



## **NAVY AND MARINE CORPS FORCE HEALTH PROTECTION COMMAND ENVIRONMENTAL PROGRAMS DIRECTORATE**

### **Site Safety and Health Plan Review Checklist**

Enclosed is the latest version (October 2020) of the Site Safety and Health Plan (SSHP) Review Checklist. The checklist is a tool to assist you in developing and reviewing project SSHPs, and is recommended for those projects where the SSHP is deemed applicable. The checklist has been developed based on the guidance and regulatory requirements of the following:

- (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) U.S. Army Corps of Engineers Manual, EM 385-1-1, 30 November 2014

The applicability of these requirements to Navy ER,N and BRAC projects, especially the use and application of EM 385-1-1, are specified in the Department of the Navy's February 2018 Environmental Restoration Program (NERP) Manual. Additionally, the attached checklist incorporates revisions and changes to reflect consistency with the current (2014) version of EM 385-1-1.

It is important to note that 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, excavation and trenching, 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 project-specific SSHP. 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, especially your contractors.

We welcome suggestions for improvement on any aspect of the checklist. Please feel free to e-mail your comments to: Mr. Bob Hayes, [harold.r.hayes.civ@health.mil](mailto:harold.r.hayes.civ@health.mil).

# Site Safety and Health Plan (SSHP) Review

Location: \_\_\_\_\_

Command: \_\_\_\_\_

Site: \_\_\_\_\_

Work Description: \_\_\_\_\_

Document Date: \_\_\_\_\_

Prepared For: \_\_\_\_\_

Contractor: \_\_\_\_\_

Contract Number: \_\_\_\_\_

Reviewed By: \_\_\_\_\_

## SITE SAFETY AND HEALTH PLAN (SSHP) REVIEW CHECKLIST

| <b>SSHP APPLICABILITY AND OVERVIEW</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| <p>a. Does the project meet the HAZWOPER applicability requirements? If so an SSHP is required.</p> <p><u>Regulatory references:</u> 1910.120 and 1926.65 (a)(1)(i) through (a)(1)(v); EM 385-1-1, Sect. 33.A.01</p>   |                    |                   |
| <p>b. The SSHP is attached as an appendix to the Accident Prevention Plan. The SSHP has been reviewed to ensure information presented in the APP is not duplicated in the SSHP.</p> <p><u>Regulatory reference:</u> EM 385-1-1, Sect. 33.B.01</p>  |                    |                   |
| <p>c. Changes and modifications to existing SSHPs must be in writing with knowledge and concurrence of the local Safety and Health Manager (SHM) and accepted by the Government-Designated Authority (GDA).</p> <p><u>Regulatory reference:</u> EM 385-1-1, Sect. 33.B.01</p>  |                    |                   |
| <p>d. If the site has been fully characterized and there is no known or anticipated potential for employee related exposures during the tasks to be performed an SSHP is not required. Does the project meet the criteria for an abbreviated APP?</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 33.B.01 and Sect. 01.A.12</p> |                    |                   |

| <b>OVERALL CONTENT AND ORGANIZATION OF THE SSHP</b>                                | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| Does the SSHP include and discuss the following topics in project-specific detail? |                    |                   |
| <u>Regulatory references:</u> 1910.120(b) and 1926.65(b); EM 385-1-1, Sect 33.B.02 |                    |                   |
| A. Staff Organization, Qualifications, and Responsibilities                        |                    |                   |
| B. Site Description, Characterization, Hazard and Risk Identification              |                    |                   |
| C. Site-Specific Safety and Health Risk Analysis: Activity Hazard Analysis (AHA)   |                    |                   |
| D. Training  |                    |                   |
| E. Personal Protective Equipment   |                    |                   |
| F. Medical Surveillance  |                    |                   |
| G. Exposure Monitoring   |                    |                   |
| H. Heat and Cold stress  |                    |                   |
| I. Standard Operating Procedures   |                    |                   |
| J. Site Control Measures   |                    |                   |
| K. Personal Hygiene and Decontamination  |                    |                   |
| L. Equipment Decontamination   |                    |                   |
| M. Emergency Equipment and First Aid   |                    |                   |
| N. Emergency Response Plan (ERP) and Emergency Action Plan (EAP)                   |                    |                   |
| O. Pre-Entry Briefing  |                    |                   |
| P. SSHP Effectiveness/Inspections  |                    |                   |
| Q. Confined Space Entry and Excavations  |                    |                   |

