



EHS Metrics Guidance

Environmental, Health & Safety Policies, Procedures and Guidelines

Applies to: All DEP Bureaus and Offices
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Purpose

The purpose of this guidance is to ensure accurate and consistent reporting and analysis, agency-wide, of the EHS performance indicators utilized to monitor progress and verify the effectiveness of the EHS Compliance Program.

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1 Purpose

The purpose of this guidance is to ensure accurate and consistent reporting and analysis, agency-wide, of the EHS performance indicators utilized to monitor progress and verify the effectiveness of the EHS Compliance Program.

2 Scope

This policy applies to all Bureaus and Offices. It will be consulted to assist in the evaluation and management of the DEP EHS Program and Strategic Planning.

3 Applicable Standards and References

- DEP “Spill Prevention, Environment Release Reporting & Investigation” Policy
- EPA RMP (40 CFR Part 68) and OSHA PSM (29 CFR 1910.119)
- NYSDEC Spill Guidance Manual
(www.dec.ny.gov/regulations/2634.html)
- SH 901 Instructions for Recording and Reporting Public Employees’ Occupational Injuries and Illnesses.

4 Responsibilities

4.1 Office of Environmental, Health and Safety (OEHS) is responsible for:

- Managing and communicating the contents of this guidance, and compiling, analyzing and presenting EHS Metrics data on a periodic basis, as prescribed.
- Performing quality assurance checks on the data.
- Preparing metrics reports and explanations.
- With EHS Directors, assessing the effectiveness and usefulness of existing metrics and making recommendations as indicated.
- Maintaining centralized databases, as needed, for metrics generation (e.g. NOVs, Audits, Incidents).

4.2 Bureau EHS is responsible for:

- Adhering to this policy and providing metrics data to OEHS or its delegate on a periodic basis, as prescribed.

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4.3 Office of Strategic Planning (OSP) is responsible for:

- Developing and maintaining tracking documents for metrics.
- Coordinating collection of metrics data.
- Preparing tables and charts for draft metrics reports.
- Finalizing metric report tables and charts based on OEHS and Bureau feedback.

5 Procedure/ Reporting Instructions

5.1 General Reporting Procedures

5.1.1 Monthly Reports

- Include tables and charts generated by OSP, based on input from the bureaus/offices.
- Contain a comparison of the current month and/or Year-to-Date (fiscal basis) reportable metrics, as defined herein, against those from the prior year for
- Summarize and explain, as appropriate, the unusual, non-routine or aberrant from standard metrics values or prior periods.
- Highlight trending information.
- Provide comparison to industry metrics (e.g. Bureau of Labor Statistics).
- Monthly reports which fall on FY Quarters (Oct, Jan, April, July) may contain expanded quarterly information on NOVs, audits and other indicators.

5.1.2 Annual Reports

- Include tables and charts generated by OSP, based on input from the bureaus/offices.
- Contain a comparison of the current year's reportable metrics, as defined herein, against those from the prior year(s).
- Provide an explanation of information included beyond that in the monthly year to date reports.
- Provide analysis by OEHS of comparison to metrics from previous year and progress indicated.
- Summarize the unusual, non-routine or aberrant from standard metrics values.
- Highlight trending information and recommended improvement activities.
- Provide comparison to industry metrics (e.g. Bureau of Labor Statistics data) for predetermined NAICS codes.

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6 Indicators

6.1 Injuries/Illnesses

As part of the injury and illness metrics, the information indicated below shall be assembled, maintained and provided to the OSP from each Bureau/Office on a monthly basis, unless otherwise indicated, for inclusion in the monthly metric report.

6.1.1 **Employees on Payroll:** all employees active at the end of the reporting month/quarter/year (number is provided by BHRA; Reporting Bureaus will leave this line blank).

