

# **Health and Safety Plans**

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# **Discussion Outline**

## Definitions of Safety Plans

- Types
- Goals
- Needs

## Regulatory Requirements of Different Plans

- Hazardous waste
- Construction
- Businesses

### Scope and Content Requirements

- Requirements of a Plan
- Where to Gather Data
- Review and improvement

### Resources and Guidelines

- OSHA Provided Regulatory Updates
- SSSP / HASP Frameworks



# <u>SSSP – HASP – IIPPs: Clarity</u>

#### State IIPP (Business Wide)

An Injury and Illness Prevention Program, (IIPP) is a basic safety program tailored to business operations. State OSHA programs require <u>employers</u> to adopt an IIPP, including California, Hawaii, Louisiana, Michigan, Minnesota, Mississippi, Montana, Nevada, <u>New Hampshire</u>, New York, North Carolina, Oregon, Utah, and Washington.

California

§3203. Injury and Illness Prevention Program.

(a) Effective July 1, 1991, every <u>employer</u> shall establish, implement and maintain an effective Injury and Illness Prevention Program (Program). The Program shall be in writing.

<u>OSHA SSSP / HASP (Project Specific)</u> 1910.120(b)(4)(i) 1926.65(b)(4)(i)

The site safety and health plan, which must be kept on site, shall address the safety and health hazards of each phase of site operation and include the requirements and procedures for employee protection.



# What is a Safety Plan

A Site-Specific Safety Plan (SSSP) is a risk management document written and maintained by the contractor to manage the health and safety of the construction site and those working there.

Documented Strategies for getting things done. To identify and document hazards and risks through analysis of systems hazards during early design.

A Site Health and Safety Plan (HASP) describes the potential hazards of the work site, along with all departmental policies, controls and work practices selected to minimize those hazards

https://www.osha.gov/etools/logging/site-safety-health-

plan#:~:text=A%20site%20Safety%20and%20Health%20Plan%20describes%20the%20potential%20hazards,injuries%20is%20imple menting%20the%20plan.

Both are a part of a larger safety and health management plan

SSSP: Site specific plan (Often Construction Environments) HASP: Health and Safety Plan (Often Hazardous Materials)



# <u> 1910.120 – General Industry</u>

1910.120(a)(1)(i)

<u>Clean-up operations required by a governmental body</u>, whether Federal, state, local or other involving hazardous substances that are conducted at uncontrolled hazardous waste sites (including, but not limited to, the EPA's National Priority Site List (NPL), state priority site lists, sites recommended for the EPA NPL, and initial investigations of government identified sites which are conducted before the presence or absence of hazardous substances has been ascertained

1910.120(a)(1)(ii) Corrective actions involving clean-up operations at sites covered by the Resource Conservation and Recovery Act of 1976 (RCRA) as amended (42 U.S.C. 6901 et seq.);

1910.120(a)(1)(iii) <u>Voluntary clean-up</u>operations at sites <u>recognized</u> <u>by</u> Federal, state, local or other <u>governmental bodies</u> as <u>uncontrolled hazardous waste sites</u>

1910.120(a)(1)(iv) Operations involving hazardous wastes that are conducted at treatment, storage, and disposal (TSD) facilities regulated by 40 CFR parts 264 and 265 pursuant to RCRA; or by agencies under agreement with U.S.E.P.A. to implement RCRA regulations; and

1910.120(a)(1)(v) <u>Emergency response operations</u> for releases of, or substantial threats of releases of, hazardous substances <u>without regard to the location of the hazard</u>

**Scope**. This section (above) covers the following operations, unless the employer can demonstrate that the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards:



# 1926.65(b)(4)(i) - Construction

#### Site-Specific Safety and Health Plan

The site safety and health plan, which must be kept on site, should address the safety and health hazards of each phase of site operation and include the requirements and procedures for employee protection.

#### Chapters of full HASP Plans

- 1. Organizational Structure
- 2. Site Characterization & Job Hazard Analysis
- 3. Site Control
- 4. Training
- 5. Medical Surveillance
- 6. PPF
- 7. Exposure Monitoring
- 8. Heat Stress
- 9. Spill Containment
- 10. Decontamination
- 11. Emergency Response
- Standard Operating Procedures (SOPs)
   Confined Spaces (if needed)

SDS must also be included





# **Plans Breakdown**

<u>SSSP (Not Necessarily Required by Law)</u> Addresses site / project specific operations

<u>HASP (Required by Law)</u> Addresses hazardous waste / spill operations

<u>IIPP (Required by Law in Some Situations)</u> Operation wide plan for universal injury prevention





# Do I Need a Plan

A basic decision tree can help determine what type of plan is needed for a project.

