

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	i
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

Gowanus Environmental Remediation Trust

Safety Health and the Environment

Contractor Safety Requirements

Rev.#	Date	Description
0	8/9/2016	
1	10/20/2017	

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	ii
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

Table of Contents

1.0	INTRODUCTION.....	1
2.0	INITIAL PROCESS	1
2.1	Contractor Procurement.....	1
2.2	Safety Communication	2
2.3	Safety Compliance	2
3.0	ROLES AND RESPONSIBILITIES	2
3.1	Gowanus Environmental Remediation Trust (GERT).....	2
3.2	Owner’s Representative	2
3.3	Construction Manager	2
3.4	Remedial Design (RD) Team	2
3.5	Project Safety Manager	2
3.6	Site Safety Officer	2
3.7	Risk Assessment Management Team	3
3.8	Risk Assessment (RA) Team	3
3.9	Process Hazard Analysis (PHA) Team.....	3
4.0	PRE-MOBILIZATION RESPONSIBILITIES	3
4.1	Risk Ranking of Work.....	3
4.2	Process Hazard Analysis (PHA)	3
4.3	Management of Change (MOC).....	4
5.0	GENERAL SAFETY REQUIREMENTS	4
5.1	Introduction.....	4
5.2	Project Specific Safety Requirements.....	4
6.0	ADMINISTRATIVE SAFETY REQUIREMENTS	5
6.1	Pre-Bid Meeting.....	5
6.2	Worker Qualification Assurance	5
6.3	Health and Safety Plan (HASP).....	5
6.3.1	Long Term or Complex Projects.....	5
6.3.2	Professional Services	7
6.4	Contractor Orientation	7
6.5	Visitor Orientation	7
7.0	TECHNICAL SAFETY REQUIREMENTS	7

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	ii
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

7.1	Personal Protective Equipment (PPE).....	7
7.2	Safe Vehicle Operation	8
8.0	SAFETY MEETINGS AND BRIEFS	8
8.1	Pre-Construction Meetings for High Risk Activities.....	8
8.2	Safety Meetings	9
9.0	INCIDENT AND OTHER REPORTING	9
9.1	Incident Analysis	9
9.2	Incident Response Steps.....	10
9.3	Other Reporting.....	10

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	1
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

1.0 INTRODUCTION

This document, “Contractor Safety Requirements”, represents the minimum safety requirements acceptable for contractor safety programs. This document does not reference actions that are required by OSHA, other laws, rules, or regulations. These are requirements that should be understood by the contractor and contractor compliance with all applicable federal, state and local laws, rules, and regulations is expected as a contractual condition.

Please direct any questions regarding this document to the Project Safety Manager (PSM)

NOTE: All references to “Contractor” also apply to Subcontractors and all business entities working on site.

2.0 INITIAL PROCESS

The purpose of these requirements is to ensure the contractor understands the project specific health and safety requirements for performing work for the Gowanus Environmental Remediation Trust.

Safety performance is a prime consideration in the selection of contractors. The Gowanus Environmental Remediation Trust (Gowanus ERT) Project will stipulate safety performance requirements and responsibilities in contracts and purchase orders and will hold the contractor accountable for meeting the contractual requirements.

This document, “Contractor Safety Requirements”, is updated periodically to communicate all aspects of project-required contractor safety to bidders and current contractors.

Contractor safety on the project involves three broad areas:

- The Contractor Selection Process (Procurement)
- Safety Communication
- Safety Compliance

2.1 Contractor Procurement

Contractor safety begins with the selection of contractors who have demonstrated a good safety record. This is accomplished through a process overview during the procurement process and the scope of work involved. The information that the Bidder provides in their proposal serves as the basis for assessing safety qualification. For this reason, it is important that this form is approached in a candid and thorough manner. The Owner’s Representative will review the submitted information. Any effort to avoid complete disclosure will disqualify the Bidder from bidding work on the project.

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	2
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

2.2 Safety Communication

Safety communication covers all the avenues and forums early in the bidding phase and is ongoing throughout the project duration. The goal is to reinforce that safety is a priority, ensure clarity and to limit misunderstandings.