- Includes full-time, part-time, temporary, seasonal, paid interns, salaried, and hourly employees.
- Does not include vacancies; employees on Terminal or Separation Leave status, full-time military leave, Annual Leave or Sick Leave; contract employees, employees from other agencies assigned at DEP facilities, or unpaid interns/ volunteers.
- “Floaters” (employees who are on loan to another Bureau) are included in the Bureau by which they are assigned work.
- Bureau workforce groups will be classified by NAICS Codes/Primary Operation for annual comparison to BLS

6.1.2 **Total Hours Worked by all Bureau Employees:** total hours (regular shift + overtime) worked by “Employees on Payroll” (number will be provided by BHRA for each workforce group; Reporting Bureaus will leave this line blank).

6.1.3 **Recordable Injuries and Illnesses:** number of DEP employee injuries and illnesses that meet the recordkeeping criteria under PESH and are included on the SH-900 log (see also SH 901 Instructions for Recording and Reporting Public Employees’ Occupational Injuries and Illnesses). Generally, an injury or illness must be recorded if it:

- involves a DEP employee; **and**
- is work-related¹; **and**

¹ A case is considered “work-related” if an event or exposure in the work environment is a discernable cause of the injury or illness. The work event or exposure need only be one of the discernable causes; it need not be the sole or predominant cause. If an injury or illness did not result from an identifiable event or exposure in the work environment, but only manifested itself during work, the injury is not work-related. If the employee had a non-occupational event or exposure, and there is no evidence of a work-related event or exposure that was a cause of the injury or illness, the injury should not be recorded.

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- is a new case²; **and**
 - Results in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness;
or
 - Is a significant work-related injury or illness diagnosed by a physician or other licensed health care professional (LHCP), results from a contaminated needle or other sharp, the medical removal of an employee, hearing loss, or TB exposure.
- Does not include contractor injuries or OSHA/PESH non-recordable injuries and illnesses.
- Classify injuries by severity (severity will be reported monthly but reconciled annually) – see Attachment at §8.1 for specific criteria.

6.1.4 **Days Away from Work:** total number of days (includes weekends and holidays) employees were instructed by a LHCP to be away from work due to “new case,” “work-related” injuries or illnesses (as defined by PESH §901.7).

- New cases, when the resulting days away from work occur in successive months, will have the working days lost reported in the month the hours were lost.
 - If an employee returns to work after an injury and illness, and then has additional time away from work due to the same injury, it is not a new case. Days away from work in this event will be reported in the month the working days were lost: time lost during the month in which the injury/illness occurred is noted as “lost time;” time lost during subsequent months is recorded in the month during which the time is lost.
- Count the number of calendar days away from work beginning on the day after the injury (including weekends, holidays, and previously approved leave days, etc.) until the employee is medically approved for return to work. When there is a difference between the employee’s time away from work and the doctor’s recommendation, the days away from work should be reported based on the doctor’s recommendation.

² “New Case” is defined as a work-related injury/illness not previously recorded for an employee, i.e., the employee has not previously experienced a recorded injury/illness of the same type affecting the same part of the body. If an employee returns to work after an injury and illness, and then has additional time away from work due to the same injury, it is not a new case. Includes injury/illness from which an employee had recovered completely, but work-related incident caused the signs or symptoms to reappear.

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- If an injury or illness results in more than 180 days away from work, the days away from work will be capped at 180 days.

6.1.5 DEP employee injuries from vehicle accidents: number of recordable injuries that resulted from accidents involving vehicles used on City business (if one car accident results in injuries to two employees, report “2”). (Note: this number is a subset of the total injuries reported in the “Recordable Injuries and Illnesses” line item).

- Vehicles include cars, SUVs, medium and heavy duty trucks, motorcycles, ATVs, boats, and other on-road and off-road vehicles.

6.1.6 Notifications to PESH: the number of (1) fatalities and (2) employees hospitalized due to incidents resulting in hospitalizations of 2 or more employees.

6.1.7 Fatalities: total number of DEP employee fatalities during the month.

6.1.8 Multiple Hospitalizations: total number of employees hospitalized (admitted) during the month as a result of a single incident that resulted in hospitalizations of 2 or more employees; includes only incidents that resulted in multiple employee hospitalizations, but report the total number of employees hospitalized as a result of such incidents (e.g., if one incident results in injuries to three employees, report “3”).

