

HSEQ Regulatory Inspections

Short description

This section outlines the guidance for managing and recording regulatory and client initiated HSEQ inspections.

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1 Objective and area of application

The objective of this section is to outline the Centennial policy and process for facilitating regulatory and client initiated HSEQ compliance inspections. Regulatory agencies and client inspectors may make unannounced inspections of Centennial project sites or facilities. These regulatory agencies include: The Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA), the Mine Safety and Health Administration (MSHA), the Federal Railroad Administration (FRA), State, county or local safety and health, or environmental agencies. This section of the HSEQ Manual applies to all Centennial project sites or facilities where regulatory agencies or clients initiate HSEQ inspections.

HSEQ inspections may be initiated and conducted for a variety of reasons including:

- Regular programmed inspections
- National, regional or local emphasis programs
 - Hazard based
 - Industry based
- Agency or client specific targeting programs
 - EPA
 - OSHA
 - MSHA
 - FRA
 - State or local agencies
 - Client or customer initiated
- Referrals
- Complaints
- Fatality or catastrophe reports
- Follow-up from previous inspections
- OSHA SVEP program
- Client health and safety, quality or other types of periodic inspections
 - NAVFAC
 - USACE
 - Contract specific HSEQ inspections

This section explains Centennial employee protocol before, during and after a regulatory HSEQ inspection. The HSEQ regulatory inspection procedure has been developed to aid in comprehensively and uniformly addressing the Centennial regulatory inspection process by:

- Displaying a prepared and professional image
- Demonstrating the value that the Centennial HSEQ management system promotes in the organizational culture and climate
- Aiding in the defense of any citations or non-conformance notices issued as a result of an inspection
- Limiting operational liability

2 Superior and additional applicable documents

1000_GD_11_01_en_1.2 Group Principle on HSEQ

1000_GP_11_01_en_7.0 Group Policy on Health, Safety, Environment and Quality (HSEQ)

1000_SOP_11_01_en_2.0 SOP on HSEQ Management

1000_SOP_11_03_en_1.0 SOP on Leadership & Workers Involvement

1000_SOP_11_04_en_1.0 SOP on Health & Safety Standards of Work

1000_SOP_11_05_en_1.0 SOP on HSEQ Incidents & Accounting Rules

1000_SOP_11_06_en_1.0 SOP on Administration and use of the HSEQ management software ACTIVE

This section of the HSEQ Manual applies to all Centennial employees and subcontractors who are performing work in Centennial facilities and project sites. There may be more stringent requirements than this section as defined by specific State, local or contract specific requirements. If there is a conflict between this section and other applicable regulations, the more stringent will apply.

3 Definitions

The following definitions of terms are important for an understanding of this procedure.

Term	Definition
Centennial	All Centennial employees, joint venture employees, subcontractors and business partners
HSEQ	Health, Safety, Environment and Quality
EPA	Environmental Protection Agency
OSHA	Occupational Safety and Health Administration
MSHA	Mine Safety and Health Administration
FRA	Federal Railroad Administration
SVEP	Severe Violator Enforcement Program
NAVFAC	Naval Facilities Engineering Command
USACE	United States Army Corps of Engineers
OSHA 300 Log	Log of work-related injuries and illnesses.
OSHA 300A	Summary of work-related injuries and illnesses.
RSM	Regional Safety Manager
PSO	Project Safety Officer
PEX	Project Executive
HSEQ Director	Leads the HSEQ Team

4 Health and safety inspections

Health and safety inspections are typically conducted without advanced notice and it is imperative that all Centennial employees are trained and familiar with the Centennial health and safety regulatory inspection process. Centennial subcontractors may be included in

health and safety inspections and will be informed if the scope of the inspection will include their work areas or employees.

The Centennial employee who makes initial contact with a regulatory inspector will complete the following actions:

- Verify the inspector's credentials (Federal OSHA or state compliance officer credentials may be verified by calling the nearest federal or state OSHA office)
- Escort the inspector to an office or safe area and ask that the inspector wait for Centennial management and/or HSEQ representative if available
- Begin the Centennial internal notification process (see section 4.2 Internal notification process for specific process)
- Notify on-site affected subcontractors
- Request an opening conference and a focused inspection (see section 4.1.2 Partial or "focused" health and safety inspections)

4.1 Scope of health and safety inspections

Inspections may be either programmed or un-programmed and fall into one of two health and safety inspection categories depending on the scope and reasons for the inspection:

4.1.1 Comprehensive health and safety inspections

A comprehensive health and safety inspection is a substantially full or complete inspection of the the project site or facility. A health and safety inspection may be deemed to be comprehensive even though, as a result of the exercise of professional judgment, not all potentially hazardous conditions, operations and practices within those areas are inspected.

