



**SECKINGER HIGH SCHOOL PROJECT - STRATEGIC PARTNERSHIP**

**Between**

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

**Carroll Daniel Construction Company, Associated General  
Contractors of Georgia, Inc.,**

**Gwinnett County Public School System**

**And**

**Construction Education Foundation of Georgia (CEFGA)**

## **I. PURPOSE/SCOPE**

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA), Carroll Daniel Construction Company (CDCC), the Associated General Contractors of Georgia (AGCGA), Gwinnett County Public School System and the Construction Education Foundation of Georgia (CEFGA). For the benefit of small employers engaged as subcontractors on the jobsite, the Georgia Tech Enterprise Innovation Institute (GA Tech) will be invited to support this Partnership through its Safety, Health and Environmental Program. This Partnership will cover the construction of Seckinger High School, located at 3655 Sardis Church Road, NW, Buford, GA (the Project). The common objective and goals of the Partnership include the following:

- A. Reduced injuries and illnesses;
- B. Increased safety and health training;
- C. Reduced overexposure to health hazards;
- D. Increased 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 and encourages more participation in the safety process from the construction industry.

To facilitate the goal of reducing occupational related fatalities and serious injuries within the construction industry, OSHA and CDCC will implement a Partnership under the OSHA Strategic Partnership Program (OSPP). This Partnership covers the Project consisting of a new 475,000 SF high school with supporting athletic facilities situated on an 85-acre site in Buford, GA.

By combining their efforts, skills, knowledge and resources, OSHA, CDCC, and AGCGA expect to reduce exposure to hazards and thereby decrease the possibility of serious injuries and fatalities at the Project.

## **II. IDENTIFICATION OF PARTNERS**

The Partnership participants will include:

- Occupational Safety and Health Administration;
- Carroll Daniel Construction Company;
- Associated General Contractors of Georgia;
- Gwinnett County Public School System; and
- Construction Education Foundation of Georgia

## **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>
<p>Maintain an OSHA recordable injury frequency 10 percent below the national average for the applicable SIC/NAICS code.</p> <p>Provide a safe and healthy work environment for construction employees at the Project.</p>	<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 employer’s Total Case Incident Rate (TCIR) and Days away from work, restricted, or job transferred (DART) rates.</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 based on the 2018 BLS Rates for Non-Residential Construction NAICS 2362, which are <b>2.5</b> and <b>1.2</b>. (TRIR and DART)</p>
<p>Effectively control workplace hazards by increasing the number of construction companies with safety and health management systems.</p>	<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>	<p>Compare the number of participants that develop and implement effective safety and health management systems as a result of participating in the Partnership, to the baseline for the Partnership.</p> <p>The baseline will be established during the initial year of the Partnership</p>
<p>Increase the number of employees, employers and supervisors who are provided effective safety and health training, such as the OSHA 10 and 30 -hour course.</p>	<p>a) Evaluate employers that establish effective safety and health training programs.</p> <p>b) Evaluate employers that provide employees with OSHA 10-hour/ OSHA 30-hour training.</p>	<p>Compare the number of managers, supervisors and employees provided safety and health training, as a result of participating in the Partnership, to the number of employees provided training during the baseline (initial) year of the Partnership.</p>

<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 levels; lead; silica; asbestos; ergonomic stressors; and other health-related hazards.</p> <p>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>	<p>a) Track health hazard-related program improvements, as well as training focused on the prevention of health hazards.</p> <p>b) CDCC will track the number of weekly and monthly self-inspections and site audits, as well as the number of health hazards identified during these activities of the entire worksite.</p>	<p>A comparison will be made between the number of health hazards identified during self-inspections (including audits) conducted by management representatives and employees, with the hazards identified during the baseline year.</p>
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#### IV. MANAGEMENT AND OPERATION

