

DOCKETED

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NextEra Energy Resources

Injury and Illness Prevention Plan


The following document is the Injury and Illness Prevention Program to meet the written program requirements of Cal/OSHA standard (8CCR 3203) for the employer described below.

Blythe Solar Power Project
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Blythe CA 92225

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I. Management Approval and the Responsible Person

This Injury and Illness Prevention Plan is hereby approved and supersedes any previous program.

Christopher L Allen

October 8, 2020

Signature of Management Official

Date

Chris Allen

Regional Plant General Manager

Title

The above named person is responsible for the implementation of this Illness and Injury Prevention Plan.


Gil Makabenta

Solar Site Manager

Name

Title

The above named individual may assist the responsible person in the implementation of the Plan as designed by management.

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II. Safety Policy Statement

NextEra Energy Resources is sincerely interested in the safety of its employees, on the job as well as off. The company is committed to being in compliance with all federal, state, and local regulations regarding the safety policies and rules.


The procedures and policies set forth in this manual have been developed to train and assist our employees in preventing accidents or illnesses, and additionally to prevent incidents of injury or property damage to the public.

Ultimately, each employee is responsible for their own safety. No amount of policies or rules can protect an employee with an unsafe attitude. Safety and the prevention of accidents are every employee's responsibility. When an employee is injured, the employee, the employee's family coworkers, and the company are affected.

Each employee is expected to know the safest way to perform their duties, and to seek instruction from their Team Leader when the safety requirements for the job are not understood. Under no circumstances will any employee be expected to start work or continue work, when the safety requirements for the job are not understood.

It is the policy of this company that the standards set forth in this manual will be observed by all employees, contractors, vendors, and visitors to the plant site and that every manager and team leader will enforce these rules equally.

Our mission at Blythe Solar Power Project is to make working safely a company tradition.

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III. System to Identify Safety and Health Hazards

Identification of Hazards: This Plan’s system to identify safety and health hazards includes using information from Cal/OSHA standards and the other relevant material in this program to discover any potential hazards in the workplace. In addition, potential hazards may be identified through the following:


- Periodic scheduled inspections
- A review of the OSHA Log 300, as well as reports of near-miss and non recordable events
- Employee provided information of work area hazards.
- Vendor supplied information such as MSDS and equipment safe operating procedures.

In addition, the *Code of Safe Work Practices*, *Job Safety Analysis (JSA)*, the *Employees Safe Work Practices Manual*, and the *Behavioral Observations* are used to identify, evaluate and mitigate specific occupational safety and health hazards.

Prevention of Hazards: Compliance with any applicable Cal/OSHA standard will be assured to address hazards covered by such standards. In addition, any unsafe or unhealthy condition or work practice that is discovered will be corrected in a timely manner based on the following:

- If the hazard discovered may cause a serious injury or illness, it shall be corrected immediately or employees removed from the area, source of exposure or unsafe piece of equipment.
- If the hazard is one that is easily abated, it shall be corrected immediately.
- Other hazards shall be corrected in a timely manner.

Documentation used in discovering the hazard will be used to confirm abatement (for example, noting the correction on an inspection checklist or an injury and illness investigation form).

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IV. Elements Included in the injury and Illness Prevention Plan

This Plan includes all of the following elements consistent with 8 CCR 3203 and other applicable Cal/OSHA standards.

Injury and Illness Prevention Program Requirements: This Plan includes all of the following elements consistent with the injury and illness prevention standard:


- A system to identify and prevent safety and health hazards.
- Periodic scheduled inspections.
- Investigation of injuries, illnesses and accidents.
- Employee safety training.
- Communication with employees regarding safety and enforcement of safety rules.
- Recordkeeping consistent with applicable requirements.

Other Mandatory Cal/OSHA Standards: This Plan includes information that addresses certain standards that apply to all employees:

- Emergency action planning, including medical emergencies.
- Fire prevention and fire emergency planning.
- Work surface and work force safety.

