

SAFETY Factor

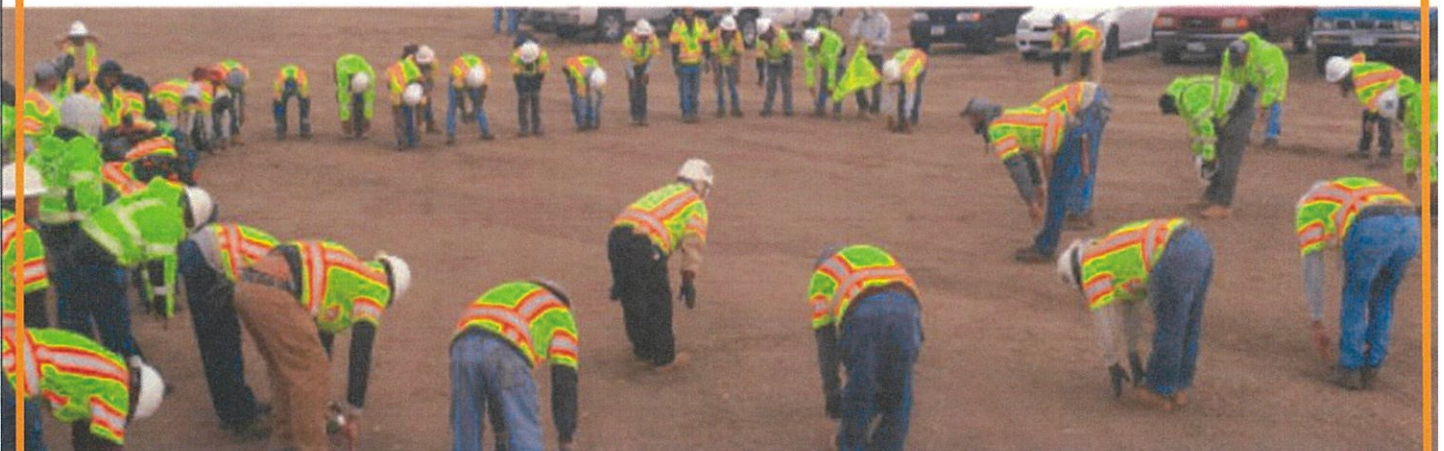
WHERE IS THE DISCONNECT?
PLAN FOR THE SAFETY FACTOR

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AMERICAN
SUBCONTRACTORS
ASSOCIATION
METRO WASHINGTON
THE FIRST & FOUNDING CHAPTER OF ASA

STRETCH-N-FLEX
Prevents Injuries
Get Up & Stretch!



Agenda

01. Introduction

Presentation Request
Objectives
Who is the presenter?
Who is the audience?

PLAN FOR THE SAFETY FACTOR?

02. What the heck are they talking about?

Brain Teaser – Safety's secret language – decode the acronyms.

03. What does the contract say?

Don't SKIP the SAFETY FACTOR of the CONTRACT!

04. Common Thread

Each Project Manager is the coach of his project team.
Know the playbook before you send them out to the field!

05. Scenario Reviews

Case studies,
Share your personal experiences?

OSHA COMES A KNOCKIN'

Agenda

1. OSHA COMES A KNOCKIN

The 3 E's of safety on a construction site
TOP 10 Most Cited OSHA Violations of 2022
Construction Industry incident STATS for USA

3. OSHA INSPECTION GUIDE

What provokes a safety investigation
The Four Main Stages of an OSHA Inspection

2. OSHA penalties

OSHA Violations vs. Citations
Type of Violations
Facts on OSHA Violation Penalty Fees
Posting requirements

4. BREAK OUT GROUP Review and Discuss

5. CONCLUSION

Safety Acronym Activity



What Are They Talking About?

EHSP _____

IAQ _____

JHA _____

IDLH _____

ANSI _____

LOTO _____

PTP _____

PPE _____

OSHA _____

SDS _____

ERP _____

SSHO _____

PTP _____

RCA _____

NFPA _____

MOP _____

SECP _____

PFAS _____

CP _____

CFR _____

HT _____

SOP _____

GHS _____

TBT _____

BBS _____

NIOSH _____

SCENARIO's

1. Elevated contract scope of work in a five-floor stairwell was planned with use of ladders and scissor lifts for primary subcontractor and their involved sub-tiers. The GC rejects the submitted plan and requires a scaffold access system installed for this stairwell activity for all subcontractors needing access to perform scope of work in this work zone. This activity also requires a spotter at all access/egress points of the CAZ areas.

2. Contract scope of work is elevated and near multiple unfinished shaft openings. Most of the contract scope of work is performed near the shaft openings that will have appropriate guardrail protection. The scope of work has been planned to use A-Frame ladders with PFAS and use of tool bags for the tools. The GC contract requires podium/platform ladders and PFAS for heights over ten feet and specifies NO A-Frame ladders. Along with the specifics for the ladders, the GC contract indicates the requirement for elevated work to use tethers for all tools during the elevated scope of work. This affects primary subcontractor and sub-tier contractors.

