



**7 WEST ELM PROJECT
OSHA STRATEGIC PARTNERSHIP**

Between

**Occupational Safety and Health Administration
Chicago South Area Office**



And

Illinois On-Site Safety and Health Consultation Program



And

W.E. O'Neil Construction Company



And

Mid-America Carpenters Regional Council



I. IDENTIFICATION OF PARTNERS

The Chicago South Area Office of the Occupational Safety and Health Administration (OSHA), Illinois On-Site Safety and Health Consultation (Illinois On-Site), W.E. O’Neil Construction Company (WEO) and Mid-America Carpenter Regional Council (Union) recognizes the importance of providing a safe and healthful work environment for workers engaged in the construction industry. This OSHA Strategic Partnership Agreement (hereafter referred to as “OSP” or “the partnership”) at the 7 West Elm project in Chicago, Illinois, will facilitate the goals of OSHA to reduce occupational-related fatalities and serious injuries within the construction industry.

The groups listed below have developed this partnership agreement jointly with a common objective to provide a safe and healthful environment for all at the 7 West Elm Project. It is the intent of this agreement to focus their combined expertise and knowledge to promote safety and encourage all workers on site to do their part in achieving the same.

- Chicago South Area Office of the Occupational Safety and Health Administration (OSHA)
- Illinois On-Site Safety and Health Consultation Program (Illinois On-Site)
- W.E. O’Neil Construction Company

All contractors and subcontractors working at this site agree to participate in the partnership agreement.

II. PURPOSE AND SCOPE

WEO is focused on commercial construction, employing more than 500 employees throughout the year and representing many aspects of the construction industry. The purpose of this Partnership is to reduce injuries/illnesses and avoid any fatalities during the construction of the 7 West Elm project.

W.E. O’Neil Construction Company (WEO) is proud to announce the construction of the new 7 West Elm project. This facility will be constructed over a period of approximately 21 months. WEO is the General Contractor for this new site in Chicago, Illinois. The project consists of a 29-story building with ground floor retail, 4 floors of parking, and 21 floors of apartments, comprising about 419,000 sq. feet. Construction activities are scheduled to be completed by March 20th, 2028. It is anticipated that, at its peak, the project may employ over 100 tradespersons on site.

The level of activity needed to complete the project on schedule will necessitate a cooperative effort to ensure that a safe and healthy work environment is maintained at all times. This OSHA Strategic Partnership (OSP) will provide an opportunity for OSHA to work with the companies involved in the project to promote safety programs, management systems and work methods that utilize the latest technologies and safest methods available. This partnership supports the

Agency's Strategic Plan by developing strategies to improve safety and health in the Construction Industry.

The above-named groups developed this Partnering Agreement jointly. The common objective and goal of the agreement is to provide a safe and healthful work environment for employees engaged in construction activities on the 7 West Elm project site, and to help prevent serious accidents within the industry through increased safety and health training, increased worker involvement and the implementation of an enhanced safety and health management system. By focusing its efforts and utilizing the skills and resources of W.E. O'Neil Construction Company, Mid-America Carpenters Regional Council, OSHA and Illinois On-Site, it is believed that this cooperative and voluntary program fosters worker knowledge, increases worker empowerment, and reduces the hazards and serious injuries at jobsites. Past participants continue to achieve injury and illness rates below the national average for the construction industry and it is expected that lower rates will be achieved through this Partnership because of increased employee involvement. This initiative represents a voluntary agreement and affords a Partnership alternative to the traditional OSHA enforcement procedures. This Partnership program is consistent with OSHA's long-range efforts to develop a business/labor/government Partnership approach to safety management, allows for better use of OSHA resources, and encourages more participation in the safety process by each stakeholder and their employees.

III. GOALS, STRATEGIES AND MEASURES

The overall goal of the Partnership is to create a working relationship that focuses on preventing work-related fatalities and injuries, controlling or eliminating serious workplace hazards, and establishing foundation for the development of an effective safety and health program.

