



NAVY AND MARINE CORPS PUBLIC HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

Site-Specific Health and Safety Plan Review Checklist

Enclosed is the latest version (June 2012) of the Site-Specific Health and Safety Plan (HASP) Review Checklist. The checklist is a tool to assist you in developing and reviewing site-specific HASPs. This version replaces all previous versions.

Since the last revision, the following changes have been made.

- References from the U.S. Army Corps of Engineers Safety and Health Manual, EM 385-1-1 were updated. This manual is used as a reference at virtually all government managed construction sites.

The checklist is based on the guidance and regulatory requirements of the:

- (1) Code of Federal Regulations, Title 29, Part 1910, Section 120 (29 CFR 1910.120)
- (2) Code of Federal Regulations, Title 29, Part 1926, Section 65 (29 CFR 1926.65)
- (3) Department of the Navy Environmental Restoration Program Manual (NERP), August 2006
- (4) U.S. Army Corps of Engineers Manual, EM 385-1-1, July 2011 (original publication 5 September 2008, with 6 changes through July 2011).

All possible and applicable regulatory requirements unique to your site-safety and health plan are not cited in the checklist. Additional regulatory requirements (i.e., blood borne pathogens, fall protection, excavations, respiratory protection, etc.) may also apply. Where obvious and generally applicable, additional regulatory citations are provided. The checklist is not a substitute for the knowledge and experience of professional safety specialists and industrial hygienists. A qualified safety and health specialist and/or an industrial hygienist should carefully review each plan to determine the full scope and applicability of all regulations. There is no right or wrong order for the presentation of information in a site-specific health and safety plan. The order of

the checklist should not be interpreted as a required format presentation for your document.

We hope the checklist is useful to you. Please feel free to share it with others, including your contractors. Copies are available from the Navy and Marine Corps Public Health Center (NMCPHC) website:

<http://www.med.navy.mil/sites/nmcphc/environmental-programs/Pages/health-and-safety.aspx>

We welcome suggestions for improvement on any aspect of the checklist. Please feel free to e-mail your comments to: Mr. Bob Hayes, Harold.hayes@med.navy.mil.

Site-Specific Health and Safety Plan Review

Location: _____

Command: _____

Site: _____

Work Description: _____

Document Date: _____

Prepared For: _____

Contractor: _____

Contract Number: _____

Reviewed By: _____

SITE SPECIFIC HEALTH AND SAFETY PLAN REVIEW CHECKLIST

PLAN ORGANIZATION AND RESPONSIBILITIES	Yes (✓)	No (✓)
<p>a. The HASP is appended to the Accident Prevention Plan.</p> <p><u>Regulatory reference:</u> EM 385-1-1, Sect. 28.B.01</p>		
<p>b. Project organization is outlined, key personnel identified, and their responsibilities and lines of authority and communication are explained.</p> <p><u>Regulatory references:</u> 1910.120(b)(2); 1926.65(b)(2); NERP, Chap. 16.2; EM 385-1-1, Sect. 28.B.02.c</p>		
<p>c. Health and safety personnel (i.e., Safety and Health Manager and Site Safety and Health Officer, Competent Person) and alternates are identified, and their qualifications and responsibilities explained.</p> <p><u>Regulatory references:</u> 1910.120(b)(2); 1926.65(b)(2); NERP Chap. 16.2; EM 385-1-1, Sect. 28.C.01.a through 28.C.01.c</p>		
<p>d. Site characterization, analysis, and hazard identification are included</p> <p><u>Regulatory references:</u> 1910.120(c)(1) through (c)(4); 1926.65(c)(1) through (c)(4); EM 385-1-1, Sect. 28.B.02.a; NERP Chap. 16.2.1</p>		
<p>e. Provisions are included for conducting pre-entry site briefings/site access prior to any site activity for employees and visitors.</p> <p><u>Regulatory references:</u> 1910.120(b)(4)(iii); 1926.65(b)(4)(iii); NERP Chap. 16.3</p>		
<p>f. Procedures are included for determining HASP effectiveness, including periodic reviews, inspections, correcting noted deficiencies, and taking corrective or disciplinary actions.</p> <p><u>Regulatory references:</u> 1910.120(b)(4)(iv); 1926.65(b)(4)(iv)</p>		