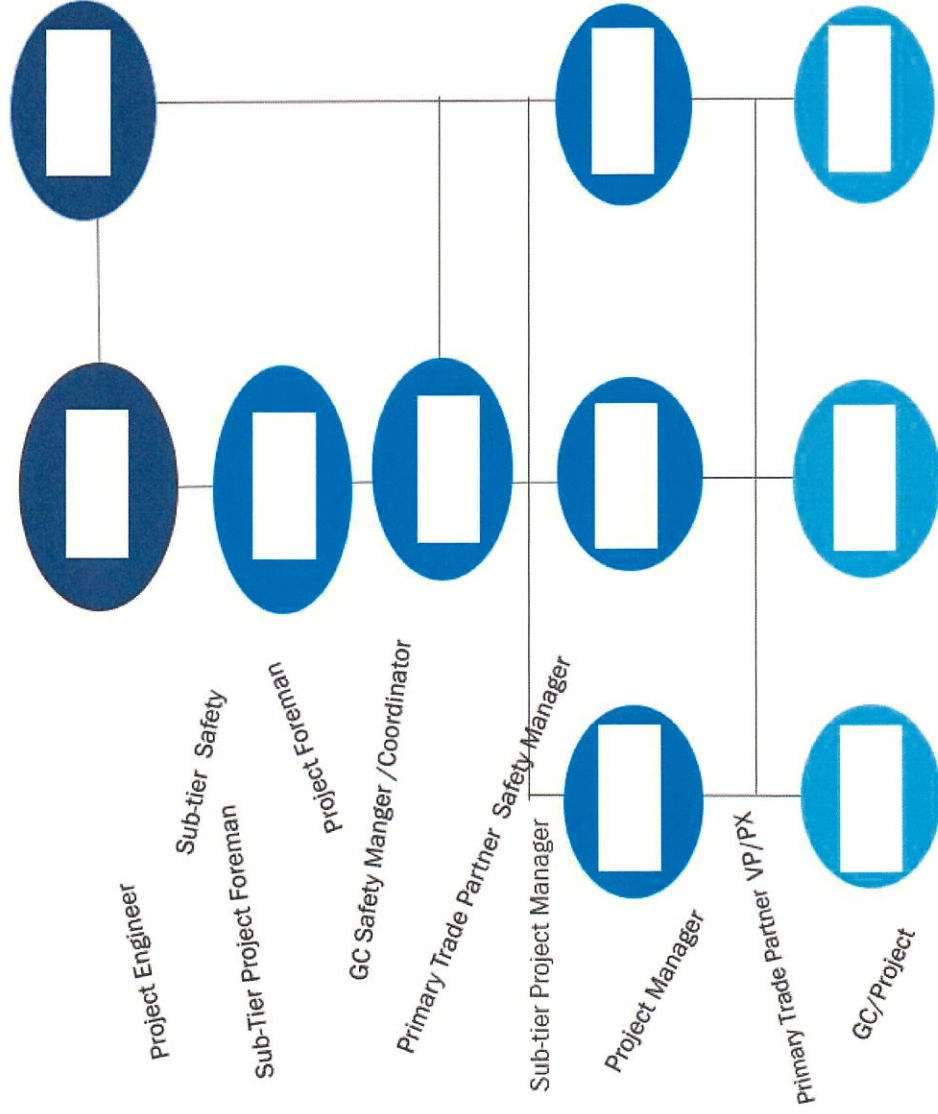
3. GC requires all primary subcontractors and their sub-tier contractors to use industrial safety helmet on all their projects. All Primary subcontractors shall require this to all their sub-tier contractors. The Primary subcontractor did not put this stipulation in their contract to each of their sub-tiers that have been awarded the work. The iconic hard hat with removable chin strap is not acceptable, but a sub-tier team of six people tried mobilizing with regular iconic hard hats and no chin strap. They were not allowed to mobilize. This caused them to have to reject a material delivery of product and their fab shop delivery of gang boxes, etc.

4. GC Corp of Engineer/EM385-1-1 project requires all contract field personnel must be American citizens (show proof) and requires all products/material is USA American made. The contract safety details states: Each trade has a competent person onsite at all times, and that competent person must have EM385-1-1 24 HR fall protection certification. The training card is required to be submitted as this training has an annual renewal requirement. How does this affect the primary contractor and their sub-tier contractors.

5. GC safety details require that if a trade/subcontractor has 15 workers or more they shall have a full-time safety representative onsite. This is required of primary contractor, and each of their sub-tiers. That safety representative will be required to provide full-time safety support and can not hybrid their roles and responsibilities, this individual will also have to have technical means to provide a daily safety observation on the GC's safety inspection software platform (GC can provide training). The GC project team require a resume review of this individual prior to mobilization to accept their credentials.

Common Thread

HAND OUT ACTIVITY



Safety/EHS Pre-Construction Meeting Checklist

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Project/Project#:		Date:	
Contractor:		Mobilization Date:	
Scope of work being pre-planned:			

Meeting Participants:		
Print Name	Company/Job Title	Contact Number(s)

*****Items that should be in place/submitted to prior to start of work.***

Item	
Notes	<p>DPR Philosophy</p> <ul style="list-style-type: none"> • Injury Free Environment • Behavior Based Safety – DPR Culture • Project Goals – Zero <ul style="list-style-type: none"> ○ Zero Accidents ○ Zero Incidents ○ Zero Near Misses ○ Zero Unplanned Business Interruptions
	<p>Subcontractor Pre-Qualification</p> <ul style="list-style-type: none"> • Subcontractor has completed the Pre-Qualification process and been conditionally approved • Should Safety Corrective Action Plan (CAP) be required, the CAP must be submitted and approved prior to mobilization • If a CAP is required, ensure CAP is incorporated into site specific safety plan
	<p>Insurance Requirements**</p> <ul style="list-style-type: none"> • Insurance certificates • Additional endorsement • Point of contact
	<p>Tiered Subcontractors</p> <p>Contractor field leads may be required to be on-site, actively managing any tiered subcontractor.</p> <ul style="list-style-type: none"> • Will any portion of your scope of work be subcontracted? If so, identify: Tiered Subcontractors: _____ Scope of work: _____