	Goal	Strategies	Measures
1.	<p>a) Maintain a project-wide injury and illness rate of 25% below the 2024 BLS Total Recordable Case (TCIR) rate of 1.9 and Days Away from Work, Restricted or Transfer (DART) rate of 1.2 for the construction industry in Illinois NAICS 2362 as the baseline</p> <p>b) Experience ZERO Serious Injury or Fatality (SIF) actual incidents.</p>	<p>a) Each contractor will implement a project specific safety plan.</p> <p>b) Each contractor shall implement and comply with the W.E. O’Neil Construction Company Corporate Safety Manual.</p> <p>c) Employers will provide all necessary engineering controls, administrative controls and personal protective equipment.</p> <p>d) W.E. O’Neil Construction Company will facilitate weekly project wide safety audits. Once per month, an audit of the site will be completed including at least one member of an Active subcontractor.</p>	<p>a) On a monthly basis WEO will collect and calculate the following injury and illness data and compare to the national average - (TCIR) Total Case Incidence Rate and Days Away and Restricted and Transfer rate (DART).</p> <p>b) On an annual basis WEO will compare the site’s injury and illness rate to the most current BLS data published.</p> <p>c) WEO will track the number of hazards found through audits performed by partners and contractors and ensure corrective actions are implemented.</p>
2.	<p>a) Promote a cooperative relationship between labor, management, Federal, State, and local government agencies and encourage employee participation to achieve a safe and healthful workplace.</p>	<p>a) Facilitate training courses each quarter that are available to all employees working onsite. Training may be conducted by WEO, representatives, OSHA and/or consultants.</p> <p>b) Ensure participation in weekly project wide safety audits.</p> <p>c) A project safety committee will be formed with a representative of each working contractor and will meet monthly.</p>	<p>a) A copy of the training presentation/information will be documented along with attendance.</p> <p>b) Track attendance at weekly safety audits.</p> <p>c) Track attendance at monthly safety committee meetings.</p>

	Goal	Strategies	Measures
3.	a) Ensure tradespeople on site are familiar with safety requirements, expectations and safe work plans.	a) Require contractors and subcontractors to have a foreman and/or competent person participate in a Pre-installation Safety meeting. b) Require contractors and Subcontractors to perform a daily Task Hazard Analysis. c) Require all workers to attend a pre-work safety orientation presented by WEO.	a) Document attendance at Pre-Installation meetings. b) Receive a copy of all THA's performed and file by contractor and date. c) Document attendance at pre-work orientations and provide a hard hat sticker.
4.	a) Ensure field supervisors are trained to safety supervise work	a) OSHA 30-hour certifications required for on-site competent person for all contractors, subcontractors and tier-subcontractors.	a) WEO will review and maintain copies of said certifications.

IV. SAFETY AND HEALTH MANAGEMENT SYSTEMS

The Safety and Health Management System (“SHMS”) is a critical part of this partnership agreement in that it is an important aspect of collaboration between the project management team, supervisors, and the workers on site. This SHMS will include, but not be limited to, the following core elements:

WEO will implement a SHMS patterned after OSHA’s “Recommended Practices for Safety and Health Programs in Construction” that will encourage partnering employers to commit a high level of worker involvement to assist in monitoring and identifying jobsite hazards on a continual basis to prevent accidents. The SHMS will be implemented at the initiation of the partnership and continue through the duration of the partnership.

[Recommended Practices for Safety and Health Programs](#)

WEO will collect and analyze injury and illness trends (including near-miss incidents) by all contractors performing work at the site. This data will be used as a tool to ensure continual safety and health improvement at the site. The management of this Agreement will be accomplished by WEO implementing a comprehensive jobsite safety and health management system, which includes:

- WEO will receive daily THA’s from all contractors. WEO will randomly attend Subcontractor THA’s.

- Coordinate with the performing contractor for industrial hygiene services provided by Illinois On-Site or other qualified resources to assess employee exposure levels for ALL toxins, carcinogens, or hazardous substances currently emphasized by OSHA and which present inhalation hazards, such as silica, lead, cadmium, and/or isocyanates. Employee exposures will be assumed, and respiratory protection worn until the results of the initial monitoring studies are received and demonstrate no exposure problems or prior surveys show no hazard exists. For exposure to respirable crystalline silica, fully and properly implemented engineering controls, work practices and respiratory protections as prescribed on 1926.1153(c)(1) Table 1 will be acceptable in lieu of monitoring. WEO will request periodic evaluation visits by its insurance company's Industrial Hygienist and Illinois On-Site. Sampling / monitoring by Illinois On-Site must be coordinated and initiated by WEO or the performing contractor as part of a visit request to Illinois On-Site.
- Allow workers to report potential jobsite hazards to WEO and/or supervisors upon discovery. All workers on the jobsite have stop-work authority as it relates to safety.
- Hold weekly foremen's meetings to communicate and share safety-related information across different crews and trades.
- Monitor all workers, visitors, and others entering the worksite to ensure safe conditions throughout the worksite.
- All contractors on-site will perform weekly audits. In addition, once each month, a comprehensive audit of the jobsite will be performed. A representative of the subcontractors will be a safety audit participant in the jobsite areas where their employees may be exposed to hazards. Any hazards found during the audits will be corrected promptly. Items identified during the audits will be documented via ProCore. When hazards cannot be corrected immediately, they will be tracked until abatement is completed. Employees exposed to these hazardous conditions will be informed of the hazard and effective interim control measures will be implemented. A record will be kept of all hazards found during the comprehensive site safety audits and the number of hazards corrected as a result of the daily audits.
- Implement an effective Fall Protection Plan to include fall protection in all cases as required by OSHA 1926 Subpart M, where work is being performed 6 feet or more above lower surfaces.
- Encouraging a "Ladders Last" approach to performing work.
- Ensure employees receive training as follows:
 - Supervisory personnel should possess an OSHA 30-hour card or its equivalent. All workers at the foreman and above position will possess minimum required training such as OSHA 30-hour and First Aid/CPR.

