

### Gilbane Turner Construction Co. - Buffalo Bills Stadium Project

---

#### I. Purpose/Scope

The Buffalo, New York Area Office of the Occupational Safety and Health Administration (OSHA) and Gilbane Turner have agreed to implement an OSHA Strategic Partnership ("Partnership") during construction of the new Buffalo Bills Stadium in Orchard Park, New York. Common objectives and goals of the Partnership include the following:

- A. Reduce injuries and illnesses;
- B. Increase safety and health training;
- C. Ensure effective safety and health monitoring is conducted; and,
- D. Increase the number of employers with 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's resources, innovation in safety management, and encourages more participation in the safety process from the construction community.

To facilitate the goal of reducing occupational related fatalities and serious injuries within the construction industry, OSHA and Gilbane Turner will implement an agreement under the Partnership. By combining their efforts, skills, knowledge, and resources, OSHA and Gilbane Turner expect to reduce exposure to hazards and thereby decrease the possibility of serious injuries and fatalities at the Buffalo Bills Stadium Project.

Gilbane Turner is providing construction management services oversight and building owner oversight on the construction of a new mixed-use building, located within the proximity of One Bills Plaza. The Project will culminate in a new 1.35 million GFS open-air stadium, 18,750 SF ancillary buildings, demolition of the current stadium and related site development. The stadium's capacity will be a minimum of 60,000 seats. The anticipated completion date for the construction of the project is tentatively Fall 2026. Decommissioning and deconstruction of the existing Highmark Stadium will occur after completion of the new stadium.

This Partnership will not relieve any participating contractors from or lessen their safety responsibilities nor change any contractual obligations between Gilbane Turner, or participating contractors, nor does it lessen any/all affirmative defenses, legal rights, or due process afforded with respect to OSHA enforcement action.

#### II. Identification of Partners

The following organizations are considered Partners:

- Occupational Safety and Health Administration, Buffalo, New York Area Office
- Gilbane Turner Construction Company
- Buffalo & Niagara County Building Construction and Trades Council

#### III. Partnership Goals, Strategies, and Measures

This Partnership establishes a working relationship that focuses on identifying, controlling, and eliminating workplace hazards, as well as establishing a foundation for the development of an effective safety and health program by participating contractors. The Partnership goals employed to achieve these results will include the following:

### Gilbane Turner Construction Co. Buffalo Bills Stadium Project

Goal	Strategy	Measures/Products
1. Reduce the total number of injuries and illnesses annually. Have injury and illness rates that are equal to or less than the Partnership baseline rates, thereby providing a safe and healthy work environment for employees at the Project.	<p>a. Review the OSHA 300 data of the Project, including participating contractors and their contractors. This data will be used <b>as a</b> tool for continuous safety and health program improvement.</p> <p>b. All worker hours will be tracked onsite to accurately calculate the Gilbane Turner Total Recordable Case Incident Rate (TCIR) and Days <b>Away</b> from Work, Restricted, or Job Transferred (DART) rates.</p> <p>c. Contractor Partners will meet bi-annually to review injury and illness statistics and work together to resolve workplace safety and health issues.</p>	<p>a. This goal will be measured by assessing OSHA 300 injury and illness data and comparing the TCIR and DART rates for the Partnership versus the established baseline rates.</p> <p>b. Baseline data for the Project will be based on prior historical rates from 2022 NAICS 2362. • TCIR 1.7 -DART 0.9</p> <p>c. Bi-annual Contractors Principals Safety meeting shall be conducted and documented. The meeting shall include a site walk to review actual conditions and provide resolution to issues.</p>
2. Control workplace hazards by Increasing the number of participating contractors with safety and health management systems.	a. Conduct evaluations of each participating contractor's safety and health management system in accordance with project requirements and make suggestions for improvement.	a. Require all prime contractors to submit a Health and Safety Manual that conforms with the Gilbane Turner Health and Safety Manual. All lower-tier contractors shall be required to utilize their respective primes Health and Safety Plans (HASP).
3. Conduct effective self-Inspections, training, technical assistance, and consultation activities in areas where employees may be exposed to hazards to reduce worker exposure to hazards and reduce injury and illness rates.	<p>a. Gilbane Turner will use an established tracking tool to document all self-inspections, the number of hazards corrected, any industrial hygiene monitoring data (if conducted), and all safety and health training conducted during the Project.</p> <p>b. OSHA will provide compliance assistance during meetings or events as resources will allow.</p>	<p>A comparison will be made after establishing baseline data during the first year for the following categories. The Partners will meet bi-annually to review:</p> <p>a. The number of self-inspections performed, the number of hazards identified and corrected. Predictive Solutions SafetyNet shall be utilized to track inspection quantity and quality.</p> <p>b. Sessions conducted by the partners, training hours for workers and supervisors/managers shall be tracked and documented.</p>
4. Support local, company sponsored, and OSHA Safety and health campaigns/initiatives.	<p>a. Gilbane Turner and all on-site participating contractors will print and display OSHA's national stand-down to prevent falls in construction poster in visible working locations and inside their on-site trailers.</p> <p>b. Gilbane Turner will present, and all on-site participating contractors will participate in the weekly toolbox talks associated with New York City Region's Focus Four Campaign.</p>	<p>a. Gilbane Turner, along with their contractors will provide the OSHA Buffalo Area Office the number of workers that participated in the national stand-down to prevent falls in construction.</p> <p>b. Gilbane Turner will provide the OSHA Buffalo Area Office with the number of workers trained in toolbox talk that is associated with the New York City Region's, Focus Four Campaign.</p>



## Partnership Agreement

### Gilbane Turner Construction Co. - Buffalo Bills Stadium Project

Goal	Strategy	Measures/Products
	<p>c. Conduct outreach for various Safety and Health topics with contractors, including OSHA's Falls Stand-downs, Safe and Sound Week, Preventing Heat Illness, and other initiatives as schedules and resources will allow.</p> <p>d. Conduct outreach for internal Gilbane Turner safety events such as but not limited to Safety Week, and Quarterly Fall Protection and Rigging Inspections as schedules and resources will allow.</p> <p>e. Participate in OSHA's Safe and Sound Campaign to encourage employers to have a safety and health management system.</p> <p>f. Provide a comprehensive Job Site Safety Orientation for all workers prior to allowing them to work on site.</p> <p>g. Implement Nothing Hits the Ground philosophy to control material handling and movement from delivery to debris.</p>	<p>c. Gilbane Turner will report on any Safety and Health outreach that is conducted to support OSHA's campaigns and encourage the use of the OSHA/NIOSH Heat Safety Tool app.</p> <p>d. Gilbane Turner will utilize SafetyNet to track quarterly fall protection and rigging inspections.</p> <p>e. Track the number of employers/contractors attended or participated in Safe+ Sound Campaign.</p> <p>F Field Control Analytics (FCA) Badging shall track all persons who attended orientation. Orientation will be required to obtain badge to access site.</p> <p>g. Visible indicators of innovative methods of moving, storing or disposing of materials.</p> <ul style="list-style-type: none"><li>• Materials shall be stored off the floor on pallets, pipe racks, carts, dollies to allow for ease of mechanical movement.</li><li>• 1 yard dump carts shall be available at work areas to facilitate debris removal.</li><li>• Workstations shall be elevated to allow for proper ergonomics.</li></ul>
5. Worker Physical and Mental Health: Focus on the worker and their wellness and mental health. Provide <i>exceptional</i> care to injured workers.	<p>a. Provide onsite access to mental health counseling, suicide prevention awareness training to anyone, but specifically to supers and foreman.</p> <p>b. Support wellness efforts throughout the project by leveraging OSHA and its resources like the unsafe Workplace Good Headspace" initiative.</p> <p>c. Establish a clinic equal to the best Urgent Care In the area focused on construction and those possible injuries</p>	<p>a. Onsite Mental Health Counselor and Physical Wellness Coach office to be located onsite to promote access.</p> <p>b. Tracking attendees at wellness sessions (like weight loss programs or smoking cessation etc.) and testimonials from workers on how the stadium efforts benefited them and or their families. Conduct required quarterly Mental Health toolbox talks.</p> <p>c. Confirmation of exceptional health care at the site and feedback from those who used it. Monthly report shall be generated by Ramp Health documenting the number of employee interactions, toolbox talks, and success stories</p>