| A. STAFF QUALIFICATIONS AND RESPONSIBILITIES   | Yes<br>(✓) | No<br>(✓) |
|--|------------|-----------|
| <p>a. Project staff organization is outlined, key personnel are 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); EM 385-1-1, Section 33.C.</p>   |            |           |
| <p>b. The designated Safety and Health Manager (SHM) has at least 3 years of experience managing safety and occupational health (SOH) programs at hazardous waste sites and has the requisite professional qualifications (CIH, CSP or CHP) to fulfill SOH management responsibilities at the project site.</p> <p><u>Regulatory references:</u> 1910.120(b)(2); 1926.65(b)(2), EM 385-1-1, Sect. 33.C.01.</p>   |            |           |
| <p>c. The SSHP requires the SHM to be responsible for:</p> <ul style="list-style-type: none"> <li>- Approving the SSHP by signature.</li> <li>- Developing, maintaining, and overseeing implementation of the SSHP.</li> <li>- Visiting the project site as needed to audit plan effectiveness.</li> <li>- Being available to respond to project emergencies.</li> <li>- Performing or approving of modifications to the SSHP.</li> <li>- Evaluating occupational exposure monitoring/air sampling data and adjusting SSHP requirements.</li> <li>- Serving as a Quality Control (QC) staff member.</li> </ul> <p><u>Regulatory references:</u> 1910.120(b)(2); 1926.65(b)(2), EM 385-1-1, Sect. 33.C.01.</p>  |            |           |
| <p>c. For HAZWOPER sites the SSHO is required. The SSHO is a designated full-time, on-site responsibility. The SSHO is an employee other than a supervisor, has also been designated as the project Competent Person and reports to a senior project/ corporate officer.</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.17 and Sect. 33.C.02</p>  |            |           |
| <p>d. The designated SSHO meets the training and experience requirements to include the following:</p> <ul style="list-style-type: none"> <li>- Proof of employment for five (5) years of continuous general industry or construction safety management/supervision.</li> <li>- Proof of 30-Hour OSHA General Industry or Construction Safety Class training (or equivalent)*</li> <li>- Documentation of maintaining competency through completion of eight (8) hours of formal, on-line or self-study safety and health coursework annually.</li> <li>- Documentation of a minimum of 1 year experience implementing SOH procedures at hazardous waste sites.</li> <li>- Completion of the OSHA HAZWOPER initial, refresher and supervisor training requirements.</li> <li>- Completion of training and experience necessary conduct exposure monitoring/air sampling and select/adjust protective equipment use.</li> </ul> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.17(a), Section 01.A.17, Sect. 33.C.02</p> <p>* This training is required for projects involving intrusive activities such as (but not limited to) drilling, demolition, excavation) as specified in EM 385-1-1, Section 01.A.17(b).</p> |            |           |

