COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK

Contractor Compliance Guideline

Version 7.0 March 2026

The Contractor Compliance Guideline contains safety, health, and environmental policies and procedures for all Contractors working at and for Columbia University. It is the responsibility of all Contractors, their staff, and subcontractors to comply with all components of this Guideline.

While this Guideline outlines some health and safety policies and procedures, it does not relieve the Contractor of the responsibility to follow federal, state, or local regulations or industry best practices. Approved site-specific procedures supersede this Guideline.

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Table of Contents

Contents

GLOSSARY OF TERMS – ACRONYMS & DEFINITIONS

Acronyms

ACM:	ASBESTOS CONTAINING MATERIAL
ADA:	AMERICANS WITH DISABILITIES ACT
ANSI:	AMERICAN NATIONAL STANDARDS INSTITUTE
CAA:	CLEAN AIR ACT
CERCLA:	COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT
CFR:	CODE OF FEDERAL REGULATIONS
CUFO:	COLUMBIA UNIVERSITY FACILITIES & OPERATIONS (Morningside & Manhattanville)
CWA:	CLEAN WATER ACT
DOB:	NEW YORK CITY DEPARTMENT OF BUILDINGS
DOT:	NEW YORK CITY DEPARTMENT OF TRANSPORTATION
HASP:	HEALTH AND SAFETY PLAN
HVAC:	HEATING VENTILATING AND AIR CONDITIONING SYSTEM
LBP:	LEAD-BASED PAINT
NEC:	NATIONAL ELECTRICAL CODE
NIOSH:	NATIONAL INSTITUTES OF OCCUPATIONAL SAFETY AND HEALTH
NFPA:	NATIONAL FIRE PROTECTION ASSOCIATION
NYCDOHMH:	NEW YORK CITY DEPARTMENT OF HEALTH AND MENTAL HYGIENE
ODS:	OZONE-DEPLETING SUBSTANCE
PACM:	PRESUMED ASBESTOS-CONTAINING MATERIALS
PCB:	POLYCHLORINATED BIPHENYL
PPE:	PERSONAL PROTECTIVE EQUIPMENT
RCRA:	RESOURCE CONSERVATION AND RECOVERY ACT
RMW:	REGULATED MEDICAL WASTE
SDS:	SAFETY DATA SHEET
SPCC:	SPILL PREVENTION CONTROL AND COUNTERMEASURES
TSCA:	TOXIC SUBSTANCES CONTROL ACT

Definitions

"Building Code" refers to the New York City Building Code, Title 28 of the New York City Administrative Code. The New York City Building Code can be viewed in its entirety through the NYC Department of Buildings (DOB) website.

"Capital Project Management (CPM)" refers to the Columbia University department that obtains the services needed to design and construct renovation and new construction projects on Columbia University properties.

"*Campus Life Safety & Regulatory Compliance*" refers to the compliance team located at Columbia University Irving Medical Center.

"*Contractor*" refers to persons or firms directly hired by Columbia University or subcontractors hired by Contractors working for Columbia University. In addition, any reference henceforth to Columbia University will apply to work occurring on all Columbia University campuses, Columbia-owned properties, or properties under the management of Columbia University.

"Environmental Health and Safety (EH&S)" refers to the Columbia University department that is responsible for managing all programs related to laboratory and research safety.

"Environmental Protection Agency (EPA)" refers to the federal agency that develops and enforces regulations designed to protect the environment. Some of the federal regulations the EPA is responsible for include the Clean Air Act (CAA), Clean Water Act (CWA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Resource Conservation and Recovery Act (RCRA), and the Toxic Substances Control Act (TSCA).

"Facilities" refers to Columbia University Facilities Operations (CUFO) at the Morningside and Manhattanville campuses and all sub-departments under its direct management. This group is responsible for managing Columbia University infrastructures at the designated campuses.

"Facilities Compliance" refers to a unit that provides technical assistance, consulting, and regulatory compliance support pertaining to environmental protection, occupational safety, and fire prevention across all of Columbia.

"FDNY" refers to the New York City Fire Department. Information regarding FDNY can be viewed in its entirety through the FDNY website located at www.nyc.gov/fdny.

"Fire Code" refers to the New York City Fire Code, Title 29 of the New York City Administrative Code.

"New York State Department of Environmental Conservation (NYSDEC)" refers to the state agency that governs state programs designed to protect and enhance the environment. Information regarding NYSDEC can be found on the web at http://www.dec.ny.gov/.

"New York City Department of Environmental Protection (NYCDEP)" refers to the city agency that governs environmental compliance, water and wastewater operations, environmental planning and assessment, and administers the Environmental Control Board. Information regarding NYSDEC can be found on the web at *http://www.nyc.gov/html/dep/html/home/home.shtml*.

"Occupational Safety and Health Administration (OSHA)" refers to the federal agency that regulates workplace safety.

"Project Representative" refers to representatives of Columbia University performing the overall management of the project.

"Project Site" refers to the property owned, leased by, or under the control of Columbia University on which the Contractor's activities related to the project are being conducted. This includes contiguous areas entering the site and locations where Contractors may temporarily store project-related materials. The Project Representative must delineate the project site before work activities.

"Radiation Safety Office (RSO)" refers to the Columbia University department that ensures the implementation of all protective measures necessary to guarantee that doses from ionizing radiation to

patients, visitors, students, faculty, and staff on campus, as well as to the community at large.

"Safety Data Sheets" are documents that contain information on the potential health effects of exposure to chemicals or other hazardous substances, as well as safe working procedures for handling chemical products.

"Worker(s)" refers to persons hired by Columbia University, Contractors, or subcontractors performing work at the project site.

1.0 General Information

Columbia University is dedicated to supporting its core educational and research missions by maintaining a safe, beautiful, and functional campus environment. Columbia University comprises laboratories, classrooms, studios, medical and dental clinics, offices, and housing for faculty and students.

The Contractor Compliance Guideline ("Guideline") applies to any work at Columbia University or Columbia-owned, leased, and/or managed property.

All Contractors performing work at Columbia University must comply with all applicable federal, state, and local regulations. This Guideline is not intended to replace the Contractor's compliance responsibilities with any applicable regulation.

