

# **Office of Chief Health and Safety Officer (CHSO) HASP REVIEW PROCESS**

Presentation to Port Authority TCAP Community

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1.11.2023

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# **HASP Overview, Review Team, and Review Process**



# Background Information

- What is a Health and Safety Plan (HASP) and why are they important?
- What do we review?
- How does this affect construction?
- What challenges do we face?
- How do we address these challenges?

HASP Submittal Checklist with “HASP Verification Sheet”

Coaching

**Contract/Project Name:** Click or tap here to enter text.

**Facility/Location(s):** Click or tap here to enter text.

**Submitted by (Contractor):** Click or tap here to enter text.

**Reviewed by:** Click or tap here to enter text.

**Date:** Click or tap to enter a 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 checked="" type="checkbox"/>		
Scope of Work*	<input type="checkbox"/>		
Personnel*	<input checked="" type="checkbox"/>		
Competent Person Requirements*	<input checked="" 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"/>

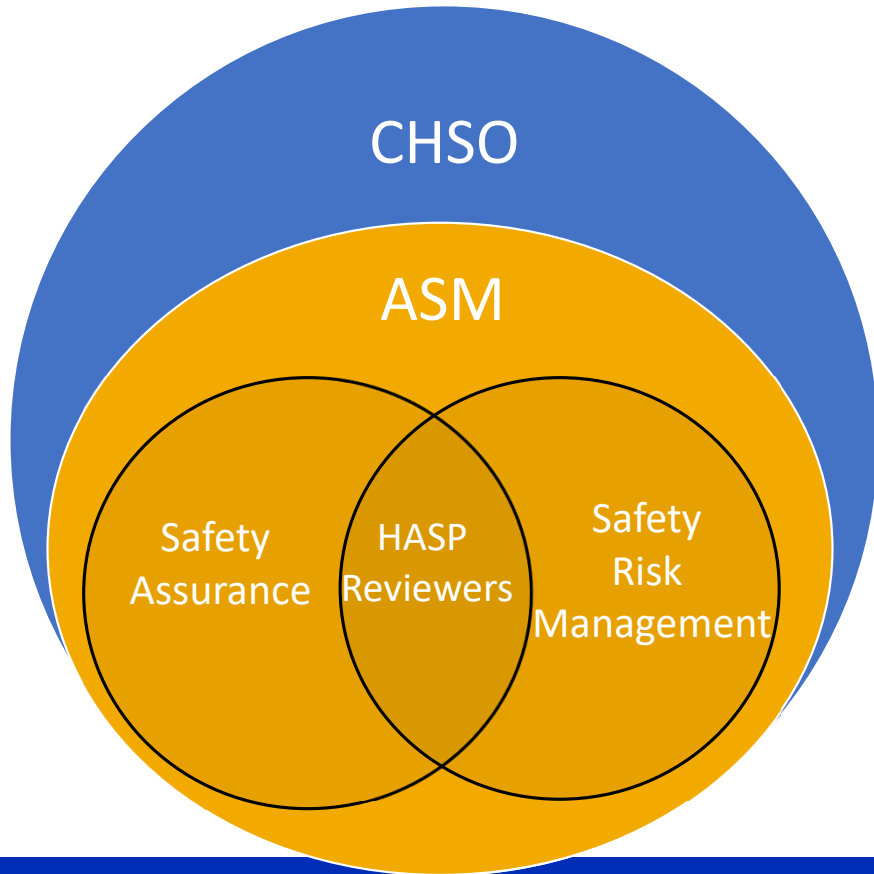
Agency Safety Management/Safety Assurance

\*- PA Required Item

Page 1 of 2

Revision # R.2  
October 2021 - JO

# HASP Reviewers Team



**Common Goal:** Safe, Clean, Compliant Construction

**Partnerships:**

- TCAP Office
- Engineering-CMD
- Clean Construction-EFO
- EWR Redevelopment
- JFK Redevelopment
- The New LGA