| A. STAFF QUALIFICATIONS AND RESPONSIBILITIES (CONTINUED)   | Yes<br>(✓) | No<br>(✓) |
|--|------------|-----------|
| <p>e. The SSHP requires the SSHO to be responsible for:</p> <ul style="list-style-type: none"> <li>- Being present on-site to implement the SSHP.</li> <li>- Inspecting site activities to identify SOH deficiencies and correcting them.</li> <li>- Coordinating changes/modifications to the SSHP with the SHM, Site Superintendent and Contracting Officer.</li> <li>- Conducting project-specific training.</li> </ul> <p><u>Regulatory reference:</u> EM 385-1-1, Sect. 33.C.02</p>   |            |           |
| <p>To ensure continued project SSHO coverage, has an alternate SSHO been appointed when:</p> <ul style="list-style-type: none"> <li>- The project has multiple shifts</li> <li>- The SSHO is temporarily off-site for a period longer than 24 hours</li> </ul> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.17 (e) and (f), Appendix Q.</p>   |            |           |
| <p>If assigned, does the alternate SSHO meet the same requirements and have the same responsibilities as the SSHO?</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect.01.A.17(e) and Appendix Q</p>   |            |           |
| <p>If a Designated Representative (DR) is preferred, is the DR only appointed only when:</p> <ul style="list-style-type: none"> <li>- The SSHO is absent for up to 24 hours and preferred in lieu of an Alternate SSHO appointment?</li> <li>- The activity, task, DFOW has multiple sites, has been assessed a RAC of low or medium (Note: a DR cannot be assigned to tasks with a RAC of “High” or “Extremely High”)?</li> <li>- Each site is a remote work location requiring more than 45 minutes travel time for the SSHO?</li> <li>- The DR can perform those tasks as designated by the SSHO and report directly to the SSHO?</li> </ul> <p><u>Regulatory references:</u> EM 385-1-1, Sect.01.A.17(g) and (h)</p> |            |           |
| <p>The DR:</p> <ul style="list-style-type: none"> <li>- Is a collateral duty safety person with safety duties in addition to other fulltime assigned project duties and responsibilities.</li> <li>- Can perform site safety duties and tasks as directed by the SSHO and reports directly to the SSHO.</li> <li>- Is identified as the DR on the applicable AHAs.</li> </ul> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01A.17(g) and (h)</p>   |            |           |

| <b>B. SITE DESCRIPTION, CHARACTERIZATION, HAZARD AND RISK IDENTIFICATION</b>  | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|---|--------------------|-------------------|
| <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. 33.B.02.a</p>  |                    |                   |
| <p>b. Required site characterization and analysis includes:</p> <ul style="list-style-type: none"> <li>- Location and approximate size of the site</li> <li>- Description of the site activity and job task(s) to be performed</li> <li>- Duration of planned employee activity</li> <li>- Site topography and accessibility</li> <li>- Safety and health hazards at expected at the site</li> <li>- Pathways of hazardous substance dispersion</li> <li>- Hazardous substances and health hazards</li> <li>- Present status and capabilities of emergency response teams that will provide assistance to site clean-up employees during an emergency</li> <li>- Selection of proper PPE and employee exposure monitoring protocols for initial site entry</li> </ul> <p>Performing site characterization and hazard identification.</p> <p><u>Regulatory references:</u> 1910.120(c)(4) through (c)(6); 1926.65(c)(4) through (c)(6); EM 385-1-1, Sect. 33.B.02.a and Sect. 33.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>  |                    |                   |