6.1.9 Total Incidence Case Rate: Compares the number of PESH recordable injuries and illnesses to the total hours worked by all employees. (The incidence rate of injuries and illnesses may be computed using the following formula:

$\begin{aligned} & (\# \text{ Injuries and illnesses}) \times (200,000) \div \text{employee hours worked} \\ & = \text{Total Incidence Case Rate} \end{aligned}$
--

- The 200,000 hours in the formula represents the equivalent of 100 employees working 40 hours per week, 50 weeks per year, and provides a standard base for the incidence rates nationally.
- This calculation does not provide an indication of the seriousness of the incidents – a broken leg is given the same weight as a laceration requiring one stitch.
- The Total Incidence Case Rate shall be included in the monthly report.

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6.1.10 Injuries Due to Workplace Violence: # of recordable injuries as a subset of total injuries which were sustained by an act of aggression or workplace violence. For BPS, this will include injuries sustained by personnel in the line of duty by an act of aggression from either another employee or the public.

6.2 Notices of Violation (NOVs)

As part of the NOV metrics, the information detailed below shall be assembled, maintained and provided by OEHS to the OSP on a monthly basis, unless otherwise indicated, for inclusion in the monthly metrics report.

NOVs issued (physically provided) to DEP on the date of the inspection shall be recorded for that month. NOVs received by mail, email or fax shall be recorded for the month of the date of the transmittal letter. Bureaus are responsible for entering all NOV-related information into the Agency-wide NOV tracking database.

6.2.1 NOVs received: All NOVs received from regulatory agencies; total should equal the sum of the Total number of Federal NOVs + Total number of State Agency NOVs + Total number of Local Agency NOVs. Only the number of NOVs are to be recorded; NOVs with multiple citations should be recorded on this line as "1" NOV. Note: For Metrics purposes, the term "NOV" includes the following:

- Notices of Violation
- Violation Orders
- Notices of Non-Compliance
- Notice of Deficiency
- Any other notice which requires corrective action by a certain date or a fee/penalty.

6.2.1.1 Federal NOVs received: All NOVs received from Federal regulatory agencies (e.g., US Environmental Protection Agency (EPA)).

6.2.1.2 State Agency NOVs received: All NOVs received from State regulatory agencies.

6.2.1.2.1 New York State Department of Environmental Conservation (DEC)

6.2.1.2.2 New York State Department of Health (DOH)

6.2.1.2.3 New York State Department of Labor (DOL) (includes PESH)

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6.2.1.2.4 Other New York State Agencies

6.2.1.3 Local Agency NOVs received: Include all NOVs received from local regulatory agencies

6.2.1.3.1 New York City Fire Department (FDNY)

6.2.1.3.2 New York City Department of Buildings (DOB)

6.2.1.3.3 Other Local Agencies: All NOVs from other local regulatory agencies (e.g., County Health Department, County/local Code enforcement, etc.)

6.2.2 **Total Citations Received:** total number of regulatory sections cited on “Total NOVs Received.” This shall be provided monthly.

6.2.3 **Previous Citation:** Number of NOVs related to non-compliance previously cited by regulator; must be same citation at same location within 3 years.

6.2.4 **NOVs by Type**

6.2.4.1 Environmental - Air

6.2.4.2 Environmental – Water

6.2.4.3 Environmental – Waste

6.2.4.4 Environmental – Tanks

6.2.4.5 Safety – Construction

6.2.4.6 Safety - Operations

6.3 Environmental Releases

As part of the Environmental Releases metrics, the information indicated below shall be assembled, maintained and provided to the OSP on a monthly basis, unless otherwise indicated, for inclusion in the monthly metrics report.

Include petroleum and chemical releases that were required by law to be reported to regulatory agencies in accordance with Agency policy and NYSDEC and USEPA regulations and those releases not required by law to be reported to regulatory agencies, unless otherwise indicated herein. Releases include solids, semi-solids, liquids and gases, unless otherwise specified.

