

# Illness Injury Prevention Plan

# **TABLE OF CONTENTS**

Element 1	Responsibility for Program Implementation	4
Element 2	Employee Compliance Safety Communication	7
Element 3	Scheduled and Periodic Inspections (Hazard Assessment)	8
Element 4	Accident/Exposure Investigation	10
Element 5	Correcting Unsafe Conditions / Work Practices	11
Element 6	Safety Training	12
Element 7	Code of Safe Practices	14
Element 8	Posting and Availability of Code of Safe Practices	15
Element 9	Periodic Supervisors Meetings	17
Element 10	"Toolbox / Tailgate" Meetings	18



## MANAGEMENT SAFETY POLICY

USS Cal Builders, Inc. considers the prevention of accidents an integral part of all processes and the first priority in all aspects of our business. We are vitally concerned about human suffering and financial losses resulting from on-the-job accidents, both for the individual and the company. Therefore, the Safety of all employees and the prevention of accidents is a core value of the company and the coordinated efforts of all employees are vital to achieving our goals.

Although providing safe working conditions is primarily a management responsibility, accident prevention can be accomplished only through the efforts of all employees. It is the responsibility of each employee to comply with established health and safety policies, regulations and procedures written in this Injury and Illness Prevention Program. The culture of safety is a mindset that is practiced by our employees both on and off the job.

While conditions of each job vary, the basic guidelines we publish provide a guide and, with preplanning and the implementation of basic safety principles, we can achieve our goal of zero accidents and incidents.

We welcome all suggestions that improve our managing of the safety function.



## RESPONSIBILITY FOR PROGRAM IMPLEMENTATION

# Program Administrator and Corporate Safety Director/Risk Management

The administrator of this Injury and Illness Prevention Program (IIPP) will be the Corporate Safety Director, Amy Schneider. As such, she has the authority and responsibility for implementing the provisions of this program for all USS Cal Builders, Inc. projects and facilities. Amy Schneider can be reached at (714) 886-8728, amys@usscalbuilders.com or by U.S. Mail at 8051 Main Street Stanton, CA 90680.

# Responsibility for Implementing the USS Cal Builders, Inc Safety Program

The responsibility for managing and enforcing the daily activities of this program are assigned to supervisors on each project.. All employees are expected to accept responsibility for their safety and to be an advocate for the safety of others.

4



# **Supervisory Compliance**

All Supervisors will be required to establish and enforce safe work practices in the workplace and correct unsafe conditions. Failure to do so will be treated as a violation of USS Cal Builders, Inc.'s Safety Policy and said Supervisor will be subject to the disciplinary actions outlined in the Employee Compliance Section. In addition, Supervisors, at the direction of the Program Administrator, may be required to meet with the Program Administrator to review the supervisor's past performance as it relates to the enforcement of the company safety policy.

# **Field Operations Manager Responsibilities**

Hold subordinate supervision accountable for the implementation of the corporate safety and health program and assure through site audits that unsafe conditions and unsafe behavior is identified and corrected. Express through training that the use of the Job Hazard Analysis (JHA) and pre-planning is a daily requirement for all levels of supervision.

- Investigate injuries and incidents thoroughly and implement corrective action.
- Ensure all new employees are provided with new hire orientation, and each new employee has a mentor to assist in their acclimation into our safety culture.

# **Corporate Safety Director Responsibilities**

- Provide daily support and guidance for safety program administration to project managers and supervisors and develop resources and criteria for IIPP enhancement.
- Monitor project operations for safety program effectiveness and compliance. Act as a resource for project level management regarding all safety issues.

Take immediate corrective action up to and including the stoppage of any work activity in order to protect the health and safety of any USS Cal Builders, Inc. employee, subcontractor, or other individuals within the project limits.

# **Project Manager Responsibilities**

Successful completion of project activities and, as such, ultimately responsible for the effective implementation of the Injury and Illness Prevention Program at the project level. This is achieved by holding subordinate supervisors responsible for their role in implementation of the Injury and Illness Prevention Program.

