



**Gas Worx Project  
STRATEGIC PARTNERSHIP**

**Between**

**Occupational Safety and Health Administration  
Tampa Area Office,**

**Juneau Construction Company**

**and the**

**University of South Florida SafetyFlorida Consultation  
Program**

## **I. PURPOSE/SCOPE**

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA), Juneau Construction Company, and the University of South Florida (USF) SafetyFlorida Consultation Program (USF). USF was invited to support this Partnership through its Safety, Health and Environmental (SHES) Program, for the benefit of small employers engaged as subcontractors on the jobsite. To facilitate the goal of reducing occupational related fatalities and serious injuries within the construction industry, OSHA, Juneau Construction Company, and USF will implement a Partnership under the OSHA Strategic Partnership Program (OSPP). The common objectives and goals of the Partnership will include the following:

- A. Reduced injuries and illnesses;
- B. Increased safety and health training;
- C. Reduction in the overexposure of workers to health hazards; and
- D. Increased numbers of employers with comprehensive safety and health management systems.

This Partnership will cover the construction of Gas Worx, which is a mixed-use apartment building project, located in Tampa, Florida. The Gas Worx project will consist of one mixed-use apartment building that is roughly 500,000 square feet, that includes 390 units, retail area, and parking deck. This project will be located on a 41 acres site. The Gas Worx name is a nod to the gas company and gas storage facility that previously occupied the site.

By combining their efforts, skills, knowledge and resources, OSHA, Juneau Construction Company, and USF expects to reduce exposure to hazards and thereby decrease the possibility of serious injuries and fatalities at the construction site. This Partnership is consistent with OSHA's long-range efforts to develop a contractor/government partnership approach to safety management. It allows for better use of OSHA resources and innovation in safety management. It also encourages more participation in the safety process from the construction community.

## **II. IDENTIFICATION OF PARTNERS**

The Partnership will include:

- Occupational Safety and Health Administration, Tampa Area Office;
- Juneau Construction Company; and
- University of South Florida SafetyFlorida Consultation Program.

## **III. GOALS/STRATEGIES/PERFORMANCE MEASURES**

The primary objective of this Partnership is to create a working relationship that focuses on preventing work-related fatalities, controlling, or eliminating serious workplace hazards, and establishing a foundation for the development of an effective safety and health program. The goals employed to achieve these results will include the following:

<b>GOALS</b>	<b>STRATEGIES</b>	<b>MEASURES</b>
Reduce the injury and illness rates 10 percent below the 2022 BLS national average for the specific SIC/NAICS code, thereby providing a safe and healthy work environment for employees at the Project.	<p>a) Review the OSHA 300 log data of the Partnership participants. Review injury and illness trends and implement effective corrective action(s).</p> <p>b) Calculate the Project’s Total Case Incident Rate (TCIR) and Days away from work, restricted, or job transferred (DART)<sup>1</sup> rates.</p>	a) This goal will be measured by comparing the Project’s TRC and DART rates to the established 2022 BLS Rates for Non-Residential Construction NAICS 2362, which is 1.7 (TCIR) and 0.9 (DART).
Effectively control workplace hazards by increasing the number of construction companies with safety and health management systems (SHMS).	<p>a) Review the number of employers that receive comprehensive consultation visits.</p> <p>b) Review the number of employers that work with the Partnership to develop and implement comprehensive safety and health management systems.</p>	Measure the number of participants that develop and implement effective safety and health management systems, as a result of participating in the Partnership, compared to the (baseline) initial year of the Partnership.
Increase the number of employees, employers and supervisors who are provided effective safety and health training, such as the OSHA 10-hour course.	<p>a) Review the number of the employers that establish effective safety and health training programs.</p> <p>b) Review the number of the employers that provide employees with OSHA 10-hour/ OSHA 30-hour training.</p>	<p>a) Measure the number of employers with effective safety and health training programs.</p> <p>b) Measure the number of managers, supervisors and employees provided with OSHA 10-hour/ OSHA 30-hour training compared to the (baseline) initial year of the Partnership.</p>

<sup>1</sup>Days Away from work, Restricted, or job Transferred (DART) rate: This includes cases involving days away from work, restricted work activity, and transfers to another job. It is calculated based on  $(N / EH) \times (200,000)$  where N is the number of cases involving days away, and/or restricted work activity, and/or job transfer; EH is the total number of hours worked by all employees during the calendar year; and 200,000 is the base number of hours worked for 100 full-time equivalent employees. For example: Employees of an establishment including management, temporary, and leased workers worked 645,089 hours at this worksite. There were 22 injury and illness cases involving days away and/or restricted work activity and/or job transfer from the OSHA 300 Log (total of column H plus column I). The DART rate would be  $(22 / 645,089) \times (200,000) = 6.8$ .