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	<p>Temporary Labor</p> <p>Will you be using temporary labor? If so, GC must be notified, and subcontractors / staffing agencies jointly ensure:</p> <ul style="list-style-type: none"> • verify temporary workers have been trained and are competent to perform assigned work. • temporary workers will be treated as company’s own employees in case of injury/emergency.
	<p>Site Specific Safety Plan**</p> <p>Contractor safety plan submitted & reviewed by GC prior to mobilization or letter of acceptance of GC safety plan</p> <ul style="list-style-type: none"> • Include any site-specific requirements pertinent to the project • If a CAP is required, CAP should be included as part of the site specific requirements. <ul style="list-style-type: none"> ○ If a CAP is required, the CAP will be reviewed during any subsequent incident reviews, instances of non-safety compliance and/or during all Root Cause Analysis discussions – should any portion of the CAP not be in compliance, corrective measures must be immediately implemented to address gaps.
	<p>Site Specific Quality Plan**</p> <p>Contractor written quality control plan submitted & reviewed by GC. At a minimum, quality plan should include the following:</p> <ul style="list-style-type: none"> • A schedule of all scope specific submittals required by specification. • A Quality Control Team Organizational Chart • The process for managing document control • Describe process for identification of project specific Distinguishing Features of Work (DFOW) <ul style="list-style-type: none"> ○ Owner expectations ○ Designer expectations ○ GC & Subcontractor expectations <ul style="list-style-type: none"> ▪ A list of all Mock-ups and “first installed work” required ▪ Dates for completion of all mockups and first Install work inspections should be loaded into Pull Plans or schedules as quality milestones • Describe process for development of measurable acceptance criteria for DFOW <ul style="list-style-type: none"> ○ For MEPFP and Structural trade partners: List the process ensuring construction per the BIM model • Describe a process for tracking deficiencies from initial identification, identifying the root cause and implementing preventative actions • Describe process for material transportation, storage and handling <ul style="list-style-type: none"> ○ (How are you going to protect the materials) ○ A materials and equipment procurement schedule • Describe personnel training and certification <ul style="list-style-type: none"> ○ Describe your company’s quality training program that ensure each employee is committed and understands the company’s quality control plan as well as the quality expectations required of them. <ul style="list-style-type: none"> ▪ A list of all individuals and their required certification and licenses.)

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	<ul style="list-style-type: none"> • An outline of all Start-up Schedules, Commissioning Requirements, Spare Parts Requirements, Punch List Procedures, As-built Drawings and Warranty Provisions • Testing and Inspection Plan, Procedures and schedule.
	Safety Representative**
	<ul style="list-style-type: none"> • Identify on-site safety representative, approved by GC, with contact number <ul style="list-style-type: none"> ○ When full-time safety responsibilities are required, cannot perform other work ○ Submit resume for GC review/approval prior to mobilization ○ Minimum OSHA 30-hour training & applicable competent person designations • Identify company safety representative, with contact number
	Safety Orientation**
	<ul style="list-style-type: none"> • Site specific – all project personnel should complete prior to start of work. • Contractors to provide other task specific orientation as needed. • Notify GC of all new hires immediately • Workers off-site for 3 months or more repeat the orientation process
	Weekly Toolbox Safety Meetings
	<ul style="list-style-type: none"> • All personnel attend daily GC mass safety meetings (i.e., safety briefings) • Submit contractor toolbox safety meeting documentation <ul style="list-style-type: none"> ○ Content sufficient to provide on-going task specific OSHA safety training ○ Copies of detailed agenda, sign-in sheets submitted to GC weekly
	Jobsite Safety Audits
	<ul style="list-style-type: none"> • Daily audits performed by the Subcontractor and Tiered Subcontractor Field Lead(s), documented a minimum of once/week
	English Language/Non-English
	<p>If all employees are not fluent in English, contractor should provide alternative means/methods to ensure communication of all safety training and safety related issues, at a minimum:</p> <ul style="list-style-type: none"> • Conduct all safety training in the alternate language • Ensure each crew has a foreman or designated individual who is fluent in English • Post signs in alternate language, as necessary
	Chemical Management Plan
	<ul style="list-style-type: none"> • SDS submitted for any chemical brought on site, prior to arrival • GC Right-to-Know Area • Flammable material storage: <ul style="list-style-type: none"> ○ “Just-in-time” fueling methods preferred ○ Fuel tanks: prior approval from GC project management required • Written plan for spill response and hazardous materials storage & disposal
	Pre-Planning (PTPs and JHAs)
	<p>Pre-Task Planning (PTP)</p> <ul style="list-style-type: none"> • Daily, written, pre-task planning is required, at a minimum, for all work activities. All activities should be pre-task planned and reviewed and/or updated as tasks and/or conditions change. <p>Job Hazard Analysis (JHA)</p> <ul style="list-style-type: none"> • JHAs are high-level planning tools that will break down an entire scope of work into tasks and define the potential hazards and controls for each task. Written,