The Contractor should contact their Project Representative if they have any doubts or concerns about any project-related task, including the material imparted in this Guideline.

1.1 Inspections

Contractor work areas may be observed and inspected at any time. Once an inspector presents their credentials, the on-site lead contractor must notify the Project Representative immediately. Safe and easy access to the site must be arranged. Pathways must be cleared, and the necessary safety gear (e.g., hard hats and safety vests) must be provided. An on-site lead contractor or CU Project Representative must always accompany the inspector, answer questions, and provide necessary information. Any deficiencies noted during the inspection must be documented and corrected promptly. Any violations must be given to the Project Representative for review and next steps. Excessive violations received for a single project may result in dismissal from University property and exclusion from future projects.

2.0 Contractor Receipt Acknowledgement Form

Contractors shall evaluate the contents of this document as it pertains to the work to be performed on Columbia properties. Contractors shall ensure that their employees and subcontractors understand these requirements. The information in this document should be communicated and jointly enforced by Columbia personnel, Contractors, and subcontractors. In addition, Contractors shall implement a documented disciplinary process for all violations.

An authorized Contractor representative must complete the online acknowledgment section of this document to verify attendance at the CU annual training, receipt of an electronic version of this document, and their responsibility to disseminate all information contained herein to all employees and subcontractors. No Contractors will be authorized to perform work until they complete the digital verification.

2.1 Safety Orientation and Training

Contractors are required to attend periodic training sessions at Columbia University. When training is required by law or regulation (e.g., oil handling personnel, hazardous waste operations, or asbestos workers), the Contractor shall ensure that only trained workers are assigned to work. Contractor personnel may be required to complete specific University-specific training before beginning work. Evidence of training shall be submitted along with the Health and Safety Plan (HASP) to the Project Representative before commencing contract work. Contractors are responsible for continuous monitoring of their operations and equipment to ensure a safe, healthy, and environmentally sound work environment. The Project Representative will maintain a current list of orientation attendees that will serve as formal evidence of Contractor training.

2.2 Contractor Code of Conduct

Columbia University (CU) is committed to conducting business with the highest levels of professionalism, integrity, and ethical conduct, and in full compliance with all applicable laws. This commitment applies not only to CU personnel but also to all **Contractors**—defined as any individual or organization, including but not limited to consultants, suppliers, manufacturers, contractors, agents, bidders, or proposers, with whom CU conducts business or is pursuing a business relationship. CU expects that its Contractors will fully uphold these standards.

CU maintains a zero-tolerance policy for wrongdoing. To protect its students, faculty, staff, and visitors, CU requires the highest standard of integrity, professionalism, and honesty from anyone performing work on CU property. This includes all **Representatives**, including subcontractors, employees, agents, and any other individuals or entities performing work on behalf of a Contractor.

Because the conduct and business practices of Contractors and their Representatives reflect directly on CU and influence the academic and work environment, strict adherence to this Contractor Code of Conduct (Code)—as well as all applicable local, state, and federal laws—is mandatory. Failure to comply may result in the immediate termination of the business relationship.

CU also reserves the right to remove from CU property any Contractor or Representative who engages in unlawful conduct or behavior inconsistent with this Code of Conduct, without prior notice.

Contractors and their Representatives play an essential role in CU's ability to provide quality services to our students, staff, and faculty. This Code sets forth the standards of conduct to which Contractors and their Representatives must adhere while conducting business with or on behalf of CU. Contractors will take appropriate steps to ensure that the Code is communicated to, understood, and followed by their Representatives while doing business with or on behalf of CU.

PROHIBITED BEHAVIORS

These behaviors are prohibited at all times and are subject to contract termination or expulsion of a Representative from CU property, as deemed appropriate by CU:

- Smoking, tobacco, and controlled substances - within CU campus confines or within 50 feet of entrances, operable windows, or outdoor air intakes. Use of tobacco or other controlled substances within the job site and the building is not permitted.

- Alcohol and Drug Use - While performing work for CU or on CU property, Contractors and Representatives may not consume, use, or be impaired by alcohol or illegal drugs or be under the influence of prescription drugs that impair a person's ability to perform work safely and efficiently.

- Workplace Violence - Acts or threats of physical violence, intimidation, and harassment.

- Weapons – possession, use, or storage of any weapon on any CU premises or job site, in CU vehicles, or when Contractor is engaged in performing work for CU. The term "weapon" includes firearms, ammunition, and explosives, but does not include tools used for legitimate business purposes.

- Hostile Environment – any actions, gestures, statements, or other behaviors that create a hostile environment for workers or anyone on campus.

- Other Inappropriate Behaviors – Any behavior not explicitly stated above but considered unacceptable by social or industry standards.

APPEARANCE

Contractors and their representatives are to wear professional attire appropriate to a distinguished institution and the work being performed. Offensive, political, or controversial messages on clothing in any location visible to others or on tools or equipment are prohibited. Proper personal protective equipment (PPE) for the task being performed is always to be worn.

INTERACTIONS WITH STUDENTS, STAFF, AND FACULTY

Most work does not require interaction with CU students, faculty, or staff. Contractors should avoid interacting with anyone who is not directly involved in the work being performed.

Contractors and Representatives who need to work in direct contact with CU constituents shall:

- Be accurate and truthful when providing information.
- Carry proper identification at all times and show it to CU constituents upon request.
- Be mindful that the conduct, demeanor, and actions of Contractors and Representatives may affect CU's reputation.
- Perform the services in a polite, professional, efficient, and competent manner.
- Not represent to customers that they are employees of CU or its subsidiaries.

CU is committed to conducting its business in an environmentally responsible manner, and Contractors and their Representatives must comply with all applicable environmental laws and regulations while operating in a way that minimizes any negative environmental impact of their products and services. Additionally, while on CU premises, Contractors and their Representatives are required to follow all University policies related to physical security and adhere to all communicated security procedures.

3.0 General Safety and Security Rules

The Contractor is responsible for establishing and implementing a Health and Safety Plan (HASP) for their employees and conducting regularly scheduled safety inspections to ensure conformance with the Plan. The Contractor will submit a written or electronic copy of their company's HASP to the Project Representative. In addition, the Contractor is responsible for completing any required regulatory training and certifications before any project and must furnish proof of such completion if required by Columbia University or any regulatory agency.

