



**Target Food Distribution Center
STRATEGIC PARTNERSHIP
BETWEEN**

**UNITED STATES DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)
DENVER AREA OFFICE**



AND

THE RYAN COMPANIES, US, INC. COMPANIES, US, INC.



AND

COLORADO ONSITE HEALTH AND SAFETY CONSULTATION PROGRAM



I. IDENTIFICATION OF PARTNERS

The Denver Area Office of the Occupational Safety and Health Administration (OSHA), Ryan Companies, US, Inc., and Colorado Onsite Health and Safety Consultation Program (CSU), recognize the importance of providing a safe and healthful work environment for workers engaged in the construction industry. This OSHA Strategic Partnership Agreement (hereafter referred to as “OSP” or “the partnership”) at the Target Food Distribution Center in Thornton, CO will facilitate the goals of OSHA to reduce work-related fatalities, injuries, and illnesses within the construction industry.

All contractors and subcontractors working at this site will be required to participate in the partnership agreement.

II. PURPOSE/SCOPE

The purpose of this partnership is to provide a safe and healthful work environment for workers involved in the construction industry. Ryan Companies, US, Inc. is committed to preventing

serious accidents and fatalities during the construction of Target Food Distribution Center in Thornton, CO, through increased training, implementation of best work practices, enhanced Safety and Health Management System (“SHMS”), and compliance with applicable OSHA standards and regulations.

The Target Food Distribution Center will consist of 105 acres of land with a steel, tilt concrete panels, and concrete construction of a one-story structure. It is anticipated that the project will employ a peak of 250 tradespersons on the site at one time. Construction activities are anticipated to be completed at year end 2025.

III. GOALS/STRATEGIES

GOALS	STRATEGIES	MEASURES
<p>1) Maintain a project-wide injury and illness rate, which is 25% below the 2021 BLS Total Recordable Case (TRC) rate of 1.9 and Days Away from Work, Restricted or Transfer (DART) rate of 1.0 for the construction industry (NAICS 2362).</p>	<ul style="list-style-type: none"> a. Establish a system for all site workers to report injuries, illnesses and near misses. b. Ryan Companies, US, Inc. will collect and analyze injury and illness trends (including first aid, near miss and property damage reports) for all contractors working at the site. c. Ryan Companies will track all man hours worked at the site by all contractors to accurately calculate site TCIR and DART rates d. Maintaining authority to enforce safety rules and regulations at the site. This authority will include provisions to hold contractors and employees accountable and, if necessary, remove contractor employees from the job site. 	<ul style="list-style-type: none"> a. Maintain OSHA 300 injury and illness data for the project and compare to national TCIR and DART rates: <ul style="list-style-type: none"> - 25% below the Total Recordable Case rate (<1.43) - 25% below the Days Away, Restricted or Transfer rate (0.75) b. Track incident reports (including injury/illness, first aid, near miss and property damage reports) on a monthly basis to identify trends and share information with the safety committee, site contractors and partners.
<p>2) All (100%) of contractors will be required to provide a copy of their comprehensive safety and health management program to Ryan Companies and be actively involved in improving site safety and health performance</p>	<ul style="list-style-type: none"> a. Provide contractors/subcontractors resources available to enhance the program. b. All contractors/subcontractors will participate in monthly site audits. c. Provide a comprehensive Job Site Safety Orientation for all workers prior to allowing them to work on site. d. All subcontractors and employees will be encouraged to adopt a zero-tolerance policy for safety and health including implementing “stop work” authority when needed. 	<ul style="list-style-type: none"> a. Ryan will review contractors/subcontractors safety programs and recognize those that are exemplary. b. If Ryan provides contractors with additional information to enhance their programs, it will be tracked. c. Ryan will facilitate the delivery of the site Safety Orientation training and track the number of employees who receive the training. d. Any initiation of stop work will be investigated and shared with all site workers.