### Gilbane Turner Construction Co. Buffalo Bills Stadium Project

Goal	Strategy	Measures/Products
6. Create opportunities for worker to provide input and feedback to site safety and management teams as well as safety and health programs.	<p>a. Worker lunches designed to solicit how the workers like working at the stadium and where improvements by the JV can be made.</p> <p>b. Anonymous feedback means and methods shall be made available</p> <p>c. Establish proactive measures for the common hazards found at construction sites.</p> <p>d. Provide all necessary engineering controls, administrative controls and personal protective equipment.</p>	<p>a. Notes from these meetings will be <b>kept</b> and where suggestions that are made confirmation that the corrections or improvements made.</p> <p>b. Utilize posted QR codes at Safety Observation and Recognition (SOAR stations) to enable workers to provide anonymous feedback.</p> <p>c. Ensure management reports back to workers routinely and frequently about actions taken in response to concerns and suggestions.</p> <p>d. Promote/discuss good work practices to ensure worker input is welcomed. i.e., examples of reporting unsafe conditions, completion of safety forms and appropriate use of PPE where required.</p>
7. Utilize OSHA outreach training programs and resources to provide effective worker safety and health training.	Increase the number of employees, employers and supervisors who are provided effective safety and health training, such as the OSHA 10- hour and 30-hour course and training in the OSHA Focus-four.	<p>FCA Badging Software shall be utilized to collect and track OSHA 10 and 30 cards and other relevant certifications for each person working onsite.</p> <p>OSHA 30 - Each contractor shall have at a minimum one onsite supervisor trained with the OSHA 30 when work is conducted onsite.</p> <p>OSHA 10 Cards are required for tradespersons.</p>

#### IV. OSHA Non-enforcement Verification and Enforcement Efforts

##### A. OSHA Non-enforcement Verification

To assist in measuring the success of this Partnership, a non-enforcement verification review of the written program elements and a non-enforcement verification site visit will be conducted no more than three months after the signing of this agreement.

After the initial non-enforcement verification visit, quarterly visits will be conducted by signatory members of this Partnership as resources permit. These visits will review program elements such as meeting attendance, safety training, and non-enforcement verification assessments, which will focus on the most serious hazards that have been previously identified pursuant to the procedure herein. During any verification visit, all reported hazards are to be corrected in a timely manner. Gilbane Turner acknowledges if during the onsite non-enforcement verification visit, the OSHA representative identifies serious hazards that the employer fails to correct, the OSHA representative will make a referral for an onsite enforcement inspection pursuant to the OSHA Field Operations Manual.

OSHA will meet with Gilbane Turner at least bi-annually or more frequently to review the implementation of the Partnership and to examine updated TCIR and DART rates and the injury

### **Gilbane Turner Construction Co. - Buffalo Bills Stadium Project**

---

and illness experience of all contractors at this site. OSHA shall provide feedback on any noted incident trends and patterns. These reviews may be conducted during a quarterly visit.

#### **B. OSHA Inspections and/or Investigations**

This Partnership provides for the timely response to each allegation of a safety or health hazard brought to each contractor's attention by any person. Upon a finding that an allegation is valid, the responsible contractor shall promptly abate the hazard.

