



Environment, Safety, and Quality (ESQ) Guidance for Subcontractors Working with ECC

Core Values and Beliefs

Friendship

People

Safety

Service

Prosperity

Dear Prospective Subcontractor:

If you are considering bidding on one of our projects, we should get to know each other. ECC has always had a strong focus on environmental protection, safety, and quality (ESQ). The purpose of this document is to explain our expectations of you throughout the *Project Life Cycle*.

Over the last several years, our safety performance has been continuously improving. Our OSHA Recordable Case Rates continue to be much better than industry averages and we continue to receive recognition for our outstanding Safety program from OSHA and the National Safety Council. In addition, our clients are very pleased with the quality of our work. Our client satisfaction has resulted in repeat business and is a significant factor in our success.

Our goal on each and every project is *performance excellence that results in zero negative impacts*. We ask all of our subcontracting partners to join us in committing to a goal of zero job related injuries and illnesses; zero property damage incidents; zero fires; zero environmental releases; zero chemical exposures above recognized limits; and zero quality failures that result in rework or the creation of hazards to others.

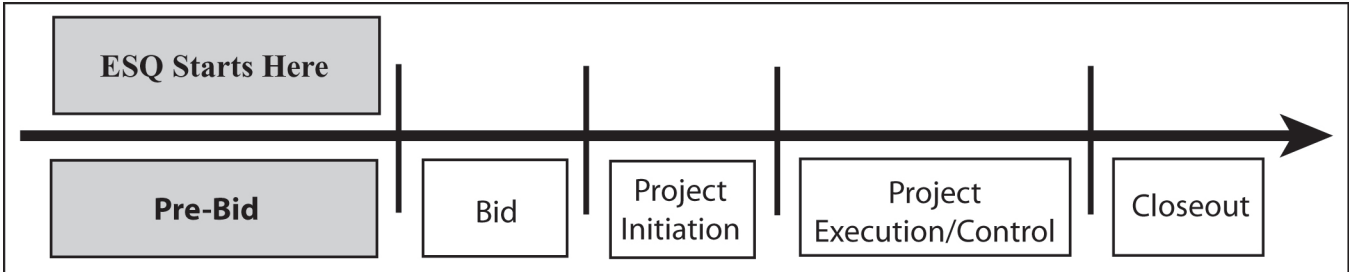
Please review our Core Values and Beliefs (left). If you can commit your organization to display these values and to join us in our goal of performance excellence, please tell us about your team. We invite you to visit www.ecc.net and complete the subcontractor registration forms.

Sincerely,

Richard Gioscia, CIH, CSP, CQM, CHMM
ECC
Vice President
Environment, Safety and Quality
Cell: 303.898.8859

Project Life Cycle

PRE-BID



ESQ Pre-Qualification

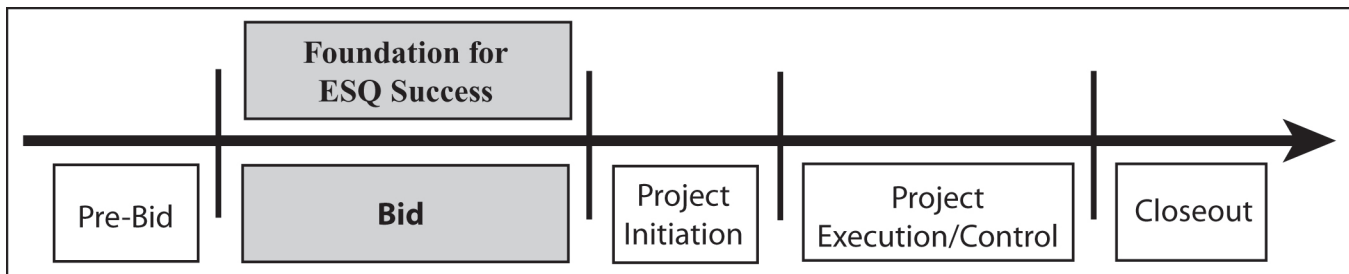
Part of the registration process is completing the on-line ESQ Questionnaire (see next page). Full disclosure is a necessary step in establishing our relationship. In addition to filling out this form on-line (or using the paper copy attached), you must send us the following:

- A letter from your workers compensation insurance carrier documenting your company's EMR for the last 3 years
- Copies of your OSHA 300 Logs and 300A Summaries for the current and previous three years
- Copies of any OSHA Citations and Notices of Violations (NOV) from environmental regulatory agencies
- The Table of Contents of your written Safety and Health and Quality Control Programs
- An explanation of what you have been doing to improve your work environment if during the current or past three calendar years, you have had: a fatality; an EMR greater than 1.0; an OSHA Recordable rate greater than your industry average; or a Citation or NOV from a government agency.