3.1 Security

Contractors are required to wear ID badges in plain sight at all times while on Columbia University premises. Personnel without a proper badge will be questioned regarding their presence and may be asked to leave the premises. The Project Representative must be immediately notified of any visitors to the project site. Visitors must always be escorted.

3.2 Site Safety Training Cards

Local Law 196 requires Supervisors at job sites requiring a Construction Superintendent, Site Safety Coordinator, or Site Safety Manager to receive 62 hours of site safety training (SST). This only includes Site Safety Managers, Site Safety Coordinators, Concrete Safety Managers, Construction Superintendents, and Competent Persons designated by Construction Superintendents.

3.3 Prohibited Items

Construction worksites are notably higher-hazard than the general workplace. Columbia University is a drug and alcohol-free zone and prohibits the possession, sale, or use of the following:

- alcoholic beverages
- all marijuana products
- illegal drugs
- firearms, ammunition, and other weapons.

Columbia may refuse entry to any person possessing such items or suspected of being under the influence of alcohol or drugs. Taking prescription medication in the manner a physician prescribes is an exception, provided it does not impair a person's ability to perform their job.

3.4 Housekeeping/Maintenance

Contractors are responsible for maintaining high standards of cleanliness and orderliness. Debris removal must be addressed daily.
Specific requirements include, but are not limited to the following:

- Support temporary cords or hoses at least 8 feet above the floor when routed across aisles. If this is not possible, cords and hoses shall be secured to the floor and protected from damage to eliminate trip hazards. In addition, the area shall be appropriately marked with warning signs or traffic cones to alert pedestrian traffic.
- Place waste materials in proper containers. The Contractor will keep work areas clear of all debris. Contractors will remove all waste materials and debris daily.
- Place equipment and materials so as not to block exits, aisles, doors, stairs, ladder ways, emergency equipment, or electrical panels.
- Remove nails and other protruding sharp objects from surfaces, and sweep up loose nails and screws.
- Do not store tools and equipment above work areas. For example, workers shall not leave materials in plenum spaces or utility rooms.

3.5 Protecting Building Occupants from Construction Activities

Contractors conducting construction/renovation activities shall ensure that the health and safety of the faculty, staff, students, and visitors are not adversely affected. Exposure to physical and health hazards shall be minimized using engineering controls. Containment barriers, barricades, signs, and localized exhaust ventilation shall be used.

Since the hazards associated with construction and renovation often change as a project progresses, the Contractor must conduct periodic hazard assessments to anticipate and plan for these changes.

Whenever it is necessary to maintain public use of work areas (such as sidewalks, ramps, entrances to buildings, lobbies, corridors, or stairways), the public shall be protected with appropriate guardrails, barricades, temporary fences, overhead protection, or temporary partitions. The public must also be adequately protected from any work-created hazards, such as excavation. Appropriate warnings, signs, warning lights, and instructional safety signs shall be conspicuously posted and placed where necessary.

The Contractor must cover all holes, excavations, trenches, and other areas where anyone might fall.

Student-Occupied Spaces

Entering a student's room without prior approval and an escort from a designated University official is prohibited. In occupied residence halls, the student union, student commons, dining halls, and other facilities where students gather, Contractors must be sensitive to the safety and comfort of hundreds of students and staff, even in seemingly minor actions.

3.6 Protection Plan Management

The **Occupant Protection Plan (OPP)** is a DOB requirement for nonresidential projects. The OPP is NOT filed with or reviewed by NYCDOB. The OPP will be created by the Construction Contractor and reviewed by the Project Team. A copy of the OPP will be available on site for review by authorized personnel and inspectors. The plan is to be reviewed by the Project Team and updated whenever site conditions change. The Project Representative facilitates occupant notification.

The **Tenant Protection Plan (TPP)** is a DOB requirement whenever there are occupied dwelling units in a building during a construction project. The TPP is required even when residential space is not within the proposed construction area (e.g., work on commercial spaces in a mixed-use building). For commercial construction in mixed-use buildings, both a TPP and an OPP must be provided.

The Construction Contractor is responsible for engaging a registered design professional to prepare the TPP and file it with the DOB. Upon DOB approval, the Owner provides 72 hours' notice to the DOB before the start of construction.

The Project Representative facilitates tenant notification.

A Special Inspector engaged by CU will conduct weekly walkthrough safety inspections. The Construction Contractor and Project Representative will be immediately notified of any observations. Immediate action by the Construction Contractor will correct all identified safety hazards.

3.7 Smoking

Smoking is prohibited in any indoor area, on all campus grounds, and in all University vehicles. “Smoking” refers to the use of cigarettes, electronic cigarettes, vaping devices, cigars, pipes, and similar products. Consult your Project Representative for your campus’s specific requirements.

3.8 Traffic Safety and Parking

Contractors shall observe speed limits, traffic signs, and other traffic rules. Contractors shall park in areas designated by the Project Representative. Vehicles parked in fire lanes, reserved areas, or roadways are subject to towing. Contractors may not park or drive on sidewalks or landscaped areas unless permitted by the Project Representative. Columbia University is not responsible for Contractor vehicles or their contents. Due to limited parking at Columbia, non-essential vehicular traffic must be minimized.

Service vehicles, material delivery, and construction equipment needed on site must be coordinated in advance with the Project Representative.

Contractors permitted to park on campus walkways and pedestrian thoroughfares must place safety cones around their vehicles to increase visibility and protect pedestrians.

No riders are permitted on moving equipment, rigging, or loads.

3.9 Storage at Job Site

Contractors are responsible for securing materials or equipment at the job site and educating workers on proper storage and security measures. The Project Representative may designate a storage area for construction materials, taking into account project-specific storage limitations. Construction waste must be regularly removed and not stored on any project site. Mechanical and electrical equipment rooms may never be used for storage. Neither may unoccupied rooms, corridors, roof setbacks, or stairwells. The Project Representative shall approve industrial and construction materials for storage outside after evaluating security and environmental issues, including secondary containment requirements, stormwater runoff concerns, and the potential for water damage or mold growth. The Project Representative shall approve all project-related storage areas before materials are stored.

