



UNIVERSITY of  
**SOUTH FLORIDA**



OHL  
North America

**SOUTH CORRIDOR PROJECT (SCP) - OSHA  
STRATEGIC PARTNERSHIP (OSP)**

**Between**

**Occupational Safety and Health Administration  
Fort Lauderdale Area Office,**

**University of South Florida (USF)  
On-site Safety and Health Consultation Program,**

**And**

**OHL North America (Obrascon Haurte Lain - NA),  
Southeast Region**

**I. PURPOSE/SCOPE**

This Occupational Safety and Health Administration (OSHA) Strategic Partnership (OSP) was developed jointly by OSHA, the University of South Florida Onsite Safety and Health Consultation Program, and OHL (Obrascon Haurte Lain) North America (NA). The common objectives and goals of the Partnership will include the following: reducing injuries and illnesses; increasing safety and health training; the effective monitoring of health hazards; and endeavoring to assure that employers have appropriate safety and health management systems.

This Partnership is consistent with OSHA's long-range efforts to reduce work-related injuries and illnesses, and develop a contractor/ government cooperative approach to improving safety and health. The relationship established through this partnership will influence the use of innovative strategies to positively impact occupational safety and health; and will encourage worker and subcontractor participation in implementation of a site-based safety program.

This Partnership will cover the construction of the South Corridor Rapid Transit; this is the first of six rapid transit corridors of the Strategic Miami Area Rapid Transit Plan (SMART). The overall project comprises of several components, including the South Corridor BRT Stations Construction and a Park and Ride Garage. The project goes along 20 miles of exclusive transit right-of-way between the SW 344th Street station and Dadeland South adjacent to US-1, Old Dixie Highway and Flagler Avenue, and connects five municipalities in South Florida.

Major Scopes of work include:

- 14 Bus Rapid transit (BRT) stations convertible to Heavy Rail Transit (HRT).
- Rehabilitation of existing stations (16 locations, 32 shelters).
- Two terminal stations (Dadeland South and SW344th Street Station).
- Transitway corridor improvements along 20 miles of exclusive transit right-of-way.
- Two (2) Florida Department of Transportation (FDOT) safety improvement projects.
- SW 168th Street Park-and-Ride/Garage.
- Department of Transportation and Public Works (DTPW) Construction Project: Roadway Improvements to SW 264th Street.

To facilitate the goal of reducing occupational related fatalities and serious injuries within the construction industry OSHA, University of South Florida and OHL-NA will implement this agreement under the OSHA Strategic Partnership Program (OSPP). By combining their efforts, skills, knowledge and resources OSHA, OHL-NA and the University of South Florida expect to reduce exposure to hazards and thereby decrease the possibility of serious injuries and fatalities at the South Corridor Project.

## **II. IDENTIFICATION OF PARTNERS**

The Partnership will include:

- Occupational Safety and Health Administration (OSHA)
- The University of South Florida Onsite Safety and Health Consultation Program
- OHL-North America (OHL-NA), Southeast region

### III. GOALS/STRATEGIES/PERFORMANCE MEASURES

The primary objective of this Partnership is to create a working relationship that focuses on preventing work-related injuries, illnesses, and fatalities; and controlling or eliminating serious workplace hazards and establishing a foundation for a high-quality 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 rates by 10 percent below the national average for the applicable SIC/NAICS, thereby providing a safe and healthy work environment for employees at the project.	<p>a) Review the OSHA 300 data of the Partnership participants and their contractors, excluding OSHA and USF.</p> <p>b) Calculate Northwest Corridor Project’s Total Case Incident Rate (TCIR) and Days Away From Work, Restricted, or Job Transferred (DART) <sup>1</sup>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 established by the 2019 BLS Rates for Non-Residential Construction NAICS 2362, which are 1.9 TCIR and 1.1 DART.</p>
Effectively control workplace hazards by endeavoring to increase the number of construction companies with safety and health management systems.	Methods to evaluate the participant’s performance in this area will include the implementation of comprehensive safety and health management systems and the increase in the number of employers that establish effective safety	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.

<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
	and health management systems.	
Increase the number of employees and supervisors who are provided effective safety and health training, such as the OSHA 10-hour course.	<p>a) Evaluate implementation of the employers' safety and health training programs.</p> <p>b) Evaluate 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 employees and supervisors 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 agreement.</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. 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>a) Track health hazard related program improvements, as well as training focused on the prevention of health hazards.</p> <p>b) OHL NA Safety Committee 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 conducted during the (baseline) initial year of the Partnership.