# Review process

- Review Standards: OSHA 1910 General Industry and OSHA 1926 Construction standards and Port Authority requirements (checklist)
- Objective of the review: Ensure that all applicable components outlined in checklist are submitted according to the scope and JHA.
- Review Disposition: Single items ('Yes Close', 'No see follow up'). Once all comments are fulfilled, the HASP is 'Accepted'.
  - Pre-Con Matrix

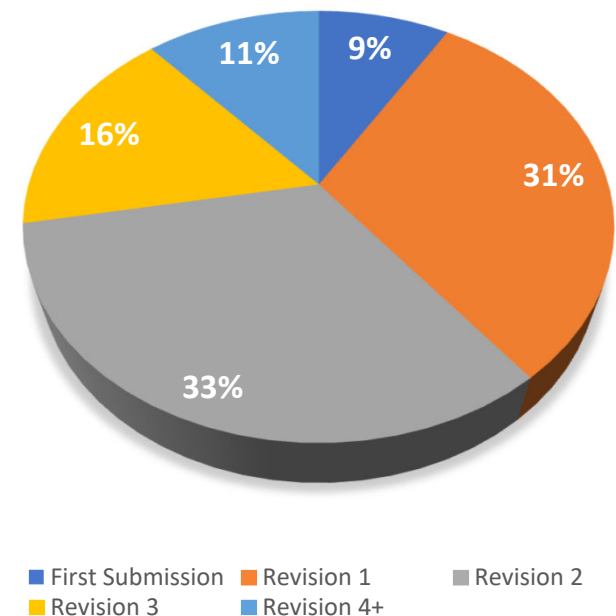
# Review Process & Common errors

- Review standards: OSHA 1910, 1926 standards, and Port Authority requirements
- How is it performed: Use checklist and reviewer knowledge/experience
- Most common errors:
  - **Emergency Response (80%)**\_no accident/injury reporting template, no evacuation/egress plan.
  - **Competent Person (70%)**\_ No contact information; no evidence of OSHA-30 training; no evidence of 2+ years of supervisory experience in construction/demolition/alteration projects
  - **Scope of Work (60%)**\_ No detailed scope; no specific job site location, no specific location of the HASP for consultation during the project
  - **Cover Page Requirements (40%), (first page of the HASP)**\_ no emergency contact list included, including (PA Resident Engineer's Office and PAPD); incorrect project name/number.
- Road Map\_ [https://www.panynj.gov/content/dam/port-authority/business-opportunities/tcap/TCAP%20ERM\\_2022V318.pdf](https://www.panynj.gov/content/dam/port-authority/business-opportunities/tcap/TCAP%20ERM_2022V318.pdf)

# HASP ACCEPTANCE RATE

- Rejections due to lack of HASP Checklist Verification Page
- Construction Companies new to the Port Authority
- **Every re-submission delays the Pre-Con Meeting and start of construction by at least 10 days**

2022 HASP Acceptance by Revision #



# **Getting your HASP Accepted the first time**

**Using the HASP  
Checklist as a Guide**





# Verification Sheet

- *Verification Sheet* is the first page of the HASP Submittal Checklist
- **Must be attached to HASP for ASM to proceed with review**
- Guideline for preparing Contractor's Health and Safety Plan
- Submitted by Contractor to PA Resident Engineer
- Verified by PA Resident Engineer that all applicable sections/page# are included in HASP submittal
- Contractor HASP submittal turned over to PA Safety Assurance Unit for review
- **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.*

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# Conditions for Accepting a HASP Document from the Contractor

## PA Requirement

- Responsible Individuals
- Cover Page Requirements
- **Project Scope of Work**
- Stand-Alone Document
  - Site Specific

Reference	Conditions for Accepting a HASP Document from the Contractor
PA Req.	Name, title, and contact information of the individual responsible for <b>developing and submitting contractor's HASP document.</b>
PA Req.	Name, title, and contact information of the individual responsible for <b>managing and maintaining OSHA/Safety records for the contractor's safety program.</b>
PA Req.	All elements in part <b>"B. Cover Page Requirement"</b> must be followed.
PA Req.	According to the scope of work, provide all necessary information including but not limited to part <b>"C. Scope of HASP Review"</b> .
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.