Additional Regulated Activities: The employer has reviewed additional regulated activities and safety requirements. The items listed below apply to this workplace and are included within this Plan.

- Personal protective equipment used by employees.
- Ergonomic safety, including prevention of repetitive motion injuries and back and joint injuries.
- Hazardous substance handling.
- Machine guarding and maintenance.
- Power tools and ladders.
- Vehicle operation.
- Forklifts, battery charging and material handling.
- Pressure vessels (air compressors) and LPG tanks.

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- Security and violence prevention.

V. Periodic Scheduled Inspections

Responsibility and Frequency of Inspections: Periodic scheduled inspections are conducted under the direction of the person responsible for implementing the Plan at the following frequency:


Plant employees shall complete a **General Plant** inspection once a month, prior to the monthly Compliance Team meeting. **Plant Vehicles** will be inspected prior to each shift turnover.

Additional **Plant Vehicles**, including tractors, forklifts, and manlifts, will be inspected prior to each use.

Documentation of Inspections: Inspections will be completed using the **Inspection Checklist** forms that follow. Deficiencies found during inspections will be noted, along with documentation of corrective action required to eliminate the deficiency.

Any hazards, or deficiencies, will be corrected as soon as possible and the corrections noted on the inspection form. If the correction cannot be completed during the inspection a Work Order will be submitted to address the deficiency. Corrections of deficiencies shall be accomplished according to Paragraph 4, Other Mandatory Cal/OSHA standards, and so indicated on the inspection checklist.

There shall be an inspection completed whenever new equipment is installed, changes are made in operating procedures, or when an injury/illness occurs. In addition, whenever information indicates that a previously unrecognized hazard may be present, the area where the hazard is present will be inspected promptly.

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In all inspections, the deficiencies found, action taken, and Work Orders written must be noted on the inspection form. Upon completion, the inspection form will be submitted to the **Solar Site Manager** for review.

After review by the Solar Site Manager, the completed inspection forms will be filed in the Safety/Compliance filing system.

Inspection Checklist

General Plant Inspection

Date: _____

Prepared by: _____

Instructions: Inspect/check each item in accordance with the Employee Safe Work Practices Manual. Note any required corrections and the individual(s) responsible for completing corrections(s).

General	
Equipment and supplies stored around the plant in a safe and orderly fashion?	
Exits: clear, well marked, and unlocked	
Tagout system being used and updated correctly	
Adequate absorbent materials and oily waste storage barrels provided for spill clean up.	
Plant cleanliness satisfactory (hoses stored correctly and in good condition).	
Work area free of excessive combustibles.	
Storage areas and holders available for lab glassware storage	
Personal Protective Equipment	
Appropriate footwear being utilized	
Fire suit properly stored and in good condition.	
Welder ventilation installed and working properly.	
Gloves and utensils available for performing lab analysis.	
Tyvek suits available.	
Electrical maintenance tools available, in good repair, and properly insulated (i.e. fuse tongs, rubber insulating blankets, high voltage test equipment, hot sticks, portable grounding cables, and rubber insulating gloves with leather protectors)	
Chemical apron and gloves available and in good repair.	
Respiratory protection available and being used by plant personnel.	
Emergency shower and eye wash station in good working order.	
Hard-hats, eye protection, hearing protection, gloves and approved footwear being used.	
Safe Work Conditions	
Hoses or cables laying in roadway protected by guards	
Power tools in good condition, i.e. frayed cords, broken cases, worn or frayed hoses.	
Welding area screen in place.	
Compressed gas cylinders stored properly	
Water Treatment chemicals stored and labeled properly	
Ventilation functioning properly	
Band saw clamp working properly	
All hoisting devices working and in good repair.	
Oily rag disposal can available for use.	
Warning signs visible	
Chairs, keyboards, monitors adjustable.	

