

# Project-Specific Corrective Action Plan

Contractor: District Plumbing  
 Project: District Avenue Expansion  
 Anticipated start date: June 1, 2019  
 Anticipated end date: November 30, 2020  
 Anticipated crew size at peak: 35

## Risk Identification & Action Plan

Risk Identification	Action Plan
Elevated TRIR and DART Rates	<p>In reviewing our incident history we acknowledge that the majority of our injuries have occurred while working overhead handling and installing ductwork. Injuries have included strains and sprains from awkward positions and cuts/lacerations from sharp edges.</p> <p>For this project we will:</p> <ol style="list-style-type: none"> <li>1. Develop detailed job hazard analysis for ductwork installation that specifically addresses body positioning, use of mechanical aids, ladders as a last option, and use of hand protection.</li> <li>2. Each employee will be involved in a detailed review of the JHA prior to starting on site.</li> <li>3. The JHA will be reviewed weekly and updated as necessary based on observations in the field and changing conditions.</li> </ol>
Previous OSHA violations	<p>In the last 3 years we have received 2 OSHA violations related to improper use of ladders. We recognize that these violations were the result of inadequate training and a lack of enforcement. We have rewritten our ladder safety program and have retrained our workforce. Understanding that ladders will always be used on our sites we will:</p> <ol style="list-style-type: none"> <li>1. Implement daily inspections of ladders before use. These inspections will be documented.</li> <li>2. Inspect our work each day with a focus on safe ladder use. Any worker using a ladder improperly or that has failed to inspect their ladder prior to use will be retrained immediately.</li> <li>3. We will review our inspection data at the start of each week with the entire crew and focus on any at-risk observations.</li> </ol>

No full-time safety manager	Today, District Plumbing does not employ a full-time dedicated safety manager. Per our contract agreement we have hired a safety consultant that will visit the project twice per week to conduct inspections, help prepare and modify job hazard analysis, and conduct training focused on current jobsite activities and any areas of emerging risk.
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## Implementation, Monitoring & Communication

Frequency	Meeting Type	Purpose
<b>Weekly</b>	Schedule, Data, and JHA Review	<p>On a weekly basis our Project Manager, Foreman, and Safety Consultant will meet with the project team to:</p> <ol style="list-style-type: none"> <li>1. Review the next week's schedule and identify any high risk or non-routine work. Existing JHA's will be revised or new JHA's will be developed accordingly.</li> <li>2. Review aggregated inspection data, discuss, and address any emerging trends. Retrain workers and/or adjust JHA's.</li> <li>3. Review current JHA's to make sure they are relevant and adequately address hazards that are present on site. Ensure that all crew members have reviewed and been trained to understand elements of the JHA's.</li> </ol>
<b>Monthly</b>	Management System Audit	<p>On a monthly basis we will collaborate with the GC to conduct a management system audit.</p> <p>Making sure that deliverables are being executed including:</p> <ol style="list-style-type: none"> <li>1. Orientation</li> <li>2. Substance Abuse Testing</li> <li>3. JHA Review</li> <li>4. Frequency of inspections</li> <li>5. Toolbox talks</li> <li>6. Incident investigations</li> <li>7. Participation in weekly foreman's meetings</li> </ol>