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6.3.1 Total Releases

- total reportable + total non-reportable (**Types**)
- total due to DEP equipment failure + total due to DEP human error + total due to contractor equipment failure + total due to contractor human error + other (**Causes**)

6.3.1.1 Total Reportable Releases:

6.3.1.1.1 Petroleum (and any other non-polar substance) releases required by law to be reported to regulatory agencies (i.e., NYSDEC, NRC) in accordance with Agency policy and NYSDEC and USEPA regulations

6.3.1.1.2 Non-Petroleum (chemical) releases that meet reportable criteria.

EXCEPT:

- Releases unrelated to DEP activities, even if DEP property is impacted.

6.3.1.2 **Total Non-Reportable Releases:** Petroleum (and any other non-polar substance and chemical releases not required by law to be reported to regulatory agencies in accordance with Agency policy and NYSDEC and USEPA regulations (i.e., spills to the environment below the RQ, spills into containment/impervious surfaces, etc.) EXCEPT:

- Incidental Releases, as defined by Agency policy.
- Sewage and Sludge Releases that enter the “Waters of the State” – they will be reflected in the “Environmental Permit Exceedences” metric (sewage or sludge that does not enter the “Waters of the State” is excluded from metrics).
- Chlorine (RMP) Releases or Near Misses; they will be reflected in the “RMP/PSM Releases” metric.
- Releases unrelated to DEP activities, even if DEP property is impacted.
- Releases of mercury from broken light bulbs.

6.3.2 Causes of Environmental Releases

6.3.2.1 DEP Equipment Failure – all releases whose root cause was DEP equipment, as further categorized below:

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<u>1) Vehicles</u>	
<p>Work Vehicles</p> <ul style="list-style-type: none"> • Backhoes • Front-end loaders • Catch-basin Equipment (e.g., Rodders/Flushers/Vactors) • Cranes • Trucks with significant tool storage 	<p>Passenger Vehicles (personnel transport)</p> <ul style="list-style-type: none"> • Cars/pick-up trucks • Boats <p>Light Duty Vehicles</p> <ul style="list-style-type: none"> • Riding mowers • PITs • GEMs
<u>2) Tanks, Containers and Appurtenances</u>	
<ul style="list-style-type: none"> • Tanks (includes sight-glass) • Transformers • Pumps • Piping & valves 	<ul style="list-style-type: none"> • Secondary containment • Transfer containment • Instrumentation • Delivery at connection • Delivery from truck
<u>3) Process and Ancillary Equipment</u>	
<ul style="list-style-type: none"> • Engines • Motors • Piping, Pumps, Valves, Hoses, Fittings • Other 	

6.3.2.2 DEP Human Error – all releases whose root cause was DEP employee error (e.g., failure to follow SOP, incorrect use of tool, inadequate PM).

6.3.2.3 Other – all releases which were:

- Related to DEP activities with a root cause other than the two above; or
- Discovered on DEP property and believed to be attributable to DEP actions or equipment.

6.4 RMP/PSM Releases

As part of the RMP/PSM Releases metrics, the information indicated below shall be assembled, maintained and provided to the OSP on a monthly basis, unless otherwise indicated, for inclusion in the monthly metric report.

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6.4.1 **Total RMP/PSM chlorine incidents:** number of chlorine releases that met the definition of an incident as a release which causes the facility to initiate their Emergency Action Plan (EAP), Emergency Response Plan (ERP) or Integrated Contingency Plan (ICP).

6.4.1.1 A catastrophic release of chlorine as described in 40 CFR 68. (*Catastrophic release* means a major uncontrolled emission, fire, or explosion, involving one or more regulated substances that present imminent and substantial endangerment to public health and the environment.)

6.4.2 **Total RMP/PSM chlorine releases:** number of unanticipated chlorine releases not meeting the definition of an incident above. Small anticipated releases as a result of an operational task should not be included in this category.

6.4.3 **Total RMP/PSM chlorine “near misses”:** number of chlorine equipment or procedural non-conformances or conditions that did not result in an incident or a release (as defined in 6.4.1 or 6.4.2) but might have done so under different circumstances.

6.5 Environmental Permit Exceedences

As part of the Environmental Permit Exceedences metrics, the information indicated below shall be assembled, maintained and provided to the OSP on a monthly basis, unless otherwise indicated, for inclusion in the monthly metrics report.