GOALS	STRATEGIES	MEASURES
<p>3) Identify and prevent the most common causes of workplace injuries and fatalities in the construction industry, including, but not limited to, falls, trenching, electrical safety, struck-by, caught in/between, silica, heat stress, material handling, and noise hazards. This will include monitoring of exposure to health hazards such as heat, noise, and air contaminants.</p>	<ul style="list-style-type: none"> a. Conduct daily site safety audits to identify and abate hazards and ensure availability and use of proper clothing and PPE. b. Conduct weekly toolbox meetings with all workers at the site. Ensure participation in weekly toolbox meetings by contractors/subcontractors c. Maintain an open-door safety policy for the site that encourages hazard reporting. d. Establish a safety committee for the site which will conduct hazard analysis during pre-task safety planning. e. Implement and require 100% fall protection for all fall hazards over six (6) feet at the site. f. Ground-fault circuit interrupters will be used throughout the entire site. g. Use protective systems for any excavation over 4 feet in depth that will be entered by employees. h. Establish internal traffic control plans to separate vehicles and pedestrians. i. No employees will be allowed to work directly below any suspended load. Materials being hoisted shall be rigged to prevent unintentional displacement. Hooks with self-closing safety latches shall be used to prevent components from slipping out of the hook. All loads will be rigged by a qualified rigger. j. Hard hats and eye protection will be worn at all times on the worksite. All employees working at the job shall wear high-visibility reflective clothing at all times. k. Wet cutting techniques and/or dust collection systems in addition to the mandatory use of respiratory protection will be used where there is the potential for airborne silica. l. Verify and document that tasks conducted in accordance with silica Table 1 fully follow the control measure requirements. Ensure that contractors conduct silica exposure monitoring or other exposure assessment for tasks which are not covered by Table 1. m. When other potential health hazards exist, such as heat, noise, or air contaminants including as silica, CO, lead or other chemicals, Ryan Companies, US, Inc. will coordinate and ensure completion of monitoring to determine employee exposure levels 	<p>The following measures will be shared with safety committee, site contractors and reported to signatory partners on a quarterly basis:</p> <ul style="list-style-type: none"> a. The number of hazards identified by daily site audits and corrective actions taken to eliminate hazards. b. The number of pre-task safety meetings held by contractors/subcontractors. c. The number of incident investigations conducted by contractors/subcontractors when hazards are reported. d. The number of industrial hygiene exposure assessments, types of assessments and results of sampling. e. Attendance at toolbox meetings. f. The number and type of silica Table 1 tasks conducted and documentation of review of Table 1 control measures.

GOALS	STRATEGIES	MEASURES
4) 100% Participation in Safety Stand-Downs and similar events.	a. OSHA and Ryan Companies US, Inc. will provide site contractors with information about upcoming stand-down campaigns. <ul style="list-style-type: none"> • Fall Prevention • Trench Safety • Safe+Sound • Suicide Prevention b. Ryan Companies will schedule site events to support each campaign and encourage subcontractors to participate. Events will be conducted in English and Spanish. c. OSHA and CSU will support site campaign events.	a. Track the number and % of site participants in each campaign event

IV. SAFETY AND HEALTH MANAGEMENT SYSTEMS

The Safety and Health Management System (SHMS) is a critical part of this OSP Agreement in that it is an important aspect of collaboration between the project management team, supervisors, and the workers on site. This SHMS will include, but not be limited to, the following core elements:

Management Leadership Roles

Ryan Companies, US, Inc. will implement a SHMS patterned after OSHA’s “Recommended Practices for Safety and Health Programs in Construction” that will encourage site employers to commit a high level of worker involvement to assist in monitoring and identifying jobsite hazards on a continual basis to prevent accidents. The SHMS will be implemented at the initiation of the partnership and continue to be implemented during the entire duration of the partnership.

https://www.osha.gov/shpguidelines/docs/8524_OSHA_Construction_Guidelines_R4.pdf

Worker Participation

Any worker at the site will be encouraged to report jobsite hazards and bring all potential hazards to the attention of Ryan Companies, US, Inc. and/or supervisors if discovered for immediate response and correction. This will be encouraged in the following ways:

- Ryan Companies, US, Inc. will hold a Job Site Safety Orientation with each worker prior to starting work on site.
- Ryan Companies, US, Inc. will provide a system to allow workers to report potential jobsite hazards to Ryan Companies, US, Inc. and/or supervisors upon discovery and stop work if necessary.
- Ryan Companies, US, Inc. will require all workers to attend weekly stand-down meetings. All identified hazards and resolutions will be tracked.
- Ryan Companies, US, Inc. and OSHA will inform the Colorado Building and Construction Trades Council of this OSP agreement and its provisions.
- The Safety Committee will meet on a monthly basis and will consist of at least 3 labor-level employees from trades currently working on the site.

Hazard Identification and Assessment

This project will focus on safety at all times and Ryan Companies, US, Inc. will enforce jobsite safety compliance to OSHA standards including, but not limited to, the following ways:

- Ryan Companies, US, Inc. Site Safety Manager will ensure daily safety audits are conducted. A schedule of daily site-safety audits will be developed by Ryan and the safety committee.
- Ryan Companies, US, Inc. will take immediate action to correct any unsafe conditions, track all unsafe observations, and provide final statistics to all parties in this agreement.
- Ryan Companies, US, Inc. will continually monitor all workers, visitors, and others entering the worksite to ensure safe conditions throughout the worksite.

Hazard Prevention and Control

Ryan Companies, US, Inc. considers Hazard Prevention and Control a process requiring continual efforts of monitoring and identifying jobsite hazards and taking corrective actions to maintain a safe and healthy jobsite at all times.