Plant lighting functioning properly.	
Access to outdoor switchyards locked.	
Low voltage electrical equipment or equipment connected to a ground fault interrupter available for confined space work	
Equipment properly grounded	
Access ways to motor control rooms, switchgear rooms, switchboard and equipment enclosures, and vaults closed.	
Work space free of debris, electrical cords, and tripping hazards.	
Safe Work Practices	
Persons performing welding or cutting jobs are qualified and familiar with the ANSI/ASC welding/cutting safety standards.	
Smoking policy being adhered to.	
Proper fall protection equipment available.	
Waste from lab analysis stored properly.	
Glassware stored properly.	
Ventilation fan being used during welding.	
Only qualified persons using or operating heavy equipment.	
Cable and wires removed from equipment properly taped and insulated.	
Work piece supports available for the different machinery.	
Tool chuck keys removed from chuck during in use.	
Solvent tank lid closed when not in use.	
Hydraulic press platform pins in place.	
Moving aids (hand trucks/carts) available for moving heavy loads.	
File cabinet drawers opened one at a time and closed when not in use.	

Details of unsatisfactory results:

Corrective action taken:

Is Tagout required (due to imminent hazard)? _____
 Person(s) responsible for correction? _____ Date/Time assigned? _____
 Date/Time correction completed: _____

Inspection Checklist

Administration and Warehouse Areas

Date: _____ Prepared by: _____

Instruction: Inspect/check each item in accordance with the Employee Safe Work Practice Manual. Note any required corrections and the individual(s) responsible for completing correction(s).

General	Admin Area	Warehouse
Exits: clear, well lit and unlocked		
Hallways and aisles free of obstructions		
Work area free of excessive combustibles		
Fire fighting equipment accessible.		
Personal Protective Equipment		
Appropriate footwear being utilized		
Hard-hats, eye protection, and hearing protection available.		
Safe Work Conditions		
Barrels, pipe, steel stock, and similar materials blocked in place	N/A	
Compressed gas cylinders stored properly	N/A	
Paper cutter safety latch operates correctly.		N/A
Equipment storage; safe and orderly		
“No Glare” screens available for computer monitors		
Warning signs visible		
Chairs, keyboards, monitors adjustable		
Work space free of debris, electrical cords and tripping hazards		
Safe Work Practices		
Moving aids (hand trucks/carts) available for moving heavy loads		
Paper shredder reverse function works properly		N/A
Portable staircase available for retrieving items out of reach	N/A	
File Cabinet opened one at a time and closed when not in use		

Details of unsatisfactory results:

Corrective actions taken:

Is Tagout required (due to imminent hazard)? _____

Person responsible for correction: _____ Date/Time assigned: _____

Date/Time correction completed: _____

Inspection Checklist

Plant Vehicles

Date: _____ Prepared by: _____

Instruction: Inspect/check each vehicle prior to every shift turnover. Any deficiencies will be reported to a Production Leader immediately.

Personal Protective Equipment	
Seat belts installed and working properly.	
Fire extinguishers in place and full.	
Safe Work Conditions	
Emergency brake working.	
Coolant level correct.	
Battery: electrolyte level okay. Fully charged.	
Engine belts and hoses in good condition.	
Windshield wipers working correctly.	
Power steering fluid correct.	
Oil level correct.	
Brake fluid level correct.	
Brakes working properly.	
Parking lights, brake lights, and headlights working correctly	
Emergency flashers working correctly.	
Turn signals work correctly.	
Spare tire in good condition.	
Tires inflated correctly and in good condition.	
P.T.O. working correctly.	
Hydraulic fluid level correct.	

Details of unsatisfactory results:

Corrective actions taken:

Is Tagout required (due to imminent hazard)? _____

Person responsible for correction _____ Date/Time assigned _____

Date/Time correction completed _____

Inspection Checklist

Heavy Equipment

Date: _____ Prepared by: _____

Instruction: Inspect/check each piece of equipment. Any deficiencies will be reported to a Production Leader immediately.