3.10 Accessibility

Columbia is committed to fostering a barrier-free environment for students, faculty, staff, and visitors. Obstruction of corridors and common areas, even for a short time, causes a major inconvenience for those with mobility, vision, or other challenges. Contractors are responsible for maintaining safe and unobstructed access to all areas adjacent to their project areas, including material delivery routes. This includes, but is not limited to:

- Locating temporary partitions so they do not restrict corridor widths.
- Not blocking door actuators to surrounding spaces still in use.
- Not storing construction materials or allowing debris to collect in stairwells, refuge areas, or corridors.
- Monitoring corridor floor surfaces for hazards and slippery conditions during and immediately after deliveries.
- Maintaining floor protection in good condition
- Clearly marking necessary projections into corridors with high-contrast signage or decals.

3.11 Falling Object Protection

Contractors shall provide adequate protection where there is a potential for endangering persons below an elevated work site. Such work areas shall be isolated to protect persons from falling objects. In addition, the Contractor shall barricade and monitor a work area with a minimum twenty-five (25) foot radius to prevent unauthorized personnel from entering the hazardous area. If the Contractor cannot establish this secure area due to operational constraints, the work must be scheduled during off-hours.

3.12 Equipment Functionality

All equipment brought to the site must be in proper working condition and comply with all regulatory requirements, manufacturer recommendations, and accepted industry practices. Contractors are responsible for ensuring their equipment is fully operational and meets all applicable safety standards before use. Regular maintenance checks must be performed to prevent malfunctions. In the event of equipment failure or any related incident, contractors must promptly report the issue to the CU Project Representative and take immediate steps to resolve it. Maintaining safe and efficient equipment is essential to ensuring a safe work environment.

4.0 Emergency Management

In an emergency, all Contractor personnel must know how to protect themselves and provide immediate notification to emergency response organizations (fire, police, medical, etc.). The Project Representative will notify the Contractor of any University-wide alerts.

In an emergency, the Contractor must immediately report the emergency by calling 911, Public Safety, and the Project Representative. When reporting an emergency, provide the following:

- Your name, phone number, and location
- The location of the incident (building name, floor, and room number)
- Nature and extent of the incident (injury, accident, spill, smoke/fire, damage, etc.)
- The name and amount of the material spilled (if applicable)
- The safest route to the spill (if applicable)

The Contractor shall wait at the nearest safe location until emergency response personnel arrive.

4.1 Investigation and Reporting of Accidents and Incidents

To maintain a safe and secure work environment, Contractors shall report any incidents or observations that may affect the safety of their personnel, Columbia employees, or Columbia students. All incidents and injuries, including near-miss incidents, **must be reported immediately to the Project Representative**. An Incident Report Form that your firm uses must be completed **and submitted to the Project Representative within 24 hours of the incident/injury**. Incident investigation may begin promptly after the accident or incident.

Site Safety Coordinators and Managers must immediately report applicable incidents to the Department of Buildings.

4.2 Construction Site Signage

Project Representatives will post signs that alert passersby to how to report safety concerns electronically.

5.0 Fire Safety

The Contractor should be familiar with the location of fire alarm activation devices (pull stations), portable fire extinguishers, and at least two exit routes from the work area. In the event of a fire, Contractors shall activate the nearest fire alarm station and call Public Safety.

Contractor-supplied fire extinguishers shall be marked, have an FDNY-approved tag, and have a current

inspection. Only the Fire Department shall open a fire hydrant or standpipe. Contractors may not use fire hoses.

In the event of a fire or a smoke condition at a project site, Contractors are required to immediately stop all work activities, listen to all announcements, and follow instructions. Contractors are to evacuate to Columbia University's areas of refuge for assembly, headcount, and further instructions from the Project Representative or authorized Columbia University designee. If a Contractor is missing, the Project Representative will notify Public Safety immediately.

In case of fire, remember the acronym **RACE**:

Rescue anyone in danger

Alarm activation

Confine fire or smoke condition by closing doors leading into the affected area

Extinguish the fire or **E**vacuate from the area.

5.1 Certificates of Fitness

The Contractor is responsible for obtaining all applicable FDNY Certificates of Fitness (COF) before commencing any work activities at Columbia University. The COF holder for the relevant activity must carry the COF on their person.

5.2 Hot Work Permits

To ensure a safe work environment and minimize the potential for property damage from hot work operations, CU administers its Hot Work Program in accordance with FDNY requirements. All contractors performing Hot Work operations on a CU construction site must possess an FDNY Hot Work Operations Permit specific to the DOB Work Permit for the project. A copy of the FDNY permit must be submitted to the Project Representative before a site-specific CU Hot Work Permit is requested. (See each of the *Campus-Specific Procedures* for details.)

5.3 Compressed Gas Storage

All compressed gas use and storage must comply with the NYC Fire Code. Specifically:

- All compressed gas cylinders used at Columbia University must be secured in an upright position and stored at least 3 feet from any egress area. In addition, cylinders must not be attached to any plumbing or electrical conduits.
- All cylinders must be appropriately labeled with the contents of the container.
- Cylinders not in use must have the valves completely closed, with their regulators removed, the valve cap put in place, and secured with a non-combustible strap.
- All cylinders must be stored so that incompatibles do not come into contact with each other. Cylinders should be kept away from other potential hazards, including:
    - Ledges, platforms, and elevators
    - Temperature extremes
    - Heating systems
    - Sources of ignition
    - Potential sources of leaks or corrosion
    - Falling objects

5.4 Gasoline-Powered Equipment

The use of gasoline-powered and portable heating equipment requires written approval from the Project Representative and the campus Fire Safety Officer. Care should be taken when using this type of equipment outdoors to prevent exhaust from returning into the building through air intakes. Gasoline must not be stored at the project site.

5.5 Lithium-Ion Batteries

Lithium-ion batteries are integral to many of the world's commonly used rechargeable electronic devices. All lithium-ion battery-containing items must be properly stored and have an Underwriter Laboratories (UL) or Electrical Testing Laboratories (ETL) mark.

Charge the device or batteries using chargers that bear the UL or ETL mark, in accordance with the manufacturer's instructions at all times. Make sure to charge the device in a safe place - never under a pillow, on a bed or couch, or similar setting - and do not overload outlets. Devices may not be charged overnight on University grounds.

