WILLIAMS COLLEGE WILLIAMSTOWN, MASSACHUSETTS 01267

Safety and Environmental Compliance
Manager of Safety & Environmental Compliance
60 Latham Street
Tel. (413)597-2406
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To: Contractors 7/24/18
From: The Office of Safety and Environmental Compliance
Re: Regulatory Contractor Guidelines

In an effort to ensure the safety of employees, students and the environment, the following regulatory guidelines must be followed when working on campus. Upon review of this document, please sign and date the last page and return it to the Office of Safety and Environmental Compliance, Attention: Heather Main.

1. **Asbestos Assessment** – If the scope of your project includes demolition or renovation work contact the Project Manager to schedule an asbestos assessment. MassDEP's regulation requires a survey of the area to be affected by a demolition or renovation project to be conducted before the project starts, to identify all material containing any amount of asbestos that is present in the facility or facility component to be demolished or renovated. Please note that there is a similar requirement in the federal Asbestos National Emission Standards for Hazardous Pollutants (Asbestos NESHAP).

2. **Lead paint** - For any work done in college rentals housing, the Safety & Environmental Compliance Office must be contacted prior to starting to determine the lead status of that property. Levels of training required for work within rental housing will be determined by the status of the lead compliance within a property. For work on non-residential properties, inquiries should be made to your Project Manager regarding the status of lead paint in/on the building. All OSHA lead safe guidelines must be followed and the disposal of lead debris is done in accordance with all local/state and federal laws.

3. **Hot Works** - Any work done on campus that generates heat, sparks, or open flame (including, but not limited to, using a heat gun, torch, welder, or grinding wheel in a way that sparks or heat are created) will be required to have a "Hot Works Permit." The permits can be obtained from the Facilities Office of Safety and Environmental Compliance
   Only contractors who are current on the Annual Training required by the State of Massachusetts for Hot Works, and hold a current Certification Number, will be permitted to do Hot Works on campus. Additionally, a copy of the current certification card shall be provided to the Facilities Office of Safety and Environmental Compliance, prior to the commencement of any Hot Works.
   The GC or OPM on construction sites shall administer the Hot Works program on their site, and will be responsible for obtaining the permits, verifying the safety of the jobsite for hot works as the "Permit Authorizing Individual" prior to the commencement of any hot work on-site, and coordinating the Fire Watch.
   Additionally, a Hot Works Permit must be obtained for the job from the Williamstown Fire Department, located at 34 Water Street. Consult with the Williamstown Fire Chief for the duration of their permit, and the associated Fee.

4. **Refrigerant Containing Equipment** –The enclosed policy pertains to work on existing and the installation of new equipment that contains refrigerant. In particular, note reporting requirements when adding or removing refrigerant.

5. **Oil Containing Equipment/ Oil to gas conversions** – The enclosed policy addresses installation and removal of oil containing equipment.

6. **Fluorescent Bulbs** – All fluorescent bulbs that are being removed during a renovation must be recycled. The bulbs are considered universal waste and must be boxed and labeled accordingly. Please contact our office for further instruction on the recycling of the bulbs.

7. **Confined Space Entry -** If the scope of your project includes the need to enter a confined space, you must first go through our Confined Space Awareness Training with Williams College Safety and Environmental Compliance staff. All those entering confined spaces must take part in the awareness training, at-least once annually. Please contact the Office of Safety and Environmental Compliance to set-up a training date and time.

8. **Spills**- All spills, (petroleum, chemical, & sewer breaks/backups, etc.) regardless of quantity, must be reported immediately to the Office of Safety and Environmental Compliance.

9. **Compressed Gas Cylinders -** The enclosed policy addresses the use and storage of compressed gas cylinders.

10. **On-Site Accidents** – The enclosed policy addresses the procedure to follow when 911 needs to be activated for an injury/accident on the job site.

Please read through the guidelines and pay close attention to the items that must be submitted prior to the start of work (refrigerant work) and feel free to contact the Office of Safety and Environmental Compliance or the Williams College Project Manager if you have any questions or problems

Contacts

Frank Pekarski – Mgr. of Safety and Environmental Compliance 413-597-2406/ cell 413-441-2808
Paul Ethier – Fire Safety Inspector 413-597-3967/ cell 413-822-1731
Heather Main – Safety and Environmental Compliance Coordinator 413-597-3003/ cell 413-464-4702
Kory Richardson – Safety Assistant – 413-597-4110/ cell 413-844-5888

Williams College Regulatory Contractor Guidelines for Refrigerant Containing Equipment

Contractor Requirements

The Contractor shall be responsible and accountable for compliance with the EPA Clean Air Act (CAA) Section 608, 40 CFR Part 82 and any state and local codes for all refrigerant-related work. Contractor shall ensure that all contractor employees are made aware of these practices prior to beginning work on refrigerant containing equipment.