- All employees will receive a site-specific construction safety orientation covering jobsite safety and health issues, procedures related to the work being performed, as well as the requirements outlined in the Partnership Agreement. Each employee who has attended orientation will receive a project specific sticker confirming their participation in the orientation.
- Safety and health training will be provided to all workers in a language and vocabulary they understand. Bilingual instructors will perform this training. WEO will provide a list of instructors to all subcontractors to ensure that all workers are effectively trained.
- Other hazard-specific training will be conducted on an as-needed basis.
- A task specific training topic will be chosen each month at the project safety committee meeting.
- Each subcontractor with written safety and health management systems must submit them to WEO. Companies without safety and health management systems may adopt WEO's Incident Prevention Plan or develop an adequate safety and health management system with the assistance of Illinois On-Site.
- Ensure WEO and/or the affected subcontractors adequately address health-related issues, which arise during the course of the Project, with the assistance of OSHA and Illinois On-Site as resources permit; all health-related issues will be discussed during the scheduled Partnership meetings.
 - An effective environmental monitoring program will be implemented to control airborne hazards, such as silica, and will include personal monitoring, employee training, implementation of engineering controls where possible, and the use of respiratory protection when necessary. Previous site-based data will be considered acceptable.
- Ensure compliance with the NFPA 70E when working on live electrical equipment, including training and the availability and use of personal protective equipment.
- Ensure all equipment capable of causing amputations is adequately guarded
- Monitor environmental conditions for heat/cold stress, high wind conditions, threatening storms, tornados, along with surface conditions such as mud and ice. Establish wind limits for cranes and exterior work affected by wind. Have a warning system and established shelters in place for storms. Incorporate breaks and provide break areas for heat or cold with ample supply of fluids throughout the worksite.

V. WORKER INVOLVEMENT

By being a signatory to this OSP all affected unions support this OSP or waive their opportunity to be a signatory; however, indicated their willingness for this OSP to proceed.

The Labor Unions shall be permitted to designate a Safety Representative if they desire. The Safety Representative will be permitted to attend all safety related meetings and onsite audits. The Safety Representative can be someone other than the job steward.

- Each contractor will ensure workers participate in weekly safety toolbox talk meetings.
- Each contractor will require reporting of any near miss, unsafe conditions, or incident.
- Each contractor will provide support to all workers and/or their representatives by providing feedback on risks and assisting them in eliminating hazards.
- Each contractor will participate in safety and health program reviews
- Each contractor will conduct worksite inspections, Safety and health audits, job hazard analyses, and other types of hazard identification.
- Each contractor will participate on safety and health committees, joint labor-management committees, and other advisory or specific-purpose committees, if otherwise lawful and appropriate

VI. PERFORMANCE MEASURES

Performance measures as outlined in section III will be used to assess the effectiveness of the partnership. WEO will gather and track data for the performance measures and share the information with OSHA, as specified in Appendix B of the Strategic Partnership Program for Worker Safety and Health, OSHA Directive CSP 03-02-003.

VII. ANNUAL EVALUATION

This partnership will be evaluated on an annual basis by using the Strategic Partnership Annual Evaluations Format measuring system as in Appendix C of the Strategic Partnership Program for Worker Safety and Health, OSHA Directive CSP 03-02-003.

