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Environmental, Health and Safety Contractor Resource Manual

Newport News Shipbuilding

Part I - General Information

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Part I — General

A. Disclaimer

This is a summary of environmental, health and safety requirements applicable to contractors at Newport News Shipbuilding (NNS). Every attempt has been made to ensure that it is complete. However, inadvertent omission of a requirement does not relieve the contractor of a responsibility which he/she otherwise has, whether by regulation, law or NNS purchase order.

B. Commitment to Excellence at NNS

NNS is committed to EH&S excellence through programs and expertise protecting employees, the community and our natural resources. We achieve this mission through corporate leadership, employee, contractor, vendor, and customer involvement. This mission is also achieved by rigorous implementation of best management practices and regulatory requirements. As an NNS contractor, it is vital that you understand your role in making NNS a safe place to work and also your responsibility to protect the environment.

To maintain our standards in health and safety, all of us must be involved in and support the NNS health and safety program. We hope that you will find the contractor EH&S protection process at NNS to be a mutually beneficial experience for your company and for NNS. Some of the benefits that your company may gain include an increased awareness of EH&S concerns, a reduction in the number of injuries experienced and a reduction in your worker's compensation expenses.

C. Purpose of this Manual

1. The purpose of this manual is threefold:
 - a. To provide information for current, as well as, prospective contractors on the Newport News Shipbuilding (NNS) Environmental, Health and Safety (EH&S) Program and the requirements they must meet to perform work at NNS. To set forth NNS-specific environmental protection and health and safety guidelines and rules that supplement federal and state safety, health and environmental laws and regulations. **This manual is not inclusive of every possible Environmental, Health and Safety topic.**
 - b. Secondly, this manual provides information on the potential hazards that are encountered in the shipbuilding and repair industry and general information on the means to avoid, eliminate or minimize those hazards.
 - c. Lastly, the manual provides information on the resources that are available to you to build or enhance your EH&S program.



2. Contractors are responsible to ensure that all applicable requirements in this manual are met. Not all details in this manual will be applicable to every NNS contractor. For this reason, it is provided with an extensive table of contents and several appendices, to make it easier for you to go directly to the applicable sections. Please note that Appendix A contains a detailed list of definitions and acronyms used in this manual.
3. It is the responsibility of each and every contractor at NNS, as a separate employer, to comply fully with all applicable federal, state and local regulations and laws.
4. We hope that this information helps you and employees of your company to have a safe, healthy and injury-free environment as well as a profitable experience at NNS.

D. EH&S Orientation Program

1. Non-employee orientation is provided for contractors, customers and visitors prior to their entering production areas, or performing production work at NNS. Non-employee orientation may only be waived for visitors who will be continuously escorted by responsible NNS personnel.
2. The orientation includes a 15-minute video which discusses environmental, health and safety information at NNS about which visitors must be knowledgeable and must be viewed at the NNS Badge Office on 39th Street (between Washington and Huntington Avenue).

E. Environmental, Health and Safety at NNS

1. Responsibilities

- a. Protection of the environment and maintenance of health and safety in the workplace are responsibilities of all personnel at NNS, whether they work for NNS or for any other employer at NNS. It is the responsibility of each individual employee to know specific hazards to which they could be exposed, and take appropriate steps to correct or protect against these hazards.
- b. Everyone at NNS must read and comply with all labels, tags, signs, rope boundaries, and all verbal instructions from NNS management personnel. NNS management personnel includes:
 - 1) Security and Emergency Management personnel
 - 2) Environmental, Health and Safety Department Staff (Department O27)
 - 3) Radiological Control Department (RADCON)
 - 4) Hourly personnel belonging to EH&S Task Teams.



Furthermore, it is vital that all contractor employees at NNS ensure that his/her company on-site management is aware of his/her presence, to include arrival time and departure, each and every day they are at NNS.

- c. The EH&S Department (Dept. O27) provides guidance to employees and non-employees concerning EH&S issues. For any environmental, health or safety concerns: contact the EH&S Department at (757) 688-5523, or the O27 Contractor Section at (757) 688-1647 or (757) 688-2249.
- d. NNS has established EH&S task teams to assist in the awareness of EH&S issues at NNS. Teams function in all the various geographical areas and in trade-specific operations. Membership in these task teams includes both NNS management and the hourly workforce. Many of these task teams also include customer and contractor representation.