Budget Estimates

If you have been asked to provide a budget estimate in advance of bidding an actual opportunity, please read through the rest of this packet. You will need to understand our expectations so you can include all costs in your estimate.

BID PHASE



At ECC, we believe that properly bidding the work is the foundation for successful execution. Failing to properly account for safety and quality in your schedule and pricing will pose a risk to our joint success. To ensure a fair and seamless competitive process, we must make several commitments to each other.

Our Commitments to You

- To provide a clear and detailed scope of work, to identify the safety and quality standards you will be expected to meet, and to clarify any issues raised during the bidding process
- To provide your team with on-going education on ECC values and ESQ expectations
- To provide you with suggestions for safety and quality improvements
- To provide you with information on known hazards on the project so that you can plan for their mitigation
- To answer your questions.

ECC - Never Compromising Safety



USA ESQ Questionnaire

Company Name:	Primary NAICS Code:
ECC Project Name/Location/Dates (if applicable):	Purchase Order No. (if available):

Loss History	Current Year	Last Year	Previous Year	Previous Year
Experience Modification Rate (EMR) <i>(Attach verification letter from your workers' comp carrier)</i>				
Number of Fatalities <i>(Including those of subcontractors under your control)</i>				
Number of OSHA Recordable Injuries/Illnesses <i>(Attach an OSHA 300 Form for each year listed)</i>				
Number of cases with days away from work				
Total Employee Hours Worked by Year				

Environmental Health and Safety Compliance History

The following compliance questions relate to your company and operations over the past 5-year period. The term company is inclusive of all operations nationwide, all companies and operating divisions, and all company names currently and previously used.

- Has OSHA (federal or state) issued any citation(s) to your company? Yes No
- Has OSHA (federal or state) issued any citation(s) to subcontractors working on projects or sites managed by your company? Yes No
- Are there any past or pending environmental enforcement actions or environmental compliance violations for your company or subcontractors working on projects or sites managed by your company? Yes No

If yes to one of the above questions, attach a copy of the violation, citation, or enforcement action description, and a description of the company action taken to resolve the issue and prevent recurrence.

Substance Abuse Programs

- Does your company have a substance abuse program which includes pre-employment, "for cause", and post accident employee drug and alcohol testing? Yes No
- Does your company have a program in place that complies with the Federal Drug-Free Workplace Act? Yes No

ESQ Programs

- Does your company have an ESQ program in place that complies with OSHA, EPA, DOT, and other applicable federal, state, and local regulations? Yes No
- Include a copy of the table of contents of your ESQ Programs.**

Certification and Signature

I certify and declare under penalty of law that the foregoing environmental health and safety compliance history is true and correct, and that I am a duly authorized representative of the company.

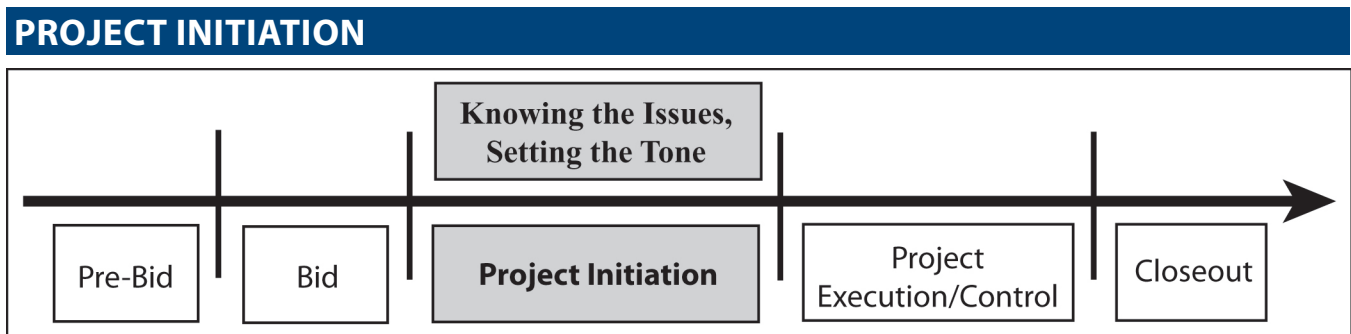
Printed Name		Title
Phone	Signature	Date

Your Commitments to Us

- To share in our performance excellence goal
- To provide a full and complete bid
- To include the costs of providing qualified individuals, safe equipment and safe operating practices in your bid to us
- To plan for compliance with the safety, health, and quality requirements of ECC, OSHA and our clients such as the US Army Corps of Engineers
- To meet or exceed all of ECC's quality and safety expectations.