GOALS	STRATEGIES	MEASURES
Conduct effective self-inspections to reduce the exposure of workers to health and safety hazards.	<p>a) Track health and safety hazard awareness related program improvements, as well as training focused on the prevention of health and safety hazards.</p> <p>b) The Juneau Construction Company Team will track the number of self-inspections and site audits, as well as the number of health and safety hazards identified during these activities.</p>	A comparison will be made between the number of health and safety hazards identified during self-inspections and audits conducted during the (baseline) initial year of the Partnership.

#### IV. OSPP MANAGEMENT AND OPERATION

##### A. Juneau Construction Company will:

1. Establish a jobsite safety walk team, consisting of a representative of all primary trades active on site, to develop an understanding and awareness that all accidents are preventable. This action will be accomplished by implementing the Juneau Construction Company Team’s Safety Vision, a comprehensive safety and health management system, which includes:
  - a. Management commitment and employee involvement;
  - b. Hazard analysis;
  - c. Hazard control; and
  - d. Arrangement of training assistance for other stakeholders on site.
  
2. Mentor subcontractors in safety and health management systems. The term “subcontractors” shall include all multi-tiered subcontractors that arrive for work on the site.
  
3. Where the potential for airborne silica exposure exists, require the use of wet cutting, or soft cutting techniques and/or dust collection system in compliance with Table 1 of 29 CFR Part 1926.1153, and when employee exposure levels require, mandatory use of approved respiratory protection. Where the potential for airborne silica exposure exists, personal air monitoring will be conducted to assess employee exposure levels. Where the potential for other health issues exists (i.e., carbon monoxide, lead, or large-scale use of chemicals in the building interior during floor finishing), Juneau Construction Company will coordinate with the subcontractor responsible for creating the hazard and ensure that air monitoring is accomplished to assess employee exposure levels. The Juneau Construction Company Team and USF will compile and track sampling results.

4. Enforce safety rules and regulations. This enforcement authority will include provisions to hold contractors and employees accountable for safety rules and regulations, and, if necessary, remove contractors' employees and supervisors from the job site, following proper disciplinary procedures.
5. Ensure that a competent person performs a risk assessment of all fall hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce risks through conventional fall protection, engineering, or administrative controls to as low a level as possible. Regarding the fall hazard risk assessment:
  - a. Critical risks will not be tolerated. A critical risk is defined by work that contains high probability in occurrence and high severity in consequence. No work will be performed until action is taken to reduce the level of risk to as low as reasonably feasible.
  - b. Workers on the face of formwork or reinforcing steel must be protected from falling by personal fall arrest systems, with the use of a positioning device, and/or lanyards.
6. Identify and correct serious ergonomic hazards.
7. Ensure that ground fault circuit interrupters (GFCI) are used to protect all electrical circuits that are installed for work. All contractors will ensure that employees are protected by the use of a GFCI at all times.
8. Ensure that Juneau Construction Company Project Managers and Safety Directors serve as points of contact, monitor safety and health at the site and its progress toward achievement of the Partnership goals.
9. Ensure that Juneau Construction Company Superintendents, Construction Managers, and Project Managers verify that weekly Safety Audits are conducted (since this is a multi-employer worksite and all workers are to work together on safety issues). Upon request, the Juneau Construction Company Team will review subcontractors' daily reports and audits, note any hazards found, and review the results with all Safety Committee members at the weekly coordination/subcontractor meeting.
10. Conduct and document weekly jobsite safety meetings/toolbox talks.
11. Collect and submit monthly accident reports to the Juneau Construction Company Safety Committee, including first aid, injury, property damage and near miss reports.
12. Continually audit the Partnership's effectiveness and recommend improvements.

