
CITY OF ANAHEIM PUBLIC UTILITIES DEPARTMENT ORDER

515 – STOP WORK POLICY AND CONTRACTOR SAFETY

I. BACKGROUND

A primary goal of the Anaheim Public Utilities Department (APU) is to maintain a safe work environment. Due to the nature of work on utility systems, hazards cannot always be completely mitigated. Employees have a responsibility to identify hazards and take all reasonable steps to ensure safety. To that end, all APU staff have the authority to suspend or stop work at a jobsite if they perceive that work is being conducted in a manner that places any person, or the public generally, in imminent danger. For Department Order (DO) 515, an “imminent danger” is a condition that could reasonably be expected to cause immediate risk of death, serious injury, or environmental harm.

For the purposes of this DO, “Contractor” or “Contractors” refers to entities working on APU-initiated projects or projects by other entities impacting APU facilities; these include Contractors under direct contract with the City of Anaheim or working as subcontractors. “Third Party” or “Third Parties” refers to agencies and contractors performing work for private development, governmental agencies, or other utilities.

Consistent with generally accepted construction practice, the Contractor shall be solely and completely responsible for conditions of the job site, including safety of all persons and property during performance of the work, and the Contractor shall fully comply with all applicable laws, rules, regulations, and orders relating to safety of public and workers. All Contractors are responsible for protecting their employees, subcontractors, and suppliers by implementing safety policies, practices and procedures at the jobsite. They are also responsible for ensuring that their work does not place APU employees, other Contractors or members of the public in imminent danger.

With respect to safety, Contractors must comply with all contract requirements, applicable Cal-OSHA regulations, and any other applicable state, federal, and local requirements that may pertain to their work. APU staff may take any actions reasonably necessary to ensure Contractors’ compliance with safety requirements, and to notify any Third Parties working for other agencies of observed imminent danger. The goal is to prevent water and electricity accidents and injuries regardless of contractual arrangements.

II. APPLICABLE REGULATIONS

- 8 CCR Chapter 4 (Division of Industrial Safety)
- APU Accident Prevention Manual
- City of Anaheim Injury and Illness Prevention Program

III. STEP-BY-STEP PROCEDURES

APU Work Crews

If an APU employee (Observer) observes conduct by another APU employee (Worker) on an APU project that poses imminent danger to any person, the following steps shall be implemented:

- The Observer shall inform the Worker that he or she perceives a possible imminent danger resulting from the performance of the work and direct that the dangerous work in question stop immediately.
- The Observer and the Worker shall discuss the conditions that give rise to the perceived imminent danger. If, after discussing these conditions, the Observer is satisfied that an imminent danger does not actually exist or has been mitigated, the work may resume. The Observer or Worker may request a supervisor be involved in the discussion.

- If this discussion confirms that imminent danger exists, or the Observer and Worker disagree whether imminent danger exists, the work shall not resume until the Worker notifies his or her supervisor and the imminent danger has been mitigated to the satisfaction of the Worker's supervisor. If the Worker does not notify his or her supervisor, the Observer should notify his or her own supervisor, and the work shall not resume until the imminent danger has been mitigated to the satisfaction of the Observer's supervisor. If deemed necessary by the Observer, Worker, or either supervisor, the Safety Administrator and division Field Safety Coordinator may be consulted to assist in developing mitigations.
- The supervisor of the work at issue shall notify the Safety Administrator by phone or email within one business day of the initial condition that merited the safety-related work suspension or stoppage.

Contractor Crews

If the Observer observes conduct by a Contractor working on an APU project or other project impacting APU facilities that poses imminent danger to any person, the following steps shall be implemented:

- The Observer shall inform the Contractor that he or she perceives a possible imminent danger resulting from the performance of the work and request the dangerous work in question stop immediately. The Observer shall also ask the Contractor to notify the Contractor's supervisor of the work suspension or stoppage.
- The Observer and the Contractor should discuss the conditions that give rise to the perceived imminent danger. If, after discussing these conditions, the Observer is satisfied that an imminent danger does not actually exist or has been mitigated, work may resume. The Observer or the Observer's supervisor must notify the APU Project Manager of the work stoppage immediately.
- If the discussion confirms that imminent danger exists, or the Observer and Contractor disagree or are uncertain whether imminent danger exists, the Observer shall notify the APU Project Manager. If the APU Project Manager cannot be reached, the Observer shall notify the Safety Administrator. The APU Project Manager shall immediately contact the Contractor's Project Manager to discuss the nature of the perceived imminent danger that gave rise to the work stoppage. Work may resume when the Observer and the APU Project Manager or Safety Administrator are satisfied that the imminent danger has been mitigated and work will be conducted in a safe manner.
- The Observer shall send a written description of events leading to the work stoppage to the APU Project Manager. The APU Project Manager shall notify the Safety Administrator and Contractor's Project Manager by email within one business day of the initial condition that merited the safety-related work suspension or stoppage.
- The Safety Administrator will review the stop work event with the Contractor's Project Manager and the Contractor's safety staff to discuss measures to prevent reoccurrence of the event on future APU projects.
- If the Observer identifies an imminent danger on a project impacting APU facilities that is being conducted by a Third Party, the Observer shall notify the Third Party's worker or on-site supervisor of the imminent danger and if necessary, contact the Safety Administrator who shall determine if the City Safety Manager or a utility inspector is needed to address the matter.

IV. DEPARTMENT ORDER RESPONSIBILITIES

APU Project Managers:

- Establish expectations that Contractors must conduct their work in a safe and responsible manner, and in compliance with all applicable laws, rules, regulations, and orders relating to safety of public and workers, and contract requirements.

- Ensure that adequate safety and stop work provisions are included in APU/City contracts and specifications.
- Ensure that the Contractor has submitted a written Injury and Illness Prevention Program prior to beginning work.
- When appropriate under this Stop Work Policy, notify the Contractor to suspend work until imminent danger is mitigated or resolved.
- Report all stop works, as well as incidents that might reasonably be considered near misses or injuries, to the Safety Administrator.

The Safety Administrator:

- Develops and evaluates the effectiveness of this Stop Work Policy.
- Investigates all safety reports from the APU Project Manager.
- Provides safety-related guidance and training for the APU Project Manager.
- Tracks and reports all safety-related work suspensions or stoppages by Division at the Executive Field Safety Coordinator meeting.

All APU Staff:

- Inform any site workers (including Contractors) if they perceive dangerous work conditions that create an imminent danger, and direct them to suspend or stop work.
- Notify their Supervisor or APU Project Manager (as appropriate), and the Safety Administrator if they observe any threat to health or safety in connection with the project.
- When appropriate under this Stop Work Policy, notify a Third Party's worker or on-site supervisor of imminent danger and, if necessary, contact the Safety Administrator.

Submitted:



Dukku Lee
Public Utilities General Manager

6/3/2021

Date

Approved by the Public Utilities Board on

March 24, 2021

Date