6.5.1 **Total Exceedences:** Includes all permit violations or exceedences, regardless of whether an NOV was received (equal to the sum of air exceedences + water exceedences + reportable wastewater spills + wastewater exceedences).

6.5.1.1 **Air Exceedences:** *all air permit violations or exceedences, regardless of whether an NOV was received.*

6.5.1.2 **Water Exceedences:** *all water permit violations or exceedences, regardless of whether an NOV was received (excursions from SPDES permit requirements).*

6.5.1.3 **Wastewater Exceedences:** *all wastewater operating permit violations, or exceedences (other than reportable releases – wastewater spills), regardless of whether an NOV was received. These are divided into 2 separate categories:*

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6.5.1.3.1 **Non-Compliance Events:** include all bypasses, treatment reductions, process upsets and chlorination interruptions which are reported to NYSDEC orally within two hours of confirmation.

6.5.1.3.1.1 **Raw Sewage Bypasses:** include all events which result in the restriction of sewage flow to or from the treatment plant that is less than its actual average dry weather flow (e.g. throttling at plants or pumping stations; closing of regulator gates; blockages/clogs in collection system; power failures resulting in loss of pumping, etc., - all during dry weather).

6.5.1.3.1.2 **Wet Weather Bypasses:** include the following:

- Events during which a plant throttles its influent flow to less than two times plant (2X) design flow, and for which DEC notification is required. Exceptions are those instances occurring in accordance with a DEC-approved Wet Weather Operating Plan.
- Events during which a plant is pumping more than 1.5 times its rated capacity, but less than 1.5 times rated capacity is reaching the aeration tanks, and for which DEC notification is required.
- Events during which bypasses occur within the Collection System during wet weather, and for which DEC notification is required.

6.5.1.3.1.3 **Disinfection Incidents:** include instances when disinfection standards are not met. This applies to Chlorine, Hypo and UV disinfection.

6.5.1.3.1.4 **Sewage Spills:** include sewage (sewage, sludge, centrate, etc.) spills that reach the waterways (Waters of the State) and must be reported to DEC.

6.5.1.3.1.5 **Other:** include all other items that are reported to DEC such as illegal connections, tidal inflow, etc.

6.5.1.3.2 DMR Excursions

6.5.1.3.2.1 **Effluent Limit Exceedences:** include exceedences of a specified effluent parameter (quantities, quality, rates and concentrations of chemical, physical, biological, and other constituents of effluents) limited by permit, discharging into the Waters of the State. Examples include: daily maximum or weekly and monthly average limits on concentrations or loadings, monthly average percent removal efficiencies, etc.

6.5.1.3.2.2 **Lab Related Issues:** include issues related to laboratory analyses deficiencies (e.g., inadequate preservation; quality control failures; lab accidents; etc.)

6.5.1.3.2.3 **Other:** include all other items that are reported to DEC such as sampling issues, missing log sheets, etc.

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6.6 Audits

As part of the Audit metrics, the information indicated below shall be assembled, maintained and provided to the OSP by OEHS on a monthly basis, unless otherwise indicated, for inclusion in the monthly metric report.

6.6.1 **Facilities Audited:** Total number of facilities audited by OEHS during the calendar month.

6.6.2 **Audit Findings:** Total number of audit findings identified in the OEHS audits during the calendar month. Number of findings is determined by using the audit tracking table query for “date identified.

6.6.2.1 *PIs: Total number of Priority I audit findings identified in the OEHS audits during the calendar month.*

6.6.2.2 *PIIs: Total number of Priority II audit findings identified in the OEHS audits during the calendar month.*

6.6.3 **Audit Findings – Historical:** Total number of audit findings identified during the prior OEHS audit of each facility included in “Facilities Audited.”

6.6.3.1 *PIs – Historical: Total number of Priority I audit findings identified during the prior OEHS audit of each facility included in “Facilities Audited.”*

6.6.3.2 *PIIs – Historical: Total number of Priority II audit findings identified during the prior OEHS audit of each facility included in “Facilities Audited.”*

6.6.3.3 *Findings Categorized by Subject Matter Area (e.g., CAP Areas, H&S/E)*

Note: Audit Metrics are prepared by OEHS for inclusion in the Monthly reports and may include analyses by regulatory areas as well as total findings.