If a decision tree is used, it is critical all phases of the project are accounted for when making your choice.

In some cases, a HASP or SSSP will be required by statutory law, city, or client demands.

			Field Services Checklist	Health and Safety Plan (HASP)	Site-Specific Safety Plan (SSSP)
A. I	Field Work Assignment not specifically listed below	X			
1.1	. Projects for which a client requests a Site-Specific Safety Plan (SSSP)				X
2.1	. Projects Requiring staff to perform any of the following:				X
	<ul> <li>Enter into a Confined Space</li> <li>Enter into a manway, culvert, or vault</li> <li>Enter into or work directly adjacent to a trench or excavation</li> </ul>	on			
3.	Projects posing significant safety considerations to Tighe & Bond s	taff, such as from:			x
	<ul> <li>Vehicular traffic (e.g., roadways)</li> <li>Hazardous chemicals (provided no HASP is required)</li> <li>Hazardous building material assessments (HBMA)</li> <li>Exposed/Live electrical equipment (e.g., substations)</li> <li>Fall hazards (greater than 4 feet)</li> <li>Structural hazards (e.g., abandoned buildings)</li> </ul>	<ul> <li>Work on, in including control</li> <li>Drilling or control</li> </ul>	ay field work , or adjacent ontaminated s	to hazardous w ediment increte or maso	
	Site assessment or subsurface remediation operations required by body, whether Federal, state, local, or other involving hazardous s			x	
<ol> <li>Voluntary assessment or subsurface remediation operations at sites recognized by Federal, state, local, or other governmental bodies as uncontrolled hazardous waste sites or sites that have a high probability of being identified as uncontrolled hazardous waste sites</li> </ol>				x	
	Operations involving hazardous wastes that are conducted at a tre and disposal (TSD) facility	atment, storage,		x	
	Emergency response operations for releases of, or substantial thre hazardous substances without regard to the location of the hazard			x	

#### 29 CFR § 1910.120(2)(i)

All requirements of part 1910 and part 1926 of title 29 of the Code of Federal Regulations apply pursuant to their terms to hazardous waste and emergency response operations whether covered by this section or not. If there is a conflict or overlap, <u>the provision more protective</u> of employee safety and health <u>shall apply</u> without regard to 29 CFR 1910.5(c)(1).

5(c)(1) address applicability of the standard across all impacted bodies



# **Review**

SSSP, HASP, and IIPPs are 3 different plan types each addressing a specific area. Some are required by law at the state and or federal level.

OSHA, EPA, and states may have their own requirements for plan contents so check how your local government is impacting your plans.

When choosing a plan ensure you are following codified laws, demands of clients, and all phases of the project.

OSHA Quick Takes is an excellent source of information to track federal regulatory changes.

https://www.osha.gov/quicktakes/





s who rely on QuickTakes for information about workplace safety and health. QT is ickTakes subscribers began receiving occasional "Did You Know?" messages infor

Now we let's talk a little about what and where they are needed and explore what it should contain......

# What Should a Plan Include

- Establish Plan Ownership and Project Information
  - Organizational Structure
  - Site Control
    - Upwind / downwind controls
    - Topography Issues
    - Vehicle traffic
- Procedures and Measures to Control / Avoid Hazards
  - Exposure Monitoring
  - Medical surveillance
  - Heat / Cold stress
  - Spill containment
  - Decontamination
  - Confined Space
- Contact Information in The Event of Emergencies
  - Emergency Response Plans
- Types of Hazards: New and existing from previous work
  - SDS for all potential chemical exposures
- PPE Requirements and Guidelines
  - Some PPE may require additional medical monitoring
- Training Requirements



#### Establish Plan Ownership and Project Information

	Project	/ Site Inform	nation 💻			
Person Developing SSSP:		Start Date:		Business Line:		
Project Number:		Client Name:				
Project Description:						
Project Address:	Project Address:					
Project Members:	Project Members:					
Plan Applicability:						
All employees working at this site must read, understand, agree to follow this Site-Specific Safety Plan, and sign the SSSP prior to the start of work. This SSSP must be maintained at the site in either paper or electronic copy with associated chemical SDS accessible upon request.						

