

DOCKETED

Docket Number:	01-AFC-17C
Project Title:	Inland Empire Energy Center Project Compliance
TN #:	231943
Document Title:	Injury and Illness Prevention Program 2019
Description:	N/A
Filer:	Paul Kihm
Organization:	Latham & Watkins LLP
Submitter Role:	Applicant Representative
Submission Date:	2/4/2020 6:20:58 PM
Docketed Date:	2/5/2020



SILVERADO
CONTRACTORS

IIPP

INJURY AND ILLNESS PREVENTION PROGRAM

2019

SAFETY FIRST PRIORITY

The personal safety and health of each employee of Silverado Contractors, Inc. is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity.

To the greatest degree possible, management will provide all mechanical and physical protection required for personal safety and health, but our employees must bear primary responsibility for working safely. Proper hazard identification, and a well communicated work plan, common sense and caution can prevent most accidents from occurring.

The person with the overall authority and responsibility for our company Injury and Illness Prevention Program is Joseph Capriola.

INDIVIDUAL COOPERATION NECESSARY

Silverado Contractors, Inc. maintains a safety and health program conforming to the best practices of our field. To be successful, such a program must embody proper attitudes towards injury and illness prevention on the part of superintendents and employees. It requires the cooperation in all safety and health matters, not only of the employer and employee, but between the employee and all co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved. Safety is no accident; think safety and work safely and the job will be safer.

SAFETY PROGRAM GOALS

The objective of Silverado Contractors, Inc. safety and health program is to reduce the number of incidents to an absolute minimum, not merely in keeping with, but surpassing the best experience of similar operations in our industry.

Our goal is zero incidents and injuries.

SAFETY POLICY STATEMENT

It is the policy of Silverado Contractors, Inc. that incident prevention shall be considered of primary importance in all phases of operation and administration. It is the intention of Silverado Contractors, Inc.'s management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees.

The prevention of incidents is an objective affecting all levels of our company and its operations. It is, therefore, a basic requirement that each superintendent make the safety of all employees an integral part of his or her regular management function. It is

equally the duty of each employee to accept and follow established safety regulations and procedures.

Every effort will be made to provide adequate training to employees. However, if an employee is ever in doubt about how to do a job or task safely, it is his or her duty to ask a qualified person for assistance. Employees are expected to assist management in incident prevention activities. Unsafe conditions must be reported immediately. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to their jobs.

Every injury that occurs on the job, even a slight cut or strain, must be reported to management and/or the Responsible Safety Officer as soon as possible.

Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury. When you have an accident, everyone is affected; you, your family, your fellow workers and the Company. Please work safely. Safety is everyone's responsibility.

Joseph Capriola



President

Date 10/22/19

PURPOSE

Silverado Contractor's, Inc. policy is that all employees and subcontractors on Silverado Contractors, Inc. worksites shall:

- Act in a manner to promote safety and injury prevention during all work activities.
- Comply with all provisions of this Illness and Injury Prevention Program (IIPP) and all applicable safety laws.

SCOPE

This IIPP applies to all work sites.

ROLES AND RESPONSIBILITIES

Responsible Safety Officer

The Responsible Safety Officer (RSO) or designee is responsible for administration, implementation, execution, and improvement of this IIPP as well as all other Silverado Contractors, Inc. safety programs.

The RSO is Jose Moreno.

RSO duties shall include but are not limited to:

1. Monitoring management and employee compliance with the Silverado Contractors, Inc. IIPP and other Safety and Health Programs.
2. Reviewing Cal/OSHA standards for any changes to assure regulatory compliance.
3. Oversight of the New Hire Safety Orientation program.
4. Conducting onsite safety inspections.
5. Providing incident trend information to management.
6. Providing materials and topics for safety training.
7. Assisting in acquiring personal protective equipment (PPE).
8. Providing hazard assessment or abatement information to management.
9. Investigating all serious injuries or incidents.
10. Maintaining program records (safety meetings, training, investigations, inspections).

The RSO may call on outside resources to accomplish these objectives, including independent safety consultants, insurance personnel, and Cal/OSHA Consultation Services.