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	<p>detailed JHAs should be prepared for any high hazard activity, which includes, but are not limited to:</p> <ul style="list-style-type: none"> • Chemicals: hazardous & irritant • Concrete: precast, tilt up, post tension, vertical, form work • Confined Space • Crystalline Silica • Hoisting/Rigging Activities: including cranes, derricks, forklifts, straddle buggies, etc. • Demolition Activities & Hazardous Materials Assessment: asbestos, lead, biohazards or other chemicals in the workplace, as well as general demolition hazard assessment • All Framing Activities (including drywall) • Excavation and Trenching • Fall Hazards: exposures 6+ feet, overhead work • Material Handling • Public Exposure: phased occupancy, partial demolition, traffic control, etc. • Scaffolding • Steel Erection • Startup/Shutdown/System Testing Activities: tool hookup, introduction of process chemicals into systems, utility tie-ins, lockout/tagout, work on energized equipment • Non-Routine Activities: activities not performed in last 6 months 						
	<h3>Safety Training Verification**</h3>						
	<p>Training should be documented at the time of site specific orientation, per scope of work. Documentation of applicable training should be provided upon request to GC. Training required, includes, but is not limited to (refer to Construction Industry Training Matrix at the end of this table):</p> <p>Safety Training:</p> <table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Electrical Qualifications • Qualified Operators • Qualified Riggers • First Aid/CPR </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Hazard Communication • Powder Actuated Tools • Aerial Lifts • Scaffolding – workers and erectors </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Forklifts • Ladders • Confined Space • Bloodborne Pathogens • Lock-Out/Tag-Out • Lasers </td> </tr> </table> <p>Competent Person identified:</p> <table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Rigging • Scaffolding • Fall Protection </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Fall Protection • Steel Erection • Confined Space </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Crystalline Silica • Excavation • Demolition </td> </tr> </table>	<ul style="list-style-type: none"> • Electrical Qualifications • Qualified Operators • Qualified Riggers • First Aid/CPR 	<ul style="list-style-type: none"> • Hazard Communication • Powder Actuated Tools • Aerial Lifts • Scaffolding – workers and erectors 	<ul style="list-style-type: none"> • Forklifts • Ladders • Confined Space • Bloodborne Pathogens • Lock-Out/Tag-Out • Lasers 	<ul style="list-style-type: none"> • Rigging • Scaffolding • Fall Protection 	<ul style="list-style-type: none"> • Fall Protection • Steel Erection • Confined Space 	<ul style="list-style-type: none"> • Crystalline Silica • Excavation • Demolition
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	<h3>Medical Management</h3>						
	<ul style="list-style-type: none"> • On-site first aid kit • Injured individuals should be accompanied to the medical facility, regardless of severity, by their foreman or company designee • Identify designated medical provider • Return to Work program • CPR/First Aid trained workers (one per crew) 						

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	<p>Stretch & Flex</p> <ul style="list-style-type: none"> • GC required/not required • Contractors – encouraged to participate • Project teams reserve the right to make stretch and flex a requirement for all subcontractors 			
	<p>Substance Abuse Testing</p> <ul style="list-style-type: none"> • Post accident/post incident, including near miss • For cause 			
	<p>PPE (personal protective equipment)</p> <p><i>Minimum:</i></p> <ul style="list-style-type: none"> • Hardhat • Safety glasses/approved eye protection • Substantial leather work boots (no tennis shoes look-alikes) • Clothing -- shirts w/sleeves, pants w/o holes <p><i>As required for work activities:</i></p> <table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Gloves • Leather -- material handling • Kevlar -- sharps, potential for cuts • Rubber -- chemicals, concrete • Insulated – per electrical activities • Anti-vibration – jack/roto etc. </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Kevlar sleeves – demolition • Foot protection <ul style="list-style-type: none"> ○ Metatarsal guards -- jackhammering, tamping ○ Rubber boots -- chemicals, concrete • Hearing protection • Faceshields/goggles • Respiratory protection -- as required by hazard </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> • Welding hoods, shields, protective wear • High visibility safety attire –Class 2 or 3 vests for vehicular traffic, dayglow t-shirts • Other as needed or required by OSHA, SDS, manufacturer or GC hammering, </td> </tr> </table>	<ul style="list-style-type: none"> • Gloves • Leather -- material handling • Kevlar -- sharps, potential for cuts • Rubber -- chemicals, concrete • Insulated – per electrical activities • Anti-vibration – jack/roto etc. 	<ul style="list-style-type: none"> • Kevlar sleeves – demolition • Foot protection <ul style="list-style-type: none"> ○ Metatarsal guards -- jackhammering, tamping ○ Rubber boots -- chemicals, concrete • Hearing protection • Faceshields/goggles • Respiratory protection -- as required by hazard 	<ul style="list-style-type: none"> • Welding hoods, shields, protective wear • High visibility safety attire –Class 2 or 3 vests for vehicular traffic, dayglow t-shirts • Other as needed or required by OSHA, SDS, manufacturer or GC hammering,
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	<p>Accident Reporting, Investigation and Root Cause Analysis</p> <ul style="list-style-type: none"> • Immediate reporting of any injury to GC • Reporting of all incidents & near misses immediately to GC • Completion of INCIDENT reporting • Root Cause Analysis (RCA) – <ul style="list-style-type: none"> ○ Performed for all incidents (safety or quality) except OSFA injuries ○ If CAP is in place, review of CAP is completed as part of the RCA process. Corrective actions developed and tracked through to completion. <p>Intent of injury reporting - GC Culture</p>			
	<p>Emergency Response Plan</p> <ul style="list-style-type: none"> • Explain GC emergency response plan 			
	<p>Hot Work Permits</p> <ul style="list-style-type: none"> • Daily/per shift Hot work permits required in occupied facilities • Bottle cart storage – ½ hour fire wall on cart or separate 20' • Fire extinguisher within 10' of hot work • Welding shields and blankets as applicable • Welding machines set-up as per exhaust and prevailing wind • Chop saw tables should have protective shields placed behind them 			