The Contractor shall provide only proper level EPA certified technicians using EPA certified and registered recovery/recycling units to perform work on new and existing Williams College refrigerant equipment.

The Contractor shall submit the following information to the Office of Safety and Environmental Compliance prior to starting any work.

- ☑ A list of all service technicians' names and EPA certification numbers and level of certification. (copies of EPA Certification Cards)
- ☑ A list of all recovery/recycling units to be used and a signed statement that an EPA Recovery Unit Acquisition Certification form has been sent to the EPA (a copy of the form is acceptable).

Documentation and Record-Keeping

The Contractor shall provide service records (which can be obtained from the Office of Safety and Environmental Compliance) with all required information being forwarded to Office of Safety and Environmental Compliance.

- ☑ Manufacturer and Model Number
- ☑ Serial Number
- ☑ Location of Equipment
- ☑ Refrigerant type and unit charge
- ☑ Date of service or installation
- ☑ Service, repair or disposal description
- ☑ Quantity of refrigerant added
- ☑ Quantity of refrigerant removed, recovered, recycled, reclaimed or disposed of
- ☑ Quantity of lubricant disposed of, and method of disposal
- ☑ Detailed information on any leaks discovered and repaired
- ☑ Name(s) of EPA certified service technicians who performed work
- ☑ EPA Certified and registered recovery/recycling units used on equipment

Consequences for Non-Compliance

Williams College shall have the right to stop work under any contract at any time if the work fails to meet the EPA regulations.

Williams College shall have the right to withhold payment for services if the proper documentation of refrigerant work or related work is not completed.

New Equipment Guidelines

All new equipment installed shall utilize non-CFC refrigerants. The goal is to limit the number of new alternative refrigerants utilized on site. Maintenance and inventory costs will be reduced by standardizing and limiting refrigerant types. The College Mechanical Maintenance Supervisor and Mechanical Trades Foreman shall work as a team to determine what refrigerants are presently in use and set standards for all future refrigerant equipment purchases. In addition, further maintenance and parts inventory cost savings can be achieved by standardizing on equipment manufacturers. Service history and existing parts inventory shall be considered in this analysis and the recommendations presented to the Project Managers.

New Equipment Leak Testing

All new equipment including: packaged equipment – factory charged, field charges, split systems or field-constructed systems with field installed refrigerant piping shall be leak tested prior to or during startup. The leak testing process shall utilize the appropriate method determined by the College Mechanical Trades Foreman and shall be witnessed by the College Mechanical Trades Foreman or a designated Mechanical Trades technician.

The Mechanical Trades Technicians and Safety and Environmental Compliance Coordinator shall work with Williams College Project Managers and contractors to assure all new equipment is properly tagged and equipment data is provided to be entered into RCM.

New equipment shall be leak tested during startup and a report given to the Safety and Environmental Compliance Coordinator. If detected, leaks shall be repaired before acceptance of a system. A thirty-day follow-up leak test shall be performed on systems which have had a leak detected during startup procedures.

Leak Testing Procedure

All new equipment including: packaged equipment – factory charged, field charged, split systems or field constructed systems with field installed refrigerant piping shall be leak tested during startup. On new equipment, leak testing should be performed with nitrogen set at a minimum of 150 psi and left standing for a predetermined amount of time.

Note – In order to leak test with an electronic detector, a trace gas must be mixed with the nitrogen. This is a last resort method of leak testing.
The contractor or installing party shall submit a RCM Service Order form with notes verifying the leak testing and results to the college Safety and Environmental Compliance Coordinator.

If a leak is detected the following shall occur:

1. Notify the Project Manager
2. Document the leak on a RCM Service Order input form.
3. Repair the leak.

4. Document the action and procedures taken on the RCM Service Order Form.
5. Leak test to verify the leak was repaired.
6. Schedule and provide a 30-day follow-up verification leak test with the Project Manager.
7. Document follow-up leak testing on the RCM Service Order Form.
8. Repeat the above process if follow-up leak is detected.