E-vehicles or motor devices that use lithium-ion batteries are not to be stored or charged on construction sites, as they are known to cause fires. The Project Representative must be notified of any equipment or vehicles being used on-site that contain lithium-ion batteries. Consult with the Project Representative about any questions.

6.0 Laboratory Safety

Columbia University is committed to ensuring compliance with laboratory regulations, standards, and best practices.

6.1 Laboratory Clearance Process

Columbia University Environmental Health & Safety (EH&S) oversees the laboratory clearance process before any work in spaces where biological, chemical, or radioactive materials are actively or recently used.

Additionally, once a laboratory or research space formally discontinues use of a regulated hazard (e.g., biological, chemical, or radioactive materials), EH&S shall conduct the required final surveys, inspections, or decontamination procedures to verify that the space is free of residual contamination. Upon successful completion and documentation of this final clearance, no additional EH&S clearance shall be required for future work in that space unless new hazardous materials are introduced or new risk factors are identified. Completion of clearance is evidenced by signs and stickers posted on doors and equipment.

Columbia University Clearance Process

Equipment designated for relocation or disposal must be properly decontaminated before any work is performed. Similarly, laboratory equipment handled by a commercial mover must be certified free of contamination. An EH&S clearance sticker is valid for a limited duration from the issuance date.

The Project Representative must determine, with the help of the vacating "occupants" and EH&S, if the space or equipment needs to be cleared. For example, if equipment was used in an office and has no exposure to chemical, biological, or radioactive materials, then clearance is not necessary.

If the laboratory equipment has been used with or exposed to any combination of radioactive, biological, or chemical agents, the following steps must be taken:

Radiation Safety: Occupants must ensure that any equipment or surfaces used with or potentially contaminated with radioactive materials are decontaminated and cleared. All equipment containing radioactive sources must be cleared and disposed of through EH&S's Radiation Safety Team.

Biological Safety: Occupants must ensure that any equipment or surfaces used with or potentially contaminated with biological material are decontaminated with a freshly prepared 10% bleach solution. All exposed surfaces of the equipment or contaminated furniture must be wiped down with the bleach solution. All Regulated Medical Waste (RMW) must be collected in rigid containers lined with red bags imprinted with the universal infectious waste biohazard symbol. Any sharps or materials contaminated with potentially infectious agents that may puncture a red bag must be deposited in a sharp's disposal container. All decontamination procedures and physical removal of biological materials and waste must occur prior to clearance being issued.

Chemical Safety: Occupants must ensure chemical contamination is removed by thoroughly cleaning surfaces with a soap solution, a mild detergent, or another appropriate decontamination solution. If an item is too contaminated, or if decontamination cannot be performed safely on the equipment. A University-approved Contractor will assist with decontamination. Any hazardous materials or hazardous wastes must be removed from the area and properly disposed of through EH&S prior to any work beginning at the project site. All decontamination procedures and physical removal of chemicals and waste must occur prior to clearance being issued.

Environmental Safety: The Project Representative and Facilities will ensure that any equipment containing refrigerants, such as air conditioners or refrigerators, is drained before disposal. For equipment with oil, the Owner must remove and properly dispose of the oil through EH&S before discarding the equipment. Facilities manages refrigerant removal. The Project Representative will contact Facilities to arrange for refrigerant recovery.

NOTE: Under no circumstances shall a Contractor use material in an application banned under the Toxic Substances Control Act (40 CFR 700-799).

6.2 Radiation Safety

Contractors who propose using equipment that emits radiation must obtain EH&S approval before bringing it to any project site.

Any questions or concerns that arise during a project that involves a radiation area should be brought to the attention of the Project Representative immediately.

Radioactive Materials Security

A few important reminders when working on projects that may include access to areas that contain radioactive materials:

- Unauthorized entry into radiation use areas is not permitted. Entrances to radiation use areas are marked with appropriate signage.
- Doors of unoccupied restricted areas shall be locked, as shall windows where ingress by this means is possible.

Management of Radioactive Materials Encountered at Project Sites

Most of the smoke detectors at Columbia University are photoelectric (non-radioactive); however, Contractors may encounter ionizing (radioactive) smoke detectors. In addition, photo-luminescent "Exit" signs may contain radioactive material. Devices containing radioactive materials must have a radiation label. The Project Representative will coordinate with EH&S for disposal. Never dismantle smoke detectors or exit signs.

6.3 Biological Materials

Regulated Medical Waste (RMW) refers to materials that may be contaminated with blood, bodily fluids, or other potentially infectious materials and are often referred to as "biohazardous," "potentially infectious," or "regulated medical" waste. Laboratory activities at Columbia University involve potentially infectious biological materials, including human blood, body fluids, tissues, or cells, or potentially infectious microorganisms, such as bacteria or viruses, often referred to as "biohazardous". Regulated Medical Waste (RMW) refers to materials that may be contaminated with blood, bodily fluids, or other potentially infectious materials. The OSHA Bloodborne Pathogens Standard and University Policy regulate blood and some body fluids. For transmission to occur, these fluids must come into contact with a mucous membrane or damaged tissue, or they must be directly injected into the bloodstream through a needle or syringe injury. The universal biohazard symbol indicates the presence of these materials in a laboratory or other area. This symbol may be found on red bags, red sharps containers, or large grey biological waste disposal bins. While working on University property, Contractors must adhere to the requirements of the Bloodborne Pathogens Standard and all applicable University Policies, including:

- Contractors must not enter a laboratory or area that is marked by the biohazard symbol or handle any biological materials unless it is part of the specifically contracted work to be performed.
- Contractors must not handle red bags, sharps, sharps containers, or large biological waste disposal bins unless it is precisely part of the Contractor's scope of work.
- Any Contractor who unexpectedly encounters biological materials on a project site must exit the project site and contact the Project Representative and EH&S.
- Contractors must take appropriate measures to protect their employees from exposure to bloodborne pathogens by advising them to avoid contact with all materials in and around research laboratories.

While most materials commonly encountered in laboratories do not pose a hazard when handled appropriately, exposure may occur through a spill/release, a direct splash to the eyes, nose, or mouth, or sustaining a cut or puncture wound. Therefore, when working in areas where hazardous materials are/were used or stored, appropriate precautions should be taken.