| <b>C. PROJECT SAFETY and HEALTH RISK/HAZARD ANALYSIS: AHA/JHA</b>  | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| <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) or Job Hazard Analysis (JHA) has been developed for each project task/definable feature of work (DFOW).</p> <p><u>Regulatory references:</u> 1910.120(b)(4)(ii)(A); 1926.65(b)(4)(ii)(A); EM 385-1-1, Sect. 01.A.14, Sect. 01.A.15, Sect 33.B.02.b and Appendix A.3.</p>   |                    |                   |
| <p>b. Each AHA/JHA includes all physical and chemical hazards to be encountered and is formatted to contain the following information:</p> <ul style="list-style-type: none"> <li>- Task/operation identification, site location, date prepared, who prepared and reviewed it</li> <li>- Identification of all “competent persons” and “qualified persons” for the job task, to include proof of qualifications/competency</li> <li>- Identification of job steps and work sequences</li> <li>- Analysis of chemical and physical hazards anticipated for each job step</li> <li>- Specific controls to be implemented to control hazards</li> <li>- Assignment of a Risk Assessment Code (RAC) for each job step and the entire AHA/JHA</li> <li>- Site conditions</li> <li>- List of equipment to be used for the task/operation</li> <li>- List of training requirements</li> <li>- List of inspection requirements</li> </ul> <p><u>Regulatory references:</u> EM 385-1-1, Sect 33.B.02.b and Sect 01.A.14, Sect. 01.A.15, and Appendix A.3.</p> |                    |                   |
| <p>c. Procedures are outlined for reviewing and modifying existing AHAs/JHAs based on changes in site conditions, changes in project scope and site operations, adjustment of hazard analysis and re-evaluation of RAC, need for competent and qualified persons, and for briefing employees on those changes</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.14, Sect. 01.A.15, and Appendix A.3.</p>   |                    |                   |
| <p>d. The AHA/JHA has been submitted to, and accepted by, the Government Designated Authority (GDA) prior to the start of field work.</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.14, Sect. 01.A.15, and Appendix A.3.</p>   |                    |                   |
| <p>e. The project AHAs/JHAs are readily available on the work site, and the site workers have them in their possession or are readily accessible on the site and have been trained on the content and use of the AHAs/JHAs.</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.14, Sect. 01.A.15, and Appendix A.3.</p>   |                    |                   |

| <b>D. EMPLOYEE TRAINING</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|---|--------------------|-------------------|
| <p>a. The SSHP indicates that all on-site staff have successfully completed the following OSHA training and certificates of training completion are in the SSHP or on-site:</p> <ul style="list-style-type: none"> <li>- 40-hour HAZWOPER Initial training and 8-hour Refresher training</li> <li>- 8-hour HAZWOPER specialized training for on-site supervisors</li> <li>- OSHA 30-Hour General Industry or Construction Safety training for SSSHO/Alternate SSSHO</li> <li>- Three (3) days actual field experience (minimum) for on-site managers, supervisors, and general site workers (under direction of a skilled supervisor).</li> <li>- 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.</li> <li>- Emergency response training for employees responding to site emergencies</li> </ul> <p><u>Regulatory references:</u> 1910.120(e)(3) through (e)(9); 1926.65(e)(3) through (e)(9); EM-385-1-1, Sect. 01.A.17 and Sect. 33.D.01</p> |                    |                   |
| <p>b. 40-hour initial &amp; 8-Hour refresher HAZWOPER training includes the basic training elements:</p> <ul style="list-style-type: none"> <li>- Names of site safety and health personnel and their alternates</li> <li>- Hazard/risk communication of site safety and health hazards (chemical/physical/biological)</li> <li>- Use of personal protective equipment</li> <li>- Work practices to minimize health and safety risks</li> <li>- Safe use of site engineering controls and equipment</li> <li>- Medical surveillance requirements</li> <li>- Decontamination, emergency response, and spill containment procedures</li> <li>- Confined space entry procedures</li> <li>- Refresher training covers topics relevant to organizational operations and addresses applicable hazards previously encountered</li> </ul> <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. 33.D.01</p>  |                    |                   |