- Ryan Companies, US, Inc., contractors and subcontractors will ensure that hazard correction procedures are in place and identified for their workers and others that could be exposed to hazards created.
- Ryan Companies, US, Inc. and contractors and subcontractors will ensure that everyone knows how to use and maintain personal protective equipment.
- Ryan Companies, US, Inc. and contractors and subcontractors will make sure that everyone understands and follows safe work procedures established. This will be accomplished in several ways, with one being the use of a Procore software system which is accessible by computer, smartphone or tablet. The system is used by Ryan Companies, US, Inc. to record, log, and verify corrections of hazards observed at the jobsite. Hazards identified during inspections will be assigned to the responsible party and competent person for the contractor must report back to Ryan Companies, US, Inc. with corrective action by a given due date.

Education and Training

Ryan Companies, US, Inc. understands that providing workers with an understanding of hazard recognition and control, and actively involving them in the process, can help to eliminate hazards before an incident occurs. Training is given in English and translated into Spanish. Ryan provides publications in both English and Spanish.

- Ryan Companies, US, Inc. and contractors/subcontractors will ensure work tasks are assigned to workers who are trained and authorized.
- Ryan Companies, US, Inc. and contractors/subcontractors will ensure workers are not performing work tasks that appear to be unsafe.
- Ryan Companies, US, Inc. and contractors/subcontractors will ensure that supervisors are trained to recognize hazards and understand their responsibilities.
- Ryan Companies, US, Inc. and contractors/subcontractors will ensure that training addresses diversity, equity, inclusion and accessibility.
- Site orientation training will be conducted prior to starting work at the site.
- Weekly toolbox meetings will be held with all workers at the site.

Program Evaluation and Improvement

Ryan Companies, US, Inc. understands that once a SHMS is established, it should be evaluated to verify that it is being implemented as intended. After that, employers should quarterly, step back and assess what is working and what is not, and whether the program is on track to achieve its goals.

- Ryan Companies, US, Inc. will work with contractors/subcontractors to ensure control measures are periodically evaluated for effectiveness.
- Ryan Companies, US, Inc. will ensure processes are established to monitor program performance, verify program implementation, and identify program shortcomings and opportunities for improvement.
- Ryan Companies, US, Inc. will ensure necessary actions are taken by contractors/subcontractors to improve their overall program and overall safety and health performance.

Communication and Coordination for Employers on Multi-employer Worksites

Ryan Companies, US, Inc. considers effective communication and coordination among contractors and their workers critical to a safe workplace.

- General contractors, contractors, subcontractors, and staffing agencies must commit to providing the same level of safety and health protection to all workers.
- General contractors, contractors, subcontractors, and staffing agencies must communicate the hazards present at the worksite and the hazards that contract workers may create on site.
- General contractors establish specifications and qualifications for contractors, subcontractors, and staffing agencies.
- Prior to beginning work, general contractors, contractors, subcontractors, and staffing agencies will coordinate on work planning and scheduling to identify and resolve any conflicts that could impact safety or health.

V. WORKER INVOLVEMENT

- Ryan Companies, US, Inc. and non-signatory trades will ensure workers, and/or their representatives participate in monthly safety meetings as well as report any near miss or unsafe conditions.
- Ryan Companies, US, Inc. and non-signatory trades will ensure workers and/or their representatives are involved with the site safety committee, daily and monthly site inspections and weekly toolbox talks.
- Ryan Companies, US, Inc. will provide support to all workers and/or their representatives by providing feedback on risks and assisting them in eliminating hazards. The weekly stand down meeting is the vehicle for open dialogue and feedback.
- Ryan Companies, US, Inc. will hold a Job Site Safety Orientation with each worker prior to starting work on site.
- Ryan Companies, US, Inc. will provide a system to allow workers to report potential jobsite hazards to Ryan Companies, US, Inc. and/or supervisors upon discovery and stop work if necessary.
- Ryan Companies, US, Inc. will require all workers to attend weekly stand-down meetings. All identified hazards and resolutions will be tracked.
- Ryan Companies, US, Inc. and OSHA will inform the Colorado Building and Construction Trades Council of this OSP agreement and its provisions.
- The Safety Committee will consist of at least 3 labor-level employees from trades currently working on the site.

VI. PERFORMANCE MEASURES

Performance measures as outlined in Section III will be used to assess the effectiveness of the partnership. Ryan Companies, US, Inc. will gather and track data for the performance measures and share the information with OSHA and other Partners, as specified in Appendix B of the Strategic Partnership Program for Worker Safety and Health, OSHA Directive CSP 03-02-003.

VII. EVALUATION

The program will be evaluated on an annual basis and at the conclusion of the partnership through the use of the Strategic Partnership Annual Evaluation Format measurement system, as specified in Appendix C of the Strategic Partnership Program for Worker Safety and Health, OSHA Directive CSP 03-02-003.