Demolition Procedure for Equipment Removed By Contractors

It is a requirement for the Contractor to provide names of EPA certified technicians with their certification number and certification level who will be performing the refrigerant recovery and equipment demolition. An RCM Service Order Form shall be filled out by the certified contractor technician and forwarded to the college Safety and Environmental Compliance Coordinator.

> Note: *If a properly certified contractor technician removes the refrigerant, the unit is tagged as such and the RCM Service Order Form has been submitted, then a non-certified person may perform the actual demolition.*

In all cases the Contractor's technician shall tag the unit that the refrigerant was removed. Tags can be obtained from the Office of Safety and Environmental Compliance.

ENVIRONMENTAL SAFETY NOTICE

ENVIRONMENTALLY HARMFUL REFRIGERANTS AND OIL HAVE BEEN REMOVED FROM THIS UNIT IN COMPLIANCE WITH SECTION 608 OF THE CLEAN AIR ACT

REMOVED BY: (PRINT)_____

COMPANY NAME: (PRINT)_____

ADDRESS: (PRINT)_____

_____

TELEPHONE:_____DATE:__/__/__

SIGNATURE_____

1. The Contractor, in contractor provided refrigerant recovery cylinders shall take ownership of the recovered refrigerant and transport off site to a proper disposal company or certified reclaimer (**unless otherwise directed by the Project Manager or Office of Safety and Environmental Compliance)**. The quantity removed from each unit and from the site shall be documented on the RCM Service Order Form used for the actual recovery procedure.

Williams College Regulatory Contractor Guidelines for Oil Containing Equipment/ Oil to Gas Conversions

Oil Containing Equipment

A. Any time a new piece of equipment that contains oil is installed the following information must be forwarded to the Office of Safety and Environmental Compliance:

1. Location of new equipment
2. The amount of oil in the equipment
3. Location of floor drains in proximity to the equipment
4. Whether secondary containment is required. Verification that secondary containment has been provided, if required.
5. Units with a capacity of more than 55 gallons must be listed in our SPCC Plan in accordance with EPA requirements.

Removing Equipment Containing Oil

A. When an existing piece of equipment is removed the following must be reported to the Office of Safety and Environmental Compliance:

1. The location of the old equipment.
2. Identify the Contractor who will be removing the oil.
3. Location of the oil disposal site.
4. A copy of the waste disposal manifest must be forwarded to the Office of Safety and Environmental Compliance.

Oil to Gas Conversions

The following steps must be followed:

1. Contact the Office of Safety and Environmental Compliance and make them aware the conversion is taking place.
2. Review asbestos files by contacting the Office of Safety and Environmental Compliance before removing the boiler or making any penetrations in the building. If asbestos is present, a licensed asbestos contractor must be used to remove the boiler and make penetrations. This must be coordinated through the Office of Safety and Environmental Compliance.
3. Notify the oil dealer to discontinue delivery before the project starts.
4. Determine where surplus oil from the oil tanks is going to be moved to prior to starting the job.
5. Oil fill(s) must be properly capped and tagged out of service as soon as the project begins. A proper, secure tag must be affixed to the fill pipe(s) to ensure an accidental fill does not occur.
6. Once oil tanks have been removed, remove the red signs on the exterior of the home near the oil fills.
7. Oil tank(s) must be removed within 24 hours of the firing of the new heating system.

8. Surplus fuel can only be transferred via a properly permitted and licensed fuel trailer. Contact the Safety & Environmental Compliance office for use of their trailer.
9. Tank removal permits and tank disposal slips must be returned to the Office of Safety & Environmental Compliance within 10 days of completion of the project– 60 Latham Street Williamstown, MA 01267, attention Heather Main.

Questions: Please contact Frank Pekarski- (413)597-2406, Heather Main – 597-3003 or Paul Ethier – 597-3967

Direct Vent Applications

In an effort to minimize nuisance odor complaints from building occupants and pedestrians, efforts should be made to locate the vent (where possible and allowable by code) away from building entrances or walkways.

Williams College Regulatory Contractor Guidelines for Spills

IMPORTANT: ALL MAJOR SPILLS MUST BE REPORTED TO 911 IMMEDIATELY

Spill or Release of Petroleum based Products or Chemicals

1. **All Spills** must be reported to Security and the Office of Safety and Environmental Compliance immediately regardless of quantity.

The Contractor must:

2. Take measures to stop the release if safe to do so (e.g., shut valves, stop transfer operations).
3. Immediately confine leaked material with absorbents, sand or by other means if such actions can be done so safely.
4. Identify the product/material which is involved in the spill. Get the SDS from the on-site file.
5. If necessary, outside contractors may be called in for remediation of the spill site.