**IV. OSP MANAGEMENT AND OPERATION**

**A. OHL North America will:**

1. Establish a jobsite safety walk team, consisting of a representative of all primary subcontractors on site; implement the Safety Committee's Safety Works Philosophy, in that all accidents are preventable and unnecessary; and implement 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 subs 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, and when needed, the mandatory use of approved respiratory protection. To the extent feasible, 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), OHLNA will coordinate with the subcontractor responsible for creating the potential hazard and ensure that air monitoring is accomplished to assess employee exposure levels. Sampling results will be compiled and tracked by OHLNA and The University of South Florida.
  4. Have the authority to enforce safety rules and regulations. This authority will include provisions to hold contractors and employees accountable and, if necessary, remove contractor employees and supervisors from the job site.
  5. Ensure that a risk assessment is performed by a competent person on all fall hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce the risk to as low a level as reasonably feasible through engineering or administrative controls.
    - a. Critical risk 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. 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. 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 installed for work. All contractors will ensure that employees are protected by the use of a GFCI at all times.
  8. The Superintendents, Safety Manager, and Safety Director for OHL NA will serve as points of contact, monitor safety and health at the site and evaluate progress toward achievement of the Partnership goals.

9. OHL NA Superintendents and Project Managers will ensure that daily Safety Audits are conducted (since this is a multi-employer worksite and all workers are to work together on safety issues). OHL NA, upon request, will review subcontractors daily logbooks, note any hazards found, and then review the hazards with all Safety Committee members at the weekly contractor/subcontractor meeting (Safety Committee/Subcontractor meeting).
10. Conduct and document job site safety meetings/toolbox talks on a weekly basis.
11. Submit quarterly quantitative data regarding accidents to the partners, including first aid, injury, and property damage, as well as near-miss reports.
12. Coordinate and conduct a comprehensive site audit twice each month led by OHLNA safety representatives. Safety Committee and Subcontractor Members will participate in the site safety audit as required. Non-compliant activity or hazards will be immediately corrected. OHL NA will document the corrective action taken and share this information with OSHA and The University of South Florida during the quarterly update meetings.
13. Continually evaluate the Partnership's effectiveness and make recommendations for improvement when necessary.
14. Ensure that no employees are allowed to work directly below a suspended load except for: employees engaged in the initial connection of steel; employees necessary for hooking or unhooking the load. The following criteria must be met when employees are allowed to work under the load:
  - 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;
  - d) Tag lines will be used appropriately to prevent work below suspended loads.
15. Require the use of appropriate personal protective equipment. Hardhats are mandatory. Employees exposed to, or working with, heavy equipment and all flagmen on site shall wear high-visibility reflective clothing. A 100 percent eye protection program will be implemented.
16. Ensure that all signs and warnings will be posted in English and Spanish, as well as any other appropriate languages.

17. Implement a 100 percent Fall Protection Plan for all work performed 6 feet or more above lower surfaces.
18. Implement an effective Heat Illness Prevention Program to educate workers about the hazards of working outdoors in the heat and steps needed to prevent heat-related illnesses. This should utilize tools such as OSHA's Heat Safety Tool Smartphone App and the Employer Guide to Using the Heat Index.

**B. Subcontractors will:**

1. Appoint a representative to the site Safety Committee responsible for resolving job safety matters and serving as a liaison to OHL NA Superintendents. Every prime 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 project safety walkthroughs and monthly safety meetings.
2. Conduct jobsite safety inspections for those employees under their control. This will be in addition to the general inspections that are to occur daily. Non-compliance must be immediately corrected. Documentation of abatement methods and verification must be submitted to OHL NA Safety Director.
3. Participate in the weekly Safety Committee/Subcontractor meetings and safety audits. Non-compliance must be immediately corrected. Abatement methods and verification must be submitted to OHL NA Safety Director who will document the correction 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.

**C. OSHA will:**

1. Participate, to the extent resources permit, in the quarterly Partnership Committee/Subcontractor meetings, but will not participate in the walk around inspection, except that 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 quarterly quantitative data reports/documents and make recommendations for improvements in the meeting Partnership goals, if requested by the Partners.
5. Conduct inspections in accordance with Section IX of this Partnership.

6. Conduct the annual Partnership Evaluation report in accordance with Section VI of this Partnership.

**D. The University of South Florida On-site Consultation Program will:**

1. Give priority consideration to requests for services from small contractors who are engaged in work at the project.
2. Support and perform activities and monitoring related to a heat illness prevention program.
3. Support and perform activities and monitoring related to silica for dust generating activities.
4. Support and perform activities and monitoring related to noise generating activities.