2.3 Safety Compliance

Safety compliance is the process of ensuring that the provisions of the contract are being followed. The Gowanus ERT will assign the Owners Representative, Project Safety Manager (PSM), or other designated individuals to provide guidance. However, the Contractor maintains full responsibility for their employees and subcontractors and shall be held accountable for ensuring compliance with all applicable safety rules while working on the project. The Contractor is also responsible for site control and ensuring all employees and visitors comply with the site HASP.

3.0 ROLES AND RESPONSIBILITIES

3.1 Gowanus Environmental Remediation Trust (GERT)

The Gowanus Environmental Remediation Trust (Gowanus ERT) is the grantor/trust established by the participating members of the Gowanus Canal Superfund Site cleanup.

3.2 Owner's Representative

The Owner's Representative represents the Gowanus ERT and provides technical project management for the overall project.

3.3 Construction Manager

The Construction Manager is assigned by the Gowanus ERT to manage site operations to accomplish project goals.

3.4 Remedial Design (RD) Team

The Remedial Design (RD) Team consists of the Design Engineer (Geosyntec), the Owner's Representative

3.5 Project Safety Manager

The Project Safety Manager (PSM) is assigned by Gowanus ERT and takes direction from the Risk Assessment Management Committee to ensure compliance with the site Health and Safety and Risk Assessment Programs and Procedures.

3.6 Site Safety Officer

The Site Safety Officer (SSO) is an individual assigned by each contractor to maintain that contractor's compliance with all federal, state, local, and project specific safety and risk

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	3
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

assessment rules, regulations, and requirements while on the project. All contractors will maintain responsibility for the safety of their employees.

3.7 Risk Assessment Management Team

The Risk Assessment Management Committee is compiled of members of the Gowanus ERT to provide direction for the PSM.

3.8 Risk Assessment (RA) Team

The Risk Assessment (RA) Team is specified in the Risk Assessment Procedure and is a team organized by the PSM and compiled of process experts for the activity being evaluated.

3.9 Process Hazard Analysis (PHA) Team

The Process Hazard Analysis (PHA) Team is specified in the Process Safety PHA Guidelines and is the team established for performing process hazard analyses of a particular process.

4.0 PRE-MOBILIZATION RESPONSIBILITIES

4.1 Risk Ranking of Work

Before mobilization, each contractor shall submit design and safety documentation to Gowanus ERT to be evaluated by the RA Team for evaluation of Risk in accordance with the Risk Assessment Procedure. Following the risk assessment, Gowanus ERT will categorize each contractor's activities as low, medium or high risk. "Risk" refers to the chance of injury, property damage, or adverse public impact should the contractor deviate from the prescribed safety measures.

The designation High Risk, Medium Risk, or Low Risk, refers only to the inherent risk associated with the work activity and is not an opinion on the ability of a contractor to work safely. Activities that are designated as "high risk" means that death can result if safety measures are not followed. The Risk Assessment Management Committee will notify the bidder/contractor at the beginning of the procurement process if their contracted service has been ranked as "high risk".

4.2 Process Hazard Analysis (PHA)

Before mobilization, each contractor will perform a Process Hazard Analysis (PHA) for all high-risk activities in accordance with the Process Safety PHA Guidelines (What-If, HAZOP). The PHA's will be submitted to the PHA Team for review. Any and all recommendations made by the PHA Team to the contractor must be signed off as acceptable and appropriate by the contractor Project Manager, and the RD Design Contractor if appropriate, before being implemented. The **Acceptance Form** is located in **ATTACHMENT A** of the **Process Safety PHA Guidelines** procedure.

After mobilization, each contractor will complete the PHA review together with the PSM. The

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	4
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

results of the PHA review will be presented to the RA Team for evaluation and recommendation. Any and all recommendations made to the contractor must be signed off as acceptable and appropriate by the contractor Project Manager, and the RD Design Contractor if appropriate, before being implemented.