2. Health and Safety Regulations and Requirements

As a maritime facility, NNS falls under the jurisdiction of the Federal Occupational Safety and Health Administration, rather than the Virginia state plan. Federal OSHA enforces the applicable OSHA regulations as follows:

- a. At NNS, OSHA maritime regulations (29 CFR 1915) are applicable for both shipboard and non-shipboard operations.
- b. The OSHA construction regulations (29 CFR 1926) are applicable to construction operations conducted at NNS.
- c. Where there is no specific maritime or construction regulation, then the OSHA general industry regulations (29 CFR 1910) apply.

The Occupational Safety and Health Act states, in section 5(a)(1): "Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." This covers any situation where there is no specific regulation.

3. Environmental Regulations and Requirements

- a. The NNS facility is regulated by Federal, State and Local environmental laws and other requirements. Agencies to which NNS is responsible for environmental compliance are: EPA (Federal), Coast Guard (Federal), VDEQ (State), and HRSD (State/Local). Specific environmental regulations which impact NNS include: CWA, CAA, CAAA, RCRA, SWMR, DOT and TSCA. (See Appendix A for definitions and acronyms.)



- b. NNS is regulated by the Virginia Department of Environmental Quality (VDEQ), which is authorized by EPA to administer RCRA. The VDEQ hazardous waste regulations are located in 9 VAC 20-60 et seq. and incorporate 40 CFR parts 124, 260, 261, 262, 263, 264, 265, 266, 268, 270, 273, 279 by reference.
- c. NNS adheres to the solid waste regulations administered by VDEQ which are located in 9 VAC 20-80 et seq.
- d. The DOT regulations that apply to NNS are 40 CFR parts 171, 172, 173, 174, 175, 176, 177, and 178.
- e. In addition, NNS complies with TSCA specifically for PCBs as listed in 40 CFR Part 761.
- f. NNS is regulated by HRSD, which is authorized by the EPA and the VDEQ to administer the CWA.
- g. The VDEQ industrial wastewater regulations are located in 9 VAC 25-31 et seq, 9 VAC 25-32 et seq. The federal regulations establishing test procedures for the analysis of pollutants are located in 40 CFR 136 and general provision and pretreatment regulations for existing and new sources of pollution are located in 40 CFR 401 and 403.
- h. NNS is regulated by the VDEQ Virginia Pollutant Discharge Elimination Permit (VPDES). These regulations are located in 9 VAC 25-31-10 et seq. The DEQ is authorized by EPA to administer National Pollutant Discharge Elimination System requirements (40 CFR 122 et seq.) through the VPDES program.
- i. NNS transfers oils and oily wastes in accordance with the following Coast Guard regulations:
 - 1) 33 CFR parts 126, 154, 155 and 156. Response plans have also been developed in accordance with these regulations and Virginia regulation 9 VAC 25-90-10 et seq.
 - 2) Spill Prevention, Control and Countermeasures Plan in accordance with 40 CFR 112.
- j. Air Pollution generation, control and reporting issues at NNS are regulated by Title 40, Chapter 1, Subchapter C of the Code of Federal Regulations. Federal statutes in
 - 1) Parts 50, 51, 52, 58, 60, 64, 71, 75 and 88 are implemented and enforced by the Virginia Department of Environmental Quality.
 - 2) Parts 61, 63, 66, 68, 69 and 82 are implemented and enforced directly by the Environmental Protection Agency. Additional state regulations, policy and



guidelines for implementation of federal policy are found in Virginia regulation 9 VAC 5 Chapters 10 through 80.

- k. The Community's Right-to-Know provisions are implemented by the state under Title 40, Chapter 1, Subchapter J, and Part 370 of the Code of Federal Regulations. Federal Right-to-Know regulations as implemented and enforced by the Environmental Protection Agency are found in Parts 300, 302, and 372
- l. For a list of specific permits governing operations at NNS and the O27 contact person for each permit, see Appendix C.