WEO will be responsible for gathering required participant data to evaluate and track the overall results and success of the Partnership. This data will be shared with OSHA. OSHA will be responsible for writing and submitting the annual evaluation.

The Consultation Program managers will track the number of consultation visits and will report the number of subcontractors that developed or improved their safety and health programs through consultation.

VIII. VERIFICATION

- Verification Enforcement Inspections: OSHA will conduct the initial verification enforcement inspection no sooner than three months, but within four months after Partnership participants formally enter into this Agreement. During this period, Partnership participants should develop and implement the safety and health management systems required under this Agreement. After this period, OSHA will conduct the verification enforcement inspections annually thereafter. Verification enforcement inspections will be conducted as a focused inspection, per the appropriate OSHA guidelines. Compliance Safety and Health Officers (CSHOs) who are familiar with the Project will do verification enforcement inspections. Employee rights under the Occupational Safety and Health Act (OSH Act) will be afforded. During the verification enforcement inspections, if OSHA personnel identify serious hazards that site management refuses to correct, the scope of the inspection may be expanded.

Complaint/Referral Investigations: This Partnership provides for the immediate response to each allegation of a safety or health hazard brought to its attention by any person. Upon a finding that an allegation is valid, the employer shall promptly abate the hazard.

- OSHA agrees that a copy of each non-formal complaint/referral related to the work site and filed with OSHA will be forwarded by fax, or by CSHO, WEO's - Project Management office on-site. In accordance with applicable law, the name of a complainant requesting confidentiality will not be revealed. WEO agrees to investigate these complaints, regardless of the employer involved, and provide OSHA with a written response within 5 working days of receiving the non-formal complaint/referral.
- Accident Investigations: Employers engaged in this Partnership recognize that OSHA fully- investigates accidents involving a fatality or serious physical harm. If during the course of the investigation OSHA determines that the incident resulted from violations of the OSHA standards, the employer will not be afforded Partnership incentives.
- Onsite non-enforcement verification consisting of a worksite review will be conducted as part of the quarterly partnership meeting, as resources allow. A union representative can choose to be part of the inspection group. In cases of Pandemics such as; COVID-19, off-site verification 'visits' may be performed. Off-site verification will include an annual evaluation, OSHA 300 log and quarterly progress reports.

IX. INCENTIVES

Participant benefits from OSHA may include:

- Maximum penalty reductions for good faith and history, to the extent allowed by the OSHA Field Operations Manual (FOM), OSHA Instruction CPL 02-00-160 (August 2, 2016).
- In the event that a citation with penalties is issued, the Area Director has the authority to negotiate the amount of an additional penalty reduction as part of the informal conference settlement agreement, which is consistent with OSHA's current policy regarding this matter.
- Priority consultation service and assistance for small employers working on the construction site from the Illinois Onsite Consultation program. In the event OSHA opens an investigation on the job site, all consultation activity will cease until the investigation is closed or the citations are in final status.
- An OSHA focused inspection is available where the Partnership participant has an effective safety and health management system fully compliant with 29 CFR Part 1926.20 and 29 CFR Part 1926.21. (For additional details, refer to the August 22, 1994 memo signed by then Deputy Assistant Secretary for OSHA James Stanley, which was revised on September 20, 1995.)

X. OSP MANAGEMENT & OPERATION

The 7 West Elm Partnership Committee (the committee) will consist of representatives from each of the partners listed above. The Committee will review contractor compliance and involvement in the partnership, analyze job site audits, make partnership improvements and evaluate partnership modifications, achievements and success.

WEO will:

- Implement comprehensive safety and health programs, which include:
 - management commitment and employee involvement,
 - hazard analysis,
 - hazard control, and
 - worker education and training.
- Mentor subcontractors who have not yet developed their own safety and health programs and, if necessary, refer them to OSHA-Chicago South and/or the Illinois On-Site Program, for assistance.