• Participate in all accident investigations and review accident reports from subordinate supervisors for completeness and accuracy. Ensure timely submittal of accident investigation reports to Risk Management.



# **Superintendent Responsibilities**

• Daily work activities and the effective implementation of the Injury and Illness Prevention Program by subordinate supervisors, employees.

# Foreman Responsibilities

- Implement the Injury and Illness Prevention Program at the crew level.
- Review the New Employee Orientation Checklist with new employees and evaluate new workers in the job they have been assigned.
- Provide mentoring and training as needed.
- Pre-plan daily work activities and incorporate JHAs for specific hazards in the completion of job.
- Initiate Job Hazard Analysis, site specific safety plan and other safety management best practices. Conduct job specific training for employees whenever a new substance, process, procedure, or new equipment is introduced to the workplace.

# **Employee Responsibilities**

- Work in compliance with the Injury and Illness Prevention Program.
- Submit suggestions and/or recommendations to their immediate supervisor or a company safety manager to improve working conditions and safe work practices.
- Understand that USS Cal Builders, Inc. has a disciplinary policy that will be implemented whenever safety violations rise to the level of employee discipline as outlined in the policy.



#### **EMPLOYEE COMPLIANCE**

USS Cal Builders, Inc. absolutely insists on safe work practices. USS Cal Builders, Inc. supports all Federal and State safety regulations and will maintain full compliance.

If any employee is responsible for a violation of the Construction Safety Orders or the Safety Policy of USS Cal Builders, Inc. that employee shall be disciplined as follows:

## 1st Violation

A verbal reprimand from management and retraining of the employee. After review, employees with repeat violations will be disciplined at the discretion of management. The verbal reprimand will be documented by management and filed with Human Resources.

## 2<sup>nd</sup> Violation

A written reprimand **and** warning shall be issued to the employee. A suspension of up to one (1) week without pay if within one (1) year of the date of occurrence of the first violation. The written reprimand and warning shall be documented by management and filed with Human Resources.

# 3rd Violation

A minimum one (1) week suspension without pay or possible termination of employment if within one (1) year of the date of occurrence of the second violation. The disciplinary action will be documented by management and filed with Human Resources.

Dependent upon the seriousness of violation, management reserves the right to increase the disciplinary action at any level of offense.

All prior offenses for employee will be vacated following a one (1) year period with no violations.

Supervisors whose employees continually violate the safety rules of the company will be brought before the Executive Management group to review their role in the support and enforcement of the Construction Safety Orders and the company Safety Program.



## SAFETY COMMUNICATION

USS Cal Builders, Inc. will utilize the following methods and systems for communicating with employees, in a form readily understandable, on matters relating to Occupational Health and Safety. USS Cal Builders, Inc. will also include provisions designed to encourage employees to inform the company of hazards at the work site without fear of reprisal.

- Safety Process Team The Safety Process Team is in place to oversee and advise the Corporate Safety Committee and to direct and support all other safety functions of the company. The Safety Process Team sets a visibly high standard for safety performance and innovation company wide. With oversight by the Company's President, this team includes senior management in supporting the first core value of the Company, SAFETY. The team reviews and approves all changes to the company safety program and standardized safety processes. The team meets four times a year, one week before the Supervisors Quarterly Safety Meetings.
- Corporate Safety Committee USS Cal Builders, Inc. has a corporate Safety Committee with
  members selected from Management and Field Supervision. The committee meets monthly and
  focuses on the development and implementation of basic safety processes. This safety committee
  will provide information and recommendations to management about occupational safety and
  health conditions and practices, and to provide a forum for information exchange. Focus for each
  process is on identification of unsafe behavior / conditions, pre-planning of the work and
  employee training and education.
- Area Safety Managers and project supervision work together to address local job site
  conditions, hazard recognition, and correction. Post-incident / injury investigation is
  conducted by this team, followed by corrective action as needed.
- Bulletin Board Postings USS Cal Builders, Inc. posts at each job site all necessary and required safety and health related documents as required by law.
  - Additional safety-related bulletins may be posted periodically at the project site to communicate information to employees.
- Tailgate Meetings At a minimum, jobsite supervisors will conduct crew tailgate safety meetings weekly. Additional tailgate safety meetings will be held if jobsite conditions warrant.



