SITE-SPECIFIC HAZARD MANAGEMENT PLAN

Plan the Project. Control Each Phase. Reassess Every Change.

POLICY STANDARD	Every project shall maintain a written, current Site-Specific Hazard Management Plan before mobilization and throughout the work. The plan shall identify project hazards, required controls, responsible competent and qualified persons, emergency arrangements, inspection frequency, subcontractor coordination and triggers for reassessment.

PHEIFER BROTHERS CONSTRUCTION CO., INC.

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NOT A SUBSTITUTE

This plan coordinates project hazards but does not replace detailed regulatory programs, engineered plans, permits, manufacturer instructions, exposure-control plans, rescue plans, operator qualifications or daily JHAs. The plan is not all-inclusive; unforeseen hazards shall be stopped, evaluated and controlled before work continues.

Primary References

- 29 CFR 1926.20 - employer accident-prevention programs and competent-person inspections
- 29 CFR 1926.21 - employee instruction in recognition and avoidance of hazards
- 29 CFR 1926.32 - competent and qualified person definitions
- 29 CFR 1926.35 - emergency action plan elements when applicable
- OSHA Multi-Employer Citation Policy, CPL 02-00-124
- Applicable OSHA construction standards, WisDOT/project requirements and manufacturer instructions

1. Purpose, Scope, Definitions and Responsibilities

Purpose and Scope

- Provide one controlled project framework for identifying, assigning, communicating and verifying safety controls from bid turnover through final demobilization.
- Applies to every Pheifer Brothers project, including short-duration and service work, and to hazards created by or affecting employees, subcontractors, suppliers, visitors and the public.

Definitions

- Site-Specific Hazard Management Plan (SSHMP): project-level document describing actual work, hazards, controls, responsibilities and coordination.
- JHA/pre-task plan: task- and shift-level review completed with the crew before work and when conditions change.
- Competent person: person capable of identifying existing/predictable hazards and authorized to take prompt corrective measures.
- Qualified person: person with recognized knowledge, training and experience who has demonstrated ability to solve technical problems for the subject.
- Residual risk: risk remaining after controls are implemented and verified.

Management / Document Owner

- Maintain this policy, provide resources and assign a job-title-based owner such as Operations Manager, Risk Manager or designated Safety Program Administrator.
- Review high-risk plans, unresolved hazards, serious trends and required outside professional support.

Project Manager

- Lead preconstruction hazard review, obtain drawings/specifications/owner requirements, coordinate engineering and resources, and approve the initial project plan.

Foreman / Project Competent Person

- Maintain the plan in the field; lead daily planning; verify training, inspections and controls; coordinate other employers; document changes and stop unsafe work.

Employees and Subcontractors

- Participate in planning, follow the applicable plan and training, report hazards/changes, and use stop-work authority. No one may proceed beyond their training or authorization.

2. Preconstruction and Project Startup Review

Bid / Turnover Review

- Review contract, plans, specifications, schedules, permits, owner/WisDOT requirements, utility and railroad agreements, environmental commitments, geotechnical/structural information and known hazardous-material surveys.
- Identify high-risk scopes, lead times, engineered controls, specialty contractors, monitoring, training and rescue resources before mobilization.

Site Reconnaissance

- Walk the project where accessible and document traffic, public access, terrain, water, rail, overhead/underground utilities, structures, demolition conditions, access limits, emergency response routes, adjacent property and simultaneous operations.
- Do not rely solely on drawings or prior projects. Verify actual conditions and record unknowns requiring investigation.

Work Breakdown / Phases

- Divide the project into meaningful phases: mobilization/work-zone setup, utilities, excavation/cofferdam, demolition, pile driving, substructure, falsework/formwork, steel/girders, deck work, coatings, restoration and demobilization as applicable.
- For each phase identify hazards, required programs/plans, competent/qualified persons, inspections, training, PPE, emergency/rescue and coordination.

Initial Risk Register

- Create a project hazard register showing hazard/source, exposed people, existing controls, additional action, responsible person, due date and verification/status.
- Prioritize potential fatalities and serious injuries: traffic intrusion, falls, cranes/rigging, collapse, excavation, water, electrical/utility, confined space, demolition, silica/lead and mobile equipment.

Pre-Mobilization Gate

- Do not begin exposure until required permits/locates, site emergency plan, traffic controls, sanitary/medical resources, competent persons, training and critical equipment are in place.
- Open items shall have temporary controls, owner and due date; unresolved high-risk items prevent mobilization or the affected phase.