Superintendent

Safety responsibility is delegated to the Superintendent who shall be responsible for carrying out this IIPP on a day-to-day basis as a Competent Person on the jobsite.

The Superintendent's responsibilities shall include:

1. Conducting pre-job surveys of conditions before the start of work to determine the hazards and needed safeguards to conduct the work in a safe manner. The Superintendent shall be responsible for correcting identified hazards.
2. Completing Pre Job and the Task Hazard Analysis forms.
3. Conducting documented inspections as outlined in the Inspections and Hazard Identification Section of this IIPP.
4. Conducting weekly "toolbox" safety meetings with Silverado Contractors, Inc. employees on the jobsite.
5. Completing the New Hire Safety Orientation for new employees. The Superintendent shall regularly check to see that instructions are understood and being followed.
6. Reviewing employee understanding of correct use of tools, machines, and equipment used on the jobsite. The Superintendent shall instruct employees in the safe handling of tools and equipment.
7. Performing a daily visual safety inspection of the jobsite. The Superintendent shall ensure identified hazards are corrected.
8. Investigating all injuries to determine conditions responsible for the incidents and corrective actions to be taken. The Superintendent shall follow the Incident Response Procedure.
9. Preparing reports on all jobsite incidents involving Silverado Contractors, Inc. employees, equipment, or vehicles, or incidents with third parties. The Superintendent shall obtain statements of all persons involved and identify events or actions resulting in the incident.
10. Maintaining good housekeeping at the jobsite.
11. Promoting health and safety practices at the jobsite and setting a good example for others to follow.

Competent Person

A competent person is a person who is **capable** of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees.

The competent person has the **authority** to impose prompt corrective measures to eliminate these hazards.

Qualified Person

A qualified person is a person **designated** by the employer; and by reason of **training**, experience, or instruction has demonstrated the ability to perform safely **all** assigned duties; and, when required is properly licensed in accordance with federal, state, or local laws and regulations.

COMPLIANCE/SAFETY COUNSELING

Every employee is responsible for following all correct work procedures at Silverado Contractors, Inc.

Superintendents are responsible and accountable for ensuring employee compliance with safety procedures.

Failure to comply with safe work procedures shall lead to disciplinary action. The disciplinary action taken shall depend on the nature of the infraction and the number of past instances.

Progressive Discipline

1. **First violation** – Written reprimand shall be given to the employee by their Superintendent.
2. **Second violation** – Employee shall be suspended for five days without pay.
3. **Third violation** – Employee shall be terminated from their job.

All safety violations shall be discussed between the employee's Superintendent and the RSO. The facts involving the violation shall be discussed at the next Superintendent's Meeting.

COMMUNICATION

Management Communication

This program, safety bulletins, postings, meetings, and training programs shall be used to communicate with employees on safety and health matters.

Employee Communication

Employees shall report unsafe conditions and actions to the Superintendent who will act on this information or refer the information to the RSO. Employees are encouraged to bring any safety-related issues or concerns to the Superintendent or the RSO.

No sanctions or adverse actions will be taken against any employee who refers a safety issue in good faith.

Employee Safety Suggestions

Safety suggestions may be given to Superintendents during safety meetings. Management shall evaluate all safety suggestions and implement as many good suggestions as possible.

Each employee has a unique perspective to watch and monitor the work around them. To that end, each and every employee regardless of rank is empowered with "STOP WORK AUTHORITY". This means that any employee at any time can STOP the work being performed by Silverado Contractors, Inc. and/or our subcontractors.

Safety suggestions, unsafe acts, or incidents can be reported anonymously without fear of recrimination or reprisal.

