



O & M Industries

**INJURY AND ILLNESS
PREVENTION PROGRAM
(IIPP)**

O&M Industries will provide employee access to the IIPP Program.

(A) As used in this subsection:

1. The term “access” means the right and opportunity to examine and receive a copy.
2. The term “designated representative” means any individual or organization to whom an employee gives written authorization to exercise a right of access. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative for the purpose of access to the Program.
3. The term “written authorization” means a request provided to the employer containing the following information:
 - a. The name and signature of the employee authorizing a designated representative to access the Program on the employee's behalf;
 - b. The date of the request;
 - c. The name of the designated representative (individual or organization) authorized to receive the Program on the employee's behalf; and
 - d. The date upon which the written authorization will expire (if less than one (1) year).

(B) The employer shall provide access to the Program by doing one of the following:

1. Provide access in a reasonable time, place, and manner, but in no event later than five (5) business days after the request for access is received from an employee or designated representative.
 - a. Whenever an employee or designated representative requests a copy of the Program, the employer shall provide the requester a printed copy of the Program, unless the employee or designated representative agrees to receive an electronic copy of the Program.
 - b. One printed copy of the Program shall be provided free of charge. If the employee or designated representative requests additional copies of the Program within one (1) year of the previous request and the Program has not been updated with new information since the prior copy was provided, the employer may charge reasonable, non-discriminatory reproduction costs (per Section 3204(e)(1)(E)) for the additional copies. or,
2. Provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the Program. Unobstructed access means that the employee, as part of his or her regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

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**O&M Industries
Safety Policy Statement**

No function of O&M Industries is so critical as to require a compromise of safety. Accidents and injuries can take a terrible toll on the available resources within O&M Industries, not only monetarily, but also in terms of human suffering to employees, their co-workers, and their families and loved ones.

To achieve this goal the Company has adopted an injury and illness prevention program. This program is everyone's responsibility as we work together to identify and eliminate conditions and practices that reduce the benefits of a safe and healthy work environment.

It is our desire to provide not only a safe work environment, and comply with all federal, state and local safety regulations, but also to create an atmosphere that promotes safety. We want each employee to know that every reasonable step is being taken by management to reduce the potential for an accident. We expect every employee to participate in this program.

Please join your fellow employees in achieving our ultimate goal of an injury free work place.

Tom Benzinger

January 1, 2021

Manager of Operations

Date

Responsibility

The Injury and Illness Prevention Program (IIPP) administrator,

Safety Coordinator: Tom Benzinger
Program Administrator: Rob McBeth

Has the authority and responsibility for implementing the provisions of this program for O&M Industries.

All managers and supervisors are responsible for implementing and maintaining the IIPP Program in their work areas and for answering worker questions about the IIPP Program. A copy of this IIPP Program is available from each manager and supervisor.

Designated Safety Representative

The role of the appointed safety officer or General Manager is to administer and maintain the safety and health program. To do this the safety officer is charged with the following:

- **Maintain current information on local, state and federal safety and health regulations.**
- **Act as liaison with government agencies.**
- **Establish a system for maintaining the records of inspections, abatement and training.**
- **Arrange for safety and health inspections and follow up to insure necessary corrective action is completed.**
- **Implement the safety program to target exposures to loss and compliance with applicable government standards.**
- **Make recommendations to eliminate, control or engineer unsafe conditions out of the work environment.**
- **Conduct periodic inspections of facilities.**
- **Participate and be involved in accident and injury investigations.**

Department Manager / Supervisor

Department managers and supervisors are responsible to ensure that Company safety and health policies and procedures are clearly communicated and understood by all employees. They are expected to do everything within their control to assure a safe workplace in their area. Managers and supervisors will:

- Keep abreast of safety and health regulations affecting the operations they supervise.
- Be responsible for the safety of their individual departments.
- Develop general and specific safety guidelines for their department, with help from the appointed safety officer.
- Enforce rules fairly and uniformly.
- Conduct injury and accident investigation
- Ensure that unsafe conditions and practices are corrected.
- Conduct appropriate safety orientation and training.
- Conduct safety inspections of their work areas.
- Insure that equipment is maintained and in good condition.
- Provide the necessary personal protective equipment and train employees in its use.

Employees

Employees are responsible for following all written and verbal safety instructions, and will:

- Report all injuries immediately no matter how minor to their supervisors.
- Accomplish their duties using safe work practices.
- Will be regularly evaluated on his or her compliance with safe work practices.
- Coach fellow employees on safe work practices, whenever appropriate.
- Notify a supervisor in the event of an observed unsafe condition or practice.
- Actively contribute to the success of the overall safety program.

- Will be subject to disciplinary action up to and including termination for failure to follow safe work practices and procedures or who violate the Company's safety rules or directives.