13. Ensure that no employees are allowed to work directly below a suspended load except for: employees engaged in the initial connection of steel and employees necessary for hooking or unhooking the load. The following criteria must be met when employees are allowed to work under the load: materials being hoisted shall be rigged to prevent unintentional displacement; hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping off the hook; all loads shall be rigged by a qualified rigger. Appropriate use of tag lines will be utilized to prevent work below suspended loads.
14. Require the use of appropriate personal protective equipment. Hardhats are always mandatory, on the worksite. Employees exposed to heavy equipment and working with moving equipment, as well as all flagmen on site shall wear high-visibility reflective clothing. A 100 percent eye protection program will be implemented. A glove program will be implemented when there is exposure to cut or laceration hazards.
15. Ensure that all safety signs and warnings are posted in English and Spanish, as well as in any other languages spoken by limited English proficient workers.
16. Implement a 100 percent Fall Protection Plan for all work performed 6 feet or more above lower surfaces.
17. Implement an effective Heat Illness Prevention Program (Heat Program) to educate workers about the hazards of working outdoors in the heat and steps needed to prevent heat-related illnesses. This Heat Program should utilize tools such as the OSHA-NIOSH Heat Safety Tool Smartphone App and the National Weather Service Alerts and Advisories.

**B. Subcontractors will:**

1. Appoint a representative to the site Safety Committee responsible for resolving job safety matters and serving as a liaison to Juneau Construction Company Team. Every prime trade contractor will have a person available to participate in the Safety Committee. Participation in this committee will consist of, but will not be limited to, participation in the Juneau Construction Company safety walkthroughs and monthly Safety Committee meetings.
2. Conduct jobsite safety inspections for those employees under their control. These jobsite safety inspections will be in addition to the daily general inspections. If non-compliant activity or hazards are discovered, immediate correction is required. Documentation of abatement methods and verification must be submitted to the appropriate Juneau Construction Company Safety Engineer.
3. Participate in the weekly Safety Committee/subcontractor meetings and safety audits. If non-compliant activity or hazards are discovered, immediate correction is required. Abatement methods and verification must be submitted to the

appropriate Juneau Construction Company Safety Engineer who will document the correction taken and share this information during the monthly update meetings.

4. Share the results of jobsite inspections with all the corresponding superintendents via the Procore (construction management platform) digital audit system.

**C. OSHA will:**

1. Participate, to the extent resources permit, in the quarterly meetings with Partnership participants, but will not participate in the walk-around inspection.
2. Serve as a resource and liaison for Partnership participants and assist with safety and health training, as resources permit.
3. Give priority to the construction project when technical assistance is needed.
4. Audit the monthly reports/documents and make recommendations for improvements in the meeting of Partnership goals.
5. Conduct inspections in accordance with sections VIII and IX of this Partnership.
6. Conduct the annual Partnership evaluation in accordance with section VII of this Partnership.

**D. University of South Florida SafetyFlorida Consultation will:**

1. Give priority consideration to requests for services to small contractors who are engaged in work at the project.
2. Appoint a representative to the Safety Committee and participate in meetings to the extent resources allow.
3. To the extent feasible, conduct quarterly safety and health surveys of the project, which may include performing personal air monitoring to assess employee exposure levels to chemicals, such as silica, carbon monoxide, heavy metals, isocyanates, hexavalent chromium, and other noted chemical hazards.
4. To the extent feasible, conduct personal noise monitoring to assess employee exposure.
5. Support, perform, and monitor activities related to safety focus areas not limited to, falls, confined space, trenching, excavation, and noise generating activities.

**V. SAFETY AND HEALTH MANAGEMENT SYSTEM**

Juneau Construction Company will use their systems to collect and analyze injury and illness trends (including near-miss incidents) by all contractors performing work at the site.

