

HASP SUBMITTAL & REVIEW PROCESS

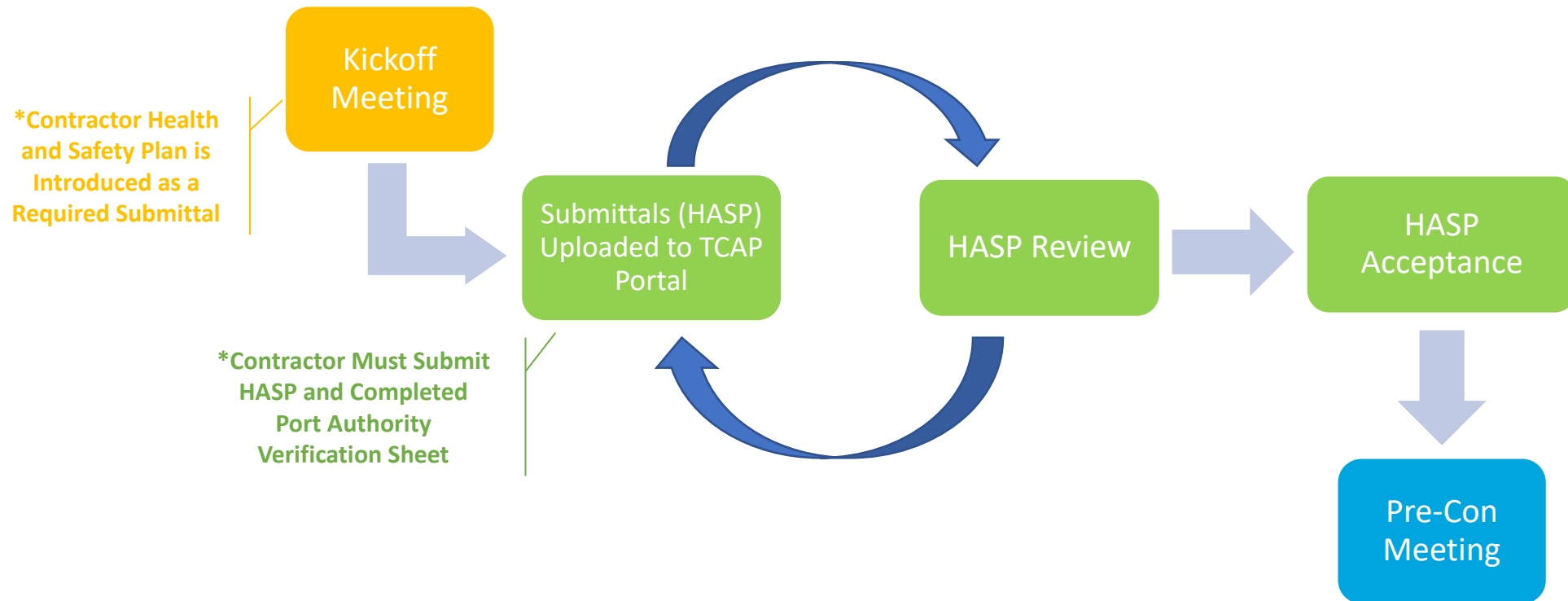
Presentation to TCAP Community

December 14, 2021

Presented by:
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The Port Authority of New York and New Jersey
Operations Services Department
Agency Safety Management, Safety Risk Management – Safety Assurance Unit

HASP Review Workflow



The HASP Submittal

- Why _ To ensure health and safety of contractor workers as well as PA employees and patrons in accordance with OSHA guidelines and PA requirements.
- Which TAAs _ Construction and alteration projects require a TAA HASP submittal. Minor Works, if required based on the scope of work.
- When in the TCAP Process_ As early as possible (Kickoff Meeting), the Tenant Coordinator will notify the Tenant that a Health and Safety Plan must be submitted by the Contractor to the Resident Engineer, a *PA HASP Checklist* shall be provided for guidance. The Resident Engineer confirms Contractor's HASP submission includes a completed *PA Verification Sheet* and sends submittal package to PA Safety Assurance for review and acceptance. Pre-construction meeting shall not be scheduled if the Contractor HASP is not accepted.
- Submission Platform_ The contractor must upload the HASP documents to the TCAP Portal as instructed.



Review Process

- Review Standards_ OSHA 1910 General Industry, OSHA 1926 Construction Standards and Port Authority Requirements (*PA HASP Checklist*)
- Objective of the Review_ Ensure that all applicable components outlined in checklist are submitted in accordance with scope of work and JHA.
- Review Disposition_ Single items ('Yes - Close', 'No - See follow up').
Once all comments are fulfilled the HASP is 'Accepted'.