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	<p>Progressive Discipline Program</p> <ul style="list-style-type: none"> ○ Violations may result disciplinary action, up to and including removal from the project ○ Zero tolerance issues may include these areas: <ul style="list-style-type: none"> <li style="width: 50%;">○ Fall protection <li style="width: 50%;">○ Horseplay <li style="width: 50%;">○ Lockout/Tagout <li style="width: 50%;">○ Substance Abuse <li style="width: 50%;">○ Confined space entry <li style="width: 50%;">○ Other site specific zero tolerance items
	<p>Hazardous Energies Management</p> <ul style="list-style-type: none"> ○ Coordination of all activities with owner ○ Detailed JHA, PTP and/or work procedures required ○ Designated subcontractor’s competent person for LO/TO & EEW operations; all affected workers trained per their scope of work ○ Work on energized circuits allowed <i>only if no other feasible means</i> of de-energizing can be demonstrated ○ Systems testing <ul style="list-style-type: none"> ○ Performed per specifications and/or manufacturer requirements ○ Hydro testing preferred or compelling reason for use of pneumatic testing
	<p>ICRA Requirements</p> <ul style="list-style-type: none"> ● Maintain negative air pressure: ante-chamber doors maintained closed at all times, no work in ante-chambers, filters checked daily/replaced as needed, immediately address/correct holes in flex tubing or gaps in temp ICRA walls ● Clean Work Areas: maintain/use tacky mats, booties inside work spaces, clean body/equipment/tools before exiting workspace, clean work at all times
	<p>Fall Protection</p> <ul style="list-style-type: none"> ○ Competent person identified ○ Documented pre-task planning required ○ Fall protection measures required at 6’ ○ All workers trained, documentation made available to DPR upon request ○ Fall protection systems inspected daily by competent person, including anchorage points and equipment ○ Rescue plan developed by competent person, included on PTP
	<p>Excavation & Trenching (exterior and interior)</p> <ul style="list-style-type: none"> ● 811/OneCall/Bluestake/USA current & verified ● Private utility locator ● “Soft Dig” potholing to visually locate existing utilities REQUIRED on existing facilities or where impact to facilities, public health and/or safety has the potential to be compromised (<i>if “soft dig” cannot be used, a compelling reason must be submitted in writing and approved by the GC project team prior to start of work.</i>) ● Pre-Excavation Checklist & Pre-Task Plan completed by competent person; reviewed by GC prior to start of excavation; utilities location map & 811/OneCall/Bluestake/USA tracking board maintained current ● Subcontractor must have excavation competent person at the/each location of excavation at all times while work is in progress; GC reserves the right to request and verify credentials ● All workers trained to recognize hazards associated with the work to be performed (documentation made available to GC upon request) ● Equipment operators trained (documented)

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	<ul style="list-style-type: none"> • Daily, documented equipment inspection • Fall protection provided for work within 6' of excavation 6' or more in depth • Walkways/bridges with handrails provided at crossover areas • Contingency plan in place on existing facilities prior to start of work • <i>GC reserves the right to require, at the subcontractor's expense, protective systems to be installed at 4', at no cost to the owner, regardless of subcontractor's competent person findings</i>
	Confined Space Entry
	<ul style="list-style-type: none"> • Spaces should be evaluated prior to entry for permit / non permit entry • Host Employer responsibilities • Controlling Contractor • Entry Employers • Worker training • Rescue and emergency services
	Crystalline Silica Exposure Control Plan (JHA)
	<ul style="list-style-type: none"> • If required, the following should be submitted to the GC project team, in writing, two weeks prior to start of work. The Silica Exposure Control Plan (JHA) should include, at a minimum: <ul style="list-style-type: none"> ○ Description of tasks to be performed ○ Housekeeping measures to be used ○ Engineering controls (such as water or ventilation) to be used to limit worker exposure to airborne silica ○ Provisions for providing respiratory protection when engineering controls cannot adequately limit exposure to airborne silica, including their medical surveillance program; ○ Provisions to limit worker access to high exposure areas; ○ Training workers on silica risks and how to limit exposures. ○ Identify company's competent person
	Cranes
	<ul style="list-style-type: none"> • Documentation submitted & approved prior to crane arrival on-site: <ul style="list-style-type: none"> ○ Crane/lift annual certification ○ Crane/lift contractor's certificate of insurance ○ Operator's certification ○ Copy of load charts pertinent to the specific crane (in the configuration to be used) being brought on site ○ Written verification from crane/lift owner that maintenance has been performed pursuant to manufacturer's recommendations. ○ Documented verification of training for riggers, signalers and assembly/disassembly director and/or qualified lift supervisor ○ Written verification of assembly/disassembly procedures • On-site documented daily inspections should be completed • Integrated anti-two block system • Work around power lines • Tower Cranes: <ul style="list-style-type: none"> ○ Weekly inspection of OSHA retrieval basket ○ Trained riggers/signalers (documented) <ul style="list-style-type: none"> • Colored vest, • "X" on top of hardhat

