



DOCUMENT TYPE: Guidance

DOC. NO.:
GD-SFTY-0003

SUBJECT: Contractor Safety Verification
Program

REV.: 1

PUBLIC RELEASE

DISTRIBUTION

APPROVALS

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REVISION SUMMARY

REVISION	DATE	CHANGE	SECTION/PAGE
1	03/18/2024	Initial Release	All

Overview

It is the responsibility of the Virginia Spaceport Authority to ensure the safety of all workers conducting business at any of our facilities. Commencement of any and all work activities are permitted only if all workers have the proper training, equipment, and work conditions to accomplish the task(s) in a safe manner.



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1.0 Summary

The Virginia Spaceport Authority (VCSFA) will ensure that safe work practices are used by contractor personnel to provide for the control of hazards during operations such as lockout/tagout, confined space entry, welding, opening process equipment or piping, construction activities and general safety within our facility. We will ensure that, when selecting a contractor for any work on VCSFA leased, occupied, or owned property we obtain and evaluate information regarding the contract employer's safety performance, programs, and training to ensure that occupational safety and health policies have been established and are being followed.

1.1 Responsibilities

The Chief Safety and Quality Assurance Officer is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Safety Program Manager will monitor the basic elements in this program, and is the sole person authorized to amend these instructions.

2.0 Written Program

The Virginia Spaceport Authority will review and evaluate this standard practice instruction:

- On an annual basis.
- When changes occur to 29 CFR, EPA, FAA, or any other applicable regulation that prompts revision of this document.
- When facility operational changes occur that require a revision of this document.
- When there is an accident or close call that relates to this area of safety.
- When changes occur to any related document that prompts a revision of this document.
- Anytime the procedures fail.



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Effective implementation of this program requires support from all levels of management. This written program shall be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of the number of workers employed or the number of work shifts. It is designed to establish clear goals, and objectives.

3.0 Statement of Policy

This document establishes a screening process so that we may hire and use contractors who accomplish the desired tasks without compromising the safety and health of employees at this facility, as well as their own. The contractor must assure that contract employees are trained on performing the job safely, of the hazards related to the job, and other applicable provisions of the OSHA standards. The Lead Contractor is also responsible for any and all Sub-Contract employees and is expected to comply with this and all regulations that may apply. This instruction describes a systematic approach that must be used to evaluate contractor personnel conducting business at any Virginia Spaceport Authority owned or operated facility. This instruction provides requirements for screening contractors.

3.1 Initiation of Work

All contract employers shall be informed, prior to the initiation of the contractors' work at the site, of the applicable provisions of facility Emergency Action Plans and all other required information as regulated by relevant OSHA standards, particularly with Process Safety Management when applicable. This is accomplished during the Security led Virginia Spaceport Authority/MARS Facility Access Training and is also required for badging access to VCSFA managed properties.

4.0 Contractor Prequalification Policy

To assure that contract employees follow the safety rules of the facility, including safe work practices required by relevant regulations and policies, the following criteria and information relating to the contractor shall be reviewed and must be complied with before any contract for work on site is approved:

- Information relating to contract employers' safety performance and programs (Accomplished using Contractor Safety Verification form).
- Review and acknowledgement of VCSFA Site Safety and Health Plan, and VCSFA Emergency Action Plan that includes information of known potential hazards related to each VCSFA property and applicable provisions of the facility's emergency plans. (Notated on Contractor Safety Verification form).
- Acknowledgement and review of VCSFA Facility Access Plan with details to control the entrance, presence and exit of contract employers and contract employees in covered process areas, or other areas where known hazards exist (Notated on Contractor Safety Verification form).
- Evaluation of contractor employer performance in complying with specific safety standards.
- Contract employee injury and illness logs related to safety standards; and
- A list of unique hazards presented by contractors' work or potential hazards generated by the contractor in the workplace that are reported to this employer, accomplished during



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site and project meetings between contractor and VCSFA Construction or Operations Project Team. This is presented to VCSFA by submitting a Contract Work Site Safety Plan form.

5.0 Routine Contractor Compliance Inspections

Routine contractor compliance inspections will be conducted periodically when contractors are on site. The inspection will be conducted to discover conditions and work practices that do not conform to best management practices regarding contractor safety compliance.

