

Division Service Contract EHS Risk and Oversight

Revised 2/8/05

NOTE: To properly assess the risk of work to be performed, the specific hazards of the work, contractor experience and skill and job-specific conditions must be collectively figured into the assessment. For the purposes of this document, the initial risk should be determined without factoring in existing controls. The appropriate controls must then be implemented to reduce/manage the level of risk determined. Oversight is but one of these appropriate controls needed.

Risk Category	DIVISION Service Contract Types	Minimum Field Oversight Expectations
<p>Low Risk: Low risk contractors include those that provide contracted work that inherently poses minimal EHS risk to employees and the public. Their work requires minimal advance EHS planning, preparation, formal training, or work controls. Risk exposure may include the following:</p> <ul style="list-style-type: none"> • Slips, trips, falls, strains/sprains, cuts • Incidental driving • Animal & insect exposure 	<ul style="list-style-type: none"> • Landscapers • Vending machine personnel • Office area workers • Technical, engineering or consulting services 	<ul style="list-style-type: none"> • Communication of general PPE and other EHS compliance expectations • Routine meetings with supervision with discussion on significant issues • Annual performance feedback on services provided • If low risk contractors are not pre-qualified, job-specific EHS requirements must be within contract documents and communicated to contractors. • Documented Contractor Post-Job Evaluation
<p>Medium Risk: Medium risk contractors include those vendors whose contracted work does pose EHS risk but the scope is limited to a narrow range of EHS programs and risk. Their contracted work may require advance EHS planning, preparation, formal training, work controls, and audit/oversight. Risks may include the following in addition to Low Risk exposures:</p> <ul style="list-style-type: none"> • Incidental Exposure to Secondary Voltage • Secondary Flash • Digging Into Other Utilities • Extensive Driving • Limited Trenching and Shoring 	<ul style="list-style-type: none"> • Lighting Installation/Repair • Non-Hazardous Spill Clean-up • Pesticide/Herbicide Spraying • Erosion Control • Siting/Surveying • Station Mowing • Precipitator/Boiler Inspections/Repair • Heavy Earthmoving Equipment Operation • NDE Operations • Plumbing Work • Sandblasting • Ash Removal 	<ul style="list-style-type: none"> • Routine meetings with supervision with discussion on significant issues • Annual performance feedback on services provided • Routine observations of contractor work by Company Contract Managers, Project Managers, EHS, etc. • Documented random field audits by Company Contract Managers, Project Managers, EHS, etc. • Contractor Supervision routinely on site • Contractor Audits of their Work • Documented Contractor Post-Job Evaluation

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<p>High Risk: High risk contractors include those vendors whose contracted work poses broad-based EHS risk. Their contracted work requires advance EHS and sometimes complex planning, preparation, formal training, robust work controls, and professional, regular audit/oversight. Risks may include the following in addition to Low and Medium Risk exposures:</p> <ul style="list-style-type: none"> • Exposure to Energized Electrical Conductors • Electrical Flash • Work in Excavations and Trenches • Work in Confined Spaces • Work at Elevated Locations • Use of Cranes and Heavy Equipment • Work with Chemicals and Solvents • Work Requiring Grounding and Bonding • Rigging and Hauling • Work Zone Safety • Operation of Aerial Devices • Complex Equipment/System Operation • Work on Complex Systems and Components • Disturbance of Asbestos-containing Materials • Disturbance of Lead-Based Coatings/Surfaces • Work Involving the need to Control Hazardous Energy 	<ul style="list-style-type: none"> • Complex System Construction, Rebuild, and Repair • Transformer Retrofit • Asbestos Abatement • Lead Abatement • Contracted EP&C Work (Projects and Outages) • Scaffold Erection/Dismantling • Hazardous Materials Incident Mitigation • Demolition work • Commercial Diving Operations 	<ul style="list-style-type: none"> • Routine meetings with supervision with discussion on significant issues • Annual performance feedback on services provided • Routine observations of contractor work by Company Contract Managers, Project Managers, EHS, etc. • Documented random EHS Audit by Company Contract Managers, Project Managers, EHS, etc. using checklist • Company or contracted EHS Professional completes frequent audits for work and files documentation for reference. • Contractor Supervision routinely on site • Contractor Audits of Work • Documented Contractor Post-Job Evaluation