| <b>D. EMPLOYEE TRAINING (CONTINUED)</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|---|--------------------|-------------------|
| c. The SSHP 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<br><u>Regulatory references:</u> 1910.120(e)(1)(ii); 1926.65(e)(1)(ii); EM 385-1-1, Sect. 33.D.02.   |                    |                   |
| d. The SSHP includes project-specific training, as applicable to the project, such as: <ul style="list-style-type: none"> <li>- Project-specific AHAs (EM 385-1-1, Sect. 01.A.14, Sect. 01.A.15 and Appendix A.3).</li> <li>- 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. 33.D.02)</li> <li>- Project/task-specific respiratory protection program (1910.134; EM 385-1-1, Sect. 05.G)</li> <li>- Heat and cold stress (EM 385-1-1, Sect. 33.B.02.h and Sect. 06.J)</li> <li>- Blood borne pathogens/first aid/cardiopulmonary resuscitation (1910.1030; 1910.151; 1926.50; EM 385-1-1, Sect. 03 and Sect. 33.B.02).</li> <li>- Applicable sections of EM 385-1-1, 29 CFR 1910 and 1926 based on specific hazards to be encountered (EM 385-1-1, Sect. 33.D.02)</li> </ul> |                    |                   |
|   |                    |                   |
|   |                    |                   |
|   |                    |                   |
|   |                    |                   |
| 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.<br><br><u>Regulatory reference:</u> EM 385-1-1, Sect. 33.D.03   |                    |                   |

| <b>E. PERSONNEL PROTECTIVE EQUIPMENT (PPE)</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| <p>a. The SSHP includes a project-specific personal protective equipment (PPE) program and specifies the project PPE that will be required for hazards associated with each DFOW (task).</p> <p><u>Regulatory references:</u> 1910.120(g)(5)/1926.65(g)(5); 1910.120(b)(4)(ii)(C)/1926.65(b)(4)(ii)(C); EM-385-1-1, Sect. 05 and Sect. 33.B.02.e</p>   |                    |                   |
| <p>b. Specific elements of the project PPE program include:</p> <ul style="list-style-type: none"> <li>- Work mission (task) duration</li> <li>- Identification of specific PPE to be used by employees for the tasks to be performed.</li> <li>- Indication that the PPE has been properly selected based on the site hazards encountered.</li> <li>- PPE training and proper fitting and donning and doffing procedures</li> <li>- Instructions on specific PPE use and limitations</li> <li>- PPE maintenance, cleaning, and storage</li> <li>- PPE inspection procedures prior to, during, and after use.</li> <li>- PPE decontamination and disposal</li> <li>- Limitations of PPE use during temperature extremes, heat stress, and employee medical limitations</li> <li>- How PPE program effectiveness will be evaluated</li> </ul> <p><u>Regulatory references:</u> 1910.120(g)(5) and 1910, Subpart I; 1926.65(g)(5) and 1926, Subpart E; EM-385-1-1, Sect. 05 and Sect. 33.B.02.e.</p> |                    |                   |
| <b>F. MEDICAL SURVEILLANCE</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
| <p>a. The SSHP 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. 33.E; 1910.120(b)(4)(ii)(D); 1926.65(b)(4)(ii)(D)</p>  |                    |                   |
| <p>b. The medical surveillance program outlined in the SSHP 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. 33.E; 1910.120(b)(4)(ii)(D); 1926.65(b)(4)(ii)(D)</p>   |                    |                   |
| <p>c. Certification of employee medical surveillance program participation is appended to the SSHP 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. 33.B.02.f and Sect. 33.E.01</p>  |                    |                   |

| <b>G. EXPOSURE MONITORING</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|---|--------------------|-------------------|
| a. An exposure monitoring and air sampling plan is included to evaluate PPE effectiveness and employee exposures to site-related contaminants and hazardous substances<br><br><u>Regulatory references:</u> 1910.120(c)(6); 1910.120(h); 1926.65(c)(6); 1926.65(h); and EM 385-1-1, Sect. 33.B.02.g |                    |                   |
| b. The exposure monitoring and air sampling plan includes:  |                    |                   |
| <ul style="list-style-type: none"> <li>- Frequency and type of employee monitoring</li> </ul>   |                    |                   |
| <ul style="list-style-type: none"> <li>- Identification of monitoring equipment and instrumentation to be used</li> </ul>   |                    |                   |
| <ul style="list-style-type: none"> <li>- Methods of equipment and instrumentation, inspection, maintenance and calibration</li> </ul>   |                    |                   |
| <ul style="list-style-type: none"> <li>- Indication that equipment/instrumentation manufacturer instructions are maintained on-site</li> </ul>  |                    |                   |
| <ul style="list-style-type: none"> <li>- Identification of approved sampling and analytical methods (NIOSH/OSHA) or other protocols</li> </ul>  |                    |                   |
| <ul style="list-style-type: none"> <li>- Verification of use of accredited laboratories to perform sample analysis</li> </ul>   |                    |                   |
| <ul style="list-style-type: none"> <li>- A method for informing employees of the monitoring/air sampling results</li> </ul>   |                    |                   |
| <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. 33.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.<br><br><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<br><br><u>Regulatory reference:</u> EM 385-1-1, Sect. 06.A.03   |                    |                   |