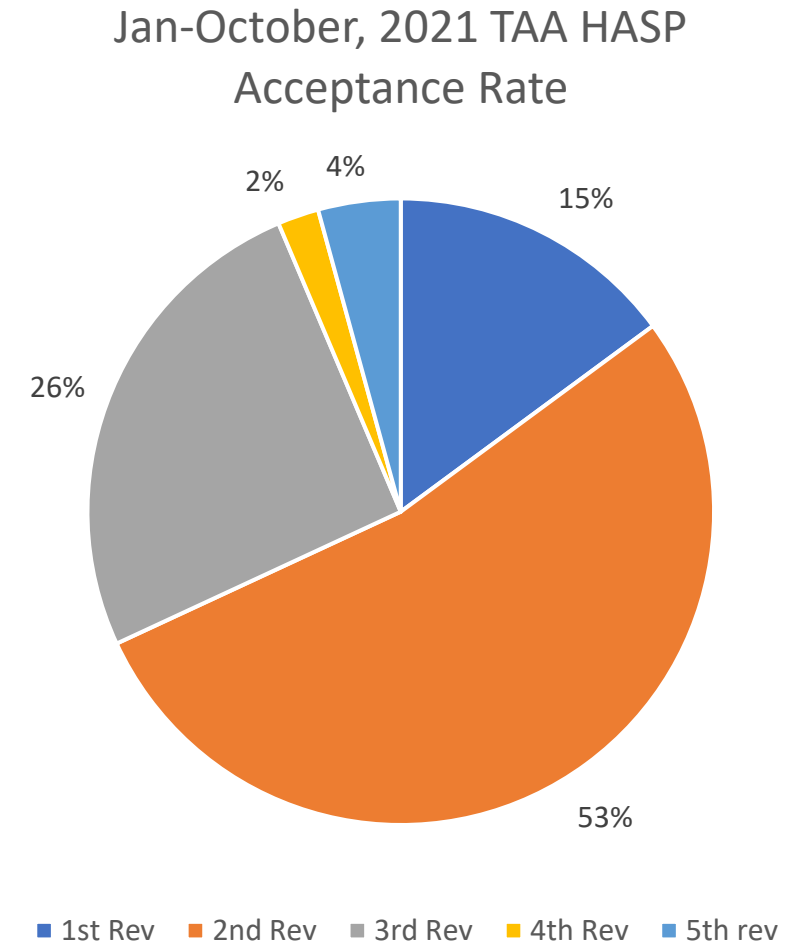
Review Process: Common Errors & Issues

- Review Standards_ unfulfilled OSHA 1910, OSHA 1926 Standards and Port Authority Requirements
- How is it Performed_ use checklist and reviewer knowledge/experience
- Most Common Problems_ Contractor HASP submittal is not site-specific (EHS Manual, Training Manual), lack of current emergency contact information (Resident Engineer), providing information and sections that are N/A to the project's scope

Port Authority ASM Continuous Improvement: A Fully Integrated HASP Checklist

- **Challenge:** Increase efficiency in HASP submittal and review process
- **Objective:** Develop a product (*PA HASP Checklist*) that provides guidance to the process of writing-reviewing a HASP.
- **Goal:** To accept the Contractor's HASP submittal on the 1st submission

Each revision up to 5-day turnaround



PA HASP Checklist: Sections and Key Elements

Updates and Additions

- Conditions for Accepting a HASP Document from the Contractor
- Cover Page Requirement
- Scope of Work**
- Competent Person Requirements
- Emergency Response – PAPD and REO incident notification
- Employee Information and Training
- Fall Protection – Port Authority 100% fall protection at 6 ft
- Infectious Disease Preparedness and Response Policy (IDPR)/COVID-19
- Job Hazard Analysis/Control – Task, Hazard, Control**
 - Alphabetical Order of Sections
 - Consolidated Training Requirements
 - Addition of PA Verification Sheet**

NEW PA Verification Sheet

- PA Verification Sheet added as cover page to PA HASP Checklist
- Guideline for preparing Contractor's Health and Safety Plan
- Submitted through TCAP Portal by Contractor to PA Resident Engineer
- Verified by PA Resident Engineer that all applicable sections and *completed* Verification Sheet are included in HASP submittal
- Turned over to PA Safety Assurance for review and acceptance
- Anticipated 5-day turnaround for review

HEALTH AND SAFETY PLAN SUBMITTAL CHECKLIST

Contract/Project Name: _____
 Facility/Location(s): _____
 Submitted by (Contractor): _____
 Reviewed by: _____ Date: _____

The following guidance document highlights key items, at minimum, to be included in the Site-Specific Health and Safety Plan (HASP). HASP documents can be more comprehensive than the items listed below depending on the work to be performed and associated hazards. The completed HASP must comply with contract documents and applicable Federal, State, or Local regulations.