OSHA agrees that a copy of each non-formal complaint related to the Project and filed with OSHA will be forwarded by email, fax, or mail to the Project office. In accordance with applicable law, the identity of a complainant requesting confidentiality will not be revealed. Gilbane Turner agrees to investigate these complaints regardless of the contractor involved and provide OSHA with a written response within five working days of receiving the non-formal complaint.

OSHA will continue to conduct inspections in any circumstance that may warrant the opening of an OSHA inspection, pursuant to the policy set forth in Field Operations Manual (FOM). These may include but are not limited to local or national emphasis programs, credible complaints, referrals, fatalities, catastrophes, or work-related injuries, or significant events. OSHA will also investigate contractors whose employees are exposed to hazards at the Project. These inspections are not subject to the terms of this Partnership agreement. OSHA retains full enforcement authority to issue citations and penalties for violations including, but not limited to, regulatory violations for which mandatory penalties are established.

#### **V. Incentives**

OSHA's FOM details opportunities available during citation/case settlement for all employers who undergo onsite enforcement inspections. These opportunities are also available for participating contractors.

GILBANEITURNER and participating contractors will receive the following benefits from OSHA:

1. Special recognition, which may include but is not limited to, press releases issued by OSHA and recognition on OSHA's web page.
2. Informational materials such as safety and health publications and electronic educational resources.
3. As resources permit, presence and participation by an OSHA Compliance Assistance Specialist (CAS) or other OSHA designee for related safety and health events held by a participating contractor for the site identified in this agreement.
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 by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995.)
5. Small businesses may request a no-cost, confidential consultation visit on-line.  
[OSHA On-site Consultation Program](#)

## Gilbane Turner Construction Co. - Buffalo Bills Stadium Project

---

### VI. Partnership Management and Operation

Gilbane Turner and OSHA will form a committee to monitor the implementation of this Partnership. It will consist of a representative from each of the Partners. The CAS will serve as OSHA's primary contact. On a quarterly basis the Committee will review contractor compliance and involvement in the Partnership, analyze job site audits, make Partnership improvements, and evaluate Partnership modifications, achievements, and successes.

#### *Partnership Roles and Responsibilities*

##### *OSHA agrees to:*

1. Evaluate Gilbane Turner's Health and Environmental Policies and Procedures Manual (Attachment 1) prior to and during the OSHA non-enforcement verification inspections using Appendix C (or equivalent) and determine whether effective safety and health management systems are in place.
2. Designate an OSHA CAS to serve as a point of contact, resource, and liaison for the Partnership.
3. Conduct an on-site non-enforcement verification, visit within 90 days of the signing of the Partnership, and annually thereafter, as resources permit.
4. Attend quarterly meetings with the Project Safety Leadership Team to review any safety and health concerns on the project and plan any training or outreach events, as resources permit.
5. Meet with Gilbane Turner quarterly to review the Project's safety performance. Safety performance will be evaluated through review of participating contractors' OSHA 300 logs for the Project, related accident reports, self-inspection data, training information, and any campaign/outreach information addressed in Goal #4.
6. Provide timely responses to requests for information and clarification of OSHA standards, as OSHA's resources permit.
7. Provide information on OSHA training resources.
8. Support the implementation of safety and health management systems, including the four main elements of management commitment/employee involvement, hazard identification, hazard correction/control, and employee training.

##### *GILBANE TURNER agrees to:*

1. Provide a dedicated Site Environmental Health and Safety Manager to serve as a point of contact, safety resource, and liaison for the Partnership and to assist contractors with safety issues/concerns.
2. Provide notice to all contractors that the Project is subject to this Partnership and include the Partnership Fact Sheet (Appendix A) in the Project's New Employee Safety Orientation.
3. Develop and implement the Project Site Specific EHS Plan (Table of Contents - Attachment 1).
4. Evaluate each participating contractors' site-specific health and safety plans (HASPs), prior to their work commencing on site and review site requirements at the pre-construction meeting for each trade.
5. Notify the OSHA Buffalo Area Office of participating contractors that have completed Gilbane Turner's Safety Evaluation and have pledged both support and cooperation to the Partnership (Appendix B).
6. Offer participating contractors' safety and health information (i.e., toolbox safety meetings) especially on the focused four construction hazards (which are Falls; Caught-In or Between; Struck-By; and, Electrocutions).
7. Maintain Project Safety Performance Report. Require all active contractors to submit an updated OSHA 300 Log for the Project annually.