SITE CHARACTERIZATION, HAZARD AND RISK IDENTIFICATION	Yes (✓)	No (✓)
<p>a. An evaluation of the site characteristics and identification of all suspected site hazards (chemical, physical, biological and immediately dangerous to life and health (IDLH) conditions) has been completed and controls developed to protect employees.</p> <p><u>Regulatory references:</u> 1910.120(c)(1) through (c)(3); 1926.65(c)(1) through (c)(3); EM 385-1-1, Sect. 28.B.02.a; NERP Chap. 16.2</p>		
<p>b. Required site characterization and analysis includes:</p> <ul style="list-style-type: none"> - Location and approximate size of the site - Description of the site activity and job task(s) to be performed - Duration of planned employee activity - Site topography and accessibility - Safety and health hazards at expected at the site - Pathways of hazardous substance dispersion - Hazardous substances and health hazards - Present status and capabilities of emergency response teams that will provide assistance to site clean-up employees during an emergency - Selection of proper PPE and employee exposure monitoring protocols for initial site entry to perform site characterization and hazard identification. <p><u>Regulatory references:</u> 1910.120(c)(4) through (c)(6); 1926.65(c)(4) through (c)(6); EM 385-1-1, Sect. 28.B.02.a and Sect. 28.B.02.b.</p>		
<p>c. Site risks for specific hazardous substances and health hazards have been identified, and procedures and protocols have been established to ensure site employees are informed of the risks and chemical, physical and toxicological properties of each suspected or known hazardous substance.</p> <p><u>Regulatory references:</u> 1910.120(c)(7) through (c)(8); 1926.65(c)(7) through (c)(8)</p>		

SITE-SPECIFIC SAFETY & HEALTH RISK/HAZARD ANALYSIS:	Yes (✓)	No (✓)
<p>a. Site-specific safety and health risks for each project hazard (chemical and physical) have been identified and analyzed (assessed), and an activity hazard analysis (AHA) has been developed for each project task.</p> <p><u>Regulatory references:</u> 1910.120(b)(4)(ii)(A); 1926.65(b)(4)(ii)(A); NERP Chap. 16.2.1; EM 385-1-1, Sect. 01.A.13, Sect. 06.A.02, and Sect 28.B.02.b.</p>		
<p>b. Each AHA includes all physical and chemical hazards to be encountered and is formatted to contain the following information:</p> <ul style="list-style-type: none"> - Task/operation identification, site location, date prepared, who prepared and reviewed it - Identification of the “competent person” for the job task - Identification of job steps - Analysis of chemical and physical hazards for each job step - Specific controls to be implemented to control hazards - Assignment of a Risk Assessment Code (RAC) - List of equipment to be used for the task/operation - List of training requirements - List of inspection requirements <p><u>Regulatory references:</u> EM 385-1-1, Sect 28.B.02.b and Sect 01.A.13.</p>		
<p>c. Procedures are outlined for reviewing and modifying existing AHAs (at least monthly) based on changes in site conditions, competent persons, or operations, and for briefing employees on those changes</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect 01.A.13</p>		

EMPLOYEE TRAINING	Yes (✓)	No (✓)
<p>a. The HASP indicates that all on-site staff have successfully completed the following OSHA training and certificates of training completion are in the HASP or on-site:</p> <ul style="list-style-type: none"> - 40-hour HAZWOPER Initial training and 8-hour Refresher training - 8-hour HAZWOPER specialized training for on-site supervisors - OSHA 30-Hour Construction Safety for Site Safety Officers/Coordinators and Industrial Hygienists - Three days actual field experience (minimum) for on-site managers, supervisors, and general site workers (under direction of a skilled supervisor). - 24 hour HAZWOPER training and one day of field experience for on-site managers, supervisors and employees IF air monitoring and site characterization demonstrate exposures are below permissible exposure limits and no site health hazards or potential emergencies exist. - Emergency response training for employees responding to site emergencies <p><u>Regulatory references:</u> 1910.120(e)(3) through (e)(9); 1926.65(e)(3) through (e)(9); EM-385-1-1, Sect. 28.D.01 and Appendix A.4.b</p>		
<p>c. The project HASP includes the basic training elements:</p> <ul style="list-style-type: none"> - Names of site safety and health personnel and their alternates - Hazard/risk communication of site safety and health hazards (chemical/physical/biological) - Use of personal protective equipment - Work practices to minimize health and safety risks - Safe use of site engineering controls and equipment - Medical surveillance requirements - Decontamination, emergency response, and spill containment procedures - Confined space entry procedures <p><u>Regulatory references:</u> 1910.120(b)(4)(ii)(B); 1910.120(c)(7); 1910.120(e)(1) and (e)(2); 1910.1200; 1926.65(b)(4)(ii)(B); 1926.65(c)(7); 1926.65(e)(1) and (e)(2); EM 385-1-1, Sect. 06., Sect. 28.D.02, and Appendix A.6</p>		
<p>c. The HASP requires that employees will not be allowed to work or supervise at the site until they have received all project training at the level of their job function/responsibility</p> <p><u>Regulatory references:</u> 1910.120(e)(1)(ii); 1926.65(e)(1)(ii); EM 385-1-1</p>		
<p>d. The HASP includes project-specific training, as applicable to the project, such as:</p> <ul style="list-style-type: none"> - Project-specific AHAs (EM 385-1-1, Sect. 01.A.13 and Appendix A) - Project/task-specific personal protective equipment program and use of PPE (1910.120(e)(2)(iii); 1926.65(e)(2)(iii); EM 385-1-1, Sect. 05 and Sect. 28.D.02) - Project/task-specific respiratory protection program (1910.134; EM 385-1-1, Sect. 05.G) - Heat and cold stress (EM 385-1-1, Sect. 28.B.02.h and Sect. 06.I) - Blood borne pathogens/first aid/cardiopulmonary resuscitation (1910.1030; 1910.151; 1926.50; EM 385-1-1, Sect. 28.B.02.m and Sect. 03) - Applicable sections of EM 385-1-1, and 29 CFR 1910 and 1926 (EM 385-1-1, Sect. 28.D.02) 		
<p>e. DOD/DOT training/appointment letters for employees preparing DOT shipping papers and hazardous waste manifests; and labeling, packaging and/or marking containers for transport.</p> <p><u>Regulatory reference:</u> EM 385-1-1, Sect. 28.D.03</p>		