Through this section, anyone should be able to determine the origin, project, and ownership of a plan. This is the "Organization Structure" of the plan.



#### • Establish Plan Ownership and Project Information

F. Site-Specific Safety Plan Review and Approvals							
	1. Person Developing SSSP:						
Name:							
Completion Date:							
2. P	roject Manager or Project Director	:					
Name:							
Review/Approval Date:	Review/Approval Date:						
Save the file including the project number and Client or Street Address, then chick the <b>SUBMIT</b> button for final review. Always save file before clicking submit button.							
3. Safety & Health Department Review:							
Name:							
Review Date:							

Formal sign off indicates that the plan was developed and reviewed by competent persons. Having a formal system to submit plans to a set repository also increases ease of accessing and updating plans.



### G. Site-Specific Safety Plan Communications and Sign Off

All employees working at this site must read, understand, and agree to follow this SSSP, prior to the start of work. This signed plan and all associated SDS must be kept at the job site in hard or digital copy. A HARD COPY must be kept if there is risk of poor connection or a fixed trailer is available.

ACKNOWLEDGMENT					
Employee Name	Signature	Date			

All persons that will access the site must read and sign off on the plan. Additionally, guests and contractors must read and sign off when accessing the site to ensure all parties are aware of the plan.



### Establish Plan Ownership and Project Information

Project Manager:		B. Key Project Personnel	
Project Manager: Emergency Contact: Emergency Contact: Safety Director: All On-Site Staff: Key Client Contacts Name of Client: Primary Client Contact Report Emergencies To: Other Key Contractor: Primary Client Contact Report Emergencies To: Other Key Contacts Name of Subcontractor: Is this a Subcontractor? Yes No Contractor Supervisor: Report Emergencies To:		Employeee Contacts	
Emergency Contact:	Role	Name	Contact Number
Safety Director:	Project Manager:		
All On-Site Staff:       Image: Client Contacts         Name of Client:       Image: Client Contacts         Primary Client Contact       Image: Client Contacts         Report Emergencies To:       Image: Client Contacts         Other Key Contacts:       Image: Client Contacts         Name of Contractor:       Image: Client Contacts         Primary Client Contact       Image: Client Contacts         Name of Contractor:       Image: Client Contacts         Primary Client Contact       Image: Client Contact         Report Emergencies To:       Image: Client Contacts         Other Key Contacts:       Image: Client Contacts         Name of Subcontractor:       Image: Client Contacts         Is this a Subcontractor?       Yes       Image: Client Contacts         Subcontractor Supervisor:       Image: Client Contact Client	Emergency Contact:		
Key Client Contacts         Name of Client:         Primary Client Contact         Report Emergencies To:         Other Key Contacts:         Other Key Contactor:         Primary Client Contact         Report Emergencies To:         Other Key Contactor:         Primary Client Contact         Report Emergencies To:         Other Key Contacts:         Other Key Contacts:         Name of Subcontractor:         Key On-Site Subcontractor Contacts         Name of Subcontractor:         Is this a Subcontractor?         Yes         Subcontractor Supervisor:         Report Emergencies To:         Ves         Is this a Subcontractor?         Yes         No	Safety Director:		
Name of Client:	All On-Site Staff:		
Name of Contractor:		Key Client Contacts	
Report Emergencies To:	Name of Client:		
Other Key Contacts:       Key On-Site Contractor Contacts         Name of Contractor:       Primary Client Contact         Primary Client Contact       Image: Contractor Contacts         Report Emergencies To:       Image: Contractor Contacts         Other Key Contacts:       Image: Contractor Contacts         Name of Subcontractor:       Image: Contractor Contacts         Is this a Subcontractor?       Yes         Subcontractor Supervisor:       Image: Contact	Primary Client Contact		
Key On-Site Contractor Contacts         Name of Contractor:       Image: Contractor Contact         Primary Client Contact       Image: Contractor Contact         Report Emergencies To:       Image: Contractor Contacts         Other Key Contacts:       Image: Contractor Contacts         Name of Subcontractor:       Image: Contractor Contacts         Is this a Subcontractor?       Yes         Subcontractor Supervisor:       Image: Contact Cont	Report Emergencies To:		
Name of Contractor:	Other Key Contacts:		
Primary Client Contact     Image: Client Contact       Report Emergencies To:     Image: Client Contacts       Other Key Contacts:     Image: Client Contacts       Name of Subcontractor:       Is this a Subcontractor?     Yes       Subcontractor Supervisor:     Image: Client Contact Supervisor:       Report Emergencies To:     Image: Client Contact Supervisor:		Key On-Site Contractor Contacts	
Report Emergencies To:     Image: Constant State Sta	Name of Contractor:		
Other Key Contacts:     Key On-Site Subcontractor Contacts       Name of Subcontractor:        Is this a Subcontractor?     Yes       Subcontractor Supervisor:        Report Emergencies To:	Primary Client Contact		
Key On-Site Subcontractor Contacts         Name of Subcontractor:       Pres       Pres       Pres         Is this a Subcontractor?       Yes       No       Pres         Subcontractor Supervisor:       Report Emergencies To:       Pres       Pres	Report Emergencies To:		
Name of Subcontractor:     Image: Constract of Subcontractor:       Is this a Subcontractor?     Yes       Subcontractor Supervisor:     Image: Constract of Supervisor:       Report Emergencies To:     Image: Constract of Supervisor:	Other Key Contacts:		
Is this a Subcontractor? Yes No No Subcontractor Supervisor: Report Emergencies To:	K	ey On-Site Subcontractor Contacts	
Subcontractor Supervisor:	Name of Subcontractor:		
Report Emergencies To:	Is this a Subcontractor?	Yes 🗆	No 🗆
	Subcontractor Supervisor:		
Other Key Contacts:	Report Emergencies To:		
	Other Key Contacts:		

