

Safety and Health

SAFETYSHARES!

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Working at Multi-Company Worksites

Typically, our field crews have the luxury of performing tasks without having to work alongside another work crew that has been tasked to perform work that is unrelated to our assignments. However, there are circumstances when we find ourselves, unexpectedly, having other persons “invade” our work areas, setting up equipment and materials and ready to perform their field work.

Such situations can lead to many complications as well as being susceptible to unknown hazards (as it is said in the S&H profession, being able to identify a hazard is 50% of the solution; but when we are unaware that a hazard exists, we are in an increased risk scenario). Take, for instance, one work crew that is conducting work activities that involve flammable materials. They have taken the proper time and consideration to identify the potential hazards associated with their work and therefore, established proper work controls such as keeping oxidizers, combustibles and open ignition sources away from the work zone. However; unknown to the work crew, another group has been tasked to work in the same area without any prior communication of their work schedule.

Now, the second crew has their own set of work activities, and hence, workplace hazards. And, since neither group is aware of the others’ work activities, there could be some conflict. For instance, the second crew will be performing size reduction on lead-containing pipes. This will require torch cutting activities. I think we can see the problem. One group will be working with flammables while the other group has open flame conditions – a definite recipe for a disaster. In addition, there is the potential health concern of the inhalation of airborne lead fumes.

When more than one employer operates at a single site, OSHA considers it a multi-employer worksite. A construction site can be an example of such a scenario as it is typical to have multiple contractors assigned to work in close proximity. Employers at multi-employer worksites need to know their responsibilities, assigned roles, and accountability with respect to how each groups’ work will affect the other crews in the area.

On multi-employer worksites, employers must work together to identify and control hazards to meet appropriate health and safety precautions. When OSHA identifies safety violations at such a worksite, the agency evaluates the owner and employer hierarchy to determine which owner and/or employer(s) is/are responsible for the violation.

Recently we had such a scenario where TPMC employees were setting up at a location that was under the control of a DOE facility contractor. And while TPMC had been given approval to work at their specific worksite, without any warning, the DOE contractor approved one of their work crews to enter into our work area and perform waste transfer operations. Imagine our surprise and concern when we saw these unexpected visitors start to don full face respirators and coveralls while industrial hygiene sampling pumps were placed upon their lapels to assess employee exposures to...whatever! Of course, our concern was whether our team members were in jeopardy of being exposed to harmful airborne materials.

Our course of action was to immediately notify our PM, who, in turn, contacted our client, who then, contacted the DOE contractor. Within a relatively short period of time, through the chain-of-command, we were told that the PPE was precautionary, and our crew was not subject to airborne inhalation hazards or subsequent adverse health effects. Quite frankly, this seemed to make sense as we were able to observe the visiting crew members: some with respirators, coveralls and booties while other team members were dressed in mere street clothing, positioned right next to each other and abutting the waste containers. Obviously, this is poor work practices and contrary to S&H procedures as addressed in numerous OSHA regulations. In addition, there was a strong wind that day. Fortunately, our crew was situated upwind from the neighboring activity. Had the wind been reversed, our crew would have paused work and left the area until the other crew completed their tasks and left the area (this was discussed among our team members which all personnel agreed to be an acceptable plan).

Regulations such as Hazard Communication (29 CFR 1910.1200) and the OSHA Confined Space regulation for construction (29 CFR 1926, Subpart AA (sections 1200-1213) addresses multi-employer worksites and the responsibility of the “controlling employer” to ensure that each contractor/subcontractor understands and agrees to follow the safety requirements in their respective contracts as well as establishing communications and inspections between the site safety managers and subcontractors; thereby helping to keep everyone informed about changing worksite conditions and potential problems.

When such actions are not implemented, we need to recognize and assess our risk and then to determine an appropriate plan of action based on the S&H of the work team. Communications should always be a priority unless, personnel are being placed in eminent danger. In which case, taking action to protect personnel should be the first action. Another safe guard would be to include a pause work until the hazard(s) are adequately addressed (based on PM and S&H management).

In our scenario, communications should have been established with an explanation of the specific work activities that each group was assigned to perform along with the hazards and their respective controls prior to entering the work site. While this was not the case in our specific scenario, TPMC took the initiative to communicate our concern and through the required chain-of-command, proceeded with our field work as soon as we were assured that our safety and health would not be compromised. Bottom line: it is only through the cooperation of all of the employers involved in a multi-employer worksite that the S&H of all affected employees can be properly controlled.

Stuff your eyes with wonder, he said, live as if you'd drop