##### A. CDCC will:

1. Establish a jobsite safety committee, consisting of a representative of all primary contractors on-site, in order to develop an understanding and awareness that all accidents are preventable. This action will be accomplished by implementing a comprehensive safety and health management system, which includes:
  - a. Management commitment and employee involvement including participation, resources allocation, clear responsibilities and planning for an effective Safety and Health Program.
  - b. Hazard analysis of routine jobs, task and processes.
  - c. Hazard prevention and control including emergency preparedness, personal protective equipment, administrative and engineering controls.
  - d. Safety and health training provided/offered to all employees, management and supervision levels, and training assistance provided for other stakeholders on-site.
2. Mentor subcontractors/trade partners in safety and health management systems. Subcontractors/trade partners shall include all multi-tiered subcontractors/trade partners 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 a 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 exist (i.e., carbon monoxide, lead, or large-scale use of chemicals in the building interior during floor finishing), CDCC will coordinate with the subcontractor responsible for creating the hazard and ensure that air monitoring is accomplished to assess employee exposure levels. When airborne exposure results from an operation not covered by Table 1, project participants and subcontractors will adhere to applicable parts of 29 CFR 1926.1153. CDCC's on site safety manager will gather air-sampling data to share with the Safety Committee and a request will be made to GA Tech to conduct air sampling.

4. Enforce safety rules and regulations. This enforcement authority will include provisions to hold contractors, subcontractors/trade partners, and employees accountable for following safety rules and regulations and the ability to remove a contractor's employees and supervisors from the job site, if necessary.
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 the risk of fall hazards through conventional protection, engineering or administrative controls to a level as low as possible. Regarding fall hazard risk assessments:
  - 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. Employees performing overhand bricklaying and related work above lower levels must be adequately protected from falls. Safety monitoring system will not be used on-site.
  - c. All personnel exposed to a fall greater than six feet shall conform to CDCC's 100 percent tie-off policy for all employees with fall exposure at heights at six feet or greater.
6. To the extent feasible, serious ergonomic hazards will be identified and corrected.
7. Ensure that ground fault circuit interrupters (GFCI) are used to protect all electrical circuits that are used for work. All subcontractors will ensure that employees are protected by the use of a GFCI at all times.
8. CDCC's Superintendent, Project Managers, and on-site Safety Manager will serve as a point of contact, monitor safety and health at the site and progress toward achievement of the Partnership goals.

9. CDCC's Superintendent, Project Manager, and Safety Manager will ensure that daily safety audits are conducted by each subcontractor along with the CDCC daily inspection. The Safety Manager, upon request, will review subcontractors' daily logbooks and audits, note any hazards found, and then review them with the safety committee members at the weekly safety committee meeting. The CDCC Team will use Fieldwire<sup>1</sup> or I-auditor<sup>2</sup> and contractors will be required to utilize a paper form that is to be submitted daily or Fieldwire.
10. Conduct and document job site safety meetings/toolbox talks with subcontractors and employees on a weekly basis.
11. Submit accident reports to the Safety Committee, including first aid, injury, property damage and near miss reports within 24 hours.
12. CDCC's Superintendent or Safety Manager will lead, coordinate and conduct a comprehensive site audit on a weekly basis. Safety Committee members will participate in the site safety audit. If non-compliant activity or hazards are discovered, immediate correction is required. CDCC will document the corrective action taken and share this information with OSHA during the monthly update meetings.
13. Annual evaluate the Partnership and make recommendations for improvement.
14. Post the results of jobsite inspections and information concerning near misses where workers can review the information. Near misses and daily safety audits will be discussed during toolbox talks.
15. Ensure that no employees are allowed to work directly below a suspended load except for situations where no other safe alternative may exist. In these rare cases, the following criteria must be met:
  - a. Materials being hoisted shall be rigged to prevent unintentional displacement;
  - b. Hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping out of the hook;
  - c. All loads shall be rigged by a qualified rigger; and
  - d. Use tag lines on all loads hoisted by rigging.
16. Require the use of appropriate personal protective equipment. Hard hats and safety glasses are mandatory. All employees on-site shall wear high-visibility reflective clothing (vest or shirt). Gloves should be worn when hand injuries are likely to occur.

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<sup>1</sup> A field management software for construction teams, which is used to document plans, photos and task in real time.

<sup>2</sup> I-Auditor or Internal Auditor is an auditing software used by employers to manage and track internal audits.