PERSONNEL PROTECTIVE EQUIPMENT (PPE)	Yes (✓)	No (✓)
<p>a. The HASP includes a project-specific personal protective equipment (PPE) program meeting the requirements of 1910.120(g)(5), 1926.65(g)(5), and EM 385-1-1, Sect. 05.</p> <p><u>Regulatory references:</u> 1910.120(b)(4)(ii)(C), 1926.65(b)(4)(ii)(C), NERP Chap 16.2.4; and EM-385-1-1, Sect 28.B.02.e</p>		
<p>b. Specific elements of the project PPE program include:</p> <ul style="list-style-type: none"> - Work mission (task) duration - Identification of specific PPE to be used by employees for the tasks to be performed. - Indication that the PPE has been properly selected based on the site hazards encountered. - PPE training and proper fitting and donning and doffing procedures - Instructions on specific PPE use and limitations - PPE maintenance, cleaning, and storage - PPE inspection procedures prior to, during, and after use. - PPE decontamination and disposal - Limitations of PPE use during temperature extremes, heat stress, and employee medical limitations - How PPE program effectiveness will be evaluated <p><u>Regulatory references:</u> 1910.120(g)(5) and 1910, Subpart I; 1926.65(g)(5) and 1926, Subpart E; NERP Chap 16.2.4; and EM-385-1-1, Sect. 05 and Sect. 28.B.02.e.</p>		
MEDICAL SURVEILLANCE	Yes (✓)	No (✓)
<p>a. The HASP includes a medical surveillance program for site employees that will be exposed to contaminant-related health and safety hazards be enrolled in a medical surveillance program.</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 28.E; 1910.120(b)(4)(ii)(D); 1926.65(b)(4)(ii)(D); NERP Chap 16.4</p>		
<p>b. The medical surveillance program outlined in the HASP meets the requirements of 29 CFR 1910.120(f) and 29 CFR 1926.65(f).</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 28.E; 1910.120(b)(4)(ii)(D); 1926.65(b)(4)(ii)(D); NERP Chap 16.4</p>		
<p>c. Certification of employee medical surveillance program participation is appended to the HASP and includes the employee name, date of last examination, and name of examining physicians.</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 28.B.02.f and Sect. 28.E.01</p>		

