

## **Goodfellow SSSP Plan Review Checklist**

This is a guide to what a Goodfellow Site Specific Safety Plan (SSSP) should contain. Upon review, these are the items we are looking for in an SSSP that will allow us to determine if the contractor submitting the plan understands the safety and health requirements of the job they are performing as they relate to the contaminants they may be exposed to. Most importantly we have to do our due diligence to ensure the work contractors are performing does not jeopardize the safety and health of our GSA employees, the tenants, or other contractor employees on site. Generally, a SSSP should contain the following:

### 1) Title of Document:

- Document title should include "Site-Specific Safety Plan" as part of description.

### 2) Date of Plan:

- Include the date of when the plan was written. If revisions are made to the initial plan, the new revision date can be used or the original date with the revision number can be used, i.e., October 12, 2017, Revision 1.

### 3) Introduction:

- Brief acknowledgement that there is an understanding that the site is contaminated.

### 4) Location and Description of Work:

- Describe the work you intend to perform and all the contaminated spaces you intend to perform it in.
  - Currently, GSA has identified the following areas as contaminated: all spaces above suspended ceilings and below the raised floors on the first and second floor of every building, all building HVAC air handlers, VAV's, and ductwork, all penthouses, all mechanical rooms, all electrical closets, all telephone closets, all substations/electrical vaults (PCBs embedded into concrete floors, and lead and heavy metal dust on surfaces ), all utility tunnels, all building basements (concrete floors), all building basement crawl spaces (in addition to other contaminants, dirt floor is also contaminated with up to 35% friable asbestos), all sump pump/groundwater and exterior grounds. This is not an all-inclusive list. If you identify a space or a contaminant not listed, please notify GSA immediately.

## 5) Hazard Assessment

- Assessment
  - Your evaluation of the hazards (contaminants) in the contaminated spaces you intend to perform your work in.
- Personal Protective Equipment (PPE) Required
  - PPE you are requiring your employees to use while working in the contaminated space(s).
- Responsibilities
  - Describe who is responsible for the plan and who is going to ensure it is complied with. Provide Name, Title, and Contact Information.
  - Signature of person responsible for the plan.

## 6) Operating Procedures

- Must include the work practices and procedures you plan on using to keep your workers safe, i.e. steps employees must take to enter the space, work safely in the space, and what they need to do after exiting the space.
- Must include decontamination, disposal and clearance procedures for contaminated materials/PPE.
- Must include requirement to post signage and/or controls your employees will use so other complex personnel don't accidentally enter the space while your employees are performing work.
- Must include requirement to coordinate and communicate all contractor activities through the GSA St. Louis West Field Office.
- Must include how you plan on "clearing the space" if your activities stir up/make contaminants airborne before releasing the space back to GSA/tenants. Clearance criteria must be known prior to work.
- Must include requirement that all work will be performed after business hours/when tenants are not present.
- Must include how you intend to close off/isolate the air plenum in the space above the suspended ceiling between the space you are working in and other spaces so contamination made airborne by your work activities is not spread.

- Negative Exposure Assessments (NEA) – A negative exposure assessment demonstrates that employee exposure during an operation is consistently below the permissible exposure limit (PEL) established by OSHA for a contaminant. You can show an NEA by one of the following
  - Objective data demonstrating that work activities cannot release airborne contaminants in excess of the 8-hour Time-Weighted Average (TWA) PEL;
  - Exposure data obtained within the past 12 months from prior monitoring of work operations closely resembling the employer's current work operations; or
  - Current initial exposure monitoring that used breathing zone air samples representing the 8-hour TWA and 30-minute short-term exposures for each employee in those operations most likely to result in exposures over the 8-hour TWA PEL for the entire job. If you chose to perform a NEA (optional), you must include a sampling plan and statement that GSA will be provided and accept all NEAs (including supporting documentation and sampling data) before you are allowed to implement it.
  
- Must include how you intend to close off/isolate spaces that open to the exterior so contamination made airborne by your work activities is not spread. Also, plan must include methods to prevent tracking of contaminants from the space into the exterior.

#### 5) Emergency Procedures

- Must include your emergency contacts, emergency/accident procedures (hospital location, first aid, etc.).