CHECKLIST SECTIONS	YES	Page #	N/A
Conditions for Accepting a HASP Document from the Contractor*	<input type="checkbox"/>		
Cover Page Requirement*	<input type="checkbox"/>		
Scope of Work*	<input type="checkbox"/>		
Personnel*	<input type="checkbox"/>		
Competent Person Requirements	<input type="checkbox"/>		
Confined Space	<input type="checkbox"/>		<input type="checkbox"/>
Crane & Hoist Safety	<input type="checkbox"/>		<input type="checkbox"/>
Cutting & Welding Safety	<input type="checkbox"/>		<input type="checkbox"/>
Diving Program	<input type="checkbox"/>		<input type="checkbox"/>
Drug and Alcohol, Disciplinary Action	<input type="checkbox"/>		
Emergency Response	<input type="checkbox"/>		
Employee Information & Training	<input type="checkbox"/>		
Excavation & Trenching	<input type="checkbox"/>		<input type="checkbox"/>
Fall Protection	<input type="checkbox"/>		<input type="checkbox"/>
Fire Protection & Prevention	<input type="checkbox"/>		
First Aid	<input type="checkbox"/>		
Hazard Communication	<input type="checkbox"/>		
Hearing Conservation	<input type="checkbox"/>		<input type="checkbox"/>
Housekeeping, Site Conditions	<input type="checkbox"/>		
Infectious Disease Preparedness and Response Policy (IDPR)/COVID-19	<input type="checkbox"/>		
Job Hazard Analysis/Control	<input type="checkbox"/>		
Lockout & Tag Out	<input type="checkbox"/>		<input type="checkbox"/>
Medical Surveillance	<input type="checkbox"/>		<input type="checkbox"/>
Personal Hygiene Facilities and Sanitation	<input type="checkbox"/>		
Protective Clothing & Equipment	<input type="checkbox"/>		
Recordkeeping	<input type="checkbox"/>		
Respiratory Protection	<input type="checkbox"/>		<input type="checkbox"/>
Restricted Zones & Signs	<input type="checkbox"/>		
Scaffolding	<input type="checkbox"/>		<input type="checkbox"/>
Silica Program	<input type="checkbox"/>		<input type="checkbox"/>
Traffic Safety	<input type="checkbox"/>		<input type="checkbox"/>
Waste Management	<input type="checkbox"/>		<input type="checkbox"/>
Working Near Water	<input type="checkbox"/>		<input type="checkbox"/>

Conditions for Accepting a HASP Document from the Contractor

PA Requirement

- Responsible Individuals
- Cover Page Requirements
- Scope of HASP Review
- Stand-Alone Document

Reference	Conditions for Accepting a HASP Document from the Contractor
PA Req.	Name, title, and contact information of the individual responsible for developing and submitting contractor's HASP document.
PA Req.	Name, title, and contact information of the individual responsible for managing and maintaining OSHA/Safety records for the contractor's safety program.
PA Req.	All elements in part "B. Cover Page Requirement" must be followed.
PA Req.	According to the scope of work, provide all necessary information including but not limited to part "C. Scope of HASP Review".
PA Req.	The HASP must be a "stand-alone" document that details all aspects of the tasks and potential hazards associated with the scope of work. The HASP and all HASP related documents must be submitted digitally and contain only site specific and job specific information.