3. Required Site-Specific Plan Elements

Project Identification

- Project name/number, owner/controlling contractor, location/address/GPS, project contacts, schedule, normal shifts, crew/subcontractors and plan revision/date.
- Identify the document owner, preparer, approver, field custodian and method for employees to access the current plan.

Site Layout and Logistics

- Attach or reference a current site sketch showing entrances, internal routes, parking, material/equipment zones, public interface, utilities, crane/pile-driving areas, excavations, water, rail, emergency access, assembly point and severe-weather shelter.
- Update layout as phases, closures, ground conditions or access change.

Hazard and Control Matrix

- List each phase/task, people exposed, credible hazards, selected controls, controlling program/standard, responsible person, inspection/monitoring and stop-work trigger.
- Identify residual risks and how they are communicated to each shift and employer.

Required Assignments

- Name by job title and individual, as appropriate: project manager, foreman, competent/qualified persons, crane lift director, signal persons, first-aid/CPR responders, emergency coordinators and primary/backup contacts.
- Assignments are valid only when the person has the required knowledge, authority, availability and task-specific qualification.

Emergency and Rescue

- Reference the completed Project Emergency Action Plan with exact address/GPS/access, 911 roles, hospital, communication, accountability, severe weather and task-specific fall/water/confined-space/excavation rescue.

Document Index

- List the controlled policies, plans, engineering, permits, drawings, SDSs, exposure data, inspections, qualifications and forms applicable to the project, including their location/revision.

4. Hazard Identification, Risk Evaluation and Controls

Hazard Identification Methods

- Use plan/specification review, site walks, employee input, JHAs, equipment manuals, SDSs, exposure data, incident/near-miss history, competent-person inspections and owner/subcontractor coordination.
- Evaluate routine, nonroutine, startup/shutdown, maintenance, delivery, cleanup, emergency and adjacent-crew exposure.

Risk Evaluation

- Consider severity, likelihood, frequency/duration, number exposed, uncertainty, changing conditions and potential for a single failure to cause fatal/serious injury.
- Uncertainty raises the need for investigation and conservative interim control; lack of injury history is not proof of low risk.

Hierarchy of Controls

- Eliminate the hazard or redesign the work first; substitute safer materials/methods; use engineering controls; then administrative controls; use PPE for remaining exposure.
- Examples include road closure instead of flagging alone, prefabrication at ground level, guardrails instead of relying only on harnesses, wet cutting/local exhaust before respirators, and equipment/pedestrian separation before high-visibility apparel.

Control Quality

- Controls shall be specific and verifiable: identify equipment, capacity, location, boundary, responsible person, inspection, training and failure trigger. Statements such as 'be careful' are not controls.
- Account for interactions; a containment may add wind/load/noise hazards, water suppression may add slip/electrical hazards, and a traffic shift may change crane access.

Stop-Work Triggers

- Define observable conditions requiring pause: utility not positively identified, lost traffic protection, people inside fall/swing zone, wind beyond limit, water rise, ground movement, missing rescue capability, failed monitoring/control or work outside the approved plan.

Verification

- Before exposure, the responsible person confirms controls are installed, working and understood. Re-verify during the task and after change, interruption or handoff.

5. Competent, Qualified and Authorized Persons

Designation Matrix

- Maintain a project matrix for each required role: subject/task, regulatory basis, individual, employer, evidence of knowledge/training/experience, authority, limitations, shift/availability and alternate.
- Common subjects include excavation, scaffolds, silica, lead/asbestos, confined space, cranes/rigging/signals, fall protection, demolition, electrical, temporary works, traffic control and first aid.

Authority

- A competent person must have authority to stop work and correct hazards. A title or training card without authority and field presence does not satisfy the role.
- Qualified-person/engineer design decisions shall be documented and communicated to the field; the foreman may not alter engineered requirements.

Availability and Coverage

- Plan coverage for each shift, weekend/night work, remote crews and absences. Stop the regulated activity when the required person is unavailable.
- One person may fill multiple roles only when actually qualified, able to perform all duties and free from conflicting assignments.

Authorized Operators / Workers

- Verify licenses, certifications, employer evaluations and task-specific authorizations for cranes, forklifts, aerial lifts, powered equipment, powder-actuated tools, respirators and specialty work.
- Subcontractor cards/certificates shall be reviewed with actual competence, equipment and scope; documentation alone is not proof of safe performance.