6.7 Hazardous Waste Generation

As part of the Hazardous Waste Generation metrics, the information indicated below shall be assembled, maintained and provided to the OSP on a monthly basis, unless otherwise indicated, for inclusion in the monthly metrics report.

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6.7.1 **Routine Operations (lbs.):** All hazardous waste shipped during the calendar month from routine operations including waste associated with all normal operational and laboratory processes, regardless of the frequency of generation

- Includes lab wastes generated as a foreseeable part of lab operations, even if generated only sporadically during the course of the year
- Includes waste generated as a result of routine maintenance activities, even if those activities are conducted infrequently

6.7.2 **Remedial Projects (lbs.):** All hazardous waste shipped during the calendar month from remedial activities, including waste generated from BEDC projects at host-bureau sites. For BEDC projects, the quantity will be reported in BEDC metrics.

6.7.3 **Episodic Projects (lbs.):** All hazardous waste shipped during the calendar month from non-routine, unforeseeable operational processes (e.g., a lab or building clean-out, discovered used chemicals, etc.).

6.7.4 **Episodic Projects (no.):** Total number of episodic projects that resulted in hazardous waste being shipped during the calendar month; does not include projects that did not have any shipments of hazardous wastes. For BEDC projects, the number will be reported in BEDC metrics.

7 Contractor Indicators

As part of the Contractor metrics, the information indicated below shall be assembled, maintained and provided to the OSP by Bureaus on a monthly basis, unless otherwise indicated, for inclusion in the monthly metrics report. “Contractor” includes employees of the Contractor and employees of the subcontractors and consultants hired to perform work for DEP.

Note: Operating and Support Bureau Contractors (non-BEDC) data for injuries and NOV's will be entered on the worksheet for the Bureau. Data for BEDC contractors will be entered onto the BEDC worksheet.

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7.1 Illnesses/Injuries

- 7.1.1 **(All Bureaus) Injuries to contract employees:** the total number of contractors' employees incurring recordable injuries and illnesses (to be reported by bureau managing the contract).
- 7.1.2 **(BEDC only) Contract employees' hours worked:** Total number of hours worked by BEDC contractors during the calendar month.
- 7.1.3 **(BEDC Only) Contract employee incident rate:** compares the number of PESH recordable injuries and illnesses to the total hours worked by contract employees
- 7.1.4 **(BEDC Only) Contract employees' lost working days:** Total number of days that DEP contractors' employees were unable to work due to a work-related injury or illness that occurred at a DEP project/facility.
- All lost calendar days (including weekends and holidays).
 - Lost time "capped" at 180 days per injury.

7.2 Environmental Releases

- 7.2.1 Total contractor environmental releases
- 7.2.2 Contractor releases by cause
- 7.2.2.1 *Contractor Equipment Failure – releases whose root cause was contractor equipment.*
- 7.2.2.2 *Contractor Human Error – releases whose root cause was contractor personnel error.*

7.3 Notices of Violation

All NOVs issued to BEDC and all Bureau Contractors while they are conducting work at a DEP facility will be submitted to OSP.

- 7.3.1 **NOVs received:** All NOVs received from regulatory agencies; total should equal the sum of the Total number of Federal NOVs + Total number of State Agency NOVs + Total number of Local Agency NOVs. Only the number of NOVs are to be recorded; NOVs with multiple citations should be recorded on this line as "1" NOV. Note: For Metrics purposes, the term "NOV" includes the following:
- Notices of Violation
 - Violation Orders
 - Notices of Non-Compliance
 - Notice of Deficiency

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- Any other notice which requires corrective action by a certain date or a fee/penalty.

7.3.1.1 *Federal NOVs received: All NOVs received from Federal regulatory agencies (e.g., US Environmental Protection Agency (EPA)).*

7.3.1.2 *State Agency NOVs received: All NOVs received from State regulatory agencies.*

7.3.1.2.1 New York State Department of Environmental Conservation (DEC)

7.3.1.2.2 New York State Department of Health (DOH)

7.3.1.2.3 New York State Department of Labor (DOL) (includes PESH)

7.3.1.2.4 Other State Agency NOVs

7.3.1.3 *Local Agency NOVs received: Include all NOVs received from local regulatory agencies*

7.3.1.3.1 New York City Fire Department (FDNY)

7.3.1.3.2 New York City Department of Buildings (DOB)

7.3.1.3.3 Other Local Agencies: All NOVs from other local regulatory agencies (e.g., County Health Department, County/local Code enforcement, etc.)