| J. SITE CONTROL: SAFE WORK PRACTICES, SOPs, SANITATION, SPILL CONTAINMENT  | 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. 33.B.02.j</p>  |         |        |
| <p>b. The site control plan includes the following elements:</p> <ul style="list-style-type: none"> <li>- A site map</li> <li>- Establishment of work zones, a clearly defined EZ, SZ, and a CRZ as a transition between EZ and SZ</li> <li>- Use of the “buddy” system</li> <li>- Site communications, including alerting employees of emergencies</li> <li>- Standard operating procedures and safe work practices, to include site rules and prohibitions</li> <li>- Work permits and task/equipment-specific safety standard operating procedures</li> <li>- Identification of the nearest medical assistance and facility</li> <li>- Provisions for conducting pre-entry site briefings/site access prior to any site activity for employees and visitors</li> </ul> <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. 33.B.02.i</p> |         |        |
| <p>c. A site sanitation plan has been prepared, to include the following:</p> <ul style="list-style-type: none"> <li>- Providing and distributing potable water to site employees</li> <li>- Non-potable water identification/methods to prevent cross contamination with potable water supplies.</li> <li>- Identification and use of temporary or permanent toilet facilities</li> <li>- Providing personal hygiene stations or facilities for proper hand washing</li> </ul> <p><u>Regulatory references:</u> 1910.120(n); 1926.65(n); 1926.51; EM 385-1-1, Sect. 02 and Sect. 33.B.02.i;</p>   |         |        |
| <p>d. A spill containment plan/program is provided that includes (as applicable to the project):</p> <ul style="list-style-type: none"> <li>- Spill containment and material handling procedures</li> <li>- Drum/container/tank handling, opening, sampling, packaging and transport</li> <li>- The shipping and transport of drums and containers</li> <li>- Handling of radioactive wastes or shock sensitive wastes</li> <li>- Tank or vault entry</li> </ul> <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. 33.B.02.i</p>  |         |        |