Information may also be reported confidentially through anonymous letters to the RSO at the Silverado Contractors, Inc. main office:

Responsible Safety Officer
Silverado Contractors, Inc.
2855 Mandela Parkway
Oakland, CA 94608

Labor/Management Safety and Health Committee

The Labor/Management Safety and Health Committee shall serve to comply with the communication requirements of this IIPP. The Labor/Management Safety Committee shall:

1. Meet regularly, but not less than quarterly;
2. Prepare and make available written records of the safety and health issues discussed at the committee. The committee meeting records shall be maintained for at least one (1) year;
3. Review results of the periodic, scheduled worksite inspections;
4. Review investigations of occupational incidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submit suggestions to management for the prevention of future incidents;
5. Review investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions;
6. Submit recommendations to assist in the evaluation of employee safety suggestions; and
7. Upon request from Cal/OSHA, verify abatement action taken by the employer to abate citations issued by Cal/OSHA.

At Silverado Contractors, Inc. there are at least two employees designated by the RSO to be Labor members of the Labor/Management Safety Committee.

Management members include the RSO, Safety Staff and a Project Manager.

INSPECTIONS AND HAZARD IDENTIFICATION

Inspections

Superintendents shall conduct safety inspections of the worksite. The Daily Safety Meeting/Task Hazard Analysis form or equivalent shall be used to document the inspection and any corrective actions.

Ongoing visual inspections by the superintendent shall be made.

Safety inspections shall be conducted:

1. Before beginning work on the project;
2. When new substances, processes, procedures, or equipment are introduced into the workplace that represent a new occupational safety and health hazard; and
3. Whenever the company is made aware of a new previously unrecognized hazard.

The RSO or designee shall conduct a safety inspection at least monthly. Periodic audits of jobsites may also be conducted by insurance risk control representatives or independent safety consultants.

The shop shall be formally inspected monthly, documented on the Shop Safety Inspection form. Offices shall be inspected semi-annually, documented on the Office Safety Inspection form.

Additional Hazard Identification

Ongoing hazard identification shall be conducted by monitoring injury/illness investigation reports, new equipment or processes in construction, new Safety Data Sheets, communications from government agencies, and information received from consulting organizations. As necessary, work practices and procedures shall be changed to improve risk control.

INJURY/ILLNESS INVESTIGATION PROCEDURES

All injuries and illnesses on the jobsite shall be investigated using these procedures:

1. Employees shall report all injuries, illnesses, or property damage to the Superintendent.
2. The Superintendent shall make certain that appropriate first aid or medical treatment is immediately provided following the Silverado Contractors, Inc. Medical Services Plan.
3. The Superintendent will follow the Silverado Incident Reporting Program.
4. The RSO shall be notified immediately following an injury/incident by the Superintendent.
5. The RSO or designated shall report a serious injury or fatality to the closest Cal/OSHA office no later than 8 hours from when management becomes aware of the incident. A serious injury means any injury or illness occurring in a place of employment or in connection with any employment which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation, or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement.
6. Reports may be reviewed by the Labor Management Safety Committee and additional corrective measures developed if warranted.
7. All corrective actions shall be followed up by the RSO to check that the proper action is taken.

HAZARD CORRECTION PROCEDURES

It is Silverado Contractors, Inc.'s policy to promptly correct identified hazards.

Unsafe conditions, work practices, and work procedures shall be corrected in a timely manner based upon the severity of the hazard. Imminent hazards shall be corrected immediately.

Procedures to correct hazards are contained in the Management Safety Responsibility section of this program. The primary responsibility for hazard correction is with the superintendent. If there are any questions or problems, the superintendent is instructed to contact the RSO and/or management for assistance.

Hazards are identified through:

- This IIPP
- Information received from manufacturers, other contractors, or utilities
- Inspections by insurance representatives or independent safety consultants
- Inspection by Silverado Contractors, Inc. Superintendents, the RSO or safety personnel

When an imminent hazard exists that cannot be immediately abated without endangering employees or property, all exposed personnel shall be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided necessary safeguards.

The Superintendent shall be responsible for hazard correction at the jobsite.

TRAINING

Safety Orientation

All incoming or promoted employees shall complete the Silverado Contractors, Inc. New Hire Safety Orientation before starting work.

The New Hire Safety Orientation program will be followed for every new or promoted employee.

Employee Safety Toolbox Meetings

Silverado Contractors, Inc. has safety toolbox meetings every week. The purpose of the meeting is to convey safety information and answer employee questions.