It will be the responsibility of Ryan Companies, US, Inc. to gather required data to evaluate and track the overall results and successes of the partnership program. This data will be shared with OSHA and CSU.

Ryan Companies, US, Inc. will write and submit the annual evaluation to the Partners for input and concluding the evaluation. The Denver Area Office of OSHA will submit the annual evaluation.

VIII. VERIFICATION PROCEDURES

Both offsite and onsite verification methods will be used by OSHA to monitor the partnership. Offsite verification methods will include reviewing reports and data identified in Section III. Ryan Companies will provide OSHA with quarterly reports for each measure identified in Section III at least 2 weeks prior to the scheduled quarterly onsite non-enforcement visit.

Onsite non-enforcement verification reviews will include partner presentations and site walkthroughs and will be conducted as part of the quarterly partnership meeting. Union representatives and workers will participate in the verification process. If non-compliant activity or hazards are discovered, immediate correction is required. Ryan Companies, US, Inc. will document the corrective action taken, and share with all contractors A referral for an enforcement inspection will be made if management refuses to correct a serious hazard identified during the non-enforcement verification visit. Onsite non-enforcement verifications will include the entire jobsite and all contractors/subcontractors actively working onsite.

Ryan Companies, US, Inc. and its contractors and subcontractors will remain subject to OSHA inspections and investigations in accordance with agency procedures.

IX. INCENTIVES

OSHA's Field Operations Manual details opportunities available during citation/case settlement for all employers who undergo onsite enforcement inspections. These opportunities are also available for partnering companies participating in the partnership program.

X. OSP MANAGEMENT AND OPERATION

Ryan Companies, US, Inc. and its contractors, in association with OSHA and CSU, will form a partnership committee to monitor the implementation of this Agreement. It will consist of a representative from each of the designated Partners. Ryan Companies, US, Inc. will serve as the

chairperson and as OSHA's primary contact. The committee will review contractor compliance and involvement in the partnership; analyze jobsite audits; make partnership improvements; and evaluate partnership modifications, achievements, and success of the partnership.

Ryan Companies, US, Inc. will:

- Coordinate the collection and distribution of all job site data required by this agreement (see Goals/Measures/Strategies in Section III). Prepare quarterly summaries for OSHA offsite verification purposes.
- Implement or assist site contractors with implementation of all hazard control strategies identified by this agreement.
- Coordinate and communicate partnership commitments and expectations with all contractors and subcontractors.
- Share the responsibility for overseeing site safety, serving as a point of contact, and overseeing the partnership goals.
- Allow OSHA representation on the site for inspection activities (un-programmed activities such as fatalities and employee complaints).
- Audit the partnership and make recommendations for improvement.

OSHA will:

- Participate in the quarterly partnership meeting and site verification audit.
- Designate a Denver Area Office contact to be used as a resource for technical issues.
- Conduct quarterly offsite verification. Review the site safety and health self-audits, accident reports, and industrial hygiene monitoring on a quarterly basis.
- Periodically provide an OSHA representative at monthly site safety committee meeting and activities as resources permit.

CSU will:

- Provide a CSU representative at the monthly safety committee meetings and site audit activities as resources permit.
- Participate in the quarterly partnership meeting.
- Assist in planning and implementation of all safety and health management systems.
- Provide/assist in training as resources permit.

XI. WORKER AND EMPLOYER RIGHTS

This partnership does not preclude workers and/or employers from exercising any rights provided under the OSH Act (or, for federal workers, 29 CFR 1960), nor does it abrogate any responsibility to comply with rules and regulations adopted pursuant to the Act.

XII. OSP TERM

This OSP Agreement will terminate at the completion of construction activities. If any signatory of this agreement wishes to terminate its participation prior to the established termination date, written notice of the intent to terminate must be provided to all other signatories.

If OSHA chooses to terminate its participation in the partnership, the entire agreement is terminated.




Changes to the OSP Agreement may be implemented in writing if all parties are in agreement that it is in the best interest of all members involved.

XIII. SIGNATORIES

**United States Department of Labor
Occupational Safety & Health Administration**

Based upon a mutual interest to protect construction workers, the parties below agree to the above terms of the OSHA / Ryan Companies, US, Inc. Construction Partnership

Signed this 18th of January, 2024

Organization	Signature
	<p>OSHA, Denver Area Office</p> <p>Signature: _____</p> <p>Printed Name: Art Hazen, Area Director</p>
	<p>Ryan Companies, US, Inc. Building Company</p> <p>Signature: _____</p> <p>Printed Name: John Gaddini, Corporate Safety Director</p>
	<p>Colorado Onsite Health and Safety Consultation Program</p> <p>Signature: _____</p> <p>Printed Name: Greg Gress, Consultation Program Manager</p>