This data will be used as a tool to ensure continual safety and health improvement at the site. The management of this agreement will be accomplished by the Juneau Construction Company Team implementing a comprehensive jobsite safety and health management system, which includes:

1. Using Juneau Construction Company – Job Hazard Analysis (JHA) and Pre-Task Plan forms, Juneau Construction Company Team will complete a risk assessment prior to exposing any employee to potential safety and health hazards.
2. Working with OSHA, University of South Florida SafetyFlorida Consultation, and Safety Committee members to provide the resources to conduct initial monitoring for ALL toxins, carcinogens, or hazardous substances currently emphasized by OSHA and which present inhalation hazards, such as silica, lead, cadmium, and/or isocyanates. Employee exposures will be assumed, and respiratory protection worn until the results of the initial monitoring studies are received and demonstrate no exposure problems or prior surveys show no hazard exists. Juneau Construction Company Team will endeavor to ensure that no work with these materials will occur, thus preventing any exposure. Juneau Construction Company team will request periodic evaluation visits by its insurance company’s Industrial Hygienist and USF SafetyFlorida Consultation.
3. Ensuring all contractors on-site perform daily audits. In addition, once each month, a comprehensive audit of the jobsite will be performed. A representative of the subcontractors will be a safety audit participant in the jobsite areas where their employees may be exposed to hazards. Any hazards found during the audits will be corrected promptly. Items identified during the audits will be annotated on a daily log. When hazards cannot be corrected immediately, they will be tracked until abatement is completed. Employees exposed to these hazardous conditions will be informed of the hazard and effective interim control measures will be implemented. A record will be kept of all hazards found during the comprehensive site safety audits and the number of hazards corrected as a result of the weekly audits.
4. Implementing an effective Fall Protection Plan to include fall protection in all cases where work is being performed 6 feet or more above lower surfaces.
5. Ensuring employees receive training as follows:
  - a. Supervisory personnel should possess an OSHA 30-hour card or its equivalent. The Juneau Construction Company Team will work with all subcontractors to provide each subcontractor’s safety designee with an OSHA 10-hour training, or its equivalent through available on-site training options.
  - b. All employees will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures related to the work being performed, as well as the requirements outlined in the Partnership



Agreement. In addition, employees shall receive training on the content of the risk assessment for operations they will encounter. This may require periodic retraining of employees on the content of the risk assessment as they become relevant due to entering new phases of construction. The Juneau Construction Company Team will provide this material to each subcontractor has designated safety representative for completion.

- c. Safety and health training will be provided to all workers in a language they understand. Bilingual instructors will perform this training. Juneau Construction Company will provide a list of instructors to all subcontractors to ensure that all workers are effectively trained.
  - d. Other hazard-specific training will be conducted on an as-needed basis.
  - e. Subcontractors can utilize other instructors as long as these instructors can provide a valid certification card showing completion of the OSHA 30-hour course. Juneau Construction Company Team will have primary responsibility for coordinating this training; however, as resources allow University of South Florida SafetyFlorida Consultation will also provide assistance.
6. Requiring each subcontractor with written safety and health management systems must submit them to the Project Construction Team for evaluation. Companies without safety and health management systems may adopt Juneau Construction Company Incident Prevention Plan or develop an adequate safety and health management system with the assistance of USF On-Site Consultation.
  7. Ensuring Juneau Construction Company Team and/or the affected subcontractors adequately address health-related issues, which arise during the course of the Project, with the assistance of OSHA, as its resources permit, and USF SafetyFlorida Consultation. All health-related issues will be discussed monthly during the Partnership meetings. In addition:
    - a. An effective Hearing Conservation Program, including noise monitoring and engineering controls, where possible, will be implemented by Juneau Construction Company Safety Department.
    - b. An effective environmental monitoring program will be implemented to control airborne hazards, such as silica, and will include personal monitoring, employee training, implementation of engineering controls where possible, and the use of respiratory protection when necessary. Previous site-based data will be considered acceptable.
  8. Ensuring compliance with the NFPA 70E when working on live electrical equipment, including training and the availability and use of personal protective equipment. A permit system will be implemented whenever working in close proximity to or on live electrical systems to ensure the implementation of

appropriate protective measures prior to exposure. The permit form includes requirements for pre-task review and lockout/tagout procedures to be followed.

9. Ensuring all equipment capable of causing amputations is adequately guarded.
10. Ensuring effective programs are employed, consisting of policies and procedures that comply with OSHA's Process Safety Management (PSM) standard as equipment and processes are brought live and on-line at the Project.
11. Ensuring effective programs are employed, consisting of policies and procedures that comply with OSHA's Lockout/Tagout standard, as equipment and processes are brought live and on-line at the Project.