EXPOSURE MONITORING	Yes (✓)	No (✓)
a. An exposure monitoring and air sampling plan is included to evaluate PPE effectiveness and employee exposures to site-related contaminants and hazardous substances <u>Regulatory references:</u> 1910.120(c)(6); 1910.120(h); 1926.65(c)(6); 1926.65(h); and EM 385-1-1, Sect. 28.B.02.g; NERP Chapter 16.2.3		
b. The exposure monitoring and air sampling plan includes:		
- Frequency and type of employee monitoring		
- Identification of monitoring equipment and instrumentation to be used		
- Methods of equipment and instrumentation, inspection, maintenance and calibration		
- Indication that equipment/instrumentation manufacturer instructions are maintained on-site		
- Identification of approved sampling and analytical methods (NIOSH/OSHA) or other protocols		
- Verification of use of accredited laboratories to perform sample analysis		
- A method for informing employees of the monitoring/air sampling results		
<u>Regulatory references:</u> 1910.120(4)(ii)(E); 1910.120(h); 1926.65(4)(ii)(E); 1926.65(h); EM 385-1-1, Sect. 28.B.02.g and Sect. 06.A.03		
c. Site employees responsible for performing the monitoring have been trained on sampling procedures and sampling equipment/instrumentation calibration, inspection, use, and maintenance. <u>Regulatory reference:</u> EM 385-1-1, Sect. 06.A.03		
d. Determination of concentrations of, and hazards from, hazardous/toxic agents and environments are made by a qualified industrial hygienist or other competent person <u>Regulatory reference:</u> EM 385-1-1, Sect. 06.A.03		
DECONTAMINATION	Yes (✓)	No (✓)
a. Decontamination procedures are provided for employees and equipment. <u>Regulatory references:</u> 1910.120(b)(4)(ii)(G), 1910.120(k)(2)(i) and (ii); 1926.65(b)(4)(ii)(G), 1926.65(k)(2)(i) and (ii); EM 385-1-1, Sect 28.B.02.k-l.		
b. Decontamination locations are identified. Personal hygiene and equipment decontamination stations are specified for establishment in the contamination reduction zone (CRZ) so equipment can be decontaminated, and employees can remove contaminated clothing and wash, when exiting the exclusion zone (EZ). <u>Regulatory references:</u> 1910.120(k)(2)(iii), 1910.120(k)(3) and (k)(5); 1926.65(k)(2)(iii), 1926.65(k)(3) and (k)(5); EM 385-1-1, Sect 28.B.02.k-l		
c. Procedures are provided for the site safety and health supervisor to monitor the effectiveness of the decontamination procedures <u>Regulatory references:</u> 1910.120(k)(2)(iv); 1926.65(k)(2)(iv)		

SITE CONTROL/SAFE WORK PRACTICES AND SITE SOPs/SITE SANITATION	Yes (✓)	No (✓)
<p>a. A site control plan, procedures and measures are provided to control employee exposures to site hazardous substances.</p> <p><u>Regulatory references:</u> 1910.120(d)(1) and (d)(2); 1926.65(d)(1) and (d)(2); EM 385-1-1, Sect. 28.B.02.j</p>		
<p>b. The site control plan includes the following elements:</p> <ul style="list-style-type: none"> - A site map - Establishment of work zones, a clearly defined EZ, SZ, and a CRZ as a transition between EZ and SZ - Use of the “buddy” system - Site communications, including alerting employees of emergencies - Standard operating procedures and safe work practices, to include site rules and prohibitions - Work permits and task/equipment-specific safety standard operating procedures - Identification of the nearest medical assistance and facility - Provisions for conducting pre-entry site briefings/site access prior to any site activity for employees and visitors <p><u>Regulatory references:</u> 1910.120(b)(4)(iii); 1910.120(d)(3); 1926.65(b)(4)(iii); 1926.65(d)(3); EM 385-1-1, Sect. 28.B.02.i; NERP Chapter 16.2.2</p>		
<p>c. A site sanitation plan has been prepared, to include the following:</p> <ul style="list-style-type: none"> - Providing and distributing potable water to site employees - Non-potable water identification/methods to prevent cross contamination with potable water supplies. - Identification and use of temporary or permanent toilet facilities - Providing personal hygiene stations or facilities for proper hand washing <p><u>Regulatory references:</u> 1910.120(n); 1926.65(n); EM 385-1-1, Sect. 02 and Sect. 28.B.02.i; NERP, Chapter 16.2.2</p>		
SPILL CONTAINMENT	Yes (✓)	No (✓)
<p>a. A spill containment plan/program is provided that includes (as applicable to the project):</p> <ul style="list-style-type: none"> - Spill containment and material handling procedures - Drum/container/tank handling, opening, sampling, packaging and transport - The shipping and transport of drums and containers - Handling of radioactive wastes or shock sensitive wastes - Tank or vault entry <p><u>Regulatory references:</u> 1910.120(b)(4)(ii)(J); 1910.120(j); 1926.65(b)(4)(ii)(J); 1926.65(j); EM-385-1-1, Sect. 28.B.02.i</p>		