Subcontract Agreement

Your subcontract agreement with us will contain certain clauses related to ESQ. You will also be asked to agree to other safety-related conditions and operating practices. Please review these subcontract clause requirements (available for download from www.ecc.net) before developing your bid.



Let's assume you are the successful bidder on an ECC project. Are you ready to go work? In order to avoid schedule delays, performance issues and exposing employees to unnecessary risks, it is critical that field work be well planned and that everyone is prepared. Project Initiation is the time to ensure that we have a mutual understanding on just how the project is going to go. In the area of ESQ, this means understanding the hazards and the quality expectations, and being prepared to implement the proper controls. It means assembling a qualified work force that understands the risks, the performance requirements, and is motivated to operate in a safe and high performance environment.

Implementing the following elements should make project initiation a fruitful effort:

- **Pre-Construction Meeting.** Once the award is made, ECC will hold a pre-construction meeting with your firm. This is a time to clarify any scope issues and go over communication plans. If it has not already been provided, the draft Work Plan for the project will be provided and reviewed. ESQ expectations will be clarified including any client or site-specific requirements such as access controls or work permits.
- **Activity Hazard Analysis.** If specified in your SOW, your first submittal to ECC will be an Activity Hazard Analysis (AHA) for each activity for the work you will perform. Also known as a Job Safety Analysis, the AHA is a document that breaks the work down into definable steps; identifies the hazards associated with each step; and outlines the site-specific control measures to be implemented to eliminate, reduce or mitigate the impact of each hazard. The AHA also identifies the equipment to be used, any inspection requirements, and the training employees need to safely do the job. Finally, the AHA identifies the Competent Person assigned to provide safety oversight for the activity. ECC will provide the format for the document and will assist you in preparing the AHA.

However, since we are hiring you for your professional expertise, you must take the lead on this analysis and be accountable for its implementation. Field work cannot start without an approved AHA.

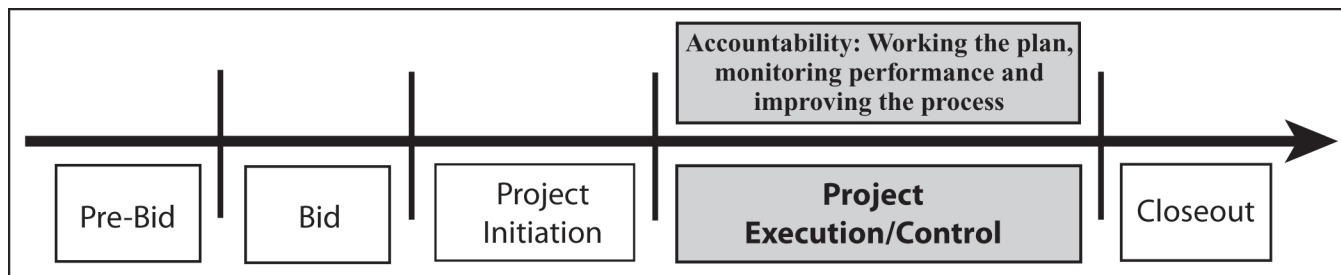
- **Quality Control Submittals.** Your contract may require a set of submittals that constitute the quality control standards you will need to meet. These submittals may include written plans, design drawings, shop drawings, catalog sheets, material samples, operating and maintenance manuals, testing plans, and other quality control-related items. Submittals must demonstrate conformance with contract specifications and referenced standards, and be provided far enough in advance to allow for contract review periods. In most cases, work cannot begin until submittals are approved.
- **Employee Certifications.** Prior to starting work in the field, you must submit the certifications of your employees. If they are engaged in tasks that require certain training or qualifications, the documentation must be current and provided for review. Such training could include HAZWOPER, asbestos abatement, forklift training, crane operator certifications, tester certifications, etc. In addition, if the job includes a medical surveillance requirement, proof of participation in such a program and fitness to work must be provided. It is important to provide these records ahead of time, so that any discrepancies can be rectified before mobilization.
- **Readiness Review Meeting.** Once all the pre-mobilization submittals have been received and approved, a Readiness Review Meeting between you and ECC may be held. The Readiness Review Meeting may be combined with the Pre-Construction Meeting. It is intended to work out any last minute details and be sure that all preparations to start work have been completed. This meeting will be held just prior to meeting with our client to do the Phase Preparatory Inspection, during which final agreements on the AHA, QC requirements, and work plans are reached.
- **Equipment, Tools and Personal Protective Equipment.** Upon mobilization, ECC fully expects our subcontractors to have all the necessary tools and personal protective equipment available in sufficient quantities to perform the work. The items must be in good condition, and be inspected by your Competent Person before being placed into service. Mobile construction equipment and cranes should be in new or like new condition, and must undergo an initial inspection upon arrival at the site. Our clients must be given the opportunity to witness or participate in this inspection, so plan accordingly. The initial and subsequent daily inspections of mobile construction equipment must be documented on a checklist.
- **Site-Specific Training.** The site orientation training is attended by all site workers before they begin working. ECC will explain the goal of performance excellence; the site organization; the known hazards of the site; the safety rules and expectations; incident reporting requirements; and emergency procedures for the site. The training will also include a description of the Quality Control process and the key quality requirements of your scope of work. The Safety and Health Plan and Quality Control Plan will be made available.