The format of most meetings shall be to review work site hazards and controls, in language understandable to every employee. At the meeting, the Superintendent shall review safe work practices contained in the Code of Safe Practices, or other safety related information such as the following:

1. The results of safety inspections

2. The Code of Safe Practice and standards of safety
3. Topics specific to the job or project
4. Employee feedback on safety-related issues or concerns

All employees attending the meeting shall sign in on the safety meeting form. An interpreter shall be used if a language other than English is needed for employee understanding.

Superintendent Meetings

All Superintendents shall meet periodically to review jobsite safety issues and/or receive training on the hazards to which their employees are exposed. Technical topics on hazard control shall be presented as part of ongoing education.

In addition, incidents and injuries shall be reviewed to discuss causes and corrective actions taken.

Written documentation of attendees, topics and issues shall be kept in the main office.

RETENTION OF RECORDS

OSHA Recordkeeping

Each recordable injury or illness shall be recorded on the OSHA Log and Summary of Occupational Injuries Form 300 following its instructions. Supplemental records of each injury shall be maintained on OSHA Form 301 or the equivalent Employers Report of Injury or Illness Form 5020.

Every year, a summary (OSHA Form 300A) of all recordable injuries or illnesses shall be posted no later than February 1, for three months, until April 30. OSHA Form 300, 300A, and 301 (or appropriate substitute) shall be retained at the Silverado Contractors, Inc. main office for five years following the end of the calendar year covered.

Every year, the RSO or designee shall report the Form 300A data on the US OSHA electronic reporting system.

Safety and Health Records

Silverado Contractors, Inc. shall retain records of employee training, hazard identification and abatement, and injury investigation in the Silverado Contractors, Inc. main office as required by legal mandates.

Records shall be maintained by the RSO per the Recordkeeping Matrix in this IIPP.

RECORDKEEPING MATRIX

Topic	Law: Title 8 California Code of Regulations Section	Type of Record (Example)	Retention Period (Minimum)
General Safety Training	3203 and 1509	Attendance logs	1 year
Specific Hazard Safety Training	5144	Respiratory Protection	30 years from end of employment
	4799	Welding	1 year
	1637	Scaffolds	1 year
	3463 (Marine) 1952 (Construction)	Confined Spaces	1 year
	1734	Demolition	1 year
	1541	Excavations	1 year
	1670	Fall Protection	1 year
	1512	First Aid	2 Years (Current)
	5194	Hazard Communication	30 years from end of employment
	5192	Hazardous Waste Operations	30 years from end of employment
	3395	Heat Illness	1 year
	1685	Powder Actuated Tools	1 year
	1529	Asbestos	30 years from end of employment
	1532.1	Lead	30 years from end of employment
	1530.1	Silica	30 years from end of employment
	3314	Lockout/Tagout	1 year
	6151	Portable Fire Extinguishers	1 year
3664	Forklift	3 years	
3203	Shop Tools and Equipment	1 year	
Hazard Assessments	3203	Inspection Checklists and assessments	1 year
Safety Committee	3203	Labor/Management Safety Committee	1 Year
Injury Reports	14301 & 3204	Workers' Compensation Claim Forms	30 years from end of employment
Employee Medical Records	3204	Medical reports, records of exposures (lead, silica, respiratory fit tests), ergonomic assessments, Safety Data Sheets	30 years from end of employment
Industrial Hygiene Records	3204	Reports and records of environmental sampling and analyses	30 years from end of employment
OSHA Logs	14301	OSHA Form 301 (or equivalent), 300 and 300A Summary	5 years
HVAC Inspection Records	5142	Records of periodic inspections of HVAC systems	5 years
Bloodborne Pathogens	5193	Medical Records	30 years from end of employment

FORMS AND PROGRAMS

Daily Safety Meeting Task Hazard Assessment

New Hire Program

Inspection Form Shop

Inspection Form Office

Safety Rule Violation Notice

Incident Investigation Form and Program

Medical Services Program

Training Forms

REGULATORY REFERENCE

8 CCR 1509 Injury and Illness Prevention Program

8 CCR 3203 Injury and Illness Prevention Program