# HASP 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

## PA Requirement

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

Reference	Emergency Response
29 CFR 1926.35 29 CFR 1926.65 29 CFR 1926.50	Program that details procedures in the event of an emergency, accident, or spill including reporting methods, corrective action, clean-up procedures, and responsibilities of key 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

## PA Requirement

- 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

## PA Requirement

- 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.

# Sample

## Job Hazard Analysis for Major Project

JOB STEPS	HAZARDS	ACTIONS TO ELIMINATE OR MINIMIZE HAZARDS
Saw Cutting Concrete	Falling/Flying Debris	<ol style="list-style-type: none"> <li>1. Ensure work area is clear of other workers.</li> <li>2. User shall wear a hard hat, eye protection, a face shield, heavy duty gloves, and ear plugs.</li> <li>3. Operators shall be trained in the proper use of this tool.</li> </ol>
	Harmful Dust (Silica)	<ol style="list-style-type: none"> <li>4. Use dust-free power tools that are equipped with a vacuum, use watering to keep down the dust, and have dust masks available for workers who might request them.</li> <li>5. Alert other trades working downwind from your operation and, if possible, try to complete your operation when it will impact as few workers as possible.</li> </ol>
	Tool Malfunction	<ol style="list-style-type: none"> <li>6. Inspect and test saw prior to use.</li> <li>7. Make sure all manufacturer's protective devices (guards) are in place and operational.</li> </ol>
	Electric Shock	<ol style="list-style-type: none"> <li>8. Electric saws should be approved, double-insulated. If not, it should be properly grounded and plugged into a GFCI-protected outlet.</li> <li>9. Cords should not lie in water.</li> </ol>

JOB STEPS	HAZARDS	ACTIONS TO ELIMINATE OR MINIMIZE HAZARDS
MOBILIZE EQUIPMENT	<ul style="list-style-type: none"> <li>Surface Encumbrances</li> <li>Struck By (Equipment)</li> <li>Backed Over</li> </ul>	<ol style="list-style-type: none"> <li>1. All surface encumbrances shall be moved or supported, as needed, to safeguard employees.</li> <li>2. Workers shall wear hard hats, high-visibility safety vests, and safety glasses.</li> <li>3. Equipment operators shall use a spotter when they have an obstructed view to the rear.</li> <li>4. All non-essential workers shall remain outside of the equipment's swing radius and the excavation zone.</li> <li>5. Essential personnel will remain in a location where they can be seen by the operator at all times.</li> <li>6. All equipment shall have operational back-up alarms</li> </ol>
LOCATE UTILITIES	<ul style="list-style-type: none"> <li>Utility Damage</li> </ul>	<ol style="list-style-type: none"> <li>1. All underground utilities that may be encountered during the excavation must be located and marked prior to breaking ground.</li> <li>2. While the excavation is open, underground utilities shall be protected, supported, or removed as necessary to protect employees.</li> </ol>