- Implement a six-foot fall protection requirement throughout the Project.
- Participate in the National Safety Stand-Down to Prevent Falls in Construction.
- Where the potential for airborne silica exposure exists, WEO will require the use of wet cutting techniques and/or dust collection systems in addition to the mandatory use of approved respiratory protection. To the extent feasible, personal air monitoring will be conducted to assess employee exposures levels. Where the potential for other health issues such as carbon monoxide, lead, or large-scale use of chemicals in the building interior (such as floor finishing's) exists, WEO will coordinate air monitoring with Illinois On-Site or other resources available to assess employee exposure levels. Sampling results will be shared at monthly meetings.
- Share the responsibility for overseeing site safety, serving as a point of contact, and overseeing the partnership goals.
- Ensure weekly safety observation is conducted and documented.
- Ensure that all subcontractors are invited and encouraged to participate in jobsite safety meetings/toolbox talks on a weekly basis and document all attendance and topics.
- Ensure a focus on Well-being during the project. Develop a culture where all people feel they are part of something extraordinary by managing risk, creating a safe environment, and demonstrating the highest standard of care for each other.
- Review monthly incident summaries, including first aid, injury, and near-miss reports, with management and the safety committee.
- Onsite non-enforcement verification reviews will be conducted as part of the quarterly partnership meeting. A union representative can choose to be part of the inspection group. If non-compliant activity or hazards are discovered, immediate correction is required. WEO will document the corrective action taken, and share this information during the quarterly update meetings. A referral for an enforcement inspection will be made if management refuses to correct a serious hazard identified during the non-enforcement verification visit.
- Agree to allow OSHA representatives site access during inspection activities (monitoring and un-programmed activities such as fatalities and employee complaints).
- Audit the Partnership and make recommendations for improvement.
- Share and make available to all workers at the site jobsite observations and near-miss incident report summaries.
- Require the use of appropriate personal protective equipment by all entering the worksite. Appropriate personal protective equipment, including ANSI-approved hardhats, eye

- protection and high-visibility reflective vests or high-visibility clothing as a minimum, will be worn at all times on the worksite.
- Monitor environmental conditions for heat/cold stress, high wind conditions, threatening storms, tornados, along with surface conditions such as mud and ice. Establish wind limits for cranes and exterior work affected by wind. Have a warning system and established shelters in place for storms. Incorporate breaks and provide break areas for heat or cold with ample supply of fluids throughout the worksite.

OSHA will:

- Prepare the annual Partnership evaluation. Review and compile data provided.
- Make an enforcement referral when identified serious hazards are not corrected by site management.
- Participate in scheduled Partnership meetings and site non-enforcement walk around.
- Provide hazard identification and technical assistance as needed.
- Conduct one enforcement inspection annually.
- Conduct focused enforcement inspections when applicable.
- Optimal use of phone and fax process to handle complaints.
- Other-than-Serious violations will not be cited if corrected at the time of the inspection.

Illinois On-Site Consultation Program will:

- Appoint a representative to the committee.
- Participate in scheduled partnership meeting and site reviews, as resources permit.
- Provide/assist in training as resources permit.
- Give priority consideration to requests for services to small contractors who are engaged in work at the Project.
- Provide industrial hygiene, safety, and ergonomics consultation services upon request as resources permit.
- Perform scheduled jobsite consultation.

Labor Unions will:

- Appoint a member to the Committee.

- Participate in monthly safety audits.
- Participate in scheduled Partnership meetings.
- Represent all unions affiliated with the work trade scopes of this project.
- Assist in additional safety training to their respective union members.

XI. WORKER AND EMPLOYER RIGHTS

This partnership does not preclude workers and/or employers from exercising any rights provided under the OSH Act (or, for federal workers, 29 CFR 1960), nor does it abrogate any responsibility to comply with rules and regulations adopted pursuant to the Act.

XII. TERMINATION OF AGREEMENT

This agreement will terminate on or about March 20, 2028. If OSHA or W.E. O'Neil Construction Company (WEO) chooses to withdraw their participation in the partnership, the entire agreement is terminated.

Any signatory may also propose modification or amendment of the agreement. If any of the other signatories wishes to withdraw their participation prior to the established termination date, a written notice of the intent to withdraw must be provided to all the other signatories

XIII. SIGNATORIES

**United States Department of Labor
Occupational Safety & Health Administration**

Based upon a mutual interest to protect construction workers, the parties below agree to the above terms on the W.E. O’Neil Construction/OSHA Partnering Agreement for the 7 W. Elm Project in Chicago, IL.

Signed this _____ day of __2026.

	OSHA, Chicago South Area Office Signature: _____ Printed Name: Jim Martineck, Area Director
	Illinois On-Site Safety and Health Consultation Program Signature: _____ Printed Name: Erik Kambarian, Chief, Division of Occupational Safety and Health (IL OSHA)
	W.E. O’Neil Construction Company (WEO) Signature: _____ Printed Name: Damian Eallonardo, W.E. O’Neil, President
	Mid-America Carpenters Regional Council Signature: _____ Printed Name: Alberto Jotautas, Safety Director