4.1.2 Partial or "focused" health and safety inspections

A partial or "focused" inspection is a health and safety inspection that focuses on or is limited to certain potentially hazardous areas, operations, conditions or practices at the project site or facility. A partial inspection may be expanded based on information gathered by the inspector during the inspection process. The inspector may use professional judgment to determine the necessity for expansion of the health and safety inspection scope, based on information gathered during records or program review and walk around inspection.

4.2 Internal notification process

Centennial employees will notify the appropriate personnel in accordance with the Administrative Manual section 1.6 Reporting Policy regarding any health and safety or other regulatory inspection according to the following internal notification process:

- Centennial employee learns of a health and safety regulatory compliance inspection and notifies the PSO and SSR
- SSR notifies the PEX
- PSO notifies the RSM
- RSM notifies the HSEQ Director
- HSEQ Director notifies legal and executive management as required

The Centennial employee representative is the Centennial employee who will facilitate the regulatory compliance inspection will utilize the Regulatory Inspection Process Flow (Appendix 1) and the Regulatory Inspection Record (Appendix 2). These documents shall be maintained on all Centennial project sites in the superintendent's jobsite binder. The Centennial employee representative is a Centennial employee who has received training on this section and is authorized to facilitate regulatory health and safety inspections.

Centennial employee representatives may include:

- Members of the Corporate HSEQ team
- Regional Safety Managers
- Project Safety Officers
- Project Superintendents
- Project Managers
- Member of the local management team

4.3 Opening conference

During the opening conference, the inspector will explain the purpose for the health and safety inspection and what the likely scope of the inspection will be.

The Centennial employee who is facilitating the inspection will do the following:

- Document participants of the opening conference (including subcontractor personnel if applicable)
- Determine the reason(s) for the inspection (if the inspection was initiated from a complaint, acquire a copy of the complaint)
- Produce the OSHA 300 Log and OSHA 300A Summary as requested by the inspector
- Request to qualify for a Focused Inspection
- Determine location(s) of the inspection and route of inspection
- Determine the procedure and location for conducting employee and subcontractor interviews
- Discuss site safety rules and any other project or facility specific safety and health rules, hazardous operations or procedures

4.4 Walk around inspection

Following the opening conference, the inspector will walk through the portions of the workplace determined during the opening conference, inspecting for health and safety hazards and violations that may potentially lead to an employee injury or illness. The inspector will work with the Centennial employee representative to determine the route and duration of the inspection.

During the walk around inspection the inspector may:

- Observe health and safety conditions and practices
- Interview Centennial employees and subcontractors
- Take photographs and instrument readings including:
 - o Air samples
 - o Atmospheric readings
 - o Noise levels
 - o Measurements

The Centennial employee representative will accompany the inspector during the walk around inspection. At project sites where subcontractor work areas or employees will be inspected, a subcontractor representative may be included for their portion of the walk around inspection.

The Centennial employee representative who accompanies the inspector during the walk around inspections is responsible to:

- Accompany the inspector to all locations during the walk around inspection
- Record all aspects of the walk around inspection including:
 - o All areas and work process that are inspected
 - o Employees and subcontractors who are interviewed
 - o Duplicate any photographs that the inspector takes (multiple angles)
 - o Duplicate any measurements taken by the inspector

During the walk around inspection, the inspector may point out apparent violations that should be corrected immediately. Prompt correction of alleged hazards and violations is a sign of good faith and should be a priority during the inspection process. The Centennial employee representative should not admit to alleged health and safety violations during an inspection.

4.5 Employee and subcontractor interviews

Often employee or subcontractor interviews involve questions regarding safety training or alleged violations. All employee and subcontractor interviews will be conducted away from work processes or potential hazards. The Centennial employee representative will document all employees or subcontractor employees who are interviewed and conduct follow-up interviews to discuss specific questions asked by the inspector and answers given by employees or subcontractor employees .

4.6 Closing conference

At the conclusion of the walk around inspection, the inspector will conduct a closing conference with the Centennial employee representative and affected subcontractors, jointly or separately according to the inspector's judgment and specific circumstances. The closing conference may be conducted on the project site, facility or by telephone. The closing conference may take place immediately after a simple health and safety inspection or may follow a major or complex inspection by several weeks. During the closing conference, the inspector describes any apparent or potential violations found during the inspection.