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	<ul style="list-style-type: none"> • Whistles or air horns for load movement • Personnel on receiving end prior to load flying • Taglines on all loads
	Water/Spill Management
	<ul style="list-style-type: none"> • Water spill response kits required to be provided by the contractor in areas where work is being conducted with the potential for water spills, releases or leaks • Multiple kits may be required, depending upon scope of work (minimum is one kit per floor, per contractor as applicable) • Shut off locations, accessibility, facility contact if required
	Tools & Equipment
	<ul style="list-style-type: none"> • Daily inspection (documentation required for forklifts, scissor lifts, boom lifts, heavy equipment and cranes) • Maintenance per manufacturer's specifications • Employee training • Spotters as required for congestion/hazardous areas • Ladders: <ul style="list-style-type: none"> ○ only fiberglass ladders are allowed ○ extension ladders should have a minimum rating ○ labels must be legible • Electrical: <ul style="list-style-type: none"> ○ Minimum 12 gauge electrical cords ○ GFCI protection preferred, or Assured Grounding Program ○ No patches on cords ○ Elevate cords and protect from damage
	Core Drilling / Saw Cutting
	<ul style="list-style-type: none"> • The subcontractor competent person should be on the job site at all times to monitor coring/cutting • Daily, detailed, written pre-task plan required • Before all cores/cuts: <ul style="list-style-type: none"> ○ Verify as-builts ○ Consult with facilities personnel ○ Utility locating ○ Additionally, one of the following must be performed: <ul style="list-style-type: none"> ▪ Ground Penetrating Radar (GPR) ▪ X-ray • Coring/cutting above occupied areas must be coordinated with DPR • Coring/cutting operators should be equipped with appropriately rated rubber gloves and boots • All coring/cutting requires full cleanup and water containment as work is being performed • Materials must be removed from the work area and disposed of properly
	Forklifts
	<ul style="list-style-type: none"> • Daily Inspections • Training Certifications for all operators (current, within 3 years, carried on person) • Backup alarm • Seatbelts • Engines turned off when leaving unit unattended

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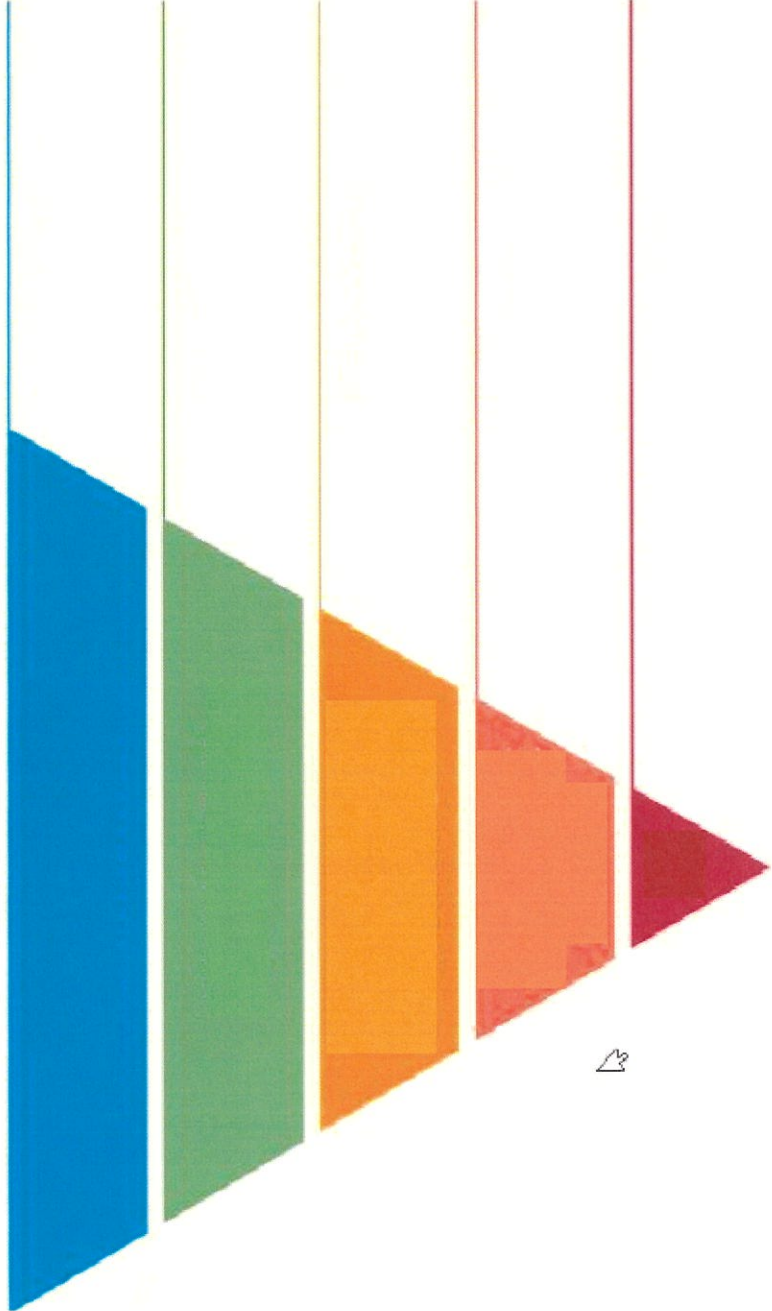
	<ul style="list-style-type: none"> • Rigging directly to forks not allowed, manufacturer’s approved attachment device required • Secure loads on lifts • Material unloading: <ul style="list-style-type: none"> ○ Flag off back side of truck, and/or ○ Provide spotter to create a no access zone
	<p>Material Handling & Storage</p> <ul style="list-style-type: none"> • Sufficient, appropriate manpower • Plan material flow -- minimize the need for double handling of materials • Material carts for movement • Spotters • Pinch Points • Utilize elevated cut station, i.e., saw horses, debris containers, etc. • Use of mechanized equipment whenever possible, or proper body mechanics when not possible • Protect materials from moisture/water • Placement of materials <ul style="list-style-type: none"> ○ access/egress paths maintained clear at all times ○ do not store within 6 feet of hoistway or inside floor openings ○ do not store within 10 feet of solid exterior wall high than materials • Use racks and/or carts whenever possible • Consolidate material when possible • Protect from trade damage • Secure material from displacement • If lifting/hoisting system is needed, all components are labeled with capacity • Material unloading: <ul style="list-style-type: none"> ○ Flag off back side of truck, and/or ○ Provide spotter to create a no access zone ○ Maintain eye contact between operator/driver/spotter
	<p>Unmanned Aerial Vehicles (Drones)</p> <ul style="list-style-type: none"> • The use must be pre-approved by GC project team • Detailed pre-plan must be developed and reviewed by GC project to flight. • Only Skycatch and KESPRY drones are approved for flight • Flights must stay below 400 ft • The person controlling the drone must have a valid FAA pilot license • A second contact needs to be present during the flight (next to the pilot) to act as a spotter • On-site personnel must be informed of the flight • The owner must approve the flight
	<p>Meetings</p> <ul style="list-style-type: none"> • Site safety orientations (daily, as needed) • Mass safety meetings (start of the week, beginning of shift) • Daily huddles • Subcontractor/foreman coordination meetings • Scheduling/weekly work plan (WWP) meetings for interior and exterior areas • Map sessions, as needed