EMERGENCY RESPONSE PLAN (ERP)*	Yes (✓)	No (✓)
<p>a. An Emergency Response Plan (ERP) or Emergency Action Plan (EAP) is provided as a separate, distinct section of the HASP.</p> <p><u>Regulatory references:</u> 1910.120(l)(i); 1926(l)(i); EM 385-1-1, Sect. 28.B.02.n; NERP Chapter 16.2.5</p>		
<p>b. The ERP contains the following minimum elements:</p> <ul style="list-style-type: none"> - Provisions for pre-emergency planning (State/Local Emergency Planning Committees Navy On Scene Coordinator/Commander (NOSC/NOSCDR), Hazardous Materials Team, Ambulance, Navy/Civilian Medical Treatment Facility (MTF); Regional Poison Control Center) - Identification of personnel roles, lines of authority, and communication procedures - Criteria and procedures for emergency situation recognition and methods for prevention - Safe distances and places of refuge - Site security and control - Evacuation procedures and routes, route to emergency MTF, emergency responder phone numbers - Decontamination procedures, to include decontaminating injured employees (not covered in other sections of the HASP) - Emergency alerting and response procedures and criteria for alerting emergency responders - Response critique and follow-up - PPE and emergency equipment identification <p><u>Regulatory references:</u> 1910.120(l)(2) and 1910.120(q); 1926.65(l)(2) and 1926.65(q); EM 385-1-1, Sect 28.B.02.n and Sect. 28.G; NERP, Chapter 16.2.5</p>		
<p>c. The ERP contains the following procedures and information for handling emergency incidents:</p> <ul style="list-style-type: none"> - Site topography, layout, and prevailing weather conditions - Reporting incidents to the local, state, and federal governmental agencies - Provisions for making the project ERP compatible and integrated with local/state/federal agency disaster, fire, and/or emergency response plans - Development and specification of an employee alarm system - Provisions for rehearsing and evaluating the ERP and planned response capabilities <p><u>Regulatory references:</u> 1910.120(l)(3) and 1910.120(q); 1926.65(l)(3) and 1926.65(q); EM 385-1-1, Sect. 28.B.02.n and Sect. 28.G; NERP, Chapter 16.2.5</p>		

* Project staff should determine if an Emergency Response Plan (ERP) or Emergency Action Plan (EAP) is required for the project. Regulatory standards require an ERP if site employees will respond to and assist with the cleanup of hazardous substance spills and releases. An EAP is required if site employees will evacuate the site when a hazardous substance spill or release occurs, and will not assist emergency/first responders with response actions and cleanup.

EMERGENCY ACTION PLAN (EAP)*	Yes (✓)	No (✓)
<p>a. An Emergency Action Plan (EAP) has been prepared for projects where employees will evacuate the site during an emergency and will not assist in handling the emergency response.</p> <p><u>Regulatory references:</u> 1910.120(i)(1)(ii); 1910.38(a); 1926.65(q)(1); 1926.35; EM 385-1-1, Section 28.G; NERP Chap. 16.2.5</p>		
<p>b. The EAP contains the following minimum procedures:</p> <ul style="list-style-type: none"> - Reporting a fire or emergency - Emergency escape, including emergency escape route assignments - Evacuating employees that remain behind to operate critical equipment - Safe distances and places of refuge - Site security and control - Identify the type of evacuation to be used and account for employees after evacuation - Emergency medical treatment and first aid - Employees assigned to perform rescue or medical duties - The name, job title and telephone number of every employee who may be contacted for EAP information or explanation of duties. <p><u>Regulatory references:</u> 1910.38(c)(1) through (c)(6); 1926.35(b)(1) through (b)(6); EM 385-1-1, Sect. 01.E; NERP Chap. 16.2.5</p>		
<p>c. The EAP contains information about an employee alarm system to warn employees of site evacuation, and the alarm is a distinctive signal. If fire brigade is alerted it also has a distinctive alarm signal.</p> <p><u>Regulatory references:</u> 1910.38(d); 1910.165; 1926.35(c)(1) and (c)(2); EM 385-1-1, Sect. 01.E; NERP Chap. 16.2.5</p>		
<p>d. Employees are provided training on the EAP and their assignments, roles, and responsibilities.</p> <p><u>Regulatory references:</u> 1910.38(b); 1910.38(f)(1) through (f)(3); 1926.35(e)(1) through (e)(3)</p>		
<p>e. The EAP training includes the designation and training of employees to assist in the safe and orderly evacuation of employees.</p> <p><u>Regulatory references:</u> 1910.38(e); 1926.35(e)(1); EM 385-1-1, Sect. 01.E</p>		

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