Specific questions that should be asked of the inspector during the closing conference:

- Are there any citations that will be issued (Centennial or subcontractor)
- What specific standards are being cited
- What is the classification of the citations (de minimus, other than serious, serious)
- What is the amount of the penalty

It is imperative that the Centennial employee representative take detailed and complete notes of the statements and responses from the inspector during the closing conference. The information that is obtained during the closing conference will be provided to the Corporate HSEQ team, legal counsel and executive management for evaluation and potential further action.

5 Environmental inspections

Environmental regulatory inspections generally include pre-inspection activities such as obtaining general site information before entering the facility or site. A Centennial employee representative will be utilized during any environmental inspection and will follow the same process as a regulatory health and safety inspection.

Other activities that may be conducted during a regulatory environmental inspection include:

- Interviewing facility or site representatives
- Reviewing records and reports
- Taking photographs
- Collecting samples (waste water, air, waste generation etc.)
- Observing facility or site operations

Environmental inspections may be conducted for numerous reasons, including the following:

- Compliance inspection for an Agency-permitted activity or permit application filed for the project site or facility
- Other inspections of regulated activities by EPA to determine compliance with specific requirements
- Follow-up inspections to check on prior violations
- Response to a citizen or employee complaint
- Referral from another federal, state, or local agency

The EPA and its regulatory partners (state or local environmental bodies) conduct environmental inspections and evaluations under several statutes. These statutes include but are not limited to:

- The Clean Air Act (CAA)
- The Clean Water Act (CWA)
- National Pollutant Discharge Elimination System
- Resource Conservation and Recovery Act (RCRA)
- Emergency Protection and Community Right-to-know Act (EPCRA)
- Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)
- Marine Protection, Research and Sanctuaries Act
- Safety Drinking Water Act (SDWA)
- Toxic Substances Control Act (TSCA)
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
- Individual state or local hazardous waste laws

5.1 Internal notification process

The internal notification process for environmental inspections will follow the process outlined in section 4.2 of this section.

5.2 Opening conference

Most environmental inspections follow a similar process as health and safety inspections and begin with an opening conference. This opening conference may range from a formal meeting to a brief, informal discussion of the plan for the inspection. The inspector may ask about jobsite or facility operations, including layout and processes, management structure, plant safety, and other information relevant to the inspection. The inspector will also identify records and/or permits he or she will want to review and may either make copies of the records or discuss how copies of relevant documents will be obtained. Since the inspector will prepare a written report after the inspection, he or she will take notes throughout the entire inspection. The inspector will record information such as contacts, plant operations and discussions with project or facility representatives. The Centennial employee representative will take detailed notes during the opening conference.

5.3 Walk around inspection

The project site or facility tour is the main tool that the inspector will use to gather information about your facility and its operations. The walk around inspection may include all environmental aspects of the project site or facility or the scope of the inspection may be limited to a specific area or work process.

During this tour, the inspectors may request information about the following:

- Project or facility processes
- Waste generation
- Air emissions
- Wastewater generation and discharge
- Permit requirements

The inspector may take samples of environmental media such as waste water discharges, waste materials and/or air emissions. The inspector may also take photographs of project site or facility operations and environmental activities such as waste treatment, disposal, storage areas and/or air pollution control devices. Centennial representatives should duplicate any photos taken by the inspector.

5.4 Closing conference

After the inspector has interviewed project site or facility personnel, toured the project site or facility, and collected samples (if necessary), he or she will conduct a closing conference. This conference may range from a formal meeting to a brief, informal discussion. The inspector may review his or her observations and request clarification. The inspector will also identify if further information or documentation is needed and coordinate regarding when that information or documentation will be provided. All requested documentation should be cleared through the Corporate HSEQ team and legal department before being released. The inspector will provide general observations about any problems observed at this time, but the final compliance evaluation will be performed after the inspection.

6 Quality inspections

Quality inspections are the means by which Centennial clients and customers verify compliance of ongoing and completed construction with the contract specifications through conducting reviews, inspections, and tests to ensure that the final work product is compliant with the quality established by the contract.

A customer or client initiated quality inspection may involve the following:

- Examination of the quality control methods being used to determine if adequate measures are being taken to control construction activities
- Ensure that there are not excessive construction deficiencies occurring during the construction process
- Examination of all ongoing and completed work
- List of contract documents
- Materials testing schedule and referenced documents
- Example of reports to be used (nonconformance report, daily reports etc.)
- Methods for tracking construction deficiencies
- Record keeping procedures
- Material submittals

7 Amendment history

Date	Version	Revised content
29.01.2014	1.0	Initial Preparation
01.01.2018	2.0	Updates to Paragraph 2 Superior Documents (add the Group Policy and Global Standards), Paragraph 3 Definitions (Centennial and HSEQ Director), Paragraph 4.2 Internal notification process (notification and documents), Appendix 1 (definitions and logo) and Appendix 2 (new)
07.31.2026	2.1	Updates to Paragraph 2 Superior Documents, Add FRA to Sections 1 and 3, Correct reference to Section 1.6 in Section 4.2, Update PSM to RSM and ROM to PEX throughout

8 Appendix

Appendix 1: Regulatory Inspection Process Flow (0206500_CP_11_10_en_A1.1)

Appendix 2: Regulatory Inspection Record (0206500_CP_11_10_en_A2)

Regulatory Inspection Process Flow

0206500_CP_11_10_en_A1.1



1. Notification process

☐ Compliance agency arrives on site for inspection ☐ Guide them to office/safe area	☐ Notify SSR, PSO and Safety Department	☐ Verify Credentials ☐ Notify Subcontractors ☐ Reasonable wait for SSR/PSO/CSM (1hour)
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2. Opening Conference

☐ Inspection Procedures reviewed with inspector & CCE Mgt. team ☐ Document meeting participants	☐ Determine reason for inspection ☐ If the visit is from a complaint, get a copy of the complaint	☐ Acquire OSHA 300 & 300A forms ☐ Ask inspector to qualify for a Focused Inspection
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3. Walk Around Inspection

☐ Determine area and location of inspection	☐ Answer all questions truthfully and do not volunteer information	☐ Take photos of area being inspected ☐ Take multiple photos of whatever the inspector photographs (get multiple angles)
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4. Alleged Violation & Employee Interviews

☐ If an alleged violation or unsafe act is observed by the inspector, ensure it is documented and abated	☐ Ensure that all interviews take place in a safe location, not on an active construction site	☐ If the inspector interviews employees, it should be done upon completion of the inspection
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5. Closing Conference

☐ Ensure the safety department is on site or on the telephone ☐ Do not argue with the inspector	☐ Take detailed notes on alleged hazards / problem areas ☐ Document suggestions & abatement actions
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Inspection Procedures

A. Releasing Documentation: Only the Centennial / JV management can authorize the release of operational documents to the inspector. This includes photographing the documents. Identify the documents that the inspector would like copies of and obtain permission from the management team to release them.

B. Employee Interviews: All subcontractor and employee interviews will take place in a safe location. During the walk around inspection the inspector may identify individuals they would like to interview. Once the walk around inspection is completed, all personnel that have been identified can be interviewed in a central location away from the work area.

C. Photographs and other recordings must be forwarded to corporate safety as soon as possible.

D. Regulatory Inspection Record must be fully completed.

Regulatory Inspection Record

0206500_CP_11_10_en_A2



Instructions: Complete the Regulatory Inspection Record below during an OSHA compliance inspection/audit. Submit the completed form to the Senior Site Supervisor and Project Safety Manager.

General

Project:		Date / time (arrived):	
Safety / Ops person assigned to inspector:			
Subcontractors on site (list):			
Inspector (name):		Agency:	
Office Location:		Identification number:	
Supervisor:		Telephone #:	

Opening Conference

List everyone present (names):		

Inspection type: ☐ Partial ☐ Focused ☐ Comprehensive

Reason for Inspection: ☐ Scheduled ☐ Referral ☐ Complaint (copy of complaint)

List of records reviewed or requested:

Walk Around Inspection (use additional sheets if necessary)

Identify route(s) / areas inspected & list all activities taking place on-site during the inspection:

List any unsafe acts or conditions noted by Centennial and/or Compliance officer. List all corrective actions taken:

Were photos, video recordings, readings or measurements taken? ☐ Yes ☐ No

If yes, explain the following for each item (1-exact location, 2-items/area recorded, 3-equipment used)

If more space is needed, use additional paper to document

List / describe any part of the project in which work was halted by the inspection:

Interviews

Complete the information below for any employees which were interviewed during the inspection:

Name/job description:		Company:	
Name/job description:		Company:	
Name/job description:		Company:	

Closing Conference

Date: Time:

List everyone present (names):

List any alleged violations:

Additional comments:

Employee name (written) completing this form

Employee signature

Date

Send this document completely filled out to the Senior Site Representative and the Project Safety Manager.