



**GDOT I-285/I-20 East Interchange
STRATEGIC PARTNERSHIP
Between**

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

and

Archer Western – E.R. Snell, a Joint Venture

I. PURPOSE/SCOPE

This Partnership was developed jointly by the Occupational Safety and Health Administration (OSHA) and Archer Western – E.R. Snell, a Joint Venture (Archer Western Snell JV Team). To facilitate the goal of reducing occupational-related fatalities and serious injuries within the construction industry, OSHA and the Archer Western Snell JV Team will implement an agreement (Agreement) under the OSHA Strategic Partnership Program (OSPP). The Georgia Institute of Technology On-site Safety and Health Consultation Program (Georgia Tech) will also serve as a stakeholder in this Partnership. The common objectives and goals of the Partnership will include the following:

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

This Partnership will cover the I-285 & I-20 East Interchange Reconstruction Project (the Project). This comprehensive project will include the following construction components:

- 1) The reconstruction of the I-285 and I-20 Interchange (on the east side of Atlanta), and the widening of I-20 westbound (toward Lithonia).
- 2) The reconstruction of the I-285/I-20 East Interchange ramps, with more direct alignments and the construction of a new collector-distributor (CD)¹ road along westbound I-20.
- 3) The construction of an additional lane in the eastbound I-20 CD road between the I-285/I-20 East Interchange and Wesley Chapel Road.
- 4) The construction of auxiliary lanes along I-20 and I-285.
- 5) Replacing and/or widening the bridges at Miller Road and Fairington Road over I-20, Snapfinger Creek over I-20, and the northbound bridge over Snapfinger Road.
- 6) The construction of a new noise barriers where feasible and reasonable per the preliminary noise impact assessment, due to the new CD lanes.

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

II. IDENTIFICATION OF PARTNERS

The Partnership will include the following:

- Occupational Safety and Health Administration (OSHA)
- Archer Western – E.R. Snell, a Joint Venture (Archer Western Snell JV Team)

The Partnership Stakeholder(s) will include:

- Georgia Institute of Technology On-site Safety and Health Consultation (Georgia Tech)

III. GOALS/STRATEGIES/PERFORMANCE MEASURES

¹ A collector road or distributor road is a low-to-moderate-capacity road which serves to move traffic from local streets to arterial roads.

The primary objective of this Partnership is to create a working relationship that focuses on 1) preventing work-related fatalities, 2) controlling or eliminating serious workplace hazards, and; 3) establishing a foundation for the development of an effective safety and health program. The goals employed to achieve these results will include the following:

GOALS	STRATEGIES	MEASURES
Reduce the total number of injury and illness cases by 10 percent, thereby providing a safe and healthy work environment for the project's employees.	1) Review the OSHA 300 log data of the Partnership participants. Review injury and illness trends and implement effective corrective action(s). 2) Calculate the Archer Western Snell JV Total Case Incident Rate (TCIR) and Days away from work, restricted, or job transferred (DART) ¹ rates. 3) Prior to contracting with a sub, they must pre-qualify: This includes a review of employer modification rate (EMR), TRIR, and OSHA 300 Logs. If a certain criterion is not met, additional measures may be implemented to raise the performance of the sub.	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. The 2020 BLS Rates will establish the baseline for Non-Residential Construction NAICS 2362, which are 1.8 and 1.0.

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

GOALS	STRATEGIES	MEASURES
Develop or enhance the employer's safety and health program based on the Safe + Sound model (To include Management Leadership; Worker Participation; and Find & Fix Hazards).	1) Require all subs to have a 30 Hour trained competent person on site at a minimum 2) Hold comprehensive Site-Specific Safety Plan (SSSP) reviews with subcontractors to promote management systems 3) Hold detailed planning meetings for tasks including confined space entry, excavations greater than 5', crane work, and public interface work 4) Review the number of the employers that establish safety and health programs, based on the Safe + Sound model. These items may include, but are not limited to, the following: safety and health policies statement; job hazard analyze; accident investigation; and hierarchy of controls.	1) Measure the number of participants that develop and implement effective safety and health management systems, as a result of participating in the Partnership, compared to the (baseline) initial year of the Partnership. 2) Review the planning meetings held and their effectiveness, as well as the engagement in full planning meetings
Increase the number of employees, employers, and supervisors who are provided with effective safety and health training.	1) Review the number of employers that implement effective safety and health training programs, including the OSHA 10-hour/ OSHA 30-hour courses. 2) Provide quarterly Jobsite training relevant to current conditions. This may include fall protection, heat awareness, trenching and shoring, mental health, tool tethering, and others.	1) Measure the number of employers with effective safety and health training programs. 2) 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.