4.3 Management of Change (MOC)

Changes made to the approved PHA will require a Management of Change (MOC) review in accordance with the **Management of Change (MOC) Procedure**. The **Management of Change (MOC) Form** located in **ATTACHMENT A** of the Procedure must be completed and approved prior to implementing any change.

5.0 GENERAL SAFETY REQUIREMENTS

5.1 Introduction

All contractors are required to comply with the requirements of the Occupational Safety Administration (OSHA), all other applicable federal, state, and local laws, ordinances, regulations, and other project and site-specific requirements and permits

This document represents policies and safety-related work methods that are unique to the project and that may go beyond OSHA rules. Contractors must follow these requirements as well as their own rules that meet or exceed OSHA and other regulatory requirements.

In cases where there is more than one method of compliance with a given safety rule or regulation, the contractor may deviate from project practices if they can demonstrate to the PSM that the alternative practice provides an equal or greater margin of safety.

The project may provide more detailed information and guidance regarding specific procedures prior to commencement of work.

5.2 Project Specific Safety Requirements

Contractors are required to follow federal OSHA regulations as well as the regulations defined by other applicable authorities such as the U.S. Coast Guard, Department of Transportation, and federal and state Environmental Protection Agencies.

The contractor's Health and Safety Plan must address these requirements as they apply to the contractor's activities for the project. If the contractor's Corporate Health and Safety Policies are more stringent, the contractor may follow their Corporate requirements.

If a Safety Observer, Competent Person, or Fire Watch is required, it is the responsibility of the contractor to provide that person. The qualifications of that person must be kept on file with the contractor's training records.

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	5
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

6.0 ADMINISTRATIVE SAFETY REQUIREMENTS

6.1 Pre-Bid Meeting

The pre-bid meeting is coordinated to provide bidders with an opportunity to acquaint themselves with contractual requirements and specific safety issues concerning the project, including company-specific safety rules and known site conditions.

6.2 Worker Qualification Assurance

In order to meet the project safety requirements, the contractor must describe how workers, including subcontractors, are qualified. The contractor must supply information concerning the type of skills assessment performed, training programs and how they ensure that employees demonstrate competencies

A principal of the contractor shall certify the contractor has been informed of project safety requirements; that employees and subcontractors have the appropriate qualifications to perform the work, and; that the contractor agrees to comply with all applicable safety requirements by certification in a Letter of Assurance.

The bidder shall supply the backgrounds and qualifications for all management personnel through resumes, behavioral observations or other documents.

6.3 Health and Safety Plan (HASP)

6.3.1 Long Term or Complex Projects

All Contractors shall submit a project-specific safety plan prior to the start of the project and/or at pre-construction meeting. For long-term work that will take 6 days or longer, or complicated projects, the contractor will be required to complete a more formalized safety plan that is at least as protective as the **Gowanus Canal HASP Template** provided with the Request for Bid Package. The plan must be at least as protective as the Gowanus Canal HASP Template provided with the Request for Bid Package and must provide for the requirements of the following documents:

- Contractor Safety Requirements (this document),
- Risk Assessment Procedure,
- Process Safety PHA Guidelines, and
- Management of Change Procedure.

At a minimum, the HASP shall include the following elements:

- Roles and responsibilities
 - Each contractor's HASP shall identify who will be responsible for their activity oversight and their qualifications. For example, if the work requires excavation, there must be someone on-site who would be qualified as a competent person.

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	6
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

- Each contractor is responsible for all their employees and subcontractors. The safety plan shall clearly state this responsibility.
- Contractors must be knowledgeable of and be able to participate in or conduct one of the following types of risk evaluations if requested for their work: HazOp, HazId, What if, or FMEA
- All Contractors leading a PHA are required to be competent in the methodology to ensure a quality product.
- Scope of Work
 - Briefly state the scope of work with enough detail that an auditor or someone not familiar with the contract could understand the task being performed. The plan must specifically address the project or services requested. Therefore, these plans should be short and-to the-point.
- Task and hazard identification and risk assessment of the hazards
 - The contractor shall identify all significant tasks and the anticipated hazards (risk assessment).
 - The contractor's cost to provide adequate safety measures and to comply with the safety requirements stated herein must be considered and budgeted in the bid/proposal.
- Hazard mitigation/control procedures and work methods
 - For each hazard, the contractor shall specify measures that will be taken to mitigate the hazards.
 - A table format is the simplest way to organize and present the task, hazard, and mitigation steps. For example:

Location: Substation Yard		
Task	Hazard	Mitigation Steps
Material Handling	Contact with overhead energized lines/equipment	Off load in the clear and have a safety observer

- Incident analysis and reporting
 - Follow the requirements in **Section 9.2 "Incident Response Steps"**
- Compliance monitoring
 - Explain how you will ensure that both your employees and subcontractors will achieve safety compliance. Some tasks may require a full-time safety representative (hired by the contractor) on

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	7
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

site anytime work is to be performed. Qualifications of this safety representative must be submitted with the Proposal.

A copy of all Contractor HASPs will be maintained on site and shall be accessible to their employees and to the PSM. All employees shall acknowledge in writing that they have read and understand the contents of the Site HASP provided by their employer. Copies of the acknowledgement shall be maintained on site.

6.3.2 Professional Services

Contractor work that is of short duration (3-5 days) and low risk (such as Professional Services) may use the **Gowanus Canal HASP Template for Professional Services** as their health and safety plan.

6.4 Contractor Orientation

Contractor orientation will be conducted by the PSM or CM in the form of a **Site Safety Orientation** training intended to serve as a resource in order to provide the contractor with the tools necessary to educate their employees and subcontractors. Contractors shall keep a record of all training, including the Site Safety Orientation, delivered to all new employees. Records shall be made available to the PSM upon request. The contractor Project Manager shall attend the Site Safety Orientation training.

6.5 Visitor Orientation

Visitors will review the **Visitor Safety Checklist** with the PSM or CM. Visitors will sign the Checklist acknowledging that they understand and will comply with the requirements. Records of the checklist review will be made available to the PSM upon request.

7.0 TECHNICAL SAFETY REQUIREMENTS

7.1 Personal Protective Equipment (PPE)

All contractors (regardless of risk rating) are responsible for providing PPE for their employees. PPE shall meet the requirements of 29 CFR 1910.132. At a minimum, PPE will include: hard hat; safety shoes, safety glasses, and visibility vest (or clothing).

The contractor shall ensure that their employees and subcontractors use protective safety footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where such employee's feet are exposed to electrical hazards. Electrical Hazard (EH) rated footwear is required when working on or near (within MAD) around electrical equipment over 50 volts, or in an area of expected downed wires. This requirement is based on OSHA 1910.136 and ASTM standard F-2413-05.

Guidance for additional PPE is referenced in **HASP Template** provided with the Bid Package.

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	8
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

7.2 Safe Vehicle Operation

- Contractors are required to have a safe motor vehicle operation policy, and said policy must be communicated to their employees.
- Contractors are required to comply with the requirements of all federal, state and local regulations regarding safe motor vehicle operations.
- Vehicles may not be operated while the driver is texting or using a hand-held phone
- Seat belts and other vehicle restraints must be used while the vehicle is in motion
- Contractors shall ensure that new and existing employees have valid Driver's Licenses in accordance with requirements of specific job duties and type of vehicles operated. Contractors must have acceptable driving records, and where their driving records are unacceptable, drivers shall not be permitted to drive on behalf of Gowanus ERT.
- Contractors shall provide vehicles in safe operating condition, in accordance with federal state and local regulations, with proper safety equipment as appropriate for the vehicle type and its intended use.
- Contractors shall track and evaluate their employees' vehicular accidents. Corrective actions, such as driver coaching, defensive driver training and medical/vision tests, should be applied where appropriate.

8.0 SAFETY MEETINGS AND BRIEFS

8.1 Pre-Construction Meetings for High Risk Activities

The CM, PSM, or other Owner's Representative shall hold a pre-construction (project kickoff) meeting prior to the start of a high risk-ranked project/service.