Maintaining a list of all key players helps control access and maintains a list of contact information if needed in an emergency.

#### • Types of Hazards: New and existing from previous work

Work Hazards (Check all that apply)						
All Risk	s Selected Will Appear I	n Section H Below				
Actual or Potentia	al Exposure to: (PLACE AN "X"	NEXT TO EACH THAT APPLIES)				
Taking Photos/Videos During Field Work	Poisonous plants (Poison ivy, oak, sumac, etc.)					
Working near vehicle traffic	Temperature extreme (Cold)	Hazardous ticks or insects (Bees, Wasps and Homets)				
Falling objects	Temperature extreme (Heat)	Wildlife animal encounters (bears, deer, moose, snakes, etc.)				
High noise	Working with or Around Live / Exposed Electrical Equipment	Overhead power lines (posing a hazard to staff)				
Exposures to contaminated soils or water	Chemical Use/Exposure (list below)	Driving Company Trailer				
Slips, trips, and falls (Indoors)	Exhaust Gases from Fuel Burning Equipment (i.e., tailpipe emissions, generators, burners, etc.)	Working at Sites Containing Fall Hazards (>4 feet)				
Slips, trips, and falls (Outdoors)	Ergonomic Injuries (strains/sprains) and Impacts to Hands and Fingers	Working near Forklifts				
Working near Railroad Tracks	Working with Hand Tools	Hunters				

All hazards and risks must be identified, and controls implemented. This list may trigger additional procedural needs like LOTO or confined space programming requirements that require a JSA / JHA to support the plan.

### Types of Hazards: New and existing from previous work

Chemical / Hazard Specific Exposures						
Hazardous Building Material (NON HBMA STAFF)	Mold or other microbial Exposures	Lead Exposure				
Asbestos Exposure for HBMA Staff	Benzene Exposure	Hydrogen Sulfide Exposure				
Asbestos Exposure (NON HBMA STAFF)	Cadmium Exposure	Hexavalent Chromium Exposure				
Cyanide Exposure						
This Project Inv	olves the Following Higher F	lazard Work Activity*:				
Use of fall protection equipment:	Use of lift (i.e. scissor/aerial lift as an OPERATOR):	Entry into or working at sites that have a Confined Spaces (tanks/manway/pipe/v ault, etc.)				
Work within an Electrical Substation:	Working with Hazardous Energy - Lockout-Tagout (Control of Hazardous Energy):	Working Around Downed Utility Lines or Transformers				

- Exposure Monitoring
- Medical surveillance
- Heat (OSHA NEP!) / Cold stress
- Spill containment
- Decontamination