GOALS	STRATEGIES	MEASURES
Conduct effective self-inspections to reduce the exposure of workers to health and safety hazards. The overall outcome of this goal should be the reduction of hazards and the overexposure of workers to health hazards, as well as a reduced injury and illness rate.	1) Use an online safety observation app to track both favorable and at-risk conditions and actions 2) Engage key subcontractors to become fully involved in this Partnership. 3) Track health hazard-related program improvements, as well as training focused on the prevention of health hazards. 4) The Archer Western Snell JV Team will track the number of self-inspections and site audits and the number of health hazards identified during these activities.	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. OSPP MANAGEMENT AND OPERATION

A. The Archer Western Snell JV Team will:

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

4. Have the authority to enforce safety rules and regulations. This enforcement authority will include provisions to hold contractors and employees accountable for safety rules and regulations and, if necessary, remove contractors' employees and supervisors from the job site, following proper disciplinary procedures.
5. Ensure that a competent person performs a risk assessment of all fall hazards. The probability and severity of occurrence for each identified hazard will be evaluated to eliminate or reduce risks through conventional fall protection, engineering, or administrative controls to as low a level as possible.
 - a. Critical risks will not be tolerated. A critical risk is defined as work with a high probability of occurrence and increased severity of consequence. No work will be performed until action is taken to reduce the level of risk to as low as reasonably feasible.
 - b. Workers on the face of formwork or reinforcing steel must be protected from falling by personal fall arrest systems, with a positioning device and lanyards.
6. Identify and correct serious ergonomic hazards.
7. Ensure that ground fault circuit interrupters (GFCI) are used to protect all electrical circuits installed for work. All contractors will ensure that employees are protected by using a GFCI at all times.
8. Ensure that the Archer Western Snell JV Team's Project Managers, Superintendents, and Safety Professionals serve as points of contact, monitoring safety and health at the site and its progress toward achievement of the Partnership goals.
9. Ensure that the Archer Western Snell JV Team, including Superintendents, Senior Project Managers, and Project Managers, verify that weekly Safety Audits are conducted (since this is a multi-employer worksite and all workers are to work together on safety issues). Upon request, the Archer Western Snell JV Team will review subcontractors' daily reports and audits, note any hazards found, and then review the results with all Craft Leadership Safety members at the weekly coordination/subcontractor meeting.
10. Conduct and document weekly Jobsite safety meetings/toolbox talks.
11. Submit quarterly quantitative data regarding accidents to the partners, including first aid, injury, property damage, as well as near miss reports.
12. Continually evaluate the Partnership's effectiveness and recommend improvements.
13. Ensure that no employees are allowed to work directly below a suspended load except for employees engaged in the initial connection of steel and employees engaged in work necessary for hooking or unhooking the load. The following criteria must be met when employees are allowed to work under the load: materials being hoisted shall be rigged to prevent unintentional displacement; hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping off the hook; a qualified rigger shall rig all loads. Appropriate tag lines will be used to prevent work below suspended loads.
14. Require the use of appropriate personal protective equipment. A 100 percent eye & hand (gloves) protection program will be implemented.
15. Ensure that all safety signs and warnings will be posted in English and Spanish and in any other languages spoken by limited English proficient workers.

