



SCATES CONSTRUCTION, INC.

ILLNESS & INJURY PREVENTION PROGRAM

I. INTRODUCTION

Scates Construction Company has developed and implemented this written Injury and Illness Prevention Program (IIPP) as part of its health and safety program. The work performed by Company personnel is varied, both in nature and location. Under all circumstances it is the intent of the Company to: (1) Comply with the requirements and spirit of the California Code of Regulations, Title 8, and (2) provide a safe and healthful work environment for employees. The Company originally implemented this IIPP July 1, 1991 in compliance with Senate Bill 198, encoded as labor code 6401.7, and the California Code of Regulations (CCR), Title 8, Section 3203. The Company expects and requires all employees to follow the requirements set forth in this IIPP.

II. IDENTIFY AND EVALUATE WORKPLACE HAZARDS (8 CCR 3203 (a) (4))

The goal of this IIPP is to identify and evaluate unsafe work conditions and practices so that accidents, injuries, and job related illnesses are minimized, if not completely eliminated. To this end the Company has instituted the procedures described in this section of the IIPP.

The principal approach to reducing accidents at the Company is through periodic scheduled and unscheduled inspections. Inspections will be conducted as follows:

The Superintendent may conduct daily inspections as part of a daily routine. The Safety Director will inspect all jobs at least once a month. Larger jobs will warrant more frequent inspections. Inspections will be conducted at the following intervals, in addition to those times listed above:

- Whenever new substances, processes, procedures, or equipment are introduced to the work place that represent a new occupational safety and health hazard
- Whenever the Company is made aware of a new or previously recognized hazard

The following approaches will be used periodically by the Safety Director to further evaluate the workplace:

- Review job site Safety Meeting and Safety Inspection Reports
- Records review (including workers' compensation summaries, accident reports, injury reports, new material safety data sheets)
- Other means of evaluating (input from safety meetings or Superintendents, or employee suggestions)

III. EMPLOYEE COMPLIANCE/DISCIPLINARY POLICY (8 CCR 3203 (a) (2))

Under the Company's policy, all employees are required to follow Company safety policies and operating procedures. When needed, employees will be provided with additional training and information, or retraining, to maintain their knowledge.

The disciplinary policy of the Company is intended to encourage employee compliance with the Company IIPP and to comply with the mandate of California Labor Code 6401.79 (a) (6).

Employees found performing work in an unsafe manner that would endanger the employee or other employees shall be subject to discipline or termination by management.

The Safety Director will determine the course of action best suited to the circumstances. At a minimum, the steps to be taken shall include the following:

1. Verbal Warning – As the first step in correcting unacceptable behavior, the Superintendent shall review the pertinent facts with the employee. The Superintendent will consider the severity of the problem and the employee's past performance. A verbal warning will be issued to the employee and documented by the Superintendent in his Daily Report of which report will be put in the employee's personnel file. If necessary, the employee will be placed on probation.
2. Written Warning – If the unacceptable performance continues, the next step will be a written warning. The written warning will clearly state the safety policy that was violated and the necessary steps to be corrected. Probation will be a part of the written warning. It may also include time off without pay. At the completion of the probationary period, the Superintendent will meet with the employee to determine if the employee has achieved the required level of performance.
3. Termination – The employee may be terminated if he or she does not improve his performance while on probation, or has violated another Company safety policy within twelve (12) months.

IV. COMMUNICATION OF SAFETY AND HEALTH MATTERS (8 CCR 3202 (a) (3))

The elements of the Company IIPP and all aspects of its safety and health program shall be communicated in a readily understandable manner to all employees. All employees will receive a written copy of the Injury and Illness Prevention Program as well as the Code of Safe Practices. The job site Superintendent will conduct an orientation on Company safety policies and operation procedures for all new employees.