6.4 Laser Safety

Laser-emitting tools and equipment are standard in many work situations. Lasers in construction tools are generally lower powered and designed to be safe, but when misused or mishandled, they can pose a hazard. OSHA Regulations specify generalized rules for the safe use of lasers in the construction industry. These include user training, posting and labeling requirements, laser safety goggles, and maximum exposure intensities.

- Contractors should review any process or equipment using lasers with their Project Representative.
- Contractor use of Class 3b and 4 laser systems at Columbia University must be approved by EH&S.
- Contractors must post laser use signage at the project site.
- Contractor evidence of laser safety training on the specific laser being used on a project must be furnished to the Project Representative upon request.
- Lasers should never be directed toward the eyes or near reflective surfaces that may redirect lasers toward the eyes.
- Product warning labels on the laser device must not be removed or obscured in any way while working on a project site.

7.0 Environmental Safety

Columbia University is committed to ensuring compliance with environmental regulations, standards, and best practices.

7.1 Hazardous Materials Management

In the course of any project, materials may be used that are hazardous to people, wildlife, or the environment. These include, but are not limited to, materials Contractors use every day, such as oil-based paints, chemical paint strippers, solvent-based waterproofing agents, compressed gases (such as acetylene), and aerosol cans.

All containers and cylinders must be appropriately labeled and stored to prevent spills or releases. The Contractor must make a Safety Data Sheet (SDS) for each chemical or hazardous product used at the job site available. The following general guidelines apply to working with hazardous materials at a project site:

- All containers must be stored upright and closed unless the material is in use. No product containers may be left open after the workday is complete at a job site. All cylinders must be properly secured at all times.
- Materials should be stored within secondary containment and, when feasible, away from drains and penetrations.
- In the event of a spill or release, all drains and/or penetrations in the area should be protected or covered. Spills must be contained and reported to the Project Representative.
- Any malodorous materials should be mixed in a well-ventilated area, away from air intakes, and in a fashion that prevents release. Such materials must be coordinated in advance with the Project Representative to ensure adjacent occupants are not affected.

In the event of a spill of any hazardous materials, the following procedures must be followed:

1. The Contractor must immediately stop all work activities, isolate the area (e.g., close the door, place caution tape, etc.), and exit the area to prevent the spilled material from dispersing. All penetrations and drains near the spill must be protected.
2. The Contractor must immediately notify the Project Representative and furnish them with a detailed incident report.
3. The Project Representative must assess the situation, determine the required action, and coordinate all remediation activities in the work area.
4. The Contractor must not attempt to dispose of the spilled material.

7.2 Hazardous Waste

Hazardous waste generated at Columbia University must be stored in compatible containers, properly labeled, and securely closed when not in active use. The Project Representative, the Contractor, and Facilities Compliance shall determine the disposal of hazardous waste generated during a project.

The designated Columbia University representative must sign any shipment of regulated waste from Columbia University. Hazardous waste may not be transported by the Contractor or relocated from the point of generation unless the Contractor is specifically hired to perform such actions. EH&S may assign EPA Identification Numbers.

7.3 Universal Waste

The Contractor may be responsible for handling and managing universal wastes during the demolition phase of the project. Universal waste that a Contractor can expect to encounter at project sites may include fluorescent lamps, mercury-containing equipment, aerosol cans, batteries, and certain architectural paints—including oil-based paints, stains, and varnishes.

Universal waste is considered hazardous waste, but is subject to less stringent regulations. However, Universal waste may not be disposed of as regular trash.

Before demolition, the Project Representative determines what type of universal waste may be present at a project site and ensures that properly labeled Universal waste containers are available. Fluorescent lamps are to be stored intact in a fiber light tube container obtained from a Columbia University-approved vendor. Universal waste is not permitted to accumulate on floors and must be stored in labeled, closed containers. A broken fluorescent lamp is considered hazardous waste and must be managed as such. If a fluorescent lamp breaks, contact the Project Representative immediately.

7.4 Fluorescent Light Ballasts

Fluorescent light ballasts manufactured before 1978 are known to contain polychlorinated biphenyls (PCBs). Therefore, all ballasts must be appropriately handled when light fixture removal is part of a project.

Ballasts containing PCBs are managed as "regulated" waste under the Toxic Substances Control Act (TSCA). Therefore, any unmarked ballast must be treated as PCB-containing. Columbia University requires that all PCB-containing ballasts removed from light fixtures be placed in a pre-labeled collection container.

For ballasts known not to contain PCBs, the Project Representative may choose to recycle ballasts with a Columbia University-approved scrap metal recycler.

7.5 Hazardous Scrap Metal and End-of-Life Electronic Equipment

End-of-life electronic and office equipment, including but not limited to printers, copiers, CRT monitors, and CPUs, may qualify as hazardous waste. This equipment is sent to an approved vendor for recycling. Arrange with the Project Representative to remove **and recycle** used electronic equipment before the commencement of any project, approximately three weeks in advance.

7.6 Spill Prevention Control and Countermeasures (SPCC)

The Columbia University Spill Prevention, Control, and Countermeasures (SPCC) Program establishes University-wide procedures for the prevention, detection, and reporting of spills and/or releases of petroleum and oil. When working on Columbia University property, a Contractor must adhere to SPCC protocols, including the following:

- Notify the Project Representative if oil will be stored or used on the site in quantities of 55 gallons or greater.
- Provide equipment (e.g., secondary containment pallets, absorbent pads, absorbent booms, and Speedi-Dry) suitable and sufficient to control a potential spill/release.
- Use appropriate protective measures such as double containment, inspections, employee training, and overflow protection during the use, storage, or handling of petroleum products.
- Adequately train Workers in spill response and notification procedures.
- Complete a detailed incident report in the event of a spill/release to be submitted to the Project Representative.

7.7 Water Intrusion and Mold Recognition

Contractors are responsible for preventing water intrusions. All water leaks, either caused or encountered by Contractors are reported to the Project Representative and controlled immediately. **In addition, contractors are responsible for ensuring that windows are shut and window openings are properly sealed during off-hours.**

When water intrusion has occurred, all affected materials must be wholly and promptly dried or removed from the premises. Contractors who encounter mold or conditions suspected of being mold shall contact the Project Representative.

