



The Holbrook of Woodstock

**OSHA STRATEGIC PARTNERSHIP
Between**

**Occupational Safety and Health Administration
Atlanta-East Area Office**

And

**Georgia Tech Enterprise Innovation Institute – Safety, Health,
and Environmental Services Group**

And

The Associated General Contractors of Georgia, Inc.

And

Choate Construction Company

I. PURPOSE/SCOPE

The Occupational Safety and Health Administration (OSHA), the Georgia Tech Enterprise Innovation Institute – Safety, Health and Environmental Services Group (Georgia Tech), Choate Construction Company (Choate Team) and the Associated General Contractors of Georgia, Inc. (AGC Georgia), developed this Partnership jointly. This Partnership will cover the construction of the Holbrook of Woodstock Project (Project), located in the Woodstock, Georgia. The common objectives and goals of the Partnership will include the following: reduce injuries and illnesses; increase safety and health training; reduction in the overexposure of workers to health hazards; and an increase in the number of employers with appropriate safety and health management systems. 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.

The Holbrook of Woodstock will offer a variety of senior living options in the heart of Woodstock, Georgia. Surrounded by exceptional shopping, restaurants, and an abundance of outdoor activities, the venture has developed a 17.5-acre site to include an independent living apartment building. The six-story independent living facility will offer 175 luxury units, consisting of a total of 249,142 square feet (SF). The lower level of the structure provides residents a hydrotherapy pool, valet parking services, and a grooming station to care for their pets. The main level offers a bounty of amenities including an indoor lap pool, the "Holbrook Club" wellness center, library, performing arts center, cinema, coffee bar, and multiple fine-dining options. The remaining four stories will consist of spacious living areas in one, two, and three-bedroom residential units

The complex will also include an assisted living facility and a memory care center. These units will provide residents with a combination of personal care and support. Combined the assisted living and memory care building will include 87 units. Amenities will include a library, full-service dining, screening room, bistro, as well as multiple salons.

II. IDENTIFICATION OF PARTNERS

The Partnership will include:

- Occupational Safety and Health Administration;
- Georgia Tech Enterprise Innovation Institute – Safety, Health and Environmental Services Group;
- Associated General Contractors of Georgia, Inc.; and
- Choate Construction Company

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:

GOALS	STRATEGIES	MEASURES
Reduce the total number of injuries and illness cases by 10 percent, 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. Reviewing injury and illness trends and implementing effective corrective action(s).</p> <p>b) Calculate the employers' Total Case Incident Rate (TCIR) and Days away from work, restricted, or job transferred (DART) ¹rates.</p> <p>c) Compare this data with the baseline rates for the Partnership.</p>	<p>a) This goal will be measured by the number of companies participating in the Partnership, which reduce their TCIR and DART rates below the baseline for the partnership.</p> <p>b) Baseline will be established by the 2016 BLS Rates for Non-Residential Construction NAICS 2362, which is 2.4 and 1.3.</p>
Effectively control workplace hazards by increasing the number of construction companies with safety and health management systems.	<p>a) Review the number of employers that receive comprehensive consultation visits.</p> <p>b) Review the number of employers that establish and implement comprehensive safety and health management systems.</p>	Compare the number of participants that develop and implement effective safety and health management systems as a result of participating in the Partnership, with the baseline for the Partnership. The baseline will be established during the 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) Evaluate of the employers that establish effective safety and health training programs.</p> <p>b) Evaluate 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) Compare the number of managers, supervisors and employees provided with OSHA 10-hour/ OSHA 30-hour training with the baseline for the Partnership. The baseline will be established during the initial year of the Partnership.</p>
Conduct effective self-inspections, sampling, monitoring, training and consultative activities in areas where employees might be exposed to health hazards such as the following: hazardous noise	<p>a) Track health hazard related program improvements, as well as training focused on the prevention of health hazards.</p> <p>b) The Choate Team will track the number of self-inspections and site audits, as well as the number of health hazards identified during these activities.</p>	A comparison will be made between the number of health hazards identified during self-inspections and audits, during the second and third year of the Partnership, to the number of hazards identified through self-inspections and audits conducted during the (baseline) initial year of the Partnership.