# **OSHA**

## **Partnership Agreement**

### **Gilbane Turner Construction Co. - Buffalo Bills Stadium Project**

---

8. Meet with OSHA quarterly to review the safety performance of Gilbane Turner and participating contractors and provide feedback on noted incident trends or patterns. This includes related accident reports, self-inspection data, training information and any campaign/outreach information. This collection of data will be posted throughout the Project for all the trades to see.
9. Coordinate safety related matters that pertain to site general conditions such as hazard communications, emergency response, installation and maintenance of building perimeter guardrail systems, and housekeeping.
10. Commits to implementing safety and health management systems at this Partnership site as detailed in Appendix C.
11. Support the implementation of safety and health management systems, including the four main elements of management commitment/employee involvement, hazard identification, hazard correction/control, and employee training.
12. Encourage and promote the use of the New York On-Site Consultation Program - including sharing provided brochures, to small and medium sized contractors that operate at the site. Consultation is a free, confidential service that can assist small and medium sized employers with hazard identification and control, and implementation of effective safety and health management systems.

#### **VII. Employee and Employer Rights**

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

#### **VIII. Worker Involvement**

This Partnership recognizes employees bring valuable skills and perspective to the implementation of an effective site safety and health system. Employees on site will be encouraged and given opportunities to be involved in the site safety and health system. Employee involvement will include, but is not limited to, participation in self-audits, site inspections, job hazard analysis, safety and health management system reviews, safety training, and accident/near miss reporting. Employee involvement will be included in the Safety and Health Management System Evaluation (Appendix C).

#### **VIII. Safety and Health Management Systems**

OSHA and Gilbane Turner will support the implementation of safety and health management systems (SHMS), including the four main elements of management commitment/employee involvement, hazard identification, hazard correction/control, and employee training. Gilbane Turner commits to implementing a SHMS at this Partnership site as detailed in Appendix C.

#### **IX. Annual Evaluation**

The Partners will jointly prepare an annual evaluation of the Partnership (Appendix D). The evaluation will review the success of the Partnership, lessons learned, and changes that will be made to meet the goals of the Partnership. Annual evaluations will be submitted by the Partners to OSHA's Buffalo Area Office no later than 30 days after the signing anniversary date each year.

#### **X. Termination**

This Partnership shall be in effect until completion of construction activities at the Buffalo Bills Stadium Project, but in no case longer than three years. Should any Partner 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).

# OSHA

## Partnership Agreement

### Gilbane Turner Construction Co. - Buffalo Bills Stadium Project

---

#### **XI. Paperwork Reduction Act**

OSHA Strategic Partnerships are part of OSHA's available voluntary cooperative programs. As per the Paperwork Reduction Act of 1995 (PRA OMB CONTROL NO. 1218-0244, expires August 31, 2025), the public reporting burden for this Partnership's collection of information is estimated at 11 hours per participant, per year. If you have any comments regarding this collection of information, including suggestions for reducing the burden or revising the burden estimate, please direct them to:

Occupational Safety and Health Administration  
Attention: Director, Office of Partnerships and Recognition  
Directorate of Cooperative and State Programs  
200 Constitution Avenue, NW - Room N3700  
Washington, DC 20210

#### **XII. Signatures**

Based on a mutual interest to protect construction workers, the below parties agree to the terms of the OSHA / GILBANEITURNER Partnership Agreement for the construction of the Buffalo Bills Stadium Project.