Personal Protective Equipment	Man lift (equipment model)	Forklift (equipment model)	Scissor (equipment model)	Loader (equipment model)
Operator protection cage in good condition				
Safety belt/harness in basket		N/A		N/A
Seat belts installed and working properly	N/A		N/A	
Safe Work Conditions				
Emergency shut down operates correctly				
Coolant level correct.			N/A	
Battery: electrolyte level OK. Fully charged.				
Engine belts and hoses in good condition			N/A	
Hydraulics hoses in good condition				
Lifting function work properly.				
Horn work properly.				
Engine oil level correct.			N/A	
Brake fluid level correct.			N/A	
Brakes working properly.			N/A	
Debris in basket are or seat.				
Dashboard instruments function correctly.	N/A		N/A	
Does machine stop automatically when control are released.		N/A		N/A
Tires inflated correctly and in good condition				
Hydraulic fluid level correct.				


Details of unsatisfactory results:

Corrective actions taken:

Is Tagout required (due to imminent hazard)? _____

Person responsible for correction _____ Date/Time assigned _____

Date/Time correction completed _____

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VI. Investigating Injuries, Illnesses and Accidents

Policy and Responsibility: Any injuries, illnesses or accidents will be investigated to determine if any preventable safety or health hazard contributed to the occurrence. The person responsible for implementing the Plan will conduct the investigation within a timely manner after being advised of the incident. If a reportable serious injury or death results, the responsible person will assure that a report is made to Cal/OSHA within eight hours. Any hazardous condition or work practices that contribute to the injury, illness or accident will be abated according to the policy stated at Paragraph 4, Other Mandatory Cal/OSHA standards.

Documentation of Investigation: Each investigation if an injury, illness or accident will be documented to indicate information about the incident, the investigation's finding, whether a workplace hazard contributed to the incident, how the hazard will be abated and the investigator.

Accident Report Form

Part 1 – To Be Completed By Employee

Name: _____ Employee Number: _____

Date/Time of Occurrence: _____ Date/Time Reported: _____

Brief description of the Accident:

Had this type of injury before? (Y/N) _____ If Yes (date) _____

Work related (Y/N) _____

Group: _____ Employment Date: _____ Classification: _____

Hours worked on Day of Injury: _____ Part of Body Injured _____

Type of Injury: _____

Activity or Task at Time of Injury: _____

List any Special Protective Equipment Used: _____

Location of Accident: _____

Your Recommendation for Prevention: _____

Immediate Action Taken to Prevent Reoccurrence: _____

Comments: _____

Part II – to be Completed By Team Leader

Team Leader Name: _____ Date Data Entered: _____

Type of Injury (circle one)

Minor

Medical treatment

Light Duty

Lost time

Did the employee lose a full shift after the date of injury? Y/N _____

If Yes, Last Day Worked: _____ Is it OSHA Recordable? Y/N _____

Is it classified as an Injury? _____ Or an Illness _____

If accident involved contact with energized equipment, was it: Primary or Secondary

Part III – To Be Completed By Local Safety Committee

Primary Cause of Accident: _____

Factors Contributing to the Accident: _____

Countermeasures

Recommendations to Prevent Reoccurrence (what?) _____

Method of Implementation (how?) _____


Person Responsible for Countermeasure: _____ **Date Completed:** _____

How will you ensure countermeasures remain effective? _____

Date Corrective Action Assigned: _____

Person Responsible for Implementation: _____

Date Completed: _____

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VII. Safety Training for Employees

Policy and Responsibility: Employees were provided training in safe work practices and prevention of injuries and illnesses when the Plan was first established. Additional training is performed whenever a new hazard is identified, or when an employee is reassigned or newly hired prior to exposure to any potential hazards.

The person responsible for implementing the Plan is responsible for assuring the employee training is provided and documented. Supervisors and designated employees may be designated to assist in providing training.