Safety/EHS Pre-Construction Meeting Checklist

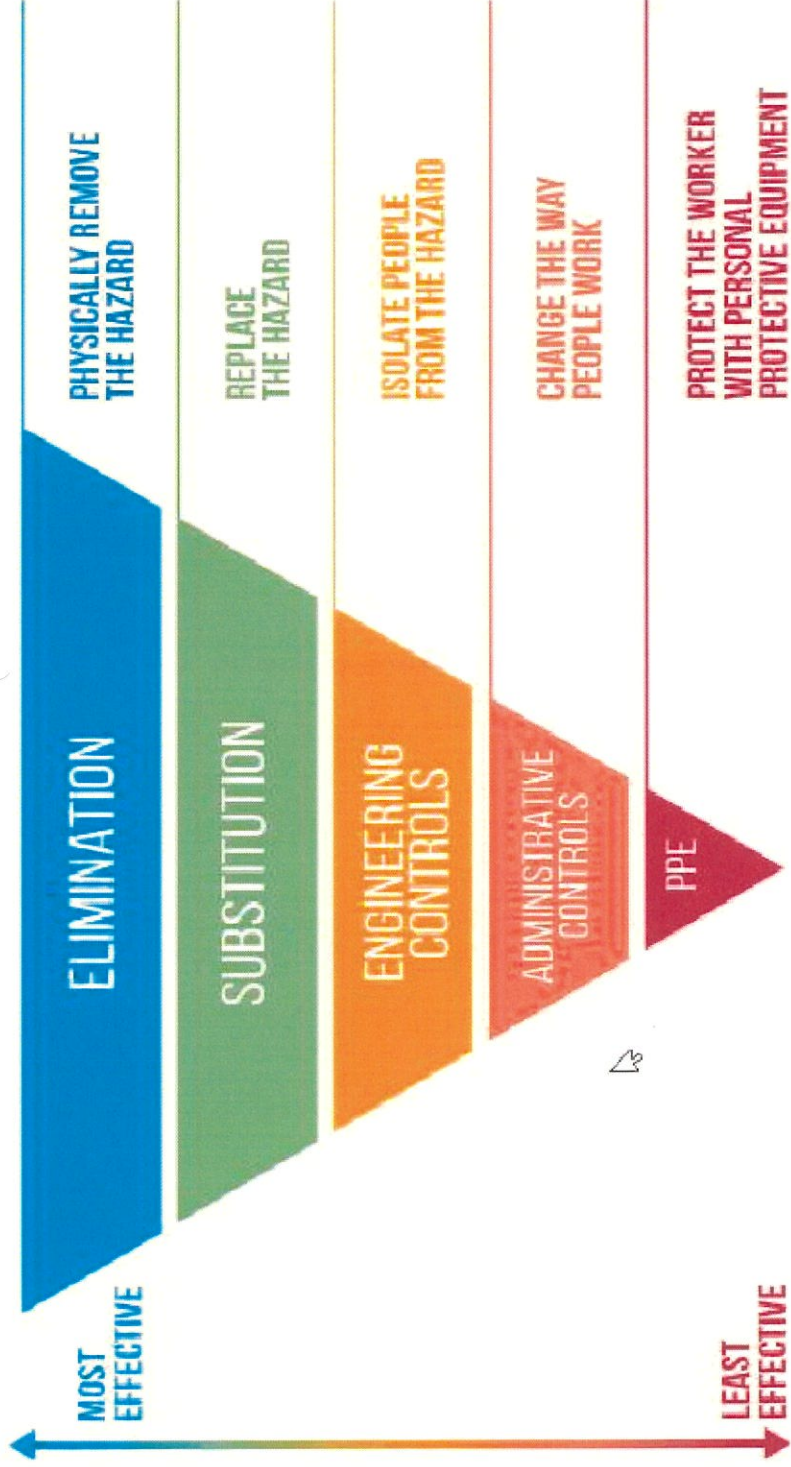
Archive Document – DO NOT DISCARD

	<p>Project Logistics</p> <ul style="list-style-type: none"> • Evacuation Plan & Meeting Area • Vehicle Access and worker parking • Trailer complex • Site & Logistics Plan • Project hours • Laydown areas • Visitor and Driver/Delivery personnel PPE guidelines • Lunch/eating area location • Lunch truck • Worker Access • Restricted areas • Badging requirements
	<p>Site Cleanup</p> <ul style="list-style-type: none"> • Performed daily • Site specific clean-up plan • Dumpsters, cart and trash receptacle availability • Materials consolidated and secured at end of shift • Compressed gas cylinders properly secured/stored at the end of shift
	<p>Site Communications</p> <ul style="list-style-type: none"> • Radios or other communication devices • Emergency channels • Contact list of all supervisory personnel • No iPods, Bluetooth technologies or other items to be used in the field •
	<p>Public/Owner Relations Issues</p> <ul style="list-style-type: none"> • Noise • Indoor air quality • Dust • Restroom usage • Access
	<p>Daily Reports</p> <ul style="list-style-type: none"> • Completed daily, turned in weekly at a minimum • Hours worked
	<p>RFIs</p> <ul style="list-style-type: none"> • Process and procedures
	<p>Overtime</p> <ul style="list-style-type: none"> • GC approval required, hours verified prior to work
	<p>Schedule</p> <ul style="list-style-type: none"> • Permit status • Start date/end date • Weekly work plans • Subcontractor input • Constraint removal • Substantial completion • Critical milestones
	<p>Drawings</p> <ul style="list-style-type: none"> • Review drawings • Site Logistics • As-builts

HIERARCHY OF CONTROLS



HIERARCHY OF CONTROLS



OSHA INSPECTION GUIDE

FACING AN OSHA INSPECTION

When an OSHA Compliance Officer (C.O.) arrives on a project, the stress level of the project team can go up a few notches. The best way to minimize this stress and have a successful OSHA inspection is to know your rights and responsibilities under the statutes, company policies and to review them with project management team on a regular basis. Whether your project falls under a federal or state program it's all the same when it comes to inspections.

When an OSHA C.O. Arrives on the Jobsite

- Designate safety knowledgeable leaders on your project to interface with the OSHA C.O. during an inspection
- Consider in advance of an OSHA inspection who you want present during the inspection; Safety Representative, Client Representation, Subcontractor Management, 3rd party consultant, etc. present during the inspection.
 - Ask the C.O. to allow time for the Regional Safety Representative to come to the site to accompany the inspection team. (typically, a C.O. will allow up to 1 hour for travel time)
- **Do not leave the C.O. alone** while he/she is on site and escort them directly to a private conference room or meeting space if available.
- The C.O. should present his or her credentials (*Review them carefully*)
- The C.O. should explain the reason for the inspection. (i.e. random, complaint, injury, and if he/she doesn't, now would be a good time to ask)