Cover Page Requirements

PA Requirement

- Project Information
- Prime Contractor Information
- Emergency Contacts

Reference	Cover Page Requirement
PA Req.	Project Name and Project Number
PA Req.	Name, address, and 24-hour phone number of the Prime Contractor
PA Req.	List of Emergency Contacts' Names and Numbers, including PA Resident Engineer's Office and PA Police/Communications Desk

Scope of Work**

PA Requirement

- Table of Contents
- Detailed Scope of Work
- Work Site Location
- Location of HASP Document

Reference	Scope of Work
PA Req.	Table of contents with indexed page numbers
PA Req.	Detailed scope of work identifying all tasks involved in project
PA Req.	Identify work site location within the facility
PA Req.	Location of the HASP written document, where it will be kept for consultation during the project

Competent Person Requirements

PA Requirement

- Designated On-Site Competent Person(s)
- Confirm Competent Person(s) Meet Minimum Experience Requirement
- Confirm Competent Person(s) Meet Minimum Training Requirement

Reference	Competent Person Requirements
PA Req.	Provide name and contact information of designated on-site competent person(s) for Prime Contractor and Subcontractor(s)
PA Req.	Provide evidence of minimum 2 years supervisory experience for construction/demolition/alteration projects (signed letter from employer stating competent person's supervisory experience or resume)
PA Req.	Provide evidence of 30-hour OSHA Construction Industry training (copies of OSHA card or certificate of completion)

Emergency Response

- Emergency Response Procedures
- Accident/Incident Reporting Template
- Map to Nearest Hospital
- Evacuation Plan
- PAPD/REO Incident Notification

Reference	Emergency Response
29 CFR 1926.35	Program that details procedures in the event of an emergency, accident, or spill including
29 CFR 1926.65	reporting methods, corrective action, clean-up procedures, and responsibilities of key
29 CFR 1926.50	personnel
PA Req.	Accident/Injury reporting template that records accidents, injuries and near misses
PA Req.	Highlighted map and directions to the nearest hospital
29 CFR 1926.35	Evacuation/Egress plan including muster locations
PA Req.	Include statement indicating that Port Authority Police Department (PAPD) and Resident Engineer Office (REO) immediately be notified in the event of an emergency

Employee Information and Training

- Minimum Training Requirements
- Workers Receive and Maintain Current Specialized Trainings
- Training Records Must be Maintained On-site for Review

Reference	Employee Information & Training
29 CFR 1926.21(b)(2)	Specify the minimum training requirements for this project
PA Req.	Provide statement indicating workers receive and maintain all applicable/required training in accordance with local/state/federal regulations to conduct tasks. Prime Contractor must ensure proof of training is maintained on site and available for review upon request.

Fall Protection

- Fall Protection Program
- Port Authority 6' Fall Protection Policy
- Rescue/Retrieval Procedures

Reference	Fall Protection, if applicable
29 CFR 1926.500-503 29 CFR 1926. Subpart M	Procedures describing site-specific Fall Protection Program
PA Req.	Include statement that any exposure to heights 6 feet or more will require implementation of the fall protection program
PA Req.	Emergency rescue/retrieval procedures

Infectious Disease Preparedness and Response Policy (IDPR)/COVID 19

- Infectious Disease Preparedness and Response Procedures
- Program Must Meet Current CDC/OSHA Guidelines

Reference	Infectious Disease Preparedness and Response Policy (IDPR)/COVID-19
CDC/OSHA	Provide a plan that describes the procedures in place to prevent and mitigate the spread of infectious disease/COVID-19. The contractor must include a statement saying, “all infectious disease/COVID-19 protocols will be modified as necessary to maintain compliance with CDC and OSHA guidelines.”

Job Hazard Analysis/Control**

PA Requirement

- Site-specific Job Hazard Analysis Based on Project's Scope of Work
- Identify Tasks, Hazards, and Controls
- Practical Application of Policy and Procedures

Reference	Job Hazard Analysis/Control
PA Req.	Site-specific hazard assessment describing tasks, hazards, and controls (including PPE) as it relates to the project. The table below can be used as a template.

Task	Hazard	Control

Task:

Describe the task(s) that workers will be performing for this project.

Hazard:

Describe the hazard(s) that the task(s) may present.

Control:

Describe how the hazard(s) would be mitigated.