The contractor's Project Health & Safety Plan that addresses the high-risk activity will be discussed at this meeting including a final review of the safety hazards checklist to insure a proper hazard mitigation plan.

The hazard mitigation measures shall be reviewed and work shall not commence until these hazards have been adequately addressed. The Owners Representative, or PSM, will discuss with the contractor the methods by which compliance will be achieved with these safety requirements.

An Emergency Call List should be exchanged with the contractor. This list must contain 24-hour contact information for key contractor and project personnel, including Owners Representative and PSM. This list should be distributed to all concerned, as determined by the project team, prior to the start of work.

For routine maintenance services, a review of associated safety issues and specific facility issues, restrictions or practices, such as evacuation procedures, must be discussed with the contractor upon initial hiring. Any changes in the facility that may affect the safety of any site employee or third parties must be communicated immediately.

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	9
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

8.2 Safety Meetings

Job safety briefs shall be documented in writing. Written job safety briefs with the contractor letterhead, shall be available at the job site for inspection and retained for 30 days after the job is completed.

Each crew shall conduct job safety briefs prior to each day's work at the job location, when there are changes to the day's work order or plan, and when a new worker or company joins the crew additional briefs are required.

Each worker must have the opportunity to voice concern. The work cannot begin until each worker signs off on the job safety brief stating that they have discussed the work, raised any questions, and agree with the plan.

9.0 INCIDENT AND OTHER REPORTING

9.1 Incident Analysis

All contractors are required to report to the CM and PSM, any work- related incidents involving injury or illness to employees, the public or property damage to the contractor's or project's equipment. The first priority is to ensure that the injured receive medical treatment.

The PSM will explain these reporting requirements in more detail prior to commencement of work.

An incident is defined as an unplanned event that has a human component, and results in, or could potentially result in, at least one of the following outcomes: (1) Harm to people; (2) Damage to property; (3) Adverse public impact.

Categories of incidents include:

1. Injury – incidents that cause harm to people;
2. Property Damage – incidents that cause damage to property;
3. Adverse Public Impact – incidents that disrupts service to the public or results in adverse public reaction;
4. Near-Miss – an incident which had the potential under different circumstances to result in an injury.
5. A hazardous condition – a condition that can and is rectified immediately by the person who identified the hazard
6. A Significant hazard – a condition that requires others to take actions to rectify and requires further investigation as to how the situation came to occur.
7. Process Safety – measures, systems, procedures and policies which prevent incidents and protect employees, the public, and the environment from the effects of major accidents.
8. Road Traffic Collision (RTC) – A moving motor vehicle incident with any vehicle other than one that measures hours instead of mileage.

Gowanus Environmental Remediation Trust Safety, Health and the Environment Procedure	Rev. No.	1
	Page No.	10
CONTRACTOR SAFETY REQUIREMENTS	Date:	10/20/2017

9.2 Incident Response Steps

In the event of an incident, the contractor shall provide details of the incident to the PSM as follows:

Contractor supervisor collects basic information about the incident from the employee or witnesses:

- a. What happened?
- b. Who and how many people were injured?
- c. What treatment was administered?
- d. What was the nature and seriousness of the injury?
- e. Where did the incident occur?
- f. When did the incident occur (date, time of day)?
- g. Were there any witnesses?

Contractor supervisor immediately calls the PSM and CM. Contractor shall conduct an investigation and provide a written report such as a Loss/Near Loss Report. The contractor shall use Incident Reporting forms which will be provided by the PSM.

The contractor will then conduct an investigation that will identify contributing factors relating to the incident and the corrective actions that will be taken to prevent reoccurrence. The contractor will notify the PSM when any action items have been completed. The results of the incident analysis shall be described in a report prepared by the contractor and provided to the PSM. The contractor shall use Incident Reporting forms which will be provided by the PSM.

Contractor vehicle accidents occurring during the performance of work will also be investigated and reported to PSM.

9.3 Other Reporting

Gowanus ERT may periodically request the following annualized data for all work activities:

1. Lost Time Incident (LTI) rate for workers
2. Restricted Work rate
3. OSHA Recordable Incident (ORI) rate