety planning, training, and problem resolution. The responsibilities associated with this position include the following:
1. Apply policies, procedures, and work practices to promote and administer assigned functions to aid in this responsibility.
 2. Administer and coordinate medical and emergency first aid services and programs.
 3. Monitor compliance and mandatory safety and health laws, regulations, standards, and codes, and audit and document the results in order to eliminate or control hazards which could contribute to or result in an occupational injury or illness.
 4. Investigate work related injuries, illness, and incidents that involve or could involve actual or potential risk to personnel and property, maintain adequate records of pertinent data, and compile the required reports of occupational injuries and illness.
 5. Administer and coordinate the contractor's alcohol and drug abuse program.
 6. Approve the "Safety Procedure Modification Form" (QES-FM-091-ALL) when its use is required.
 7. Respond to EQ site safety and audit findings with written corrective actions to address identified concerns.

4. Subcontractor Duties and Responsibilities

Subcontractor management, supervisors, and safety personnel have the same duties and responsibilities as the contractor as described in Part 3, *Contractor Duties and Responsibilities*, with the exception that the cost will be assumed by the general contractor or contract manager.

5. Employee Duties and Responsibilities

- 5.1 Contract employees must not knowingly work in unsafe surroundings or in an unsafe manner.
- 5.2 Contract employees are responsible for learning, understanding, and following the rules and regulations applicable to the work and for reporting observed or anticipated hazards to their supervisor(s). If such hazards are not addressed, employees must report the conditions to the EQ representative.
- 5.3 Contract employees will be issued a pocket reference handbook entitled "Pocket Environmental, Health and Safety Guidelines for Contract Employees" (QES-CM-003-ALL). This handbook outlines general safety procedures. Employees are required to acknowledge that they have received training on the EQ handbook and that they will comply with the requirements for working at EQ by signing the last page of the handbook, removing it from the handbook, and submitting it to the EQ representative.

6. EQ Representative's Responsibilities

- 6.1 The EQ representative's primary responsibilities are listed below:
 - A. Be familiar with the *Contractor Safety Manual* and understand the requirements established in it.
 - B. Reference EQ policies and the *Contractor Safety Manual* in contract documents.
 - C. Issue approvals and resolve problems in accordance with EQ policies.
- 6.2 The EQ representative is to emphasize that the manual is:
 - A. Applicable to all contracts.
 - B. Applicable to all EQ sites.
 - C. A consolidated approach to safety.
 - D. An expectation of minimum safety performance by all contractors.
 - E. Intended to increase requirements as risks increase.
- 6.3 The EQ representative is to provide feedback to EQ EHS personnel.
- 6.4 The EQ representative is to monitor the contractor's performance for compliance with the manual.
- 6.5 The EQ representative is to emphasize the following contractor responsibilities, as applicable:
 - A. Ensure safety of all contractor activities and contract employees.
 - B. Establish and implementing a safety program.
 - C. Conduct safety inspections.
 - D. Ensure that contract employees comply with the safety program.

- E. Designate a qualified safety manager.
- F. Provide adequate safety training.
- G. Transfer or provide for these same duties and responsibilities to subcontractor management, supervisors, and safety personnel.

7. Reservation of Rights

- 7.1 EQ reserves the right to interpret, to revise, or to depart from safety policies and procedures at any time without notice. EQ also reserves the right to dictate safety standards during the course of a contract as necessary in the interest of safety.
- 7.2 Compliance with this safety manual or EQ's policies, procedures, and standards does not confer or entitle contractors or their employees to any benefits, rights, or privileges that go to EQ employees by virtue of their status as employees of EQ.
- 7.3 Nothing in this safety manual alters contractor or contract employee status or infringes upon the rights of either.

8. Disciplinary Action

- 8.1 The progression of disciplinary action will be determined by the severity of the incident and other mitigating factors. The emphasis is to be on the desire for EQ to promote safety through a cultural shift and not through enforcement activities. However, non-compliance with safety requirements may result in work stoppage if an immediate threat to safety exists.
- 8.2 Although the disciplinary process is written for the individual, the failure of a contractor to take corrective action may lead to the same penalties being placed against the contractor.
- 8.3 There will be no penalty or retaliation for reporting any safety or environmental incident, but the reporting of an incident will not protect the individual from consequences related to the incident.
- 8.4 Disciplinary actions will progress as follows, under ordinary circumstances:

- A. Documented Verbal Warning**
- B. Written Warning with Corrective Action required**
- C. Dismissal from EQ premises for the duration of the project assignment**
- D. Ban from working on EQ premises and contract termination.**

- 8.5 Temporary or permanent removal from EQ premises may occur if the contractor's manager, supervisor, or person in charge of the work being performed requires, requests, allows, or condones employees to work in or around unsafe acts or conditions or violate environmental permits or regulations.
- 8.6 Immediate and permanent removal from EQ premises may occur if a contractor's manager, supervisor, or employee engages in any of the following activities:
 - A. Openly exhibits disregard, defiance, or disrespect for the safety program.

Contractor Environmental, Health & Safety Manual

- B. Knowingly falsifies investigative documents or testimony involving an investigation.
- C. Participates in fighting, violence, threats of violence, theft, or destruction of property.
- D. Violates established safety rules, regulations, or codes that endanger themselves or others.
- E. Violates established environmental rules, regulations, or procedures that endanger the environment.