4. Enforcement

- a. NNS maintains a proactive EH&S program that includes aggressive management of contractor EH&S issues and enforcement of rules and regulations, and NNS will enforce sanctions for contractor or visitor non-compliance with NNS rules and procedures. Notwithstanding NNS's enthusiastic approach to EH&S compliance, NNS does not consider itself a "controlling employer" in the sense that OSHA uses that concept. It is the ultimate responsibility of each contractor, not of NNS, to ensure the health and safety of each of their employees.
- b. Each and every employer at NNS must ensure that their company activities comply with applicable EH&S requirements, including those of federal, state and local agencies and of NNS requirements. Each and every employer at NNS must ensure that their own employees are not exposed to hazardous conditions created by the activities of his own company, and that other personnel are not subjected to hazardous conditions created by the activities of their company.
- c. Each and every employer at NNS also has a responsibility to ensure that their company activities do not threaten the NNS environment or the local community. It is the responsibility of any employer at NNS, who observes a hazard to their own employees which is created by another employer, to instruct their employees to recognize the hazard and how to avoid the dangers associated with it. It is the responsibility of any employer at NNS, when extreme circumstances justify, to remove their employees from the job where a hazard exists, until it is corrected. If it cannot be determined who created the hazard, the employer should notify the prime contractor (or notify NNS if there is no other prime contractor).
- d. Violations of safety rules at NNS worksites will be documented by the EH&S department. Contractors will be notified of these observations by mail and will be required to respond in writing, with a description of the cause of the violation and a corrective action plan to prevent recurrence of the violation. Failure to adequately and promptly respond may affect the ability of the contractor to perform work at NNS.



F. Newport News Shipbuilding Permits and Required Notifications

Following is a list of common permits and other work controls required at NNS and their applicability:

Permit:	For:
Entry Permit	Entry into AOD pit in the NNS Foundry
Tunnel Access Work Permit	Entering Utility Tunnel
Marine Chemist	Certified Marine Chemist Approval Certificate required for hot work in certain spaces.
Certification of Compliance	Must be completed and displayed on any and all contractor cranes at NNS.
Hot Work	Hot work in areas which are not designated for hot work.
Cold Work	Certain listed uses of flammable/combustible liquids.
Red Tags	Shipboard Hazardous Energy Control
Work Permit	Referenced
Excavation Permit	Any digging or earth penetration

G. Newport News Shipbuilding Forms

Following is a list of various forms used at NNS and their applicability:

Form:	For:
Contractor Environmental, Health and Safety Evaluation Form	Contractor Environmental, Health and Safety Qualification
NN4651 NNPN 3321836	"Waste Material" label
NN7029 NNPN 15278621	"Hazardous Waste" label
NN4694 NNPN 3321470	"Hazard Warning" label
NN7067 NNPN 16575967	"Universal Waste Light Bulbs"
NN7068 NNPN 16575958	"Universal Waste Batteries"
"Waste Material Transfer"	Hazardous waste being transported to accumulation area
Weekly Inspection	Bulk waste weekly inventory and inspection
"Chain of Custody"	Trace a sample from collection to the arrival at NNS Laboratory Services
Material Receipt Form	Transporting non-bulk hazardous waste.
Form 2 Coating Compliance Certification	Forms Used in the Painting NESHAP Compliance Assurance Program



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Form:	For:
Form 3 Method 24 Test Results Form	
Form 4 Container Compliance	
Form 5 Paint Crew Usage	

H. Newport News Shipbuilding Departments

Following is a list of NNS departments that may interact with contractors and their function:

Dept.:	Name:	For:
K45	ISCVN Production Trades	Vessel water discharges
K46	Sub Production Trades	Vessel water discharges
O15	NNS Security & Emergency Management	Fire Protection Security
O27	Environmental, Health and Safety	Contractor Safety
O31	Laboratory Services Department	Wastewater analysis
O43	Facility Maintenance	Lockout/Tagout procedures Hot/Cold Work Permits
O46	Plant Operations	Tunnel Permits, Waste and Recycling
O48	Crane Engineering & Quality	Crane Operations Safety
X18	Welders	Hot/Cold Work Permits
X33	Surface Preparation and Treatment (SP&T)	Provide oil boxes
X36	Waterfront Support Services	Equipment
X42	Pipe	Vessel water discharges, Inert Gas Operations

I. Contractor Program at NNS

1. Contractor Management Procedure

- a. The use of contractors and subcontractors at NNS involves health and safety risks and liability to NNS as well as to the contractor companies.
- b. NNS has a procedure to define responsibilities of NNS personnel in managing contractor operations. That procedure establishes NNS policy regarding the management of EH&S issues involving the use of contractors and subcontractors at NNS, and defines specific requirements for NNS personnel who have

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responsibilities managing contractors and/or subcontractors at NNS (including requisitioners, sourcing agents, Contractor Coordinators and EH&S personnel).

- c. The EH&S Department (NNS Department O27) is responsible for the content and maintenance of that procedure and this manual. That procedure is not included with this manual, and is not applicable to, and does not include requirements for contractors or subcontractors.