Signed \_\_\_\_\_ day of May \_\_\_\_\_, 2025

Michael T. Scime  
Area Director  
USDOL-OSHA  
Buffalo, New York Area Office  
130 S. Elmwood Avenue, Suite 500  
Buffalo, New York 14202

Joseph Byrne  
Program Director  
Gilbane Turner  
4041 Southwestern Blvd, Bldg. 1  
Orchard Park, New York 14127

#### **In Support of:**

Paul Brown  
Business Representative  
Buffalo & Niagara County Building Construction and Trades Council  
168 Robinson Street  
North Tonawanda, New York 14120

### APPENDIX A PARTNERSHIP FACT SHEET

The Buffalo, New York Area Office, of the Occupational Safety and Health Administration (OSHA) and Gilbane Turner have agreed to implement an OSHA Strategic Partnership ("Partnership") during construction activities of the new Building Project ("Buffalo Bills Stadium Project").

This Partnership aims to encourage cooperation between OSHA, Gilbane Turner, and participating contractors to foster a safe work environment for all Buffalo Bills Stadium Project workers.

The Partnership between Gilbane Turner and OSHA calls for the Buffalo Bills Stadium Project to be managed consistent with [OSHA's Recommended Practices for Safety and Health Programs in Construction](#), or their equivalent.

Under the Partnership, OSHA will provide timely responses to requests for information, requests for clarification of OSHA standards and other assistance as resources and/or OSHA Policy allow. To show their commitment to the Partnership, participating contractors will voluntarily sign this pledge.

This Partnership will not relieve any participating contractors from or lessen their safety responsibilities nor change any contractual obligations between Gilbane Turner, or participating contractor, nor does it lessen any/all affirmative defenses, legal rights or due process afforded with respect to OSHA enforcement action.

This Partnership will not in any way affect employees' ability to exercise rights under the OSH Act and OSHA regulations.

This Partnership is consistent with OSHA's long-range effort to develop a contractor/government partnership approach to safety management. It allows for better use of OSHA's resources and for innovation in safety management, and it encourages more participation in the safety process by each stakeholder.

### APPENDIX B PLEDGE

The OSHA Buffalo Area Office, New York City Region, of the Occupational Safety and Health Administration (OSHA) and Gilbane Turner have agreed to implement an OSHA Strategic Partnership ("Partnership") during construction of the Project ("Buffalo Bills Stadium Project").

This Partnership aims to encourage cooperation between OSHA, Gilbane Turner, and participating contractors to foster a safe work environment for Buffalo Bills Stadium Project workers.

The Partnership between Gilbane Turner and OSHA calls for the Buffalo Bills Stadium Project to be managed consistent with [OSHA's Recommended Practices for Safety and Health Programs in Construction](#), or their equivalent.

OSHA will provide timely responses to requests for information, requests for clarification of OSHA standards and other assistance as resources and/or OSHA Policy allow. To show their commitment to the Partnership, participating contractors will voluntarily sign a pledge (Appendix B)

This Partnership will not relieve any participating contractors from or lessen their safety responsibilities nor change any contractual obligations between Gilbane Turner, or participating contractor, nor does it lessen any/all affirmative defenses, legal rights or due process afforded with respect to OSHA enforcement action.

This Partnership will not in any way affect employees' ability to exercise rights under the OSH Act and OSHA regulations.

This Agreement is consistent with OSHA's long-range effort to develop a contractor/government partnership approach to safety management. It allows for better use of OSHA's resources and for innovation in safety management, and it encourages more participation in the safety process by each stakeholder.

Based on mutual Interest to protect construction workers, the below party pledges both support and cooperation to the OSHA / GILBANE TURNER Partnership Agreement by following the GILBANE TURNER Project Safety Plan.