**V. SAFETY AND HEALTH MANAGEMENT SYSTEM**

OHL-NA will use its safety and health management system to collect and analyze injury and illness trends (including near-miss incidents) regarding 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 when OHL-NA implements a comprehensive jobsite safety and health management system, which includes:

1. Complete a risk assessment prior to exposing employees to potential safety and health hazards. This will be accomplished by the use of OHL-NA Job Hazard Analysis form (Crew Work Plan/ Job Hazard Analysis) form.
2. Work with OSHA, the University of South Florida and 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. OHL-NA will endeavor to ensure that no work with these materials will occur, thus preventing any exposure. OHL-NA will request periodic evaluation visits by its insurance company's Industrial Hygienist and by the University of South Florida.
3. Daily audits will be performed by all contractors on site. In addition, twice 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 the



subcontractor's employees may be exposed to hazards. 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 noted during daily safety audits 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 audits and the number of hazards corrected as a result.

4. 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.
5. Ensure employees receive OSHA 10-hour safety and health training for the construction industry as follows:
  - a. Supervisory personnel should possess an OSHA 10-hour card or its equivalent. OHL-NA will work with all subcontractors to provide their supervisory safety designee with an OSHA 10-hour card, or its equivalent.
  - 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 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 OHL-NA to the Subcontractor's designated safety representative for completion.
  - c. Safety and health training will be provided to all workers in a language they understand. Bi-lingual Instructors will be contracted to perform this training. A list of instructors will be provided by OHL-NA 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 they can show a valid certification card showing completion of the course. OHL-NA will have primary responsibility for coordinating this training; however, as resources allow the University of South Florida will also provide assistance. OHL- NA plans to hold 10-hr Safety Training sessions periodically as needed to help train all personnel as schedule allows.
6. Subcontractors with written safety and health management systems must submit them to OHL-NA for evaluation. Companies without safety and health management systems may adopt OHL-NA safety and health management system,

or develop their own adequate safety and health management system with the assistance of the University of South Florida or an accepted outside consultant.

7. Ensure OHL-NA and/or the affected subcontractors adequately address health-related issues, which occur during the course of the project, with the assistance of OSHA, as its resources permit, and the University of South Florida. All health-related issues will be discussed monthly during the Safety Committee meetings.
  - a. An effective hearing conservation program, including noise monitoring and engineering controls, where possible, will be implemented by OHL-NA 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. Ensure 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 includes requirements for pre-task review and lock out/tag out procedures to be followed.
9. Ensure all equipment capable of amputations is adequately guarded.
10. OHL-NA will explore the possibilities of extending training opportunities to “Owner” personnel and area contractors based on relevance of the topics and availability of space.
11. Ensure effective programs are employed, consisting of policies and procedures that comply with OSHA’s Process Safety Management (PSM) standards as equipment and processes are brought live and on-line at the South Corridor Project.
12. 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 South Corridor Project.

## **VI. 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, November 6, 2013.

OHL NA 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 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 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 1926.20 and 29 CFR 1926.21 (For additional details refer to the 1994 Memo signed by then OSHA Deputy Assistant Secretary James Stanley, which was revised on September 20, 1995).

## **VIII. WORKER INVOLVEMENT**

Establish an Employee Safety Committee 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 for the general workforce. Near-misses and daily safety audits will be continued to be discussed during Tool Box Talks.

## **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 Partnership. During this period, participants should develop and implement the safety and health management systems required under this Partnership. After this period, OSHA will conduct the initial verification enforcement inspection and annually thereafter. The verification enforcement inspection will be conducted as a focused inspection, per the appropriate OSHA guidelines. Compliance Safety and Health Officer (CSHO) who are familiar with the South Corridor Project will conduct verification enforcement inspections. Employee rights under the 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 (including Employer Reported Referrals) related to the work site and filed with OSHA will be forwarded by fax, email, or personally delivered by a CSHO, to OHL-NA Project Management office at the site. In accordance with applicable law, the name of the complainant requesting confidentiality will not be revealed. OHL-NA 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 (including Employer Reported Referrals).
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 workers and/or employers from exercising any right provided under the OSH Act (or federal workers, 29 CFR 1960), nor abrogates any responsibility to comply with the Act.

## **XI. OSP TERM**

It is understood that this Partnership shall be in effect until completion of construction activities at the South Corridor Project site, but not longer than three-years. Should any “signatory” stakeholder choose to withdraw prior to project completion, such signatory shall give a written notice to the other party(s) both stating the reason(s) for and providing 30 days’ notice for the withdrawal.

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 they are in the best interest of the Partnership.

## **XII. OSP SIGNATURE PAGE**

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

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