17. Ensure that all signs and warnings are posted in English and Spanish (as well as any other language deemed necessary by the project team).
18. 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.
19. Provide all data to OSHA needed for the annual OSHA Strategic Partnership Program (OSPP) evaluation report.

**B. Subcontractors/Trade Partners will:**

1. Appoint a representative to the site Safety Committee responsible for resolving job safety matters and to serve as a liaison to CDCC's Superintendent and Safety Professional. Every subcontractor 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 weekly safety walkthroughs and monthly safety update meetings.
2. Participate in the weekly Safety Committee meeting and safety audits. If non-compliant activity or hazards are discovered, immediate correction is required. Abatement methods and verification must be submitted to the CDCC on-site Safety Manager, who will document the correction taken and share this information during the monthly update meetings.
3. Conduct jobsite safety inspections for employees under their supervision. If non-compliant activity or hazards are discovered, immediate correction is required. Documentation of abatement methods and verification must be submitted to the CDCC on-site Safety Manager.
4. Share the results of jobsite inspections with all workers by posting them in the project office and notifying all workers of the location of the results.

**C. OSHA will:**

1. Participate, to the extent resources permit, in the monthly Safety Committee meetings, but will not participate in the walk around inspection, except that the enforcement verification inspection (see Section VIII. OSHA Enforcement Verification below) 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, as resources permit, when technical assistance is needed.

4. Audit the monthly reports/documents and make recommendations for improvements in meeting Partnership goals.
5. Conduct inspections in accordance with section VIII of this Partnership.
6. Conduct the annual Partnership evaluation report in accordance with Section VI of this Partnership.

**D. Georgia Tech 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.

**E. AGCGA will:**

1. Provide resource for safety training.
2. Conduct quarterly on-site safety and health inspections.
3. Promote and coordinate safety and health training, in an effort to prevent and reduce workplace hazards.
4. Provide classroom space when needed.

**F. CEFGA will:**

1. CEFGA seeks to elevate and expand Georgia's skilled trade programs with the goal of growing a sustainable workforce for the construction industry.



2. CEFGA will work with the site to introduce students to the skilled trades, in a safe and healthful environment through highly coordinated fieldtrips, with the expectation of developing a steady pipeline of well-prepared skilled trade professionals into Georgia's construction workforce.

## **V. SAFETY AND HEALTH MANAGEMENT SYSTEM**

CDCC will manage this Partnership effectively by implementing a comprehensive jobsite safety and health management system, which will include the following components:

1. Collecting and analyzing 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.
2. Completing risk assessments prior to exposing employees to potential safety and health hazards. This will be accomplished by the use of a Crew Work Plan (CWP). Subcontractors will complete Crew Work Plans (CWP) for their crews.
3. Work with OSHA, GA Tech and Safety Committee members to provide the resources to conduct initial monitoring for toxins, such as silica exposure.
4. Conducting a comprehensive audit of the jobsite every week with the participation of a representative of each contractor currently working on-site. Any hazards found during the audits will be corrected promptly. Items noted on the audit 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 weekly audits and the number of hazards corrected as a result of the weekly audits.
5. Implement an aggressive Fall Protection Plan to include fall protection in all cases where work is being performed 6 feet or more above lower surfaces.
6. Ensure employees receive training as follows:
  - a. CDCC workers will receive OSHA 10-hour training and all CDCC supervisors will receive OSHA 30-hour training. CDCC will work with all subcontractors/trade partners to provide, or assist in providing, their safety committee member with OSHA 10-hour training.
  - b. All employees will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures relative to the work being performed, as well as the requirements outlined in the Partnership. In addition, employees shall receive training on the content of the Site-Specific Safety Action Plan for operations they will encounter. This may require periodic retraining of employees on the content of the Site-Specific

Safety Action Plan as specific parts of the Plan become relevant at new phases of construction. CDCC will provide this material to the subcontractors'/trade partners' designated safety representatives for completion.