Documentation of Training: Training is documented in the following manner:

- Each employee's personnel record contains a form that indicated the status of the employee's training. The form indicates that training on the Plan was provided and when additional training was received for new hazards, new assignments or to meet refresher requirements.
- Training sessions will be documented with a sign-in sheet that indicates the date, subject of training, trainer and attendees. This form will be used to update individual employee training records.

Safety Meetings: Production Leaders will conduct safety meetings with their teams to cover site specific safety issues. Miscellaneous safety topics or a review of accidents /near misses may be addressed during these meetings.

Tailboard Meetings: The tailboard training meetings include general safety guidelines, and potential occupational health and safety hazards for specific tasks.

Annual Required Safety Training: The Safety/Compliance Team, with the production leaders, will schedule annual required safety training. Training material and attendance logs for required training will be maintained with the compliance file.

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VIII. Communicating with Employees about Safety


Policy and Responsibility: A system to communicate with employees about safety and to assure compliance with safe work practices is in effect. Communications are implemented through safety meeting, anonymous notifications, one-on-one counseling and disciplinary procedures.

The person responsible for the Plan shall assure that effective employee communications are maintained through the following methods:

- Explanation of the IIPP and its procedures.
- Descriptions of any new hazards that have been introduced or identified through inspection of investigation of injuries, illnesses or accidents.
- Consideration of employee safety suggestions and questions (including anonymous ones) and a response provided.

Employee Compliance: Employees are required to comply with safe work practices. Both disciplinary procedures for non-compliance and recognition for safe behavior will be used to enforce compliance with safe work practices. If non-compliance is observed, the following disciplinary measures will be used as appropriate to assure future compliance. The method used should be selected based on the gravity of the violation and the frequency of such violation and be administered according to progressive disciplinary employee policies:


- Private counseling by the person responsible for implementing the Plan, or the employee's supervisor;
- Loss of incentives, negative effect on performance evaluation and similar personnel actions;
- A written warning or warnings; and
- Suspension or termination

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- Compliance with safety rules is recognized with encouragement such as good performance reviews.

Documentation of Safety Communications and Enforcement: Each instance of employee communication is documented. The documentation includes the following:

- Safety meetings are documented through a sign-in sheet.
- Written employee safety suggestions or questions are maintained on file along with the response, including information on how the response was provided to the employee.
- Actions taken to enforce compliance with safe work practices in cases that exceed verbal counseling will be documented in the employee's personnel file by the person responsible for the Plan.


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IX. Recordkeeping and Posting Requirements

Policy and Responsibility for IIPP Recordkeeping: Records that document implementation of the Plan will be maintained by the person responsible for the Plan. The following records will be maintained for the period indicated, at a minimum:

- The Written IIPP Indefinitely
- OSHA Log 300 Forms: 5 Years
- Inspection Forms: 1 Year
- Investigation Forms: 1 Year
If a log 300 injury, 5 years
- Employee Training Forms:
 - Personnel Records: Duration of employment
 - Training Sign In logs: 1 Year
- Records Relating to Employee Communication & Enforcement:
 - Safety Meeting Sign-In Log: 3 Years
 - Employee Suggestion/Question & Response: 3 years
 - Disciplinary Actions: 3 years
- All Other Safety Records Other than those Subject to The Access Standard: 3 Years
- Medical & Employee Exposure Records Subject Duration of Employment Plus 30 Years

Poster Policy: It is the policy of this employer that all posters required by federal and state occupational safety and health labor laws and regulations will be posted in the workplace.

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X. Maintaining the Injury and Illness Prevention Plan

Reviewing and Updating the IIPP: This IIPP will be periodically reviewed by the person responsible for implementing the Plan. This person shall verify effective implementation of each element of the program, make any changes needed and communicate program status and changes made to employees.

New/transferring Employees: Each new employee will be subject to the IIPP. Each employee transferred to a new job will be trained in the safety aspects of the new assignment. The person responsible for implementation of the Plan will assure that each new employee is familiar with the IIPP and will provide training on any provisions applicable to the new or transferring employee's position.