### • Procedures and Measures to Control / Avoid Hazards

Detail Task	Hazard	Hazard Control
	Taking Photos/Videos During Field Work	<ul> <li>Survey the area where you'll be taking photos for potential trip, fall, overhead or moving hazards. Be aware of hazards in your surroundings, secure loose camera straps and other equipment you may have on you.</li> <li>Prior to taking a photo/video, look around you and position yourself first before taking a picture/video.</li> <li>Before repositioning, remove the camera/phone from your face and again look 360° around you prior to taking another photo/video.</li> <li>If asking people to move for a photograph, ensure they follow the same safety protocols as the photographer.</li> <li>If photographing an animal, keep your distance. Use zoom rather than getting closer to the animal.</li> <li>Be mindful of vehicle/construction equipment traffic, whether near or on the side of a road, at a construction site or in a parking lot.</li> <li>Have a spotter (if available) watch your surroundings for you, especially if taking videos and you need to move around an area or if you are in area with traffic or moving equipment hazards.</li> <li>Consider using telescoping selfie sticks when needing to take photo/video documentation within an area that poses a potential hazard to yourself (e.g., a confined space, in/around trenches, at elevations, etc.).</li> </ul>
Working on active roads with no police support.	Working Near Vehicle Traffic	<ul> <li>Always wear a reflective vest.</li> <li>If work is at night and/or traffic speeds are 50 mph or greater, Type R, Class 3 hi-vis clothing is required.</li> <li>Stay clear of traffic and moving vehicles.</li> <li>If parked along roadway, position vehicle so it provides protection from on-coming traffic and use flashers to warn of stopped vehicle.</li> <li>Maintain constant awareness of surroundings.</li> <li>Use physical barriers between work area and traffic when possible.</li> <li>Stay within physical barriers whenever possible.</li> <li>Request flaggers/police details when necessary to avoid accidents.</li> </ul>
Walking / working below adjacent building construction	Falling objects	<ul> <li>Wear a hard hat when work is taking place overhead and when there is a potential for falling objects.</li> <li>Avoid walking, standing, working under overhead work.</li> <li>Avoid walking, standing, working under overhead work.</li> </ul>

# The task, hazard, and control must be identified for all unique tasks.



#### • Procedures and Measures to Control / Avoid Hazards

This Project Involves the Following Higher Haz	nis Project Involves the Following Higher Hazard Work Activity*:								
Use of fall protection equipment:	<ul> <li>NOTE: Fall Protection training (Using a Personal Fall Protection System CBT #210T) is required prior the use of fall protection equipment (includes harness, lanyard and/or lifeline).</li> <li>If a leading edge of an elevated surface must be approached, a harness and lanyard must be used.</li> <li>Ensure fall protection equipment is properly selected and used for the specific fall hazard.</li> <li>Inspect all fall protection equipment prior to use.</li> <li>Do not use damaged or defective equipment.</li> <li>Develop a rescue plan prior to using fall protection equipment.</li> </ul>								
Work within an Electrical Substation:	<ul> <li>ANY EMPLOYEE ENTERING A SUBSTATION FOR ANY PURPOSE AND ANY LENGTH OF TIME MUST BE TRAINED AND APPROVED TO ENTER THE SUBSTATIONS THE EMPLOYER AND THE RESPECTIVE CLIENT SUBSTATION TRAINING RECORDS ARE MAINTAINED ON SITE</li> <li>Do not enter a substation without pre-approval by the client.</li> <li>Do not enter a control house within a substation unless training beyond basic pre-entry safety training has been completed.</li> <li>Prior to entry, complete a pre-entry safety briefing with the client or client representative.</li> <li>Identify and wear appropriate personal protective equipment (PPE) including the following at a minimum (unless specific changes are specified by the escort): <ul> <li>Safety glasses with side shields, hard hat, electrically rated safety footwear.</li> <li>Outer clothing (FR Rated) with a rating of at least 10.0 call/cm<sup>2</sup>.</li> <li>FR rated safety vest.</li> </ul> </li> <li>Always maintain safe distances from energized equipment, as specified by the client and/or client representative.</li> <li>Comply with all client-specific Safety Requirements.</li> </ul>								

Some risks may require additional training including but not limited to fall protection harness usage or electrical substation training.