<p>levels; lead; silica; asbestos; ergonomic stressors; and other health-related hazards. The overall outcome of this goal should be the reduced overexposure of workers to health hazards, as well as a reduced injury and illness rate.</p>		
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¹Days 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 $(22 / 645,089) \times (200,000) = 6.8$

IV. MANAGEMENT AND OPERATION

A. The Choate Team will:

1. Establish a project Safety Leadership Team (SLT), consisting of a representative of all primary trades active on-site. This team will proactively Identify, communicate, and pre-plan hazardous activities as a team throughout all phases of construction, ensuring everyone returns home safely at the end of each day to their loved ones. This action will be accomplished by implementing the Choate Team’s Safety Vision through 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. Subcontractors shall include all multi-tiered subcontractors that 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, and when needed, the mandatory use of approved respiratory protection. We will be using Table 1, 29 CFR Part 1926.1153 where applicable. Exposure Control Plans and monitoring programs will be in writing and on

site for each contractor performing work that would expose themselves to airborne silica.

4. This enforcement authority includes holding contractors and employees accountable for following safety rules and regulations and, if necessary, removing contractors' employees and supervisors from the job site, following proper disciplinary procedures.
5. Ensure that a competent person completes an Activity Hazard Analysis (AHA) for all fall, struck-by, caught-between, and electrocution hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce the risk through conventional protection, engineering, or administrative controls to as low a level as possible.
 - a. Critical risks will not be tolerated. No work will be performed until action is taken to reduce the level of risk to as low as reasonably feasible.
 - b. Bricklayers performing overhand bricklaying and related work above lower levels must be adequately protected. No "safety monitor" system will be allowed. Additionally, bricklayers must install netting systems for stripping operations.
 - c. 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.
 - d. We will require that each Contractor have at least one (1) competent person on site at all times. Each will have to sign the Choate Team's Competent Person Log prior to beginning work on the project.
6. 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. All GFCI's will be inspected for proper functioning weekly and a log will be kept to verifying inspections have been completed.
7. All Choate Team staff members will serve as points of contact, monitoring safety and health at the site and its progress toward achievement of the Partnership goals.
8. Ensures that daily safety audits are conducted (since this is a multi-employer worksite and all workers are to work together on safety issues). Upon request, the Choate Team will review subcontractors' daily logbooks, audits, note any hazards found, and then review them with all Safety Leadership Team members at the weekly/monthly subcontractor meeting.
9. Conduct and document weekly job site safety meetings.

10. Subcontractors will report all safety incidents/concerns immediately to Choate Team, which will ensure that they are tracked through Origami Risk incident reporting program.
11. Provide a high-level safety sheet, which documents the monthly facts and information needed. This information as well as any corrective actions taken for incidents will be shared with OSHA and Georgia Tech during the quarterly update meetings.
12. Provide visual designation of who the riggers/signalmen are by using red vests. While flying a load that has potential to go overhead of workers, whistles or horns will be blown to provide proper notice.
13. Require the use of appropriate personal protective equipment. Choate will review the subcontractor's safety requirements to ensure they are following their own procedures. We will also check to ensure they are following the Site-Specific Safety Procedures, as well as Choate's "above OSHA" policy. This includes 100 percent PPE at all times (Hardhats, vests, eye protection, and hard soled shoes/boots).
14. Ensure that all safety signs and warnings are posted in English and Spanish.
15. Implement a 100 percent Fall Protection Plan for all work performed 6 feet or more above lower surfaces.
16. Identify and correct serious ergonomic hazards.

B. Subcontractors will:

1. Appoint a representative to the project SLT responsible for resolving job safety matters and serve as a liaison to the Choate Team. Every prime trade contractor will have a person available to participate in the SLT. Participation on this team will consist of, but will not be limited to, participation in the Choate Team safety walkthroughs and monthly SLT meetings.
2. Conduct jobsite safety inspections for those employees under their supervision and authority. These jobsite safety inspections will be in addition to the daily general inspections. If non-compliant activity or hazards are discovered, immediate corrective action is required. Documentation of abatement methods and verification must be submitted to the appropriate Choate Safety Director/Manager.
3. Participate in the weekly SLT/subcontractor meetings and safety audits. If non-compliant activity or hazards are discovered, immediate corrective action is required. Abatement methods and verification must be submitted to the appropriate Choate Safety Director/Manager who will document the corrective action taken and share this information during the monthly update meetings.