Two-Minute Startup Meetings - Two-minute startup meetings are held daily to review the work activities for that day. JHAs are used to train and raise employees' awareness of hazards and corrective actions.

• Supervisor's Quarterly Safety Meetings — All supervisory employees meet with senior management to discuss safety issues relevant to company operations. Pertinent safety information is presented to assist them in identifying and correcting unsafe conditions and unsafe behavior.

# **Two Way System of Communication**

USS Cal Builders, Inc. encourages employees to inform the company of any workplace hazard (without fear of reprisal) in any of the following manners:

- Verbally inform any supervisor;
- Contact a Safety Manager;
- Contact the corporate Safety Director by telephone at 714-886-8728
- Contact the company EEO Officer, Rabih El Zein 714-828-4882



#### SCHEDULED AND PERIODIC INSPECTIONS

A qualified person will conduct an inspection to identify and evaluate workplace hazards when the IIPP is first established.

USS Cal Builders, Inc. identifies jobsite hazards by the following methods:

# Scheduled inspections

- Daily by Foreman prior to beginning work
- Daily by Supervisor when job assignments are made
- Periodic by Area Safety Managers (documented inspection)
- Twice monthly by field supervision (documented self-inspection)
- Periodic by Insurance Loss Control Managers

## Non-Scheduled inspections

- Area Safety Managers
- Area Field Operations Manager
- Project Management
- Periodic Upper Management safety walks.
- Periodic inspections to identify and evaluate workplace hazards.
  - When new substances, processes, procedures, or equipment are introduced and pose a hazard.
  - When the employer is made aware of new or previously unrecognized hazards

If non-compliant issues are discovered, appropriate supervision is notified and corrections are made immediately. Additional inspections will be performed to assure correction of deficiencies.



# **ACCIDENT / EXPOSURE INVESTIGATION**

The immediate responsible field supervisor will investigate all occupational injuries, illnesses or near misses and/or damage to equipment resulting from work performed by USS Cal Builders, Inc. They will be assisted by the Corporate Safety Director.

In the event of any accident or injury, the field supervisor will immediately contact the Corporate Safety Director or inform Senior Management. The Corporate Safety Director will begin an immediate investigation.

All investigations will be conducted immediately or upon discovery, and initial written reports must be provided to Risk Management within eight (8) hours. Completed investigations will be made available to corporate individuals within twenty-four (24) hours.

All incident investigations will be documented utilizing the appropriate supervisor's report form.

Upon completion of the investigation, corrective actions will be identified and implemented to minimize the reoccurrence of the accident or near miss.

All investigation reports will be reviewed by the Project Manager, jobsite Superintendent, and Field Operations Manager.

Accident prevention recommendations will be communicated to employees once identified by investigation report findings.



# **CORRECTING UNSAFE CONDITIONS / WORK PRACTICES**

The purpose of this program is to provide methods and accountability for the identification, avoidance, and elimination of unsafe and/or hazardous conditions.

# **Policy**

It is the policy of USS Cal Builders, Inc to provide a place of employment that is free from recognized hazards that cause or are likely to cause death or serious physical harm to employees or the public. Therefore, employees will be trained to recognize unsafe conditions and hazards related to their job duties. When hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, & Personal Protective Equipment (PPE) will be implemented to minimize hazards and to ensure the safety of employees and the public.

# Responsibilities

It is the responsibility of each manager, supervisor, and employee to ensure implementation of this program covering Unsafe Conditions. It is also the responsibility of each employee to report immediately any unsafe act or condition to his or her supervisor and to make all efforts to avoid accidents and injuries.

# **Supervisors**

Supervisors will not allow any employee who has not received the required training to perform any unsafe tasks or activities associated with his or her job. Supervisors will be responsible for communicating appropriate needs to managers/unit heads and/or supervisors. Supervisors will ensure that employees are provided with PPE as necessary for their job.