7.3.2 **Total Citations Received:** total number of regulatory sections cited on “Total NOVs Received.” This shall be provided monthly.

7.3.3 **Previous Citation:** Number of NOVs related to non-compliance previously cited by regulator; must be same citation at same location within 3 years.

7.3.4 **NOVs by Type**

7.3.4.1 Environmental - Air

7.3.4.2 Environmental – Water

7.3.4.3 Environmental – Waste

7.3.4.4 Environmental – Tanks

7.3.4.5 Safety – Construction

7.3.4.6 Safety – Operations

EHS Metrics Guidance

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8 Reconciliations

8.1 Monthly

Injuries

On a monthly basis, injury data (past months) are updated to account for cases which not all data was available within the normal reporting period.

Exceedences and NOVs

Because of the lag time or delay in receiving reports of exceedences or copies of NOVs, affected bureaus will do a monthly reconciliation and update of the numbers reported in both categories to accurately reflect the number of items attributable to any previous month.

8.2 Annual

Days Away from Work and Severity of Injury/Illness

In order ensure the accuracy and completeness of information concerning the number of days away from work and associated severity attributable to each injury/illness, days lost as a result of each such incident will be reconciled on at least a calendar year basis.

9 Recordkeeping

9.1 Each Bureau and Office shall retain records, including back-up documentation, for all metrics specified herein for at least 5 years.

9.2 OEHS and OSP shall retain all reports and data provided to them by the Bureaus and Offices.

10 Attachments

10.1 Injury/Illness Severity Classifications

NEW YORK CITY		
DEPARTMENT OF ENVIRONMENTAL PROTECTION		
Policies, Procedures, and Guidelines	Environmental, Health & Safety	
	EHS Metrics Guidance	Revision: <u>1</u> Effective Date: <u>January 17, 2012</u>

Metrics SOP

Attachment 8.1: EH&S Metrics – Injury & Illness Severity Categorization

There are seven categories of injury severity. Thresholds are based on lost workdays and take into account employee sick day allotments.

Slight. Injury or illness requiring medical attention beyond first-aid treatment (recordable), when the employee returns to work either the same day or the next day (no lost workdays). Employee may resume normal work duties or be temporarily reassigned for *light duty*.

Minor. An injury or illness, less than moderate or major, that results in 1 to 7 lost workdays (no hospitalization).

Moderate. An injury or illness that results in 8 or more lost workdays or requires admission to a medical facility for 1-4 days.

Major. A non-fatal injury or illness that does not result in permanent total disability or permanent partial disability, but results in:

- a. admission to a medical facility for five days or more,
- b. any of the following regardless of hospital status:
 - (1) Unconsciousness for more than 5 minutes because of head trauma
 - (2) Fracture of any bone except simple fracture of the nose, finger or toe.
 - (3) Traumatic dislocation of major joints
 - (4) Moderate to severe laceration resulting in serious hemorrhage or requiring extensive surgical repair
 - (5) Injury to any internal organ
 - (6) Any second or third degree burn over 10 percent of the body surface.

Severe. Injury or illness that does not result in death or permanent total disability, but, in the opinion of competent medical authority, does result in permanent impairment or loss of any part of the body (e.g., loss of the great toe or the thumb or more severe)

Critical. Non-fatal injury or illness that, in the opinion of competent medical authority, permanently and totally incapacitates a person such that he or she cannot follow any gainful occupation; or the loss of use of, both hands, or both feet, or both eyes, or a combination of any of these body parts as a result of a single mishap (constitutes a permanent total disability).

Fatal. Injury or illness that is caused by a mishap or complications arising from the mishap and results in death. The length of time between the mishap and a later death has no effect on the assignment of a fatal injury classification.