Orientation and Communication

- Introduce key responsible persons during orientation/pre-task briefing and explain how to contact them and who has stop/release authority.
- Use job titles in controlled templates; update names immediately when staffing changes.

Records and Review

- Project manager/foreman review designations before each phase and after personnel, scope or regulatory changes. Preserve evaluations and supporting records.

6. High-Hazard Work Plans and Permit Controls

Work Requiring Additional Planning

- Identify before scheduling: demolition, major/critical lifts, steel/girder erection, pile driving, excavation/cofferdams, confined-space entry, work over water, railroad work, high-energy electrical/LOTO, blasting/coating, lead/asbestos/silica and night/live-traffic operations.
- Other nonroutine or high-consequence work receives equivalent planning even if not listed.

Minimum Work-Plan Content

- Scope and sequence; drawings/method; equipment/capacity; responsible competent/qualified persons; hazards and controls; exclusion zones; access; communication; inspection/testing; emergency/rescue; weather/environmental limits; permits and hold points.
- Plan the transition into and out of the phase, including delivery, assembly, temporary stability, cleanup and demobilization.

Engineering and Temporary Works

- Falsework, formwork, shoring, cofferdams, bracing, scaffold supports, lifting points, demolition sequence and structural loading require qualified/engineered design as applicable.
- Maintain current stamped/approved drawings where required. Field changes need documented designer approval before implementation.

Permits / Hold Points

- Use required permits for confined-space entry, hot work, excavation/utility, railroad/owner access and other project systems. A permit verifies conditions at the stated time; it is not blanket authorization.
- Establish hold points before concrete placement, form stripping, member release, energization, entry, critical lift or removal of temporary support.

Pre-Work Meeting

- Review the plan with involved employees, operators, subcontractors and controlling contractor. Confirm roles, signals, boundaries, emergency actions and stop conditions.
- Record questions and corrections. Work starts only after controls and required approvals are verified.

Closeout

- Cancel permits, remove temporary hazards, secure incomplete work, document inspections and communicate remaining restrictions to the next crew/phase.

7. Traffic, Public, Railroad, Utility and Environmental Interfaces

Live Traffic / Internal Traffic

- Coordinate the approved traffic-control plan with actual equipment/crew movements. Identify speed, positive protection, intrusion exposure, escape routes, spotters, backing, deliveries, lighting and emergency access.
- Develop an internal traffic-control plan separating workers from equipment and public vehicles; update when stages change.

Public and Adjacent Property

- Control pedestrians, businesses, residents, deliveries, waterways and property access with barriers, signs, scheduling, overhead/falling-object protection and authorized communication.
- Do not expose the public to suspended loads, open excavations, unsecured materials, demolition debris, blasting dust or equipment routes.

Railroad

- Identify railroad owner, right-of-entry, flagging, protective services, clearances, track windows, emergency contacts and submittals. Railroad requirements may exceed OSHA and govern access.
- No work fouling track or affecting railroad structures without authorization and required protection.

Utilities

- Use Wisconsin one-call/owner procedures, preserve marks and positively identify utilities within the tolerance zone. Address private utilities, overhead lines, temporary power and utility-owner requirements.
- Plan response to contact, damage, leak or unknown line; stop, evacuate as appropriate, call 911/utility and do not conceal damage.

Water / Environmental

- Address flooding, currents, navigation, spill prevention, dewatering, turbidity, contaminated soil/water, protected areas and permit conditions.
- Coordinate environmental controls with safety; do not enter unstable banks, contaminated releases or water hazards to save equipment/material.

Weather / Night Work

- Define lightning, wind, heat/cold, flood, snow/ice and visibility thresholds. Identify shelter, monitoring and decision authority.
- Night plans address minimum task illumination, glare/shadows, traffic visibility, fatigue and backup communication.

8. Subcontractor and Multi-Employer Coordination

Prequalification and Submittals

- Before work, obtain the subcontractor's scope, competent/qualified persons, training/authorization, equipment inspections, SDSs, exposure controls, engineered plans, emergency contacts and high-hazard methods as applicable.
- Review for interface and completeness; acceptance does not transfer the subcontractor's employer responsibilities.

OSHA Multi-Employer Roles

- Recognize that an employer may be creating, exposing, correcting and/or controlling. More than one employer may have responsibility for the same condition.
- Pheifer Brothers protects its employees even when another employer created the hazard and exercises reasonable care consistent with its authority when serving as controlling employer.