## **Employees**

Employees shall comply with all applicable guidelines contained in this safety program.

## **Safety Department**

Safety Department will provide assistance to manager, supervisors, and others as necessary on any matter concerning this safety policy and procedure. Safety Department will assist in developing or securing the required training. Safety Department will work with Purchasing to ensure that all newly purchased equipment complies with current safety regulations and this safety policy and procedure.

# **Procedure**

When any unsafe condition is identified, the condition will immediately be inspected by the responsible manager and supervisor. If the manager and supervisor cannot immediately correct the unsafe condition to allow continued operation, the affected area will be isolated and the Safety Department will be notified.



In the case of defective equipment, the equipment will be removed from service and all energy sources isolated using the Lockout-Tagout procedures. The equipment will not be returned to service until the defective condition has been corrected and a thorough satisfactory safety inspection of the equipment and surrounding work areas has been. Imminent danger situations will result in employees being removed from the danger, corrective actions immediately implemented, and a review performed to determine why the condition or action occurred.



#### SAFETY TRAINING

# **Employees**

New employees shall be provided an initial safety orientation and a copy of the USS Cal Builders, Inc. Code of Safe Practices. The orientation will be conducted at time of hire in order to familiarize new employees with the provisions of this Injury and Illness Prevention Program and to emphasize existing safety rules and procedures.

New/current employees will be instructed in general safe and healthy work practices, training will include job-specific training, and updates will occur whenever a new substance, process, procedure, or new equipment is introduced to the workplace (Hazard Communication). Documentation is required for all training.

Employees assigned to a new job will be given safety training regarding any new hazards prior to starting the new work. This training will be conducted by the immediate field supervisor.

Employees will receive additional training any time a new or previously unrecognized hazard is identified.

Through utilization of the JHA process, employees receive training each day via the two-minute startup safety talk given by the foreman.

# **Supervisors**

Supervisors are trained on hazard recognition and safe work practices in their area of responsibility on a continuous basis. This includes quarterly field supervisory meetings, monthly department meetings, pre-project planning meetings, and periodic special training and refresher training as determined by the Area Safety Manager.

Field Supervisors are trained to recognize safety and health hazards to which employees under their immediate direction and control may be exposed.



# **CODE OF SAFE PRACTICES**

A written Code of Safe Practices has been adopted by the company which relates to the company's operations.

- 1. All persons shall follow these safe practices rules, render every possible aid to safe operations, and report all unsafe conditions or practices to managers or supervisors.
- 2. Managers and supervisors shall insist on employee's observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work, and shall take such action as is necessary to obtain observance.
- 3. All employees shall be given frequent injury and illness prevention instructions.
- 4. Anyone known to be under the influence of drugs or intoxicating substances which impair the employee's ability to safely perform the assigned duties shall not be allowed on the job while in that condition
- 5. Running, jumping, horseplay, scuffling, and other acts which tend to have an adverse influence on the safety or well being of the employees shall be prohibited.
- 6. Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
- 7. Employees shall be instructed to ensure that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies promptly to the manager or supervisor.
- 8. Employees shall not enter underground vaults, chambers, tanks, manholes, silos, or other similar confined places that receive little ventilation, unless it has been determined that it is safe to enter.
- 9. Employees shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their supervisor or manager. Respect electricity under all circumstances. Never use electrical equipment in areas of excessive moisture unless all safeguards have been taken. Electric power tools are grounded thru approved cords, including extension, for your safety. Never remove or alter polarized cords or plugs.
- 10. When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back shall be used. Learn and practice the proper way to lift or carry material or any object. Do not operate any type of powered material handling or hoisting equipment unless authorized. Get help in handling heavy or bulky loads.
- 11. Stay clear of heavy earthmoving equipment. Remain aware of warning devices such as bells, horns or whistles. Hard hats are mandatory; always wear one on any construction job. Use other protective gear as recommended when exposed to unusual hazards. Never attempt an operation with which you are not familiar, ask first for specific instructions. Wear suitable work clothes at all times, heavy soled shoes protect against puncture injury.
- 12. Basic first aid is of value in the event of injury. Know how, it may save a fellow workman from death. Never attempt to move a person who may possibly suffer from an injured spine or other internal injury unless proper methods are completely understood. All injuries shall be reported