IMPORTANT NOTE: A spill of 10 or more gallons of oil must be reported to the MA DEP within **two hours**. Serious fines and penalties can be incurred if this is not done. All notifications to the DEP will be made by the Office of Safety and Environmental Compliance.

Security (413)597-4444
Safety and Environmental Compliance (413)597-2406

Sewer Release and Backup Protocol –

Please contact the Office of Safety and Environmental Compliance for all sewer releases. The Office of Safety and Environmental Compliance will provide notifications to the DEP and Town.

1. Any release that reaches a storm drain must be reported to the DEP immediately but no later than 2 hours after the release/backup has been identified. Releases that occur inside or outside of a building and may place the public at risk of exposure must also be reported to the DEP within the same time constraints.
2. Notify the Town of Williamstown
3. As a follow up to the notification to the DEP, a Sanitary Sewer Overflow/Bypass/Backup Notification Form must be filled out and sent within 24 Hours of the release or backup to the DEP.

After Hours Spill or Release Notification

NOTE: For a release during non-working hours please contact Campus Security and they will contact someone from the Safety and Environmental Compliance office to complete notifications. If for some reason they are unable to contact someone from our office, please contact the MA DEP and follow up with notification to the Office of Safety and Environmental Compliance.

Department of Environmental Protection
Western Regional Office
436 Dwight Street
Springfield, MA 01103
Phone (413)784-1100

24 hour emergency response number 1-888-304-1133
Fax (413) 784-1149

Williams College Regulatory Contractor Guidelines for Compressed Gas Cylinders

All propane cylinders must be stored outside. Under no exceptions should propane cylinders, full or empty, be brought inside a building.

Restrain compressed gas cylinders securely with a chain, belt, or stand at all times to prevent them from falling over. Secure the cylinder above its center of gravity (~2/3 up the cylinder). If the chain is too high or too low, it will not hold the cylinder if it starts to fall.

Whenever the gas cylinder is not in use or is being moved, the valve cap must be securely attached and at all other times unless a regulator is attached to the cylinder. Regulators may only be left on the cylinder when it is in use.

Flammable gases must be stored separately from oxygen and combustible materials by at least 35 feet.

Williams College Guidelines for Emergency Response to Accidents

In the event of a construction accident that may involve injuries and transport to the hospital, the following process is to be followed:

1. Call 911. Provide name of caller and company, address of accident and any pertinent information such as number hurt, location to best access the site, etc. If there are sufficient people to manage the incident, stay on the line with the 911 dispatcher until a police cruiser responds. The dispatcher is located in the Williamstown Police Department but will also dispatch fire and ambulance vehicles as needed.
2. Call Security – 597-4444. The 911 dispatcher is supposed to contact them but this provides an additional backup as Security can help direct the responders to the site.
3. Call Williams College Project Manager
4. Call the Office of Safety and Environmental Compliance
5. Person of authority should meet the police cruiser. The police cruiser will almost always be the first emergency vehicle on site. They are certified first responders trained in basic first aid, CPR and AEDs and can provide immediate medical support. They are also in radio contact with other emergency vehicles and can provide appropriate guidance as to requirements and location. They will be filing a report so they must be apprised of all pertinent information.

A procedure has been established with Williamstown Fire Department and Northern Berkshire Ambulance, for response to injuries within an Asbestos Containment or De-leading Containment:

1. Cal 911. Tell the dispatcher that the injured person is in an asbestos containment/lead abatement area and the responders should expect the potential for asbestos/lead contamination and that the Williamstown Fire Department and Northern Berkshire Ambulance (NBA) must be notified jointly.
2. Williamstown Fire Department (WFD) will be responsible for leading the response effort on-site. WFD and NBA are the only groups properly trained and equipped to respond within the containment area, with WFD entering first. No other non-abatement personnel may enter the containment area.
3. Call Williams College Security – 413-597-4444 to inform them 911 has been activated. The campus officers are not allowed to enter the abatement area, but can provide crowd control and other vital functions.
4. Cal the Williams College Project Manager
5. Call the Office of Safety & Environmental Compliance – 413-597-2406

I have read and shared the Williams College Regulatory Contractor Guidelines with all contractors and subcontractors involved with the noted project. We will comply with the Regulatory Contractor Guidelines as outlined above.

Project Name: _____

Name (printed): _____

Title: _____Company _____

Signature _____ Date: _____

Please return to The Office of Safety and Environmental Compliance, Attention: Heather Main