



CCPO Guide – Construction vs Maintenance Activities

There are safety regulatory compliance requirements for both Construction and Industrial/Maintenance activities that include specific responsibilities for the GTAA as the owner representative who approves work to be carried out on Airport Lands. In summary, any **Contractor** activities that fall under the definition of Construction or are being carried out under a Project must go through the FAP Process.

For work going through the FAP process – The safety reviews carried out for each FAP submission by CCPO ensures that contractors comply with the requirements of the construction safety regulations and also serves to document GTAA's due diligence responsibilities as the owner representative for the Airport Lands.

For work not going through the FAP process – The applicable owner representative initiating the work (GTAA/Tenant/Other) is responsible for ensuring that their contractors have properly planned their work and are implementing the necessary mitigating measures to complete their work safely. **This must be fully documented by each contractor in a Work-Specific Safety Plan (WSSP)**. The owner representative should request these plans for their contractors, have a competent person review these plans, and for due diligence keep these plans on file for future reference.

The specific Airport Construction Code applicable definitions include:

Construction means the process of building, erecting, altering, repairing, dismantling, demolishing, structural maintenance, painting, land clearing, earth moving, grading, excavating, trenching, digging, boring, drilling, blasting, or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project.

Project means an initiative agreed upon by the GTAA to design and construct a Facility to be undertaken by a GTAA or a Tenant representative within the Airport Lands and includes:

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipeline, duct or well, or any combination thereof,
- the moving of a building or structure, and
- any work or undertaking, or any lands or appurtenances used in connection with construction.

Unlike construction work, there is no regulatory definition for **maintenance**. Confusion may arise when work is being carried out under a maintenance program which is incorrectly assumed to be an industrial/maintenance activity. Some activities being carried out under a maintenance program are still by definition, construction activities and thus, for clarification, the following revised & new definitions are proposed:

Maintenance means activities that preserve the function of a building, systems or equipment which may involve cleaning, adjusting, or minor repair and that does not include activities mentioned in the definition of construction and which are performed under a project.

Minor Repair (new) include routine activities with a one-for-one part replacement without alteration, relocation or improvement to the system, equipment, or building. However, consideration must be given to the scale, complexity, location, equipment/tools, and risks associated with all the activities required to achieve the repair which may impact worker &/or public safety and/or normal operations that would require the work to go through the FAP process before any work commences.

In summary, it is the **contractors' responsibility**: to assess their work to determine which safety regulations apply (construction or industrial/maintenance), to follow all applicable Airport processes (FAP, Activity Notices, Shutdowns, etc.), to have a **Work-Specific Safety Plan (WSSP)** for all work assigned, and to ensure that their workers understand and follow the WSSP while executing all activities required for completing the work.

Also, refer to the Airport Construction Code Part 7 which details Contractor Health and Safety Requirements for compliance with the safety regulations and the specific requirements for working at Toronto Pearson. Further, the following list provides examples of maintenance activities which may fall under the definition of construction depending on the full scope of work and therefore may require going through the FAP process.



Other Factors to Consider for Determining if a FAP is Required

When determining if work requires a FAP, in addition to establishing whether work is construction or industrial (maintenance), consideration must also be given to the prevalence of other factors such as risks, hazards, operational impact, etc., which may determine the appropriate Airport processes that govern i.e., the FAP process &/or the applicable Activity Notice processes.

- The scale, complexity, and risks of the task - take into consideration concepts such as the amount of time, manpower, multiple disciplines, equipment, tools, materials, and other associated activities that may be required to fully complete the work. Normally, large scale, high risk, complex tasks indicate that a FAP is required.

Example 1: Replacing a steel beam in a building with a new identical beam – although this may be a one-for-one replacement, as it affects the structural integrity of the building, involves high risk & thus potential operation impact to normal Airport/Terminal operations. This work should go through the FAP process.

Example 2: Repairing a pipe leak - although this may be a one-for-one replacement, depending on the location & required means for access to the work area, i.e., if the pipe is in a high ceiling or wall space that requires engineered scaffolding for access &/or public way protection, the removal of drywall to gain access to the repair area, or the repair and painting to reinstate the ceiling, etc., would require that this work go through the FAP process.

Example 3: Re-lamping a light fixture can be considered a maintenance activity. However, re-lamping and/or ballast replacement of an entire area would fall under the definition of a project and thus should go through the FAP process.

- Whether the task improves the original condition or preserves it. Preservation indicates maintenance; improvement indicates construction.

Example 4: Replacing a wet sprinkler alarm valve with a dry sprinkler alarm valve within a sprinkler room will require a FAP. Although the wet and dry valves perform a similar function, a dry system's design criteria are different than that of the original wet system. When using the existing piping for the new dry system, the piping would need to be re-hydraulically verified. This may then also require additional alterations to the system piping to ensure that the converted dry system can deliver the required water flow and pressure required for the area being covered.

Example 5: Repairing a pump failure. The repair of a single pump with one-for-one part replacement would indicate maintenance. However, increasing the size of the pump or replacing a group of end-of-life pumps would indicate a Project and thus should go through the FAP process.

- System-wide impact activities - Major disruption to the overall system/equipment or to the building may indicate that this is a construction activity which should go through the FAP process.

Example 6: - Replacing just an overhead roll-up door motor could be considered maintenance if the motor can be easily accessed without alteration to the building for access however, if the entire door and motor assembly was to be replaced then this would be considered construction which should go through the FAP Process.

Example 7: Replacing a defective fire alarm or security system device that can be easily accessed may be considered maintenance however, depending on the complexity for accessing the device or if the replacing a main control panel or sections of the network cabling which impacts the entire system, would require a FAP.

Contact CCPO for clarification of applicable processes or if there are unique circumstances.

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