Departmental Responsibilities

All accidents or incidents must be reported no matter how minor. Supervisors and employees have specific reporting responsibilities.

Supervisor:

- Maintain department first aid log.
- Insure all employees reporting a work-related accident or injury are sent for appropriate medical treatment.
- Complete the supervisor's report of incident, accident, injury or fire.

Employee:

- Report all work-related accidents, injuries or illnesses to your supervisor immediately.

Employee Safety Orientation

When a new employee is about to start work, the supervisor will take time to familiarize the person to the job environment, find out what the new person can and cannot do, and integrate safety into each aspect of their job. The supervisor will complete the new employee orientation checklist.

The supervisor will:

- **Orient the employee to the work place in general. Any special plans or procedures will be discussed with an emphasis on safety.**
- **Introduce the employee to key personnel.**
- **Show the employee the work area and discuss what the employee will be doing and what the hazards involved are.**
- **Cover the areas under general information on the new employee checklist and discuss safety and performance expectations.**
 - **Provide the employee with the necessary personal protective equipment.**
- **Monitor the employee to insure that tasks are performed correctly.**

Communication

The Company recognizes that open, two-way communication between management and staff on health and safety issues is essential to an injury free, productive workplace. The following communication system facilitates this in a readily understandable format.

- **The new employee orientation will include a review of the Company's IIPP and a discussion of policy and procedures that the employee is expected to adhere to.**
- **From time to time, the Company will post and/or distribute written safety notifications. Employees should check Company bulletin boards regularly for such postings. Questions about the meaning or the implementation of safety practices should be directed to your supervisor.**
- **Other methods of communication of health and safety information include, monthly safety meetings.**
- **All employees are encouraged to inform their manager, supervisor or safety designee of any matter, which the employee perceives to be a workplace hazard. Employees are also encouraged to make safety-training suggestions. If an employee wishes, he or she may make such notification anonymously.**
- **NO EMPLOYEE WILL BE RETALIATED AGAINST FOR REPORTING HAZARDS, POTENTIAL HAZARDS OR FOR MAKING SUGGESTIONS RELATED TO SAFETY.**
- **The safety officer will review all reports and suggestions.**
- **Any directives issued as a result of the investigation shall be distributed to all employees affected by the hazard or shall be posted on appropriate bulletin boards.**

Training

Training is essential to maximize the skills of our employees. It is the key to productivity. O&M Industries wants to incorporate safety as an integral part of this training. Employees need to work productively, safely and efficiently. The supervisor is the essential link in ensuring this outcome. He or she must first know how to perform the assignment and be aware of the safety and health hazards facing employees under their immediate supervision. Supervisory personnel should follow these guidelines.

- Supervisors are responsible for ensuring that those under their direction receive training on general workplace safety as well as safety and health issues specific to each job.

- Training frequency

Orientation: All new employees prior to starting work.

Safety meetings: Conduct monthly safety meetings or when special concerns are raised.

General training: As needed.

Document all training: A sample training attendance form is included.

- Supervisors should hold employee safety meetings to discuss inspections, progress reports, anticipated hazards, accidents, injuries and any other business that is pertinent to the safety of the employees on the job.
- Additional meetings should be held after any injury, accident, and accident investigation, prior to any unusually hazardous operation and when new equipment or procedures are introduced.
- Managers or supervisors will insure that required OSHA training for all employees in their departments is completed in accordance with applicable schedules. Training will be accomplished on a regular basis as required.

The Company recognizes that continuing safety and health training is needed for:

- All employees given a job assignment for which they have not previously received training. If the position is supervisory, such training shall include familiarization with hazards and risks faced by the employee under the supervisor's direction. Training shall be provided whenever new substances, processes, procedures or equipment are introduced which pose a new hazard.

Basic Rules for Accident Investigation

- **The purpose of an investigation is to find the cause of an accident and prevent further occurrences, not to fix blame. An unbiased approach is necessary to obtain objective findings.**
- **Visit the accident scene as soon as possible, while facts are fresh and before witnesses forget important details.**
- **If possible, interview the injured worker at the scene of the accident and walk him or her through a re-enactment.**
- **All interviews should be conducted as privately as possible. Interview witnesses one at a time. Talk with anyone that has knowledge of the accident, even if they did not actually witness it.**
- **Consider taking signed statements in cases where facts are unclear or there is an element of controversy.**
- **Document details graphically. Use sketches, diagrams and photos as needed, and take measurements when appropriate.**
- **Focus on causes and hazards. Develop an analysis of what happened, how it happened and how it could have been prevented. Determine what caused the accident, not just the injury.**
- **Every investigation should include an action plan. How will you prevent such accidents in the future?**
- **If a third party or defective product contributed to the accident, save any evidence. It could be critical to the recovery of claims costs.**

Hazard Inspections And Abatement

Conducting periodic inspections of O&M Industries premises is an important part of ensuring that employees work in a safe environment. The material in this section will help in conducting and documenting such inspections.