## **VI. WORKER INVOLVEMENT**

The site will establish an employee Safety Committee consisting of one member per subcontractor that will meet on a monthly basis to share the results of jobsite inspections, information concerning accidents and near misses, suggestions for improvement and recommendations for training of the general workforce. Near misses and daily safety audits will be discussed during Toolbox Talks.

## **VII. ANNUAL EVALUATION**

The Partnership will be evaluated on an annual basis through the use of the Strategic Partnership Annual Evaluation format as specified in Appendix C of OSHA Instruction CSP 03-02-003, OSHA Strategic Partnership Program for Worker Safety and Health.

The Juneau Construction Company Team will be responsible for gathering required participant data to evaluate and track the overall results and success of the Partnership. This data will be shared with OSHA. OSHA will be responsible for writing and submitting the annual evaluation.

## **VIII. INCENTIVES**

Participant benefits from OSHA may include:

1. Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-164 (April 14, 2020).
2. If a citation with penalties is issued, the Area Director has the authority to negotiate the amount of an additional penalty reduction as part of the informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.

3. Priority consultation service and assistance for small employers working on the construction site from the USF SafetyFlorida Consultation.
4. An OSHA focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR Part 1926.20 and 29 CFR Part 1926.21 (For additional details refer to the Focused Inspection in Construction August 22, 1994, memo signed by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995).

## **IX. OSHA VERIFICATION**

1. **Verification Enforcement Inspections:** OSHA will conduct the initial verification enforcement inspection no sooner than three months, but within four months after Partnership participants formally enter into this Agreement. During this period, Partnership participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct the verification enforcement inspections annually thereafter. Verification enforcement inspections will be conducted as a focused inspection, per the appropriate OSHA guidelines. Compliance Safety and Health Officers (CSHOs) who are familiar with the Project will do verification enforcement inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. During the verification enforcement inspections, if OSHA personnel identify serious hazards that site management refuses to correct, the scope of the inspection may be expanded.
2. **Complaint/Referral Investigations:** This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to any party's attention by any person. Upon a finding that an allegation is valid, the employer shall promptly abate the hazard.
3. OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be forwarded to the Juneau Construction Company's Project Management office on-site. In accordance with applicable law, the name and identifying information of a complainant requesting confidentiality will not be revealed. Juneau Construction Company Team agrees to investigate these complaints, regardless of the employer involved, and provide OSHA with a written response within 5 working days of receiving the non-formal complaint/referral.
4. **Accident Investigations:** Employers engaged in this Partnership recognize that OSHA fully investigates accidents involving a fatality or serious physical harm. If during the course of the investigation OSHA determines that the incident resulted from violations of OSHA standards, the employer will not be afforded Partnership incentives.

## **X. WORKER AND EMPLOYER RIGHTS**

This Partnership does not preclude employees and/or employers from exercising any right provided under the OSH Act, nor abrogate any responsibility to comply with rules and regulations adopted pursuant to the OSH Act.

## **XI. TERM OF PARTNERSHIP**

It is understood that this Agreement shall be in effect until completion of construction activities at the Project, but in no case longer than three years from the Partnership Signing Date. Should any “signatory” stakeholder choose to withdraw prior to project completion, a written notice shall be given stating the reason(s) and providing 30 days notice to the other party(s).

If OSHA chooses to withdraw its participation in the Partnership, the entire Partnership is terminated. Any party may also propose modification or amendment of the Agreement. Changes may be implemented, if all parties are in agreement that they are in the best interest of the Partnership.

## **XII. THE PROGRAM - OSPP SIGNATURE PAGE**

Partnership Signing Date: \_\_\_\_\_

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Danelle L. Jindra  
Tampa Area Director  
Occupational Safety & Health  
Administration (OSHA)

\_\_\_\_\_  
C.J. Britt  
Executive Director  
Juneau Construction Company

\_\_\_\_\_  
Brian L. Warrick  
Program Director & Assistant Professor  
University of South Florida  
SafetyFlorida Consultation  
Program

\_\_\_\_\_  
Blake Jones  
Safety Director  
Juneau Construction Company

\_\_\_\_\_  
Spencer Davis  
Safety Engineer  
Juneau Construction Company

\_\_\_\_\_  
Adam Sikora  
Senior Superintendent  
Juneau Construction Company