- promptly to the supervisor or manager so that arrangements can be made for medical or first aid treatment.
- 13. Accident Prevention: All persons must abide by Construction Safety Orders; General Industry Safety Orders and Company rules. Posters and other safety material are displayed for the benefit of employees, read and abide by these suggestions. Give every possible aid in the event of injury.
- 14. Accident Reporting: Report all personal injuries to a superior immediately. Obtain authorization for any medical attention off the job. Medical release is necessary before returning to work.
- 15. Job Site: Keep work areas free of debris, good housekeeping is essential. Remove or correct any hazards. Never work or pass under suspended loads or equipment.
- 16. Work Habits: Assist other trades when necessary to maintain safe operations. Never place yourself, or allow others to work in a dangerous position. Use the right tool or equipment for all work. Use of any alcoholic beverage is strictly prohibited on the job. Don't be party to horseplay, pranks can be fatal. Construction sites offer unusual hazards, walk and work with all due respect for them.
- 17. Hand Tools: Always Use the proper tool and maintain them in good condition at all times. Loose or broken handles, mushroom heads, dull blades, improper size or type of tool should never be used.
- 18. Power Tools: Power activated tools must only be used by licensed personnel. Know the proper method of using, a skill saw; never block back the retractable guard it is for your protection. Never use a tool with which you are not fully experienced.
- 19. Protective Devices: Hand or guardrails, protective covers, toe-boards, ramps and safety devices installed on various tools are for your safety. Do not tamper with remove or damage these protective measures. Replace, correct or report any unsafe guard or device.
- 20. Transportation: When transportation is necessary in other than a passenger vehicle, ride in the cab or sit, do not stand on the bed of the truck. Never ride with arms or legs over the sides, do not sit on the tailgate; it must be closed during transportation of passengers. Be careful of any tools, material or equipment within the truck body which may shift or slide causing injury.
- 21. Flammables, Solvents: Never use gasoline or other highly volatile liquids for cleaning purposes. Oxygen and acetylene cylinders can be dangerous, secure against rolling or tipping. Do not expose tanks or containers that may contain explosive vapor or liquid to open frame or spark

Special Note: Non-compliance with these regulations will result in disciplinary action.



# POSTING AND AVAILABILITY OF CODE OF SAFE PRACTICES

The company's Code of Safety Practices shall be posted in a conspicuous location at each job site and/or provided to each Supervisor who shall have it readily available.

## **ELEMENT 10**

#### PERIODIC SUPERVISORS MEETINGS

Periodic supervisor meetings are held to discuss safety problems and accidents that have occurred.

- **Safety Process Team** The Safety Process Team is in place to oversee and advise the Corporate Safety Committee and to direct and support all other safety functions of the company.
- **Corporate Safety Committee** USS Cal Builders, Inc. has a corporate Safety Committee with members selected from Management and Field Supervision. The committee meets at least monthly. In addition to the responsibilities described in Element 3 of this IIPP, the Corporate Safety Committee discusses safety problems and incidents that have occurred, and implements change, where needed.
- Area Safety Managers and Project Supervision work together to address local job site conditions, hazard recognition, and correction. Post-incident / injury investigation is conducted by this team, followed by corrective action as needed. The team meets following each injury or incident.

Following each incident investigation, information is distributed companywide to each jobsite supervisor to communicate with their staff and crews what occurred and steps to prevent a reoccurrence.



# "TOOLBOX / TAILGATE" MEETINGS

Tailgate Meetings - At a minimum, jobsite supervisors will conduct crew tailgate safety meetings weekly in order to emphasize safety. Additional tailgate safety meetings will be held if jobsite conditions warrant.

Two-Minute Startup Meetings - Two-minute startup meetings are held daily to review the work activities for that day. JHAs are used to train and raise employees' awareness of hazards and corrective actions.