#### PPE Requirements and Guidelines

D. Personal Protection Equipment						
Define Tasks Requiring PPE	E Body Part (check all that apply)		Detail PPE Type			
	Body		Hi-Vis Vest (ANSI Class 2, Type R) or (FR vests as required)			
	Head					
	Eyes					
	Ears					
	Feet					
	Respiratory					
	Skin					
Example: (Steel / composite toe shoes, leather / rubber / nitrile gloves, Hi-Vis Vest (ANSI Class 2, Type R, Hearing protection > 33 dB, half mask respirator, dust mask, face shield, dialectic gloves, electrical protective clothing						

All PPE needs must be captured. Again, some PPE may trigger additional programming like medical clearances and fit testing. The project may also trigger medical monitoring due to exposures.



## Contact and Information in The Event of Emergencies

A. Emergency and Contact Information									
	Emergency Contacts								
Responder Type	Contact Number								
General Emergency:		911 (include non-emergency number)							
Fire Department:		911 (include non-emergency number)							
Police Department:		911 (include non-emergency number)							
Ambulance:		911							
Utility/Other (Specify):									
Closest Hospital/Urgent care Address and ER:		Distance: Travel Time:							

Knowing where, who, and how to contact emergency response personnel, especially in lone worker situations, is critical.



### Contact and Information in The Event of Emergencies

Additional Emergency Information					
Does the Site Have Cell Service:	Yes		Not Available		If Cell Service is not available: detail how communication will be managed:
			First Aid Kit	•	
			Tick Repellent / Removal Kit		
Location of Emergency Response	Equipment	t:	Fire Extinguisher		
			Spill Response Tools		
			Decontamination Tools:		
			First-aid		
List personnel with specialized training:			CPR		
			CPR / First Aid		
			Spill Response		

Reliable communication is essential, if cell service is not continuous or dependable, another system must be determined. Maintaining first aid and response kits in the operator's vehicle provides faster access to care in the field. 24-hour nursing lines offer further support.

#### Training Requirements

E. Project and/or Client-Specific Provisions & Training	
Applicable Firm Safety and Health Programs and Training Requirements	
(List all In House Safety and Health programs which are applicable)	
Required Specialized Training (i.e., OSHA 10/30/40 and/or Specialized In House training)	
Client, Contractor, and/or State-specific safety and health requirements: (Include items such as client-specific safety and health requirements, Dig-Safe #, Contractor safety orientation, and specifically required state/local licenses or permits)	

Connecticut: New York City: Section 31-53b requires 5-year 10 Hour Refresher Local Law 196 of 2017 requires 5 year 10-hour refresher

Training may be basic OSHA courses, specialty training like LOTO, supplied air, or 10+ hour courses. Being able to show the needed training, connected to training records, allows the plan to be a single source to show compliance. Hefty fines can be issued for failure to train.



# **Review**

A plan is an organic document that <u>may</u> change over time. The plan must be maintained to represent the current phases and conditions of a construction or project time frame.

Failure to review plans can result in new risks being uncontrolled. Formal review and sign off indicating all team members understand the plan is critical, as is scheduled reviews as the project develops.

The plan must be kept on site and available for review at any time. By keeping training records, SDS, and required written programs with the plan, it acts as a one stop compliance center.



After a high-level review of what is needed to complete a plan, lets follow best practices on finding the data we need.....



# **Project Leader and Ownership**

### Person Developing Plan

- Individual leading the development of the plan
- This person should not work alone
- Including employees who will be on site further drives integration

## People who will be impacted (working onsite)

- Operators
- Subcontractors
- Guests
- Visitors

### Emergency Contacts

- At the site
- Local fire
- Police
- Primary Employer

## Project Manager or Director

- Ownership of project compliance to plan
- Provides direction when changes are needed

### Formal Safety & Health Review

- Formal review of plans
- Provides oversight for safety concerns



# **Emergency and Fire Management Planning**

#### Set up site specific plan

- How will individual / groups of employees respond
- Emergency vehicle traffic
- Lone worker concerns

#### Does the site have an existing plan

- Municipalities may have a plan in place
   Universities and structures often have plans
- How can they be applied / adopted to the project

#### Location of portable kits

- First aid
- Tick removal tools
- Bear spray
- 24 Hour Nurse Line

#### Location of closest medical treatment facility

- Does it have an ER
- A 9-5 general medical practice may not offer the proper care
- Is there phone / cell phone reception to reach outside services

### Guide for reporting incidents to site, project, and company management

- How will events be documented
- Will incident impact 300 Injury Logs





# **Hazards and PPE Determination**

### What PPE will be required for all project phases

- Source for fresh PPE identified
- Proper sizing available for all worker types
- Decontamination needed