7.8 Asbestos-Containing Materials

Before a renovation project, the Project Representative will have a certified asbestos abatement contractor abate all asbestos-containing materials (ACM). However, it is not uncommon for ACM to be concealed behind walls, above ceilings, under carpets and floor tiles, or be otherwise undetected for abatement before a construction project. If a presumed ACM is uncovered during a project, stop work immediately and contact the Project Representative.

7.9 Lead-Based Paint and Stain

Before commencing a renovation project, the Project Representative will conduct testing. If lead is determined to be present at the project site, a Columbia University-authorized Contractor will perform

work to mitigate or remove it. If the Contractor's work requires intrusive or dust-generating work on painted or stained surfaces that are not being removed (e.g., sanding, drilling, cutting, brazing, scraping, demolition), such work must be performed per OSHA's Lead Safety Standard.
For renovation projects occurring in child-occupied buildings or housing constructed before 1978 containing LBP, the Contractor must be certified, and proof of training must be provided for all workers at the job site.

7.10 Refrigerant

EPA Regulations require four types of certification for refrigerant handling and recovery:

- Type I technicians: for servicing small appliances.
- Type II technicians: for servicing or disposing of high or very high-pressure appliances
- Type III technicians: for servicing or disposing of low-pressure appliances
- Universal technicians: for servicing all types of equipment

Technicians must provide a copy of their certification to the Project Representative before starting any work on refrigerant-containing equipment.

Technicians servicing appliances containing 50 or more pounds of Ozone Depleting Substances (ODS) must provide the Project Representative with an invoice indicating the amount of refrigerant added to the appliance. Proper records showing any refrigerant recovery, additions, leak discoveries and repairs, leak verifications, and other maintenance for each unit serviced must be presented to the Project Representative after the service has been performed.

Consult with your Project Representative for campus-specific procedures.

7.11 Mercury Contamination Identified During Construction

Mercury may be encountered on project sites during the removal of sink traps, cutting of pipes, or beneath floor tiles, as well as during casework and cove base removal. Mercury spills are hazardous. If mercury contamination is encountered or suspected, contractors must stop work immediately and notify the Project Representative. The Project Representative will then contact EH&S to ensure the spill is promptly addressed and cleaned up.

When opening or removing plumbing pipes or traps in a laboratory building:

- Wear the appropriate personal protective equipment (PPE), such as gloves and protective eyewear, for the work activity.
- Place a bucket or suitable container under the pipe's opening or trap to collect any liquid.
- Collect all liquids and check them for visible mercury, needles, and glass slides. Use a flashlight to check the interior surface of pipes and traps for visible mercury.
- If pipes, traps, and liquid are free of visible mercury and/or needles and glass slides, dispose of the liquid and pipes, and traps as general debris.
- If mercury and/or needles and glass slides are found, stop all work immediately and follow campus-specific procedures for dealing with uncontained mercury as set forth below.

If mercury is uncontained or has spilled:

Cleanup of mercury spills is to be performed by qualified individuals with the appropriate materials, PPE, and training to handle such a task.

1. Immediately stop all work activities.
2. Isolate and secure the area (close the door and string caution tape) to prevent the suspect material from being disturbed or dispersed.
3. Exit the immediate area of contamination, but remain in the adjacent area for evaluation by EH&S.
4. Immediately contact the Project Representative to complete an incident report and provide

all pertinent information.

5. Do not attempt to clean up or dispose of the suspect material.

7.12 Air Emissions

Combustion equipment uses fuel to heat, produce energy, or incinerate, such as boilers, generators, and incinerators. The Contractor must inform the Project Representative of any changes to equipment that may affect overall air pollutant emissions, including fuel conversions, burner replacements, or other maintenance, repair, or replacement activities.

Combustion equipment of any type is not permitted to operate inside or near any Columbia University building air intake, and such equipment must be operated in well-ventilated areas. The use of low-sulfur diesel fuels, diesel particulate filters, or fuel-efficient equipment is required at project sites. When possible, electricity should be drawn from Columbia University's power sources rather than from fuel-supplied generators.

Contractors must not cause or permit the engine of a motor vehicle to idle for longer than three minutes when parking, stopping, or standing.

7.13 Nuisance Odors

The Contractor shall carry out effective measures whenever and as often as necessary to prevent nuisance odors from all project activities. For example, enclosure seals and forced ventilation may be required to avoid odor nuisance.

The Contractor shall notify the Project Representative of any scheduled odor-causing activities. All possible odor-causing activities must be conducted after regular business hours.

The Contractor shall provide air monitoring equipment, ventilation equipment, and engineering controls to document and maintain acceptable indoor air quality. Materials of concern include products that emit highly volatile organic compounds (e.g., solvents), certain glycol ethers, which are considered reproductive hazards, epoxy-based products, combustion byproducts, and isocyanates.

If suitable indoor air quality cannot be achieved, the Contractor shall schedule activities outside of regular working hours and protect their employees with an OSHA-compliant Respiratory Protection Program.

7.14 Dust Control

The Contractor shall make all reasonable efforts to control dust emissions on indoor and outdoor project sites. These efforts may include the use of:

- Tool-associated dust suppression systems are outlined in Table 1 of the OSHA Respirable Silica in Construction standard (29 CFR 1926.1153).
- Water or another environmentally safe dust suppressant on outdoor sites.
- Dust containment systems with walls & barriers, particularly in clinical, research, teaching, and residential spaces.
- Negative pressurization and air filtration (including HEPA where appropriate) in indoor spaces.
- Dust control mats outside of indoor work areas.
- Isolation and protection of HVAC systems to prevent entry into and spread of fugitive dust via ducts and fans.
- Avoidance of dust-raising activities such as dry sweeping and the use of compressed air for cleaning.

8.0 Occupational Safety

Occupational safety is related to the standards and best practices of the Occupational Safety and Health

Administration (OSHA).

8.1 Hazard Communication

The Hazard Communication Standard requires that all workers be aware of:

- The hazardous chemicals that are present in the products they use.
- The effects of overexposure to such hazardous materials and how to protect oneself from overexposure.
- The correct fashion in which to handle such materials in the event of a spill or accidental release.
- The means and methods by which this information will be communicated to Workers.