2. Contractor Coordinators

- a. The Contractor Coordinator is a NNS employee who is assigned to monitor your activities as a NNS contractor or subcontractor.
- b. In addition to their production-related duties, Contractor Coordinators have specific responsibilities for contractor environmental, health and safety.
 - 1) The Contractor Coordinator is responsible for informing you of conditions at NNS which may adversely impact your health and safety.
 - 2) He/she will also make you aware of specific NNS procedures which apply to your particular work.

3. Contractor Selection and Evaluation Frequently Asked Questions (FAQ)

a. How does my company become approved to perform work at NNS?

NNS has a rigorous health and safety evaluation program that is designed to ensure that only contractors with established health and safety programs and satisfactory injury/illness rates are permitted to work at NNS. Prospective contractors who perform production work at NNS must obtain approval by NNS Dept. O27 prior to the release of a purchase order.

b. Listed below are the steps required for a contractor to become qualified.

1) Step One: Does my company meet the NNS definition of a “contractor”?

- a) NNS defines a contractor as any legal entity with a contract to perform production work on NNS property or on a NNS-controlled worksite. This includes entities contracting directly with NNS or indirectly through another entity that has a contract directly or indirectly with NNS (such as a subcontractor to a NNS contractor). This definition does not include leased employees, and also does not include customer contractors (such as those working directly for the Navy or other ship owner). See definition of “Production work” in Appendix A.



- b) Under certain circumstances NNS may decide to allow outside entities (such as the Virginia Department of Transportation) to perform production work at NNS but not under the control of NNS. These instances and work sites will be specifically designated and isolated.

2) Step Two: What are the requirements to become a qualified contractor?

- a) During the pre-bid process, NNS Sourcing representatives will provide you a copy of the NNS Contractor Environmental, Health and Safety Evaluation form. A copy is also provided in Appendix B. You must carefully complete this form, indicating which OSHA or other regulatory programs apply to your company.
- b) To aid you in this process, on the evaluation form we ask you about primary OSHA regulatory areas that apply most often to NNS contractor operations. You are not required to have information and programs for those OSHA regulatory areas that are not applicable to the work your company performs at NNS. Just answer the question on the form about whether your employees will be exposed to the particular hazard at NNS.
- c) If you don't know, discuss it with your Contractor Coordinator or a representative from the NNS EH&S Department.

Note: As an employer it is your responsibility to know what hazards to which your employees may be exposed!] On the other hand, omission of a regulatory area from the evaluation form does not relieve you of responsibility to comply with any other applicable laws and regulations, NNS contract or purchase order provisions.

- d) The evaluation form indicates what documentation you are required to provide, such as your OSHA log summaries, in addition to the total number of employee hours worked for the last three calendar years, and any applicable health and safety programs.
- e) Return the evaluation form with all required documentation to the NNS EH&S Department at the address noted on the form. Note that the more thoroughly you complete the form, the smoother the evaluation process will be. That is, an incomplete submittal will delay your approval, and thereby delay your work at NNS.

c. Does NNS expect all the health and safety programs to be written?

- 1) Where OSHA requires an employer to have a specific written program (such as hazard communication or respiratory protection) then NNS will require a written program. For other health and safety programs, NNS requires that you describe how you meet the major elements of the regulation. These descriptions will be understood to be statements of your company's policy.
- 2) **Note:** NNS may evaluate your company's compliance with any of these programs, whether OSHA-required written programs, or your statements of



company policy. For assistance in developing these health and safety programs, or in improving your health and safety performance, see Appendix D.

d. What will NNS do with the completed form? — How will my company know if it is approved?

- 1) The NNS EH&S Department will evaluate the information you provide to determine if your company meets the established NNS health and safety criteria. In general, you should have no difficulty in meeting the NNS requirements if your company's injury rates are below your industry's average, and written health and safety programs and descriptions of how your company complies with the OSHA requirements are found to meet requirements of the respective OSHA regulations.
- 2) The NNS EH&S Department will notify you if additional information is needed. If your company meets the established NNS health and safety criteria, the Environmental, Health and Safety Department will notify you, NNS Sourcing and your NNS Contractor Coordinator (if assigned) of your approval status.

e. How often is a contractor re-evaluated?

- 1) NNS reviews contractor performance and programs annually. You will receive a letter in January of each year requesting you send us a copy of your previous year's OSHA Form 300A summary, total hours worked and any changes to your written health and safety programs.
- 2) The evaluation process may take up to three months to complete due to the number of submissions. Upon re-evaluation you will be notified of your approval status. NNS will not award contracts to companies who no longer meet the NNS health and safety criteria, except under extreme and carefully controlled circumstances.