JOB STEPS	HAZARDS	ACTIONS TO ELIMINATE OR MINIMIZE HAZARDS
Excavation & Trenching	<ul style="list-style-type: none"> <li>Cave In</li> <li>Struck By</li> <li>Electrocution</li> <li>Toxic Atmosphere</li> </ul>	<ol style="list-style-type: none"> <li>1. Spoil piles will be placed a minimum of 2 feet away from the edge of the excavation/trench.</li> <li>2. All excavations shall be properly sloped, benched, or shielded. The Competent Person on site will determine which method to use.</li> <li>3. Stairways, ladders, or ramps shall be located in excavations or trenches that are more than 4 feet in depth. They shall be placed such that no worker is required to travel more than 25 feet laterally for access.</li> <li>4. Ladders shall be secured and extend 3 feet above the point of access.</li> <li>5. Metal ladders may not be used where they may contact electrical lines.</li> <li>6. No worker is allowed beneath loads handled by lifting or digging equipment.</li> <li>7. A warning system shall be used to delineate the edge of the excavation if an operator cannot see the edge of the excavation from the cab of his machine.</li> <li>8. All excavations shall be inspected daily by the Competent Person.</li> <li>9. Workers shall not enter excavations where water has accumulated.</li> <li>10. The atmosphere shall be tested before workers enter an excavation or trench if a hazardous atmosphere exists or could reasonably be expected to exist. Typical excavations include, but may not be limited to, excavations in landfill areas or excavations in areas where hazardous substances are stored nearby.</li> <li>11. An emergency rescue plan should be in place before work begins inside an excavation.</li> </ol>

JOB STEPS	HAZARDS	ACTIONS TO ELIMINATE OR MINIMIZE HAZARDS
REBAR INSTALLATION	<ul style="list-style-type: none"> <li>Struck By (Hot Metal)</li> <li>Cuts/Lacerations</li> <li>Mill scale</li> <li>Sharp/Sheared Tire Wire Ends</li> <li>Trips/Falls</li> <li>Impalement Hazard</li> <li>Overhead Power Lines</li> </ul>	<ol style="list-style-type: none"> <li>1. Workers cutting rebar will wear face shields, gloves, hearing protection, and hard hats.</li> <li>2. Grinder guards must be in place and fully operational prior to use.</li> <li>3. Lathers will wear safety glasses, gloves, and hard hats.</li> <li>4. Construction debris will be removed on a daily basis.</li> <li>5. All rebar ends shall be capped to protect workers from impalement/laceration hazards.</li> <li>6. If possible, stack rebar in a location that is free from overhead power lines. If this is not possible, rebar will be moved forward and away from the power lines before being lifted.</li> </ol>
PLACING CONCRETE	<ul style="list-style-type: none"> <li>Redi Mix Truck Placement</li> <li>Struck By/Caught Between (Equipment)</li> <li>Hand Injuries</li> <li>Eye Injuries</li> <li>Concrete Burns</li> </ul>	<ol style="list-style-type: none"> <li>1. Use qualified flagmen to ensure a clear path to the work zone.</li> <li>2. The redi mix truck will have an operational back-up alarm.</li> <li>3. Only the truck's operator will place the chute and run the mixer.</li> <li>4. Wear safety glasses when working with wet concrete.</li> <li>5. Wear impervious gloves when working with wet concrete.</li> <li>6. Wash off any excess concrete from your skin as soon as possible.</li> </ol>

# Keys to success

- Tenant team: ensure that personnel with qualifications appropriate to the scope of work are on board for the full length of the project.
- Tenant coordinator: inform the tenant as early as possible, providing reference documents (TCAP Manual, HASP Checklist and FAQs) and set expectations.
- Review group: attend more kick-off meetings as we receive more invitations, promote training, meeting with RE and contractor when returning HASP “not accepted”
- Communication: Communicate with RE, Tenant Coordinators if the first submission receives comments. Request meetings to clarify items with contractor.

# How to Measure Success

- As part of the TCAP team, our ultimate goal is that the tenant can open for business in a safe and compliant manner.



**Contributors:**

**Ryan Munoz  
Alonso-Cecere, Eva  
Matthew McArdle**

**THANK YOU!**

**January 3, 2023**

The Port Authority of New York and New Jersey  
Office of the Chief Health and Safety Officer  
Agency Safety Management/Safety Assurance Unit

# We would like to hear from you



Thank you for your time, please share your comments with us by taking this short survey anonymously just scan the QR code or [click here](#)