- c. Safety and health training, including the OSHA 10 and 30-hour courses, will be provided to all workers in English and Spanish (as well as any other language deemed necessary by the CDCC). Either effective translators or bi-lingual instructors will be utilized to perform this training.
  - d. Additional hazard-specific training will be conducted on an as-needed basis.
  - e. Subcontractors/trade partners utilizing other instructors for competent person, OSHA 10/30-hour, and equipment training must provide a valid certification card showing completion of the course. Subcontractors/trade partners have primary responsibility for providing their own safety and health training.
7. Requiring subcontractors/trade partners to develop an adequate safety and health management system (company safety program) for the Project and must submit them to CDCC's Safety Manager for evaluation.
  8. Ensuring CDCC and/or the affected subcontractors/trade partners adequately address health-related issues, which occur during the project, with the assistance of OSHA as its resources permit. All health-related issues will be discussed monthly during the Partnership update meetings.
  9. 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 work around live electrical systems will be done to ensure the implementation of appropriate protective measures prior to exposure. The permit form will include requirements to perform a pre-task review and follow lock out/tag out procedures.
  10. Ensuring all equipment capable of causing an amputation is adequately guarded.

## **VI. ANNUAL EVALUATION**

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

CDCC 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.

## **VII. INCENTIVES**

Participant incentives 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. 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. OSHA enforcement verification inspections will be conducted in accordance with Section VIII, OSHA Verification Enforcement Inspections.
4. Priority consultation service and assistance for small employers working on the construction site from the Georgia Tech On-site Consultation Program.
5. An OSHA focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR 1926.20 and 29 CFR 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).

## **VIII. OSHA VERIFICATION**

1. Verification Enforcement Inspections: OSHA will conduct the initial verification enforcement inspection no sooner than two months, but within three 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 an annual verification enforcement inspection. Compliance officers that are familiar with the Seckinger High School Strategic Partnership will conduct the verification inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. If during the verification enforcement inspections, OSHA personnel identify serious hazards, 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 delivered to the CDCC Management office by an OSHA Compliance Safety and Health Officer (CSHO), forwarded by fax, or sent via email. In accordance with applicable law, the name of the complainant requesting confidentiality will not be revealed. CDCC agrees to

investigate these complaints, regardless of the employer involved, and provide OSHA with a written response within five-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 Partnership may be terminated.

## **IX. WORKER INVOLVEMENT/WORKER AND EMPLOYER RIGHTS**

This Partnership does not preclude employees and/or employers from exercising any right provided under the OSHA Act (the Act), nor does it abrogate any responsibilities of the Partnership participants to comply with rules and regulations adopted pursuant to the Act.

CDCC will ensure employee involvement by establishing an employee Safety Committee that will meet on a weekly and 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. The Partnership members' management and supervisors will discuss near misses and daily safety audits during toolbox talks.

## **X. TERM OF PARTNERSHIP**

It is understood that this Partnership shall be in effect until completion of construction activities at the Project. If any signatory of this Partnership wishes to terminate their participation prior to the established termination date, a written notice of the intent to withdraw must be provided to all other party(s), which provides a 30-day notice.

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 agree that the changes are in the best interest of the Partnership.

## XI. Seckinger High School – OSHA Strategic Partnership

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

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William Cochran  
Acting Area Director  
Occupational Safety and Health  
Administration

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Cherri Watson  
Dir. Of Safety, Education &  
Workforce Development  
AGC of Georgia

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Robbie Pope  
Safety Director  
Carroll Daniel Construction  
Company

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Brian Daniel  
President/CEO  
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Al Patrangeli  
COO  
Carroll Daniel Construction  
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Steve Hix  
EVP  
Carroll Daniel Construction  
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Tommy Wiley  
VP & Division Manager  
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Henry Irvin  
Operations Manager  
Carroll Daniel Construction  
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Dave Gotwalt  
Sr. Project Manager  
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Eddie LeBlanc  
Sr. Superintendent  
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Jim Mantinone  
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Pete Wilson  
Director of Construction  
Gwinnett County Public Schools

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John Hodgson  
Executive Director of Facility  
Planning and Construction  
Gwinnett County Public Schools