Inspections should target:

- Exposures that have been involved in past losses and have not been corrected from previous inspections.
- Policies and procedures.
- Rules and regulations.
- Lack of adequate tools to do the job.
- Maintenance of equipment or facilities.
- Environmental conditions such as noise, lighting or hazardous chemicals.
- Lack of training.
- Enforcement of rules and regulations.
- The introduction of new substances processes procedures or equipment that present a new safety and health hazard. Each supervisor is responsible for promptly reporting to the safety officer whenever a new substance (i.e., chemical or solvent), new work procedure, technique or new equipment is introduced which may pose a safety risk.
- All new chemicals or products must have a current MSDS on file.

Use the checklist found in this section to document inspections. Use the report of safety hazard form as a tool to report more serious observations. Hazards and observations can also be brought to the attention of the safety officer.

When performing inspections, look beyond the items on the form. No inspection checklist is complete or can cover every situation.

Abatement of Hazards

It is the Company's intention to eliminate all hazards and unsafe work practices immediately. However, some corrective actions require more time. Priority will be given to severe and imminent hazards.

Hazards and observations will be documented in the monthly safety meetings. Corrective actions and the efforts made to address each hazard or observation will be documented. A hazard or observation cannot be removed from the safety audits until it can be resolved to the satisfaction of the safety officer and management.

While corrective action is in progress necessary precautions are to be taken by the supervisor to protect or remove employees from exposure to the hazard.

- Employees shall not enter an imminent hazard area without prior specific approval of the supervisor.**
- Employees who are expected to correct the imminent hazard should be properly trained and provided necessary safeguards.**

Safety and Health Compliance Process

While the four-step progressive disciplinary process listed below will generally be followed, any unsafe action can be considered serious enough to warrant disciplinary action up to and including termination for a first offense.

- Should a safety or health violation be noted, the supervisor is to informally discuss the behavior with the employee, stating the potentially dangerous result and the correct actions to follow. The supervisor should conduct retraining to insure employee understanding.
- A second violation should generate a formal verbal warning or a written warning, depending on the severity.
- The third infraction results in a formal written warning and/or suspension.
- A fourth violation may lead to suspension or termination.
- A fifth violation in one year will lead to termination.

ENFORCEMENT OF THE SAFETY PROGRAM

A. Progressive Disciplinary Program

1. There is a comprehensive training program where all employees will be introduced to the safety rules and guidelines.
2. The Foreman will review with the employees the job hazard analysis for each machine and procedure used in our shop or on the job site.
3. It is the responsibility of all employees to learn and adhere to the procedures and policies outlined in this program.
4. Any employee found to be in violation of a safety rule or guideline will be subject to disciplinary action, up to and including termination of employment. The following is the guideline for discipline:
 - a. Verbal warning – copy to employees file.
 - b. Written warning- outlining nature of offense and corrective action – copy to employees file.
 - c. Written warning and three (3) days suspension without pay, noted in employees file.
 - d. Termination – if an employee is to be terminated, specific and documented communication between foremen or management and the employee must have occurred as outlined above.
5. It should be noted that some violations may be serious enough to warrant immediate suspension or termination on the first offense.
6. Employee files will be reviewed annually and at that time safety-related work habits will be discussed with the employee.
7. Foremen will be subject to disciplinary action for the following reasons:
 - a. Repeated safety violations by persons under their direction.
 - b. Failure to maintain safe conditions.
 - c. Failure to maintain good housekeeping standards in their department.

Records

The regulation requires that records be kept of the steps taken to establish and maintain our injury and illness prevention program and shall include:

- **Inspections and investigations.**
- **Safety and health training.**
- **New employee orientation.**
- **Occupational injury and illness records. Prepare and maintain a Cal/OSHA form 5020 or its equivalent OSHA form No. 300.**
- **Every year, complete and post OSHA form No. 300 no later than February 1, until March 1 where employees can see it.**

The General manager, safety officer or location designee will retain the above records.

Each supervisor will forward to the General manager, safety officer or designee the following records as required:

- **All records of inspections/investigations, including date(s), person(s) who performed the inspection(s)/investigation(s), the unsafe conditions or work practices identified and the corrective action(s) taken. (Departmental self-inspection checklists)**

The Safety Supervisor will document records reflecting the safety and health training received by employees. These records should contain the employee's name, training date, type of training and identification of the trainer. (Training/meeting attendance sheet)

Each supervisor will maintain an updated copy of the Company's IIPP.