- If a complaint was made request to see a copy of the complaint.
- Notification of the impending inspection needs to be given to the Safety Department, Project Manager, Project Executive, and subcontractor supervision as soon as possible.
- An opening conference should be held with the project team including subcontractor supervision.
 - It's one of your rights to ask for the opening conference. If denied, do the following:
 - Document the reasons stipulated by the inspector
 - Notify the Trade Partners of the change
 - This action will probably indicate the type of inspector/inspection and how to proceed
- Inquire as to the scope of the inspection (specific piece of equipment/area or wall to wall).
 - If wall-to-wall inspection, ensure the Safety Department is notified for direction.
 - If it's a specific inspection, reach agreement as to approach for inspection and take the most direct safe path to that specific equipment/area.
- If the C.O. identifies this as a *Random* or a *Programed Inspection*; Request a **Focus Inspection**.
 - *Focused Inspection* - focused on Big 4 hazards. (Falls, Struck By, Caught Between, and Electrocution)
 - If your request is rejected, document precisely why.
- If possible, have a team member prepare paperwork for the C.O. during the walk through. Do not give any paperwork to the C.O. during the visit, this can all be forwarded by the team following the inspection. If the C.O. asks for paperwork, politely inform him/her that company policy is to gather the information and send upon written request. For example: Toolbox Talks, additional Pre-Task Plans, Project Specific Safety Plans, SDS Binders/Documentation, Meeting minutes regarding Safety or significant safety planning, Contractual Information
- The jobsite inspection walk will begin.
 - Walk with C.O. (elbow to elbow) through entire inspection.
 - Answer any questions in a direct, courteous, polite manner, but don't offer any unnecessary information.
 - Keep a good steady pace throughout the inspection.
- If the C.O. stops to look at something, ask them what they see. If they take pictures/videos, you do the same. Take two pictures; one at the spot the C.O. took one and one three paces behind. Make notations of any hazards as indicated by the C.O.
- Make any immediate corrections you can while the C.O. is present. Trade Partners should also be encouraged to make corrections.
- Closing conference should be held with the affected parties after completing the walkthrough.
- Don't offer unnecessary information or comments during the closing conference and do not ask how much money the violations will cost us. (this is not determined by the C.O.)
- Escort the C.O. off the premises.
- Complete the OSHA / Compliance Inspection Form and share with your safety representative if not present for the inspection.
- Hold a meeting with project team and review inspection findings and lessons learned. Contact affected Trade Partners and ask for corrective actions on their part.
- Share inspection trends and anything unusual you noticed during the process with your Safety Representative.



For questions or comments please contact your Safety Representative.