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

B. Subcontractors will:

1. Appoint a representative to the site Craft Leadership Safety program responsible for resolving job safety matters and serving as a liaison to the Archer Western Snell JV Team. Every prime trade contractor will have a person available to participate in the Craft Leadership Program. Participation in this program will consist of, but will not be limited to, participation in the Archer Western Snell JV Team safety audit walkthroughs and weekly Craft Leadership Safety meetings.
2. Conduct Jobsite safety audits for those employees under their control. These Jobsite safety audits will be in addition to the daily general inspections. If non-compliant activity or hazards are discovered, immediate correction is required. Documentation of abatement methods and verification must be submitted to the appropriate Archer Western Snell JV Team Senior Safety Manager.
3. Participate in the weekly Safety Committee/subcontractor meetings and safety audits. If non-compliant activity or hazards are discovered, immediate correction is required. Abatement methods and verification must be submitted to the appropriate Archer Western Snell JV Team Senior Safety Manager, who will document the correction and share this information during the monthly update meetings.
4. Share the results of Jobsite inspections with all workers by posting them in the Project office or on the Jobsite bulletin board to ensure all workers are notified of the results.

C. OSHA will:

1. Participate, to the extent resources permit, in the quarterly meeting with Partnership participants, but will not participate in the walk-around inspection, except that the verification visits may be scheduled as part of the weekly walk-around inspection.
2. Serve as a resource and liaison for Partnership participants and assist with safety and health training, as resources permit.
3. Give priority to the construction project when technical assistance is needed.
4. Audit the quarterly reports/documents and make recommendations for improvements in meeting Partnership goals if requested by the Partnership.
5. Conduct inspections in accordance with section IX of this Partnership.
6. Conduct the annual Partnership evaluation report in accordance with section VII of this Partnership.

D. Georgia Tech's On-site Consultation Program will:

1. Perform quarterly Jobsite inspections to the extent resources permit.
 - A. Support and perform activities and monitoring related to a heat illness prevention program.
 - B. Support and perform activities and monitoring related to silica for dust-generating activities.
 - C. Support and perform activities and monitoring related to noise-generating activities.
2. Give priority consideration to requests for services to small contractors who are engaged in work at the Project.

V. SAFETY AND HEALTH MANAGEMENT SYSTEM

The Archer Western Snell JV Team will use its systems to collect and analyze injury and illness trends (including near-miss incidents) by all contractors performing work at the site. This data will be used as a tool to ensure continual safety and health improvement at the site. The management of this agreement will be accomplished by the Archer Western Snell JV Team implementing a comprehensive Jobsite safety and health management system, which includes:

1. The Archer Western Snell JV Team will complete a risk assessment before exposing any employee to potential safety and health hazards by incorporating Work Plans, Job Hazard Analysis (JHA), and Pre-shift Task Hazard Analysis (THA) documentations.
2. Working with OSHA, Georgia Tech, and Safety Committee members to provide the resources to conduct initial monitoring for ALL toxins, carcinogens, or hazardous substances currently emphasized by OSHA and which present inhalation hazards, such as silica, lead, cadmium, and isocyanates. Employee exposures will be assumed, and respiratory protection will be worn until the results of the initial monitoring studies are received and demonstrate no exposure problems or prior surveys show no hazard exists. The Archer Western Snell JV Team will endeavor to ensure that no work with these materials will occur, thus preventing any exposure. The Archer Western Snell JV Team will request periodic evaluation visits by Georgia Tech and their Industrial Hygienist.
3. Ensure all contractors on-site will perform daily verification of safe activities and a Pre-Task Plan/THA. A representative of the subcontractors will be a safety participant in the Jobsite areas where their employees may be exposed to hazards. Any hazards found during the reviews will be corrected promptly. Items identified during the reviews 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 of all hazards found during the comprehensive site safety reviews and the number of hazards corrected as a result of the weekly reviews will be kept.
4. Implement an effective Fall Protection Plan to include fall protection in all cases where work is being performed 6 feet or more above lower surfaces.
5. Ensure employees receive training as follows:
 - a. Supervisory personnel should possess an OSHA 30-hour card or its equivalent. The Archer Western Snell JV Team will work with all subcontractors to provide each subcontractor's safety designee with an OSHA 10-hour training or its equivalent.
 - b. All employees will receive a site-specific construction safety orientation covering job site safety and health issues, procedures related to the work being performed, and the requirements outlined in this Partnership Agreement. In addition, employees shall receive training on the content of the risk assessment for operations they will encounter. This may require periodic retraining of employees on

