

Project Environmental, Health and Safety Performance Requirements

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ENVIRONMENTAL, HEALTH AND SAFETY PERFORMANCE REQUIREMENTS

Objectives:

- I. To construct Projects in a manner that results in Injury Free, Incident Free and No Adverse Environmental Impacts (collectively “Injury Free”).
- II. To clearly state Contractor’s obligation to develop an EHS Plan (as outlined in contract documentation).
- III. To ensure all construction projects utilize consistent EHS standards and established Best Known Methods (BKM) from past projects.

Scope:

I. Content

- A. These Project EHS Performance Requirements may be amended and/or supplemented by Site- or Project-Specific provisions. Site- or Project-Specific provisions shall be considered an Addendum to these EHS Performance Requirements.
- B. The following documents are incorporated by reference into these Project EHS Performance Requirements. Copies are available from EHS:
 1. EHS Construction Manual,
 2. Site Incident Prevention Plan (“SIPP”)
 3. Safe Behavior Observation Program
- C. This document together with the other documents outlined in the underlying Contract documentation set forth the minimum contents of Contractor’s EHS Plan; however, they do not comprehend all EHS requirements applicable to the Work. Contractor must also comprehend all applicable international, national, state, province, county, municipal, or local laws or regulations as well as industry practices applicable to the Work in its EHS Plan.
- D. Any waiver of or amendment to the requirements in these documents must be approved in writing by EHS.

II. Applicability

- A. These requirements apply to all tiers of Contractors, Subcontractors, and Suppliers who provide services or materials for construction to projects worldwide.

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III. Process

- A. Contractor shall submit its preliminary EHS Plan prior to RFP and its final plan within 30 days of contract issuance, or as specified in a Site Addendum. Project Team shall have seven (7) days to review and comment on the EHS Plan. The plan is deemed accepted after 7 days if no comments are provided or requests for extending the review period have been made. Contractor shall revise its EHS Plan based on Project Team's comments. Once accepted by Project Team, Contractor shall enforce the accepted EHS Plan and shall not change any of its provisions without advance notice to Project Team.
- B. Prior to the commencement of Work or at anytime during the Project, Project Team may conduct a "Project Readiness Review" to ensure that all EHS programs and elements are in place and are in compliance with the EHS Plan. Contractor shall participate with Project Team in the Project Readiness Review. Deficiencies must be rectified (or an acceptable plan put in place) prior to commencing or continuing work.

EHS Plan Required Components:

- I. EHS Staffing Component. The EHS Plan must address Contractor's staffing of the EHS function, which shall include, at a minimum, the following:
 - A. Engage one on-site, full time safety professional and additional safety professionals as agreed by Project Team and the Contractor and identify personnel and other resources that will be responsible for managing the entry of the EHS indicator data. Project Team reserves the right to disapprove any EHS personnel based on qualifications. Resumes of personnel shall be provided to Project Team, upon request.
- II. Employee Site Access and Orientation Component. The EHS Plan must address the following elements:
 - A. All projects must provide New Contractor Orientation (NCO) safety training. The NCO contents shall be mutually agreed to between Project Team and General Contractor/Construction Manager. NCO shall provide information regarding all applicable laws and regulatory requirements.
 - B. All contractors shall ensure personnel attend the defined project NCO and prohibit project access to the Work prior to completion of the NCO.
 - C. Contractor employees not assigned to a Project within the last six (6) months must attend repeat NCO.
 - D. Project Team reserves the right to require annual refresher EHS training.
- III. Injury Free Component. The EHS Plan must identify Contractor's plan to conduct the work Injury Free, minimum requirements include:

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- A. Require all managers and foremen must attend an Injury Free Workshop (conducted by Project Team) within 30 days of commencing work on the Project.
 - B. Require at least one company representative (for each Contractor and Subcontractor) to attend biweekly Safety Leadership Team (SLT) meetings.
 - C. Conduct periodic (not less than quarterly) perception surveys (include form of survey in EHS Plan). This may include participation in Project Team's Safety Self Assessment.
 - D. Conduct and participate in craft feedback luncheons, identify schedule and activities.
 - E. Arrange and participate in periodic craft appreciation luncheons, identify schedule and activities.
- IV. EHS Training Component. The EHS Plan must identify training needs and requirements and state how training will be delivered. Minimum requirements include:
- A. Documentation of all hazard specific EHS training requirements by job classification before work commences.
 - B. Provision of all OSHA, State, local and/or site required EHS training prior to an employee performing that type of work on site.
 - C. Provision of training records to Project Team, upon request.
- V. Safety Meetings/Forums Component. The EHS Plan must identify safety meetings and forums, to include at a minimum:
- A. Weekly foreman and superintendent safety meetings.
 - B. Daily safety meetings at the work site conducted by the foreman or designee (also known as “tool box meetings”). Attendance is mandatory for all persons performing Work on the Project. Pre-task planning may be completed at this daily meeting.
 - C. Mandatory attendance of all contractor employees at Safety Meetings announced by Project Team or its designee.
- VI. Buddy Program Component. The EHS Plan must describe how the Contractor will implement a “Buddy Program” that meets the following minimum criteria:
- A. Efficiently and effectively familiarizes field personnel with fieldwork procedures and requirements.
 - B. At a minimum, assigns a buddy to craft employees new to a Project (those employees conducting fieldwork) during the first 14 working days of employment (or as indicated in the Site Addendum).

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- VII. Contractor Pre-Qualification Component. As part of the EHS Plan, the Contractor's Procurement Plan must comprehend the following when considering potential subcontractors and suppliers:
- A. Each proposed subcontractor (all tiers) must have above average EHS performance records, specifically:
 - 1. EMR ratings of 1.0 or lower for last three years (unless exempted in Site Addendum);
 - 2. Lagging Indicators:
 - a) Recordable Rate \leq 4.0
 - b) Days Away Case Rate \leq 0.8
 - c) Zero (0) Fatalities in last 12 months
 - B. Any exception requires the subject subcontractor to prepare a written Corrective Action Plan (CAP), which must be accepted by Project Team.
 - C. Any contractor or subcontractor who fails to maintain an acceptable EHS performance record on the Project shall be required to prepare a CAP demonstrating how it will improve its record.
- VIII. Pre-Bid and Pre-Construction Meetings Component. The Contractor's Procurement Plan must comprehend the following when engaging in the competitive bid and contract award process:
- A. At pre-bid conferences, Contractor shall review in detail Project Team's EHS performance requirements and expectations for the Project.
 - B. At pre-construction conferences, Contractor shall review project-specific EHS requirements and work scope challenges.
 - C. Project Team shall be notified 48 hours in advance of any pre-bid / pre-construction conferences.
- IX. Design/Constructability Component. The EHS Plan must explain how designs will be reviewed for safe construction, including:
- A. Contractor shall identify constructability and maintainability design issues that could increase the potential for injury due to construction sequencing and/or design.
- X. Task Planning Component. The EHS Plan must describe how Contractor will implement Job Hazard Analysis and Pre-Task Planning that comprehends, at a minimum, the following:
- A. Job Hazard Analysis (JHA) - Conduct JHA's for all construction activities that are identified by the Project's EHS team prior to the commencement of work. At a minimum, JHA shall consist of the following:

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1. JHAs must be reviewed and approved by the applicable project workgroup (as defined by Project Team).
 2. JHA must be conducted a minimum of 3 weeks (or as early as feasible) before work commences.
 3. JHA must be written and made available to crews conducting Pre-Task Plans.
 4. Completed JHAs must be documented and made available to Project Team upon request.
- B. Pre-Task Planning (PTP) – Prior to starting any work, develop crew level pre-task planning that complies with the following minimum requirements:
1. May be conducted by the foreman or craft lead designated by the foreman, provided however, that the foreman reviews all pre-task plans to ensure that they are appropriate, complete, and accurate for the subject task(s).
 2. Must be documented in writing.
 3. Must be conducted at least daily, unless otherwise agreed in writing by Project Team.
 4. All crew members must participate at the job location in pre-task planning and shall sign the completed plan.
 5. Must include hazards and precautions identified in applicable Job Hazard Analysis (JHA).
 6. Must be readily available at the work site (posted and/or placed where crew members have knowledge of its location at the work area).
 7. Pre-Task Plans must be reviewed and revised whenever work conditions or crew membership experience change that may affect the ability to safely complete the work.