| <b>K. and L. PERSONAL HYGIENE, PERSONAL/EQUIPMENT DECONTAMINATION</b>  | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| <p>a. Decontamination procedures are provided for employees and equipment.</p> <p><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 33.B.02.k-l.</p>  |                    |                   |
| <p>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).</p> <p><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 33.B.02.k-l</p> |                    |                   |
| <p>c. Procedures are provided for the site safety and health supervisor to monitor the effectiveness of the decontamination procedures</p> <p><u>Regulatory references:</u> 1910.120(k)(2)(iv); 1926.65(k)(2)(iv)</p>  |                    |                   |
| <b>M. EMERGENCY EQUIPMENT AND FIRST AID</b>  | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
| <p>Equipment, personnel and information required to administer first aid and CPR and respond to project site emergencies is established and available. Medical and first aid meet the requirements of Section 03 of EM 385-1-1 to include (but not limited to):</p>  |                    |                   |
| <p>a. Effective means of communication with #911 or other emergency response source.</p>   |                    |                   |
| <p>b. Transportation to effectively care for injured workers</p>   |                    |                   |
| <p>c. Telephone numbers of physicians, hospitals, ambulances conspicuously posted on safety bulletin boards and near project telephones.</p>   |                    |                   |
| <p>d. Highly visible map delineating the best route to the nearest medical facility is available, posted on the safety bulletin board and readily available to mobile crews.</p>   |                    |                   |
| <p>e. At least 2 employees on each shift are trained and qualified to administer first aid and CPR (required if 2 or more employees on work location and emergency services not accessible within 5 minutes)</p>   |                    |                   |
| <p>f. First aid, CPR and Automatic External Defibrillator (AED) training is provided by the American Red Cross (ARC), American Heart Association (AHA), from a licensed physician or organization adhering to the International Liaison Committee on Resuscitation. Classes must have a hands-on component, a certificate issued that indicates date of issue and validity, and FA/CPR personnel retrained/recertified every 2 years.</p>  |                    |                   |
| <p>g. A first aid kit is available for every 25 (or fewer) employees. The first aid kit shall meet the criteria of ANSI Z308.1. First aid kit contents shall be based on the work type and level of training be the responders using the kit.</p>  |                    |                   |
| <p>i. The first aid kit is easily accessible, protected from the weather, and contents kept sterile.</p>   |                    |                   |
| <p>j. Employees responsible for rendering first aid/medical assistance must be included in employer site specific bloodborne pathogen program and adhere to the Exposure Control Plan.</p>   |                    |                   |
| <p><u>Regulatory references:</u> EM 385-1-1, Sect. 03 and Sect. 33.b.02.m</p>  |                    |                   |

| <b>N.1: EMERGENCY PLANNING</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| An Emergency Plan based on identified potential site work and natural disaster (to include weather) emergencies has been prepared in writing, employees trained on its use, and the plan has been tested (drilled) for its effectiveness.  |                    |                   |
| The Emergency Plan includes escape procedures and routes, employee accounting following evacuation, rescue and medical duties, means of reporting emergencies, and persons to contact for information and clarification.   |                    |                   |
| The Emergency Plan includes on-site planning and integration with off-site emergency support, to include any written agreements, memorandums, telephone conversations logs. Additionally, the emergency services provider has been provided on-site project orientation and training/information on site hazards.  |                    |                   |
| Emergency alert systems have been designated and tested.   |                    |                   |
| Emergency telephone numbers and reporting instructions for ambulance, hospital, fire, and police are conspicuously posted on-site and communicated to employees.   |                    |                   |
| Employees working remotely or away from other workers are provided an effective means for emergency communication (i.e., cellular phone, two-way radio, land-line telephone, or other acceptable means). The communication system is readily available to the employee and tested at the start of each work shift. |                    |                   |
| An employee check-in/check-out communication procedure is implemented.   |                    |                   |
| A determination as to the applicability of an Emergency Response Plan (ERP) or Emergency Action Plan (EAP) has been performed and the ERP or EAP has been included as a separate, distinct section of the SSHP.  |                    |                   |
| <u>Regulatory references:</u> 1910.120(l)(i); 1926(l)(i); EM 385-1-1, Section 01.E, and Sect. 33.B.02.n  |                    |                   |

\* 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.



| <b>N.2: EMERGENCY RESPONSE PLAN (ERP)*</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| <p>a. The ERP contains the following minimum elements:</p> <ul style="list-style-type: none"> <li>- 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)</li> <li>- Identification of personnel roles, lines of authority, and communication procedures</li> <li>- Criteria and procedures for emergency situation recognition and methods for prevention</li> <li>- Safe distances and places of refuge</li> <li>- Site security and control</li> <li>- Evacuation procedures and routes, route to emergency MTF, emergency responder phone numbers</li> <li>- Decontamination procedures, to include decontaminating injured employees (not covered in other sections of the HASP)</li> <li>- Emergency alerting and response procedures and criteria for alerting emergency responders</li> <li>- Response critique and follow-up</li> <li>- PPE and emergency equipment identification</li> </ul> <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 33.B.02.n and Sect. 33.G</p> |                    |                   |
| <p>b. The ERP contains the following procedures and information for handling emergency incidents:</p> <ul style="list-style-type: none"> <li>- Site topography, layout, and prevailing weather conditions</li> <li>- Reporting incidents to the local, state, and federal governmental agencies</li> <li>- Provisions for making the project ERP compatible and integrated with local/state/federal agency disaster, fire, and/or emergency response plans</li> <li>- Development and specification of an employee alarm system</li> <li>- Provisions for rehearsing and evaluating the ERP and planned response capabilities</li> </ul> <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. 33.B.02.n and Sect. 33.G</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.