Sample

Job Hazard Analysis for *Minor* Project

JOB HAZARD ANALYSIS			
Project Name: _____		Project Number: _____	
Project Address: _____		Work Task Location/ Floor: _____	
Work or Task Description: Hanging Sheetrock			
Prepared By: _____			
Subcontractor: _____		Subcontractor's Supervisor: _____	
Date for Work in this JHA: _____		Date Prepared: _____	
PPE Required: Safety Shoes, Safety Glasses, Leather work gloves, N95/KN95 Face masks			
Task #	JOB TASKS	POTENTIAL HAZARDS	CONTROLS/ PROCEDURES
1	Hanging sheetrock from baker scaffold	Falling from baker scaffold	Baker scaffold will be set up per manufacturer directions. A Competent person will evaluate scaffold set-up and inspect prior to use. Men working on scaffold will have 4 hr scaffold user card and ensure wheels are locked and set prior to accessing scaffold.
		Falling from ladders	Only type 1 A ladders will be used All workers will be trained on safe ladder use Ladder use will be addressed in pre-shift meetings
2	Screwing off/installing drywall	Cuts to the hand/handling material	Safety gloves will be used while performing work
		Dust in eyes/flying dust particles	Safety glasses will be work to protect eyes while cutting sheetrock. Hepa Vacs with hepa filters will be used for sanding operations.
3	Zip routing holes and drywall sanding	Drywall dust can irritate breathing passages and lungs/Silica exposure	N95/KN95 masks will be worn at all times in addition to hepa vaccums with hepa filters
4	Transporting/Lifting sheets of drywall.	Back strains or other soft-tissue injuries	All materials will be delivered to the appropriate areas/levels by subcontractor. A-Frames will be used to transport materials. Men will work in teams when heavy lifting is required.

Keys to Success

HASP Submittal and Review Process

- TCAP Community_ ensure that personnel equipped with qualifications appropriate to the scope of work are on board for the full length of the project.
- Resident Engineer_ inform the tenant as early as possible, providing reference documents (TCAP Manual, PA HASP Checklist and FAQs) and set expectations.
- Review Group_ ensure program efficiency, guidance and communication

How to Measure Success

- In collaboration with TCAP Community, our ultimate goal is that the tenant can open for business in a safe and compliant manner.



Resources and Contact Information

- Resources:
 - Port Authority HASP Checklist: [PA HASP Checklist](#)
 - TCAP Central Office Road Map: See next slide
- Contacts:
 - TCAP Office: TCAP@panynj.gov
 - PA ASM HASP Review Coordinators:
 - Eva Alonso-Cecere: eacecere@panynj.gov
 - Consuelo Avila-Ramsey: cavila@panynj.gov

The TCAP Central Office

Start Here!

Interactive TCAP RoadMap

Download the Interactive TCAP Road Map using the link below for an overview of each step of the process. Once downloaded, click on the boxes in the flowchart and gain quick access to important TCAP forms and documents.

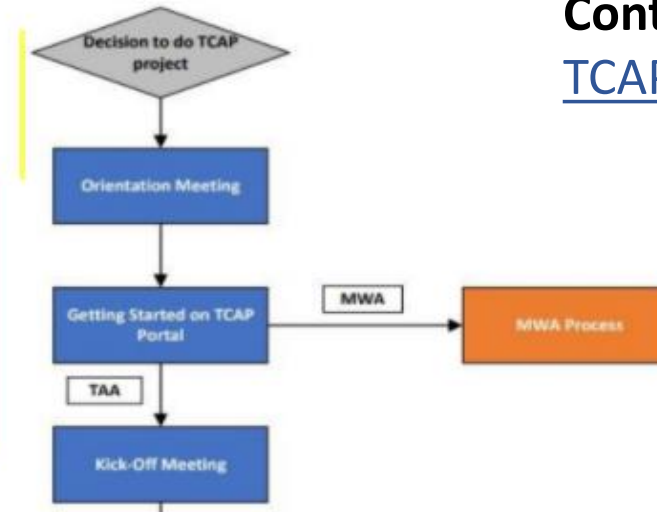
[Click here to download Interactive TCAP Road Map](#)

Let's Keep In Touch

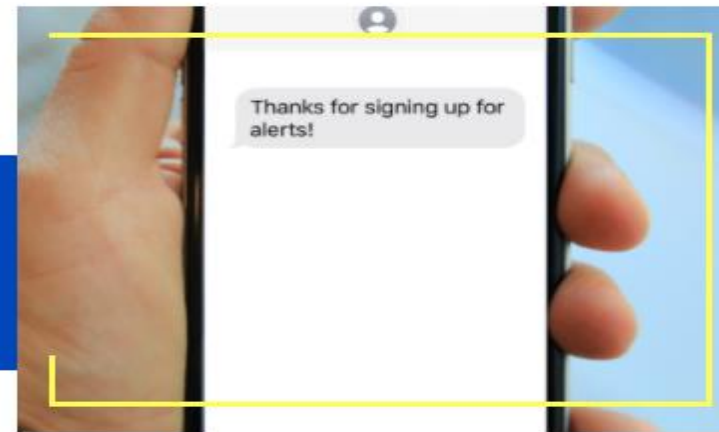
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THANK YOU!

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