---

*Authorized Representative (print / type)*

---

*Signature*

---

*Title (print / type)*

---

*Company / Organization (print / type)*

**APPENDIX C****SAFETY AND HEALTH MANAGEMENT SYSTEM EVALUATION**

1. Gilbane Turner and participating contractors have and will have implemented a comprehensive written Gilbane Turner Project Safety Plan.
2. Gilbane Turner maintains or will maintain copies of participating contractors' safety and health plans, Construction Work Plans, hazard communication plans, and fall protection plans (where applicable). Gilbane Turner requires participating contractors to follow its Safety plan and will not accept any plans or practices that are less stringent.
3. Gilbane Turner will have a full-time safety representative at the site to conduct and document safety inspections of work, and who through training and experience, can recognize hazards, and has authority to take prompt corrective action. Minimum training required for a site safety representative in addition to current OSHA 30-hour training, Safety Manager shall hold a valid certification of Board of Certified Safety Professionals (BCSP), Construction Health and Safety Technician (CHST), or Safety Trained Supervisor Construction (STSC) credential. Deviation from the minimum qualifications must be reviewed and approved by Gilbane Turner management.
4. Gilbane Turner and participating contractors have or will have trained field supervisory personnel and has provided additional training for competent persons in such areas as scaffolding, excavation, fall protection, crane operations, etc. (Additional training will be dictated by the type and scope of the work the participating contractor routinely conducts).
5. Gilbane Turner has and will provide an Environmental Health and Safety orientation for all new workers, including hazard recognition specific to the work sites.
6. Gilbane Turner and participating contractors will have employee involvement in the Partnership. Examples include, but will not be limited to, participation in self-audits, site inspections, job hazard analysis, safety and health management system reviews, safety training and accident /near-miss investigations.
7. Gilbane Turner and participating contractors will follow a six-foot fall protection policy.
8. Gilbane Turner and participating contractors will conduct and document weekly employee safety meetings.
9. Gilbane Turner and its participating contractors will conduct and document self-audits.
10. Gilbane Turner and contractors will have a written enforcement program which includes progressive discipline. The program progresses from verbal warnings to written warnings with enforcement. The written enforcement notices will require either complete re-training or dismissal from the job site of the individual worker at Gilbane Turner's discretion. Gilbane Turner reserves the right for immediate dismissal without warnings for anything that is deemed a flagrant disregard of safety rules and regulations, including zero tolerance for the following potentially hazardous conditions: Fall protection not in compliance with 29 CFR 1926.451, electrical work not in compliance with NFPA 70E, working in a non-OSHA compliant excavation and/or confined space. All contractors are subjected to the same enforcement program and policy and may be removed from the job site

### Appendix D

#### OSHA STRATEGIC PARTNERSHIP PROGRAM

#### ANNUAL EVALUATION REPORT

Partnership Name

Goal	Strategy	Measure

#### Strategic Management Plan Target Areas (check one)

Construction		Manufacturing Amputations	
Non-Construction		Other	

#### Strategic Management Plan Areas of Emphasis (check all applicable)

Amputations in Construction		Oil and Gas Field Services	
Blast Furnaces and Basic Steel Products		Preserve Fruits and Vegetables	
Blood Lead Levels		Public Warehousing and Storage	
Concrete, Gypsum and Plaster Products		Ship/Boat Building and Repair	
Ergo/Musculoskeletal		Silica-Related Disease	
Landscaping/Horticultural Services		Other:	

### Section 1 General Partnership Information

Date of Evaluation Report	Evaluation Period
---------------------------	-------------------

Start Date	End Date
Evaluation Contact Person	
Originating Office	

<b>Partnership Coverage</b>	
<b># Active Employers</b>	<b># Active Employees</b>

**Industry Coverage (note range or specific SIC and NAICS for each partner )**

Partner	SIC	NAICS

**Section 2 Activities Performed**

**Note whether an activity was required by the OSP and whether it was performed**

Activity	Required	Performed
a. Training		
b. Consultation Visits		
c. Safety and Health Management Systems Reviewed/Developed		
d. Technical Assistance		
e. VPP-Focused Activities		
f. OSHA Enforcement Inspections		
g. Offsite Verifications		
h. Onsite Non-Enforcement Interactions		
i. Participant Self-Inspections		
j. Other Activities		