| <b>N.3: EMERGENCY ACTION PLAN (EAP)*</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|--|--------------------|-------------------|
| <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, Sect. 01.E</p>   |                    |                   |
| <p>b. The EAP contains the following minimum procedures:</p> <ul style="list-style-type: none"> <li>- Reporting a fire or emergency</li> <li>- Emergency escape, including emergency escape route assignments</li> <li>- Evacuating employees that remain behind to operate critical equipment</li> <li>- Safe distances and places of refuge</li> <li>- Site security and control</li> <li>- Identify the type of evacuation to be used and account for employees after evacuation</li> <li>- Emergency medical treatment and first aid</li> <li>- Employees assigned to perform rescue or medical duties</li> <li>- The name, job title and telephone number of every employee who may be contacted for EAP information or explanation of duties.</li> </ul> <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</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</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>  |                    |                   |

\* 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.

| <b>O. PRE-ENTRY BRIEFING</b>  | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
|---|--------------------|-------------------|
| <p>a. 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)</p>   |                    |                   |
| <p>b. Applicable project AHAs/JHAs with RAC assigned for the project DFOW (task) and associated job steps have been discussed with all supervisors and site workers in a job pre-brief prior to the start of work.</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.15 and Sect. 33.B.02</p>   |                    |                   |
| <b>P. SSHP EFFECTIVENESS/INSPECTIONS</b>  | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
| <p>a. Procedures are included for determining SSHP effectiveness, including periodic reviews and inspections, documentation of inspections, deficiency tracking, correcting and documenting noted deficiencies, documenting corrective or disciplinary actions and documenting resolution and closeout.</p> <p><u>Regulatory references:</u> 1910.120(b)(4)(iv); 1926.65(b)(4)(iv); EM 385-1-1, Sect.01.A.13 and Appendix A.3.g</p> |                    |                   |
| <p>b. Specific responsibilities for daily/periodic job site safety and health inspections have been assigned, with assignment based on the level of technical proficiency required</p> <p><u>Regulatory references:</u> EM 385-1-1, Sect. 01.A.13 and Appendix A.3.g</p>  |                    |                   |
| <b>Q. CONFINED SPACE ENTRY AND SITE EXCAVATIONS</b>   | <b>Yes<br/>(✓)</b> | <b>No<br/>(✓)</b> |
| <p>a. Project confined spaces have been identified. Confined space hazards have been assessed, permit determination has been made, project-specific confined space plans and procedures have been developed, and key personnel identified and trained.</p> <p><u>Regulatory reference:</u> 1910.120(b)(4)(ii)(I); 1926.65(b)(4)(ii)(I); 1926, Subpart AA; 1910.146; EM 385-1-1, Sect. 34.</p>                                       |                    |                   |
| <p>b. Project excavation work has been identified and assessed, permit requirements determined, project-specific excavation plans and procedures have been developed, key personnel identified and trained, and excavations shored/sloped as appropriate to prevent accidental collapse.</p> <p><u>Regulatory reference:</u> 1910.120(b)(1)(iii); 1926.65(b)(1)(iii); 1926, Subpart P; EM 385-1-1, Sect. 25.</p>                    |                    |                   |