Coordination Meeting

- Before mobilization and each new phase, exchange schedules, work zones, energy sources, utilities, traffic routes, cranes, excavations, overhead/fall zones, chemical/noise/dust exposure and emergency/rescue arrangements.
- Identify who installs, inspects, controls, corrects and removes shared systems such as guardrails, scaffold, temporary power, traffic devices and access.

Daily Coordination

- Foremen discuss simultaneous work, deliveries, changing boundaries and handoffs. Communicate changes to every affected employer before exposure.
- Do not assume another employer's barricade, permit, inspection, monitoring or rescue plan covers Pheifer Brothers employees.

Hazard Correction

- Stop or isolate imminent danger. Notify the creating/controlling/correcting employer, document the condition and verify correction before reentry.
- If another employer does not correct a hazard, elevate to project management/owner and protect or remove Pheifer Brothers employees.

Performance

- Track inspections, incidents, repeated violations and corrective-action closure. Use contractual remedies consistently while maintaining nonretaliatory reporting and stop-work rights.

9. Daily Planning, Communication and Change Management

Daily Pre-Task Planning / JHA

- Before each shift/task, the foreman and crew review actual steps, hazards, controls, roles, equipment, simultaneous operations, emergency actions and stop triggers.
- Employees participate and ask questions. Signatures document participation but do not replace discussion or understanding.

Weekly Toolbox Talks

- Each active crew completes a relevant documented weekly toolbox talk; the Monday topic should match current work, observation, incident, season or policy reinforcement.
- Toolbox talks supplement - not replace - task, operator, competent-person, respirator or regulatory training.

Shift Handoffs

- Communicate incomplete work, energization/LOTO, excavations, temporary supports, suspended restrictions, weather/water changes, defective equipment, barricades and open corrective actions.
- Incoming supervision verifies conditions; a prior shift's inspection does not replace required current inspection.

Management of Change

- Reassess after scope/sequence/design changes; new equipment/material/subcontractor; weather; incident/near miss; utility discovery; traffic switch; ground/water movement; extended shutdown or failed control.
- Update affected SSHMP pages, hazard register, JHA, EAP, permits, drawings and training. Record revision, reason, author/approval and employees briefed.

Communication Methods

- Use orientations, preconstruction/coordination meetings, JHAs, toolbox talks, postings/maps, radios/signals, Raken or approved records and direct briefings in language/vocabulary employees understand.
- Post only the current controlled plan. Remove superseded versions or clearly mark them obsolete.

Stop / Restart

- Changed work stops at a safe point until hazards are evaluated, controls approved/installed and affected persons rebriefed. Schedule pressure is not approval to proceed.

10. Inspections, Corrective Actions and Stop-Work Authority

Frequent and Regular Inspections

- Designated competent persons perform frequent and regular inspections of jobsite conditions, materials and equipment as required by 1926.20 and topic-specific standards.
- Define frequency by hazard: daily/shift, before use, after event, weekly or periodic. The SSHMP index identifies responsible person and record.

Inspection Focus

- Prioritize fatal/serious hazards, plan-control verification, public/multi-employer interfaces, changing phases and recurring conditions. Include remote and night work.
- Observe work practices and speak with employees; paperwork alone is not an inspection.

Corrective Action System

- Record condition, location/photo, immediate protection, responsible owner, priority/due date, root/contributing factors, permanent correction and verification/close date.
- Correct imminent danger before exposure. Temporary controls require monitoring and a timely permanent solution.

Stop-Work Authority

- Every employee may stop work in good faith without retaliation when a hazard is uncontrolled, conditions differ from the plan, required person/equipment is absent or an emergency develops.
- Stop signal shall be acknowledged. Move to a safe condition, notify the foreman and protect others; do not argue inside the hazard zone.

Restart Authority

- Only the responsible foreman/competent/qualified person, as applicable, may release work after correction, inspection and communication. Engineered or permit controls require the designated approval.
- Document significant stops and lessons learned; share across crews/projects when applicable.

Trends and Accountability

- Project management reviews overdue actions, repeat findings, near misses and leading indicators. Address planning, procurement, staffing or supervision causes - not only employee behavior.
- Willful bypass of controls or falsification is subject to corrective action; reporting hazards and stopping unsafe work are protected expectations.

11. Emergency, Incident, Training, Records and Review

Site Emergency Action Plan

- Complete and maintain the separate project EAP before mobilization: exact address/GPS/access, who calls 911/meets responders, hospital, alarms, evacuation, assembly/accountability, severe-weather shelter and rescue resources.
- Coordinate with owner, controlling contractor, subcontractors, railroad/utility and emergency services as hazards require. Conduct drills appropriate to fall, water, confined-space, evacuation or other high-risk work.