Your Supervisor or Competent Person is expected to participate in this training by covering the AHA for your work, and the Subcontractor Safety Plan where required. This is an excellent opportunity for your organization to express its commitment to incident prevention and emphasize that:

- Everyone is responsible for safety and quality, and expected to participate in the ESQ effort
- Everyone should take safety and quality personally, and immediately fix or report any hazards or substandard work
- No one is expected to work unsafely
- Everyone has an obligation to stop work if unsafe conditions or practices are observed, and
- Employee's recommendations for safety and quality improvements are appreciated and will be addressed.

If your work group has individuals who do not understand English, you must provide an interpreter at this training and for all daily meetings and contacts to ensure safety instructions are understood.

PROJECT EXECUTION AND CONTROL



Now we are into the execution phase of the project. The hazards are real. The risks to life and health, as well to cost, schedule, and quality demand our focused attention. ECC will hold the subcontractor accountable to perform in accordance with the plans and expectations set earlier. As a team, we must also be ready to deal with the unexpected.

Implementing the following elements will help us achieve performance excellence, and be a successful team:

- ***Plan of the Day and Daily Toolbox Meetings.*** The day begins with a meeting to go over the Plan of the Day (POD), and a brief safety discussion that may include a review of any incidents that occurred the day before; hazards expected today; and findings of the safety observer. The daily toolbox safety meeting generally lasts about 10 minutes, but once a week, a more extensive toolbox meeting will be held which will present or reinforce training on regulatory requirements or site-specific issues. All site personnel are expected to attend a daily and weekly toolbox.

Each day will end with a meeting with your on-site Supervisors to go over the plans for the next day. This will be used to coordinate the activities of the various contractors and to be sure everyone is aware of the activities to be undertaken and the hazards associated with them.

- ***Integrating ESQ.*** Environment, safety and quality must be built into the way you do your job. Your field staff will be expected to know the plans and specifications. Current up-to-date design drawings must be readily available and the quality standards must be adhered to at all times. An initial inspection will be conducted as the work is about to begin, to be sure all appropriate work and safety measures are in place. As members of the quality team, your Supervisors are expected to routinely inspect the work throughout the day to ensure compliance with the specifications and drawings. They are also expected to track progress and provide accurate data for as-built drawings.

Your team is expected to work in a safe and professional manner. They must review the Activity Hazard Analysis and identify new or unexpected hazards as they work. They must take the necessary actions to eliminate the hazards and to follow the requirements set forth in regulations, site safety plans, and contract requirements. They are also expected to report every incident, no matter how minor, so that corrective actions can be taken to mitigate risks.

- ***Audits and Inspections.*** While your firm must ensure that all quality standards are met through daily inspections of your own work, ECC and our client will also be conducting follow-up inspections on a daily basis. The inspection process is not a replacement for building quality into your product. Do it right the first time.

The Competent Person must conduct daily safety inspections of the work area. Sometimes formal documentation of these inspections will be required, such as for excavations. Others are expected to be documented in a log book.

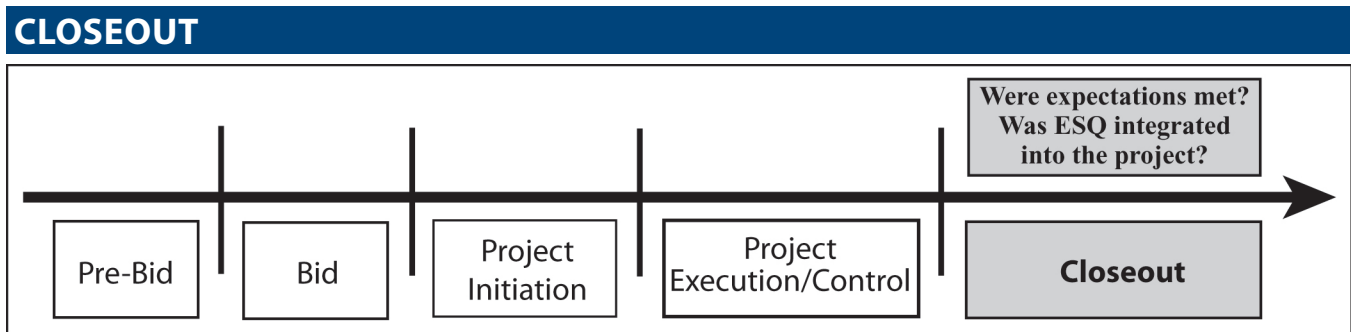
Routine safety inspections and audits by ECC management staff will be conducted. You will be expected to participate in these activities, to correct any deficiencies and to implement recommendations for improvement.

- **Reporting and Record Keeping.** You will be required to keep records and to provide daily or weekly reports on such things as equipment use, personnel work hours, materials placed, progress versus schedule, and percent complete. You may also need to provide certified payroll records, quality control forms, test reports and redline drawings.

All incidents, no matter how minor must be reported to the Supervisor and the Site Safety and Health Supervisor. The subcontractor is expected to participate in the investigation and reporting of incidents so that causal agents can be identified and recurrence can be avoided. This is particularly useful when implemented for no-loss or ‘near hit’ incidents, before a major loss occurs. In addition to incident reporting, other reports and records will be required to be submitted, such as daily equipment inspections, weekly work hour summaries, air monitoring records, and material safety data sheets.

- **Lessons Learned and Continuous Improvement.** As the project progresses, incidents, inspections, employee suggestions, safety observations and change analyses will all contribute to a learning process. To make the most of these “lessons” we need to make sure we communicate them throughout the work site, so that a culture of continuous improvement is established. A safer, more efficient work process benefits all of us.
- **Hotline.** You will see the ECC Hotline numbers prominently posted on the site. You and your workers will be encouraged to make use of this resource whenever waste, fraud or abuse is suspected and can’t be resolved at the local level. This is meant to include environment, safety and quality as well as ethics, contract and employment issues. Callers can remain anonymous, and all reports on either the ECC Hotline, or the third party Employee Hotline will be investigated.

ECC HOTLINE: 877-987-1240, ext. 111 or THIRD PARTY REPORTING: 888-801-5260



To close out the project and turn over the work, ECC will conduct a completion inspection. The work product must meet all the quality requirements and be free of hazards to which others may be exposed. The work site must be clean and orderly.

ECC requires that all records generated as part of the scope of work be submitted before final payment. This includes any safety related records including monitoring data; incident reports; and medical surveillance termination exams, if required.

All subcontractors are evaluated for performance, with ratings entered into our on-line database. Different categories are rated on a five-point scale from Unsatisfactory to Excellent. ECC personnel looking for subcontractors consult the database for past performance on ECC jobs.

Rating categories include:

- Overall
- Quality
- Safety
- Price
- Delivery/Schedule

The database also includes the comments of the raters. Subcontractors are encouraged to discuss performance ratings with the ECC Project Manager throughout the project.



*Vision
Integrity
Results*

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ECC has offices located world wide. Please contact our Corporate Office or visit www.ecc.net for additional locations and to learn more about ESQ Guidance for Subcontractors Working with ECC.

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