Columbia University is required under the Hazard Communication Standard to inform Contractors of existing potential hazards during their work at the University.

The Contractor must maintain an inventory of products containing hazardous chemicals and keep the Safety Data Sheets (SDSs) for these products on-site. The Contractor must provide the locations of the use and storage of such products to their employees and Columbia University. Under no circumstances may the Contractor store chemicals or other hazardous products outside the project site. Long-term storage of products (beyond the project duration) is prohibited.

8. 2 Personal Protective Equipment (PPE)

It is the sole responsibility of the Contractor to provide appropriate PPE to their employees and ensure its proper use. Hardhats are required on demolition projects and on project sites where there is a risk of a head injury.

Hazardous areas shall be appropriately secured, and proper signage shall be posted to identify the PPE required at the project sites and the hazards posed by activities therein. If non-Contractor personnel need to enter or pass directly through the work area, the Contractor shall provide appropriate PPE for such visitors. Typically, hard hats and safety glasses are recommended. Hard hats are required on demolition projects and on project sites where there is a risk of head injury.

8.3 Ladder Safety

Working on and around ladders is a significant source of workplace obstructions and injuries.

Defective and inappropriate ladders are not to be used on any project sites. All ladders must be in good condition and free of any broken or defective parts. Any ladders with broken or split rails, rungs, steps, or any defective parts must be removed from the property. Unsafe equipment noted at a project site will result in a work shutdown and the removal of such equipment from the site.

8.4 Lockout / Tagout

To ensure that energy hazards are properly controlled during construction, and servicing/maintenance of machines and equipment, the OSHA Lockout/Tagout Standard is enforced.

Before any service interruption, the Contractor is to coordinate with the Project Representative to ensure that Columbia University understands the impact on infrastructure.

The Contractor shall perform Lockout/Tagout procedures in conjunction with a Facilities employee who is also placing a lock. Contractors must supply their own identifiable locks and indicate on the tag the date the lock was placed, the company name, and contact information.

8.5 Electrical Safety

All permanent and temporary electrical work shall be done following the National Electric Code, OSHA, and other applicable standards.

8.6 Confined Space Entry

The Project Representative will identify any permit-required confined spaces at the project site before commencing work activities.

The Contractor shall develop and implement a confined space entry and rescue program specific to the project that meets or exceeds the OSHA Guideline. In addition, the Contractor shall be responsible for maintaining all permits.

The Contractor's Confined Space Entry and Rescue Program must include:

- Description of the nature of the work
- Potential hazards and associated methods to eliminate or control the hazards
- List of Contractor's personnel assigned to perform work and their role: authorized entrant, entry attendant, fire watch, rescue
- Evidence of training of Contractor's employees for Confined Space Entry
- Safety Data Sheets for all products being used

8.7 Scaffolding

Contractors whose work cannot be performed from ground level or other solid construction must take precautions to ensure the safe performance of such work. All scaffolding, staging, and work platforms must satisfy the applicable DOB and OSHA regulations and the manufacturer's erection requirements. The use of site-built staging or scaffolding is not allowed unless prior approval is obtained from the Project Representative.

The Building Code requires permits for all supported scaffolds 40 feet or more in height. Copies of the permit and applicable signs must be posted at a conspicuous location and visible to the public. Copies of the approved plans and all worker training records for the scaffolding must be maintained on-site.

8.8 Fall Protection

All contract work done at Columbia University is subject to the fall protection standards set forth by OSHA as follows:

- 4 feet above a lower level, where there is a risk of falling into dangerous equipment or where there is a hazard from falling objects. (General industry)
- 6 feet above a lower level, where there is a risk of falling into dangerous equipment or where there is a hazard from falling objects. (Construction)

The fall protection measures must be appropriate to the work being performed.

8. 9 Machine Guards

Any machine where machine parts, functions, or processes may expose an employee to injury must be guarded. Safeguards must prevent workers from making contact with dangerous moving parts, create no interference that impedes a Worker from performing a task, create no new hazards, and allow for maintenance of the machine. It is strictly forbidden to override, bypass, disable, or ignore any machine guards when working at Columbia University.

8.10 Excavation

Excavation activities may pose multiple hazards, including egress limitations, hazardous atmospheres, chemical or biological hazards, instability of adjacent structures, fall protection concerns, and cave-ins. Underground utilities may be present in excavation areas. To protect underground utilities and assure

public safety, mark out all utilities before excavation. All excavations must have a clear warning system to protect workers, pedestrians, and traffic from falls, accidents, and injuries.

The following steps must take place before beginning any excavation:

- The Contractor shall notify the One-Call Notification System (NYC 811) 48 hours before any excavation
- Make a note of the ticket reference number and the names of operators to whom the notice will be transmitted.
- Delineate the work area with white paint. No other color may be used to delineate the work area
- Detailed information regarding utility mark-outs can be found at the One-Call Notification System

If an underground storage tank is discovered during excavation, stop work and notify the Project Representative.

8.11 Noise

Construction and demolition work often involves many tasks that produce excessive noise, potentially disrupting essential activities in the Columbia community. Every effort should be taken to mitigate unwarranted and excessive noise at the project site. The following items must be considered when performing activities at the project site that may generate excessive noise:

- Engineering and administrative controls for noisy equipment or activities.
- Perform all core drilling, chipping, and drilling after routine business hours or at a time determined by the Project Representative.

8. 12 Mobile Equipment/Work Platforms

Unless permitted by the Project Representative, Contractors shall not use CU-owned or leased aerial work platforms. In addition, contractors shall ensure that only trained and authorized personnel operate mobile equipment.

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For more information or questions, contact your campus representative:

Morningside and Manhattanville Facilities Compliance:	CUFCOMPLIANCE@Columbia.edu
Morningside and Manhattanville Capital Project Management:	CUFDR-FEEDBACK@Columbia.edu
Columbia University Irving Medical Center Compliance:	CUMCFIRESAFETY@Columbia.edu

Please use the link below to acknowledge receipt and understanding of this guideline**.**

Contractor Compliance Guideline Verification Form