Incident and Near-Miss Response

- Provide care, call emergency services, secure/preserve the scene and notify management. Report all injuries, illnesses, property/environmental events and near misses under company policy.
- Authorized management completes OSHA severe-event reporting within required deadlines and evaluates recordkeeping; the project team does not delay emergency care or disturb evidence.

Training / Orientation

- Before exposure, orient employees to site layout, hazards, PPE, traffic, access, emergency plan, reporting and stop-work. Provide task/regulatory training and verify competence/authorization.
- Retrain after plan/control changes, incident, observed deficiency or new assignment. Maintain language/vocabulary employees understand.

Records

- Maintain current SSHMP/revisions, hazard register, site maps, competent-person matrix, JHAs, toolbox talks, orientations, training, inspections, exposure data, permits, engineering, subcontractor coordination, incidents and corrective actions.
- Protect medical/confidential records and provide employee access as required. Printed copies are uncontrolled unless formally issued.

Review and Closeout

- Review at least weekly at the project level, before each new phase and after significant change/incident. Management audits plan effectiveness periodically.
- At closeout, address demobilization hazards, transfer records, document lessons learned and remove/secure temporary systems.

Limitation

- No plan can anticipate every hazard. Employees shall use good judgment, follow training and report unforeseen conditions; work resumes only after evaluation and effective control.

12. Project Hazard Management Worksheet

VERIFY	PROJECT EXPECTATION
Project control	Project/name/number, owner, location/GPS, contacts, revision and current-plan access
Phases	Major work phases, dates, crews/subcontractors and transition/hold points listed
Fatal/serious hazards	Traffic, falls, crane/rigging, collapse, excavation, water, electricity, demolition, exposure
Control hierarchy	Elimination/substitution/engineering considered; residual controls specific and verifiable
Responsible people	PM/foreman, competent/qualified persons, operators, emergency roles and alternates
Plans / permits	EAP, traffic, lift, demolition, excavation, confined space, exposure and engineered plans
Interfaces	Public, rail, utilities, water/environment, adjacent employers and deliveries coordinated
Training	Orientation, task/regulatory training, JHA/toolbox and language needs verified
Inspections	Required type/frequency/person/record and after-event inspections scheduled
Change triggers	Scope, crew, equipment, utility, traffic, weather, incident and failed control reassessment
Actions	Open items have protection, owner, due date and verified closeout
Emergency	Access, 911 roles, hospital, accountability, weather and rescue arrangements current

PROJECT / NUMBER:	DATE / REVISION:
PROJECT MANAGER:	FOREMAN:
CURRENT PHASE / NEXT PHASE:	COMPETENT / QUALIFIED PERSONS:
TOP HAZARDS / STOP TRIGGERS:	OPEN ACTIONS / OWNER / DUE:
CHANGES / EMPLOYERS BRIEFED:	REVIEW / APPROVAL:

13. Test Your Knowledge

Circle the best answer. Review missed questions with your foreman.

1. When must the project plan be completed? A. After the first incident B. Before mobilization/exposure and kept current C. At project closeout	2. Does the SSHMP replace daily JHAs? A. No B. Yes C. Only on short projects
3. What should happen when actual conditions differ from the plan? A. Continue carefully B. Note it at week's end C. Stop, reassess, control and rebrief	4. What must a competent person have in addition to hazard knowledge? A. A management title B. Authority to take prompt corrective action C. Ten years of service
5. Which is the strongest control? A. Eliminate or redesign the hazard B. Add a warning sign C. Require employees to be careful	6. Who may stop work for an uncontrolled hazard? A. Only the project manager B. Only OSHA C. Any employee acting in good faith
7. What does accepting a subcontractor plan do? A. Transfers all responsibility B. Coordinates the work but does not transfer employer duties C. Eliminates inspections	8. What belongs in a corrective-action record? A. Condition, protection, owner, due date and verified closeout B. Only a photo C. Only the employee's name
9. When is the plan reviewed? A. Only annually B. Only if the owner requests C. Regularly, before phases and after changes/incidents	10. What should happen with superseded plan copies? A. Leave all versions posted B. Remove or clearly mark them obsolete C. Give them to new employees

EMPLOYEE: _____ DATE: _____

ANSWER KEY: 1-B | 2-A | 3-C | 4-B | 5-A | 6-C | 7-B | 8-A | 9-C | 10-B