the content of the risk assessment as they become relevant due to entering new phases of construction. The Archer Western Snell JV Team will provide this material 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. Bilingual instructors will perform this training. The Archer Western Snell JV Team will provide a list of instructors to all subcontractors to ensure that all workers are effectively trained.
 - d. Other hazard-specific training will be conducted on an as-needed basis.
 - e. Subcontractors can utilize other instructors as long as these instructors can provide a valid certification card showing completion of the OSHA 30-hour course. The Archer Western Snell JV Team will have primary responsibility for coordinating this training; however, as resources allow, Georgia Tech will also assist.
- 6. Each subcontractor with written safety and health management systems must submit them to the Archer Western Snell JV Team for evaluation. Companies without safety and health management systems may adopt the Archer Western Snell JV Team's Health, Safety & Environmental Plan or develop an adequate safety and health management system with the assistance of Georgia Tech.
 - 7. Ensure the Archer Western Snell JV Team and the affected subcontractors adequately address health-related issues arising during the Project, with the assistance of OSHA, as its resources permit, and Georgia Tech. All health-related issues will be discussed monthly during this Partnership's meetings. In addition: An effective environmental monitoring program will be implemented to control airborne hazards, such as silica. It 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 working in close proximity to or on live electrical systems to ensure the implementation of appropriate protective measures prior to exposure. The permit form includes requirements for pre-task review and lockout / tagout procedures to be followed.
 - 9. 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 online at the Project.

VI. WORKER INVOLVEMENT

The site will establish a Craft Leadership Safety Program consisting of craft members of the Archer Western JV Team and at least one member per key subcontractor that will meet on a weekly, bi-weekly, and monthly basis to share the results of Jobsite inspections, information concerning accidents and near misses, and suggestions for improvement and recommendations for training of the general workforce. Near misses and daily safety observations will be discussed.

VII. ANNUAL EVALUATION

The Partnership will be evaluated annually through the Strategic Partnership Annual Evaluation Format as specified in Appendix C of OSHA Instruction CSP 03-02-003, OSHA Strategic Partnership Program for Worker Safety and Health.

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

VIII. INCENTIVES

Participant benefits from OSHA may include the following:

1. Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-164 (April 14, 2020).
2. In the event that a citation with penalties is issued, the Area Director has the authority to negotiate an amount of an additional penalty reduction as part of the informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.
3. Priority consultation service and assistance for small employers working on the construction site from the Georgia Tech Consultation program.
4. An OSHA-focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR Part 1926.20 and 29 CFR Part 1926.21 (For additional details, refer to the Focused Inspection in Construction August 22, 1994, memo signed by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995).

IX. OSHA VERIFICATION

1. Verification Enforcement Inspections: OSHA will conduct the initial verification enforcement inspection no sooner than three months but within four months after Partnership participants formally enter into this Agreement. During this period, Partnership participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct verification enforcement inspections annually thereafter. Verification enforcement inspections will be conducted as a focused inspection per the appropriate OSHA guidelines. Compliance Safety and Health Officers (CSHOs) familiar with the Project will do verification enforcement inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. During the verification enforcement inspections, if OSHA personnel identify serious hazards that site management refuses to correct, or hazards otherwise become apparent, the scope of the inspection may be expanded.
2. Complaint/Referral Investigations: This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to its attention by any person. Upon a finding that an allegation is valid, the employer shall promptly abate the hazard.
3. OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be forwarded by email, or by CSHO, to the Archer Western Snell JV Team's - Project Management office on-site. In accordance with applicable law, the name and identifying information of a complainant requesting confidentiality will not be revealed. The Archer Western Snell JV Team 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 investigation, OSHA determines that the incident resulted from violation(s) of the OSHA standard(s), the employer will not be afforded Partnership incentives.

X. WORKER AND EMPLOYER RIGHTS

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

XI. TERM OF PARTNERSHIP

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

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

XII. THE PROGRAM - OSPP SIGNATURE PAGE

Partnership Signing Date: _____

_____ Joshua W. Turner Area Director Occupational Safety & Health Administration (OSHA)	_____ Steve Hausler VP SETG Archer Western Construction.	_____ Greg Munna Senior Project Manager Archer Western Construction.