4. Share the results of jobsite inspections with all workers by posting them in the Project office or on the jobsite bulletin board, to ensure all workers are notified of the results.

C. OSHA will:

1. Participate, to the extent resources permit, in the quarterly meeting with the partners, but will not participate in the walk around inspection, except that the verification visits may be scheduled as part of the weekly 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 report in accordance with section VII of this Partnership.

D. Georgia Tech will:

1. Perform quarterly jobsite inspections.
2. Participate, to the extent resources permit, in the quarterly meeting with the partners.
3. Give priority consideration to requests for services to small contractors who are engaged in work at the Project.

V. SAFETY AND HEALTH MANAGEMENT SYSTEM

The Choate Team 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 Choate Team will manage this portion of the Partnership by implementing a comprehensive jobsite safety and health management system, which includes the following:

1. Use the Choate Team's Activity Hazard Analysis (AHA), forms. Additionally, the Choate Team will complete a risk assessment prior to exposing any employee to potential safety and health hazards.

2. Work with OSHA, Georgia Tech and the SLT 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. The Choate Team will endeavor to ensure that no work with these materials will occur, thus preventing any exposure. The Choate Team will request periodic evaluation visits by Georgia Tech
3. All contractors on site will perform daily audits. In addition, weekly, 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. Implement 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. Ensure employees receive training as follows:
 - a. All Choate Team staff members are required to have OSHA 30-hour training cards. Additionally, subcontractor's supervisory personnel should possess an OSHA 10-hour training card or its equivalent.
 - 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. This material will be provided by the Choate Team to each subcontractor's designated safety representative for completion.
 - c. Safety orientation will be provided to all workers in a language they understand. Subcontractors are required to provide a bilingual instructor who will participate in this training and translate when needed.
 - d. Other hazard-specific training will be conducted on an as-needed basis.
6. Each subcontractor with written safety and health management systems must submit them to the Choate Team - Project Construction Team for evaluation.

Additionally, Choate requires each Subcontractor to provide have a dedicated safety person if they exceed 20 employees on-site.

7. Ensure health-related issues, which arise during the course of the Project, are adequately addressed by the Choate Team and/or the affected subcontractors, with the assistance of OSHA, as its resources permit, and Georgia Tech. All health-related issues will be discussed monthly during the Partnership meetings.
 - a. Choate requires all subcontractors to provide an effective hearing protection program, including noise monitoring as necessary.
 - 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. No electrical circuits will be used while live.
9. Ensure all equipment capable of causing amputations is adequately guarded.
10. Ensure effective programs are employed, consisting of policies and procedures that comply with OSHA's Lockout/Tagout standards, as equipment and processes are brought live and on-line at the Project.

VI. WORKER INVOLVEMENT

The site will establish an employee Safety Leadership Team 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 Tool Box 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 Choate 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 02-00-160 (August 2, 2016).

2. In the event that 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.
3. Priority consultation service and assistance for small employers working on the construction site from the Georgia Tech Consultation program.
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 August 22, 1994, memo signed and issued by former Deputy Assistant Secretary for OSHA James Stanley, which was revised in 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, 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 its 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 by fax, or by CSHO, to the Choate Team's - Project Management office onsite. In accordance with applicable law, the name of the complainant requesting confidentiality will not be revealed. The Choate 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 the 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 does it abrogates 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. Should any “signatory” stakeholder choose to withdraw prior to the Project’s 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 Holbrook of Woodstock PROJECT SIGNATURE PAGE

Partnership Signing Date: _____

William C. Fulcher
Area Director
Occupational Safety & Health
Administration (OSHA)

Paul Hanes
Safety Director, Atlanta
Choate Construction Company

Paul Schlumper
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Enterprise Innovation - Safety,
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