5.1 Inspection Intervals

The Safety Program Manager will coordinate inspection dates and times with all assigned inspection members. The Safety Program Manager or designee will conduct inspections on a regular basis while work is in progress. Intervals between inspections can be increased if the inspection history shows negligible deterioration or shortened where experience shows this is necessary to prevent danger.

5.2 Inspection Findings

Inspection findings of significance shall be reviewed and eliminated immediately with contract company onsite during the inspection, with the VCSFA Construction Project or Program Manager and the contractor designated worksite representative (i.e., Site Supervisor). All findings will be documented, sent to the contract company with the responsibility for mitigation and solutions. Final inspection report will be reviewed with all items to be handled within a timeframe agreed upon by all parties.

6.0 Safety Meetings

Contractor safety issues will be included in the agenda of Operations Contractor Projects and Construction Project Meetings during times when contractors are used in their departments. Department heads will ensure that selected contractor Safety Verification Program information is transmitted to supervisors for inclusion in meetings. Supervisors may ask the Safety Program Manager or designee to provide contractor safety briefings as required.

7.0 Weekly Contractor Safety Meetings

Weekly safety meetings will be a common best practice for all contract companies and include sub-contract representatives when applicable. These meetings will be conducted by a designated individual by the **lead** contract company considered the SME and has the wealth of knowledge of the VCSFA facility or property where work will be accomplished. Minutes of these meetings and roster shall be provided to the Virginia Spaceport Authority upon request, no later than five (5) working days after said meetings.



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8.0 Specific Safety Standards Requiring Contractor Safety Compliance

The following standards will be reviewed if the contractor engages in activities that could fall under the jurisdiction of the specific standard:

29 CFR 1910.119	Process Safety
29 CFR 1910.120	HAZWOPER
29 CFR 1910.134	Respiratory Protection
29 CFR 1910.146	Confined Space
29 CFR 1910.147	Lockout Tagout
29 CFR 1910.178	Powered Industrial Trucks
29 CFR 1910.252	Welding Safety
29 CFR 1910.1200	Hazard Communication
29 CFR 1926.500	Fall Protection
29 CFR 1926	General Provisions

9.0 Contractor Training Compliance

All contractors will ensure their employees are properly trained about the known fire, explosion, toxic hazards, uncontrolled energy, confined spaces, and any other hazard related to their jobs.

1. Contractors used by this employer are required to provide training to their employees in the work practices necessary for their specific job. Additionally, where regulatorily required, the contractor in coordination with VCSFA, will conduct process hazard analyses to identify, evaluate and control processes involving highly hazardous chemicals.
2. Whenever there are outside contractors present, coordination with VCSFA is mandated. For example, VCSFA will inform the contractor (and vice versa) when equipment cannot be touched, re-energized, or restarted. This is accomplished also by using tags with specific information and deficiencies notated and placed on the equipment.
3. Based on interviews with the contractor's employer, VCSFA will ensure, through periodic evaluations, that the training provided to contractor employees by the contractor employer meets OSHA requirements. The burden of training contractor employees remains with the contractor employer.
4. Contractors used by VCSFA must:
 - 4.1. Assure their employees are trained in safe work practices needed to perform the job.
 - 4.2. Assure their employees are instructed in the known potential fire, explosion, or toxic release hazards related to the job and the applicable provisions of facility emergency plans.
 - 4.3. Document the required training and the means to verify their employees have understood the training and provide to Virginia Spaceport Authority representative, when requested.



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4.4. Assure their employees follow the facility safety rules and work practices.



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- 4.5. Advise the VCSFA of unique hazards presented by the contractor's work.
5. Contractor shall submit, within 24 hours to the Safety Program Manager or designee at the site a written report covering all injuries to the employees of lead contractor and/or its sub-contractors occurring on the site. This report must include the following information:
- 1) Name and address of the injured employee.
 - 2) Name and address of lead contractor's liability insurance carrier.
 - 3) A detailed description of the accident and whether any of VCSFA/MARS equipment, tools, materials, or personnel were involved.
 - 4) Dated copy of Lead Contractor's report of injury to VCSFA insurance carrier.
 - 5) Any other information reasonably requested by VCSFA.

10.0 Contractor Certification and other forms

All contractors are required to complete the Contractor Safety Verification form.

Other forms available for use:

Contract Work Site Safety Plan

Standard Lift Plan – Contractors

Critical Lift Plan - Contractors

END