### Does the site have access to required PPE

- FR and Hi VIZ vests in electrical substation
- How will it be provided
- Ample stock available

### All parties been trained to use PPE

- Proper donning / doffing methods
   Know limitations of PPE
- Expectations for care

#### Have employees been medically cleared

- Half Mask, supplied air masks
- Fit Tests up to date
- Is Lead, Crystalline Silica, or Asbestos an exposure concern \_



# **Training Requirements**

# General site safety and health training

- Risk and safety expectations
- Broad safety training
- Emergency response review

# Site specific training

- Does the site have specific training needs
- OSHA 10/30, HAZCOM 40
- Some states like Connecticut require refresher training on OSHA 10 Hour

# OSHA Specific training

- PPE
- Fall Protection
- General Electrical

# Are all trainings current and up to date

- Training history
- Content proper for project location
- Do you have a system to monitor training completion



# **Review**

Digging for data is a key step. It is important to capture all the relevant risks and implement controls for each. If risks are missed, training and PPE needs might not be caught.

Additionally, a framework of ownership and response both for project management and in the event of an emergency in the field shows proper review by competent parties was done.

Training and proper PPE is another critical step requiring a detailed review and rereview as the project changes.



Where else can source information and support be found.....



# **OSHA NEP and LEP Programs**

National Emphasis Programs (NEPs) are temporary programs that focus OSHA's resources on hazards and high-hazard industries. Plans are excellent tools to control for these high-risk tasks before work starts. OSHA sites can lead to additional information and back-ground knowledge to better help you complete a plan. If there is enough data to drive OSHA to look closer, we also need to look that much closer.

#### <u>NEP</u>

- CPL 03-00-024
- Outdoor and Indoor Heat-Related Hazards
- CPL 03-00-009
- CPL 03-00-018
- CPL 03-00-023
- CPL 02-00-161

#### LEP / REGIONAL

- CPL 04-00-024G
- CPL-04-00-023G
- CPL-04-00-016.9
- CPL-04-00-0021
- Noise in the Workplace
- G Powered Industrial Trucks
  - Cranes in Construction
  - I Fall Hazards

### Items in **RED** are very common in construction projects

- Lead
- Primary Metal Industries
- Respirable Crystalline Silica
- Trenching and Excavation

#### Trucks ction

# **Numerous Online Resources**

OSHA believes that one vital element to ensure that safety and health is a core value is for every workplace to implement and integrate a written safety and health plan or program as part of their overall safety and health management system. https://www.osha.gov/construction/infrastructure

An injury and illness prevention program, is a proactive process to help employers find and fix workplace hazards before workers are hurt.

https://www.osha.gov/sites/default/files/OSHAwhite-paper-january2012sm.pdf

ASSP A10 Standards on Construction and Demolition https://www.assp.org/standards/standards-topics/construction-and-demolition-operations-a10

EPA Health and Safety Plan (HASP) Users Guide

https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=2000IRJ5.TXT

Example of OSHA SSSP https://www.osha.gov/etools/logging/site-safety-health-plan/example

OSHA NEP https://www.osha.gov/enforcement/directives/nep

OSHA LEP https://www.osha.gov/enforcement/directives/lep

Example of a HASP <a href="https://www.osha.gov/anthrax/hasp">https://www.osha.gov/anthrax/hasp</a>



# Your own Teams

Our teams in the field are the best source for up-to-date information on the status of a project and any new issues that may have or are developing. Morning meetings and formal monthly reviews are another great source and venue to discuss changing risks. By holding daily / weekly review meetings plans can be kept polished, accurate, and up to date. Lessons learned on one project will further strengthen the planning process for the next project.

More importantly, by engaging field staff we close the loop on plan development by engaging the operators and in turn improving the plan. Integrating site staff adds the foundation to keep the plan accurate and all operators protected.



# **Discussion Summary**

- State and Feds have different requirements
- Assign ownership of the plan and implementation
- Plan must be complete, accurate, and representative
- Plans must capture all risks and outline controls
- Names and contact info must be up to date
- A plan is designed to address all anticipated risks
- Rely on internal and external sources for data

Not all plans are the same, they come in different formats, but must include all required sections based on the scope of work. For most construction sites, a streamlined SSSP will work to identify and control risks.





# **HEALTH AND SAFETY PLANS**

## Safety & Health

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