It is the policy of the Company to encourage all employees to report hazards existing at their work site to their Superintendent or the Safety Director so that corrective action can be taken in a timely manner. Suggestions can be brought up in the weekly safety meetings or at any time an employee deems necessary. Employees who report such conditions will not be disciplined nor will they suffer any reprisals due to their actions.

Employees shall be kept informed of the requirements of the Company's IIPP through the orientation that is held for all new employees. Also, job site safety meetings conducted by the Superintendent and written communications from the Safety Director will be distributed when deemed necessary.

V. MULTI-EMPLOYER POLICY

As a general contractor and construction management employer with responsibility for safety and health at the work site, the Company will adhere to the following:

1. Include in its subcontractor agreements, scope statements and front end documents the requirement that the subcontractor possess an IIPP, including written programs which address hazards unique to the subcontractor's trade and that the subcontractor will comply with general safe work practices, its own company's requirements and with all Cal/OSHA regulations.
2. Take those actions necessary to ensure the subcontractor is complying with their own programs, as well as with Cal/OSHA regulations. Additionally, on construction management projects, this requirement is addressed in the pre-qualification process.
3. Upon learning of the presence of a hazardous condition or practice, immediately inform the subcontractor responsible for the conditions of the need for prompt corrective actions.
4. Ensure prompt, corrective actions by the employer responsible for such actions.

VI. EMERGENCY MEDICAL SERVICES PLAN

1. It is the policy of the Company to ensure the availability of emergency medical services for its employees and the availability of a suitable number of appropriately trained persons to render first aid.
2. First-aid kits in weatherproof containers are to be provided at all sites. These kits will be inspected regularly to ensure the expended items are promptly replaced and the contents of the first-aid kits shall be arranged to be quickly found and remain sanitary. The first-aid dressings shall be sterile in individually sealed packages for each item.
3. The Superintendent shall inform all of his or her employees of the procedures to follow in case of injury or illness.
4. All job sites are to have the telephone numbers of emergency services in the area posted near the job telephone. The emergency numbers shall include those of a physician and at least one alternate, hospitals, ambulance services, and fire-protection services.
5. Where the eyes or body of any person may be exposed to injurious or corrosive materials, suitable facilities for drenching the body or flushing the eyes with clean water shall be conspicuously and readily accessible.

VII. ACCIDENT, INJURY, AND ILLNESS INVESTIGATIONS (8 CCR 3202 (a) (5))

When accidents, injuries, or illnesses occur on the job which require medical care, they will be thoroughly investigated by the Safety Director. Investigators will complete the Supervisor's Report of Accident form. The investigation will determine at least the following:

- Who and what was directly involved in the accident
- Who and what was indirectly involved in the accident
- Where and when the accident occurred
- The cause of the accident, if known
- Steps/procedures to take to prevent reoccurrence, if applicable

VIII. METHODS AND PROCEDURES FOR CORRECTING UNSAFE AND UNHEALTHY CONDITIONS, WORK PRACTICES (8 CCR 3203 (a) (6) (0))

All unsafe or unhealthy work conditions or work practices identified will be evaluated and corrected.

Unsafe or unhealthy work conditions or work practices will be corrected in a timely manner as determined by the severity of the hazard. Under no conditions will Company personnel be permitted or required to work under conditions that pose a clear and imminent hazard.

Problems that cannot be corrected immediately will be assigned to the Safety Director to ensure completion of the corrective action. Once corrected, written documentation of the action will be developed or obtained by the Safety Director.

When an imminent hazard exists which cannot be immediately corrected without endangering employees and/or property, the following steps will be followed:

1. Remove all potentially endangered employees.
2. Provide the necessary safeguards to the employees responsible for correcting the condition.
3. Correct the problem.
4. Document on the Safety Inspection Report the corrective action and date corrected in accordance with this Section. The documentation is to be completed by the Safety Director or his designee. The Safety Director will maintain documentation on file.

Unsafe or unhealthy work conditions needing corrective action will be documented by using:

1. One form for identifying the hazards with an attached checklist noting corrective action assignments. The form will include the