**2a. Training (if performed, provide the following totals)**

Training sessions conducted by OSHA staff	
Training sessions conducted by non-OSHA staff	
Employees trained	
Training hours provided to employees	
Supervisors/managers trained	
Training hours provided to supervisors/managers	

--

**2b. Consultation Visits (if performed, provide the following total)**

Consultation visits to partner sites:

**Comments/Explanations (briefly describe activities, or explain if activity required but not performed)**

--

**2c. Safety and Health Management Systems (if performed, provide the following total)**

**Systems implemented or improved using the 1989 Guidelines as a model**

**Comments/Explanations (briefly describe activities, or explain if activity required but not performed)**

--

Activity	Provided by OSHA Staff	Provided by Partners	Provided by Other Party
----------	------------------------	----------------------	-------------------------

Conference/Seminar Participation			
Interpretation/Explanation of Standards or OSHA Policy			
Abatement Assistance			
Speeches			
Other (specify)			

**Comments/Explanations (briefly describe activities, or explain if activity required but not performed)**

--

**2e. VPP-Focused Activities (if performed, provide the following totals)**

Partners/participants actively seeking VPP participation	
Applications submitted	
VPP participants	

**Comments/Explanations (briefly describe activities, or explain if activity required but not performed)**

--

**2f. OSHA Enforcement Activity (if performed, provide the following totals for any programmed, unprogrammed, and verification-related inspections)**

OSHA enforcement inspections conducted	
OSHA enforcement inspections in compliance	
OSHA enforcement inspections with violations cited	
Average number of citations classified as Serious, Repeat, and Willful	

<b>Comments/Explanations (briefly describe activities, or explain if activity required but not performed)</b>

<b>2g. Offsite Verification (if performed provide the following total)</b>
----------------------------------------------------------------------------

Offsite verifications performed	
---------------------------------	--

<b>Comments/Explanations (briefly describe activities, or explain if activity required but not performed)</b>

<b>2h. Onsite Non-Enforcement Verification (if performed provide the following total)</b>
-------------------------------------------------------------------------------------------

Onsite non-enforcement verifications performed:	
-------------------------------------------------	--

<b>Comments/Explanations (briefly describe activities, or explain if activity required but not performed)</b>

<b>2i. Participant Self-Inspections (if performed provide the following totals)</b>
-------------------------------------------------------------------------------------

Self-inspections performed	
Hazards and/or violations identified and corrected/abated	

<b>Comments/Explanations (briefly describe activities, or explain if activity required but not performed)</b>

<b>2j. Other Activities (briefly describe other activities performed)</b>
---------------------------------------------------------------------------

--

### **Section 3**    *Illness and Injury Information*

Year	Hours	Total Cases	TCIR	# of Days Away from Work Restricted and Transferred Activity Cases	DART
Three-Year Rate					
BLS National Average for 20_____					
Baseline					

Comments

## ***Section 4 Partnership Plans, Benefits, and Recommendations***

Changes and Challenges (check all applicable)

Activity	Changes	Challenges
Management Structure		
Participants		
Data Collection		
Employee Involvement		
OSHA Enforcement Inspections		
Partnership Outreach		
Training		
Other (specify)		

Comments

Plans to Improve (check all applicable)

Activity	Improvements	NA
----------	--------------	----

Meet more often		
Improve data collection		
Conduct more training		
Change goals		

<b>Comments</b>

<b>Partnership Benefits (check all applicable)</b>
----------------------------------------------------

Increased safety and health awareness	
Improved relationship with OSHA	
Improved relationship with employers	
Improved relationship with employees or unions	
Increased number of participants	
Other (specify)	

<b>Comments</b>

<b>Status Recommendation (check one)</b>
------------------------------------------

Partnership Completed	
Continue/Renew	
Continue with the following provisions:	

<b>Terminate (provide explanation):</b>