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- XI. Site Incident Prevention Program Component. For Projects where Project Team has a Site Incident Prevention Program (“SIPP”) in place, the EHS Plan must describe the resources and methods to be used in implementation. For Projects where Project Team has not adopted a SIPP, the Contractor shall develop a site incident prevention program that meets the minimum requirements stated in Corporate SIPP guideline. A copy of the Corporate SIPP guideline may be obtained from the Project Manager.
- XII. Recognition. The EHS Plan must explain how Contractor will recognize workers for safe behavior.
- XIII. Disciplinary Action Plan Component. The EHS Plan must explain how Contractor will enforce workers’ compliance with the EHS Plan, minimum requirements include:
- A. Develop a progressive disciplinary action plan which includes actions for workers who violate EHS requirements.
 - B. Identify “zero tolerance” acts or omissions that constitute grounds for removal and the manner in which they will be communicated to all personnel. At a minimum, zero tolerance items shall include willful violations of fatality prevention programs such as Fall Protection, Control of Hazardous Energies (lockout/tagout), Energized Electrical Work (EEW), Confined Space Entry, and Trenching/Excavation.
- XIV. EHS Information Management Component. The EHS Plan shall describe how the Contractor will input EHS data into the Project Team-designated information system. The data will be managed and maintained in compliance with the following requirements:
- A. Incident and Injury Information:
 - 1. Injury/Incident preliminaries must be entered within 24 hours of the injury/incident
 - 2. Injury/Incident full details (including root cause and corrective action) must be entered within 5 working days of the injury/incident. Project Team’s Project Manager may extend this time period if necessary.
 - B. Contractor Headcount and Person Hour Reporting:
 - 1. Contractor’s headcount and hours (including headcount and hours for all Subcontractors and Suppliers of every tier who perform Work on the Site) shall be reported each week (on a date established by the Project Team).
 - C. Leading Indicators
 - 1. Contractor shall manage leading indicators (i.e. Safe Behavior Observations).
 - 2. Information about the leading indicator program is available from the Project Team.

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- XV. Audits and Inspections Component. The EHS Plan must include, at a minimum, the following core audit and inspection activities:
- A. Periodic Compliance Audits. These audits must be designed to ensure compliance with the EHS Plan and applicable regulations. Contractors shall require Subcontractors to conduct similar audits, as appropriate.
 - B. Audits by Management. Supervisors must conduct weekly worksite EHS evaluations (for example, Safety Management By Walking Around (SMBWA)).
 - C. Leading Indicator Program. Contractor must participate in the Project's Leading Indicator Program (i.e. Safety Behavior Observations, etc.).
 - D. Records of reports, findings, and corrective actions must be retained through Project close-out.
- XVI. Incident Reporting & Investigation Component. The EHS Plan must describe how Contractor will investigate and report safety incidents, including the following minimum requirements:
- A. Reporting:
 - 1. Report all incidents (near miss, first aids, recordables, days away cases, and environmental releases) to Project Team within one hour of their occurrence.
 - 2. Present all incidents for review at least weekly. The affected foreman and Contractor's on-site Project Manager shall conduct the review.
 - 3. Maintain incident records throughout the duration of the Project, transfer these records to Project Team at Project Closeout Completion (refer to contract documentation). Project Team may use these records (minus personal information) to develop incident communications.
 - B. Investigating:
 - 1. Contractor shall investigate all incidents. Investigations shall include:
 - a) Identification of all incident causal factors (root and contributing causes) using pre-approved investigative means.
 - b) Identification and documentation of all corrective actions.
 - c) Documentation of closure of all identified corrective actions.
- XVII. Quality of Life/Work Place Health Requirements Component. The Site Logistics Plan or EHS Plan shall address Contractor's provision and management of health facilities including, at a minimum, the following:
- A. Provision for adequate rest rooms and hand wash facilities.
 - B. Provision for adequate potable drinking water.

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- C. Provision for adequate lunch and break quarters that provide shelter from the heat/cold, and are sufficiently isolated from construction areas so that Personal Protection Equipment (PPE) need not be worn during lunch and other breaks.
- XVIII. Medical Coverage and Case Management Component. The EHS Plan must describe medical services and must include a “Case Management and Return-To-Work Program” that is designed to return personnel safely and efficiently back to their positions following an occupational and/or non-occupational injury or illness. The medical and case management program shall include:
- A. Medical support (on or offsite) appropriate for the Project’s established work hours.
 - B. Onsite management coverage for accompaniment to clinic/doctor.
 - C. Physician/Clinic follow-on visit.
 - D. Consideration of restricted work activities in coordination with the investigation and follow up to address potential, but unsubstantiated claims and injuries.
- XIX. Housekeeping. The EHS Plan must describe Contractor’s housekeeping activities, which shall ensure the work area is kept free of hazards at all times. Minimum requirements include:
- A. Disposal of scrap, waste, and debris as generated.
 - B. Securing of light or loose materials stored on roofs or open floors.
 - C. Ensuring egress and ingress of buildings/facilities meets all applicable code requirements at all stages of the Project.
 - D. Developing a method for ensuring subcontractors comply with the housekeeping requirements listed in this section.
- XX. Hazardous Materials. Hazardous Materials are defined in the EHS Construction Manual and include those materials that require a Material Safety Data Sheet. The EHS Plan must describe Contractor’s handling of Hazardous Materials and shall include the following at a minimum:
- A. Development of a list identifying all Hazardous Materials to be used.
 - B. Approval by Project Team of all hazardous materials before they are brought on-site.
 - C. Development of a procedure for obtaining approval from Project Team prior to conducting any activity that may generate Hazardous Materials or Hazardous Waste.
- XXI. Solid Waste and Hazardous Waste Component. The EHS Plan or Site Logistics Plan shall address how solid waste and Hazardous Waste will be managed; minimum contents include:

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A. Solid Waste.

1. Describe how Contractor will attain Project Team's goal to recycle a minimum of 65% of construction-generated debris.
2. Recyclable solid wastes include: wood, cardboard, glass, paper, aluminum, plastic, ferrous metals (copper, stainless steel, and so forth).
3. Acknowledge that Contractor shall not permit removal of waste(s) from the Site for personal or other use.

B. Hazardous Waste

1. Describe method to properly collect, identify, and label Hazardous Wastes.
2. Identify the disposal plan, including removal of Hazardous Materials brought on-site by Contractor. All hazardous waste generated on the jobsite must be managed by Project Team-authorized suppliers.

XXII. Demolition/Decontamination. The EHS Plan must ensure that decontamination and demolition work plans are reviewed by Project Team prior to commencement of work.

XXIII. Emergency Response Plan Component. The EHS Plan must describe the project specific Emergency Response Plan, minimum contents are as follows:

- A. Names and contact numbers of Contractor management
- B. Defined roles and responsibilities for each person/party
- C. Emergency response procedures (spill containment, emergency medical response, etc.) for any potential emergencies that might arise due to construction activities in Contractor's defined scope of work
- D. Defined communication systems used to ensure efficient communication with affected project personnel, responders and Project Team as appropriate
- E. Procedures to ensure that the plan is maintained throughout the duration and completion of the Project.
- F. Escalation path for reporting spills that meet or exceed a federal or state reportable quantity (RQ) to an authorized Project Team construction representative upon discovery.
- G. Acknowledgement that any emergency response undertaken by Contractor shall, at a minimum, comply with 29 CFR Section 1910.120.
- H. Designate a minimum of two responders to work with existing Emergency Response Team (ERT) if an event of an Emergency Response is conducted by the local ERT.

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XXIV. Environmental Protection Programs Component.

A. Green Field or Projects NOT on an established campus:

1. The EHS Plan shall address compliance with all applicable laws and are required to implement the following Environmental and Pollution prevention programs:
 - a) Solid Waste Management Plan
 - b) Pollution Prevention Plan
 - c) Hazardous Waste Management Plan
 - d) Air Pollution Control Plan
 - e) Hazardous Material Control Plan
 - f) Waste Water Management Plan
2. Samples of these plans are available from Project Team upon request.

B. Projects ON an established Project Team campus:

1. The EHS Plan shall acknowledge the applicable environmental performance requirements and describe methods of compliance with them.

XXV. Musculoskeletal Disorder (MSD) and Cumulative Trauma Disorder (CTD) Injury Prevention Programs.

A. MSD's and CTD's Injury Prevention Program Requirements:

1. In an effort to prevent MSD and CTD related injuries, all contractors shall have a process in place that, at a minimum, includes each of the following items:
 - a) Awareness/Education: All employees assigned to the project, including field, management, and office support shall be provided training, that is designed to increase awareness and understanding of risk factors that may lead to MSD/CTD injuries, and of how proper ergonomics can prevent such injuries.
 - b) Risk Factor Assessment and Mitigation: An MSD/CTD risk factor assessment and mitigation plan shall be completed for all job tasks, tools used, work procedures, work stations, and equipment operation where exposure may exist. Since the number one cause of MSD/CTD injuries are related to manual material handling, special emphasis shall be placed on the reduction of manual handling of material, equipment, and tools.

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- c) Documentation: Items a) and b), above, shall be documented for the purpose of training, consistency, proliferation of BKMs, and continuous improvement.

Received, reviewed and acknowledged by:

_____ (Name) _____ (Date)

_____ (Title)

_____ (Company Name)