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Health & Safety Integration in to Phase I Environmental Site Assessments

BEX LUKAC | SENIOR SCIENTIST

What is a Phase I Environmental Site Assessment (ESA)?

- Evaluate risks and liabilities associated with a property
  - History, current condition, surrounding area
- Basic environmental due diligence
- ASTM E1527-21 standard
- Does not include soil, water, or air (Phase II)
- Does not include Health and Safety
  - Diet HS or HS Lite
  - Typically a separate assessment or audit

// Health and Safety as a “bolt-on” to ESAs

WHO WOULD WANT THIS?

- Property buyers
- Lenders
- Corporations
- Merger/Acquisition

WHY IS THIS IMPORTANT?

- Best Practice
- Proactive risk management
- Legal liabilities for injuries
- Delays in project timelines
- Incurred costs

- What am I inheriting?

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What's the narrative?

SITE RECON

- Talk to the client
  - The CEO → the boots-on-the-ground
- What do they make?
- How do they make it?
- What are their pain points?
- What to they think is missing from the operation?
- What is the future of the business/operation?

This is an important <u>first</u> step

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What should be included for Health & Safety?

- Top-down view
  - High risk
    - H&S and for the client

OSHA | Oregon OSHA
Department of Consumer and Business Services

Top 25 Standards Violated

Standards Cited During Oregon OSHA Inspections Opened in Calendar Year 2025
Industry: All Industries
Category: Safety and Health

Questions?
Contact Enforcement Analyst
e-mail

Oregon OSHA - ENFORCEMENT 12/08/2025 12:53 PM

Rank	Standard Violated	Subject	Total Violations	Serious	Repeat	Willful	Other	Total Initial Penalties	Serious	Repeat	Willful	Other
1	OAR 437-003-1501(1)	Fall protection	365	262	101	2	0	$4,706,790	$688,705	$3,902,101	$115,984	$0
2	29 CFR 1910.1200(e)	Written hazard communication program	342	117	0	0	225	$223,167	$222,762	$0	$0	$405
3	OAR 437-001-0765(1)	Rules about safety committees or safety meetings	326	86	2	0	238	$208,991	$185,333	$23,538	$0	$120
4	OAR 437-001-0765(13)	Documentation of safety committee meetings	194	4	4	0	186	$57,345	$5,296	$52,049	$0	$0
5	OAR 437-003-0503(2)	Certification of fall-protection training	142	0	9	0	133	$108,863	$0	$108,863	$0	$0
6	29 CFR 1926.1053(b)	Requirements for use of ladders	136	118	16	0	2	$748,477	$252,673	$495,804	$0	$0
7	29 CFR 1910.1200(g)	Safety data sheets	114	9	3	0	102	$63,548	$28,241	$35,307	$0	$0
8	OAR 437-002-0187(2)	Rules regarding inspection and maintenance of fire	100	3	0	0	97	$3,766	$3,766	$0	$0	$0
9	29 CFR 1910.28(b)	Protection from fall hazards	92	86	3	0	3	$493,693	$376,642	$117,051	$0	$0
10	29 CFR 1910.178(l)	Training for operators of powered industrial trucks	86	25	0	0	61	$51,782	$51,542	$0	$0	$240

- Records
  - Training
  - PMs and Inspections
- Programs & Procedures
  - HazCom
  - Confined Space Entry
  - Lead & Asbestos Awareness
  - Spills, fire, chemical release

INFORMED DECISION

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EX: Fall Protection

365 TOTAL | 262 SERIOUS | 101 REPEAT | 2 WILLFUL | $4.7M

- Load capacity signs
- Guardrails
- Toeboards
- Permanent access and egress to elevated work surfaces
- Dock boards and bridge plates
- Ladders

=$$$$$$$ to the client

All information within this document is strictly confidential and solely for the use of the recipient

What to look for:

- If…then
  - Chemicals?
    - HazCom
    - Controls
    - Emergency Response Plan
    - ….
  - Machine Shop
    - Machine guarding
    - Electrical hazards
  - Overhead Crane
    - Inspection

// Sometimes overlooked:

- ADA compliance
  - Site accessible?
  - Life safety accessible?
- Fire Safety
  - Fire extinguisher location and signage
  - Correct type
  - Abandoned
- New & Upcoming regulations
  - HFC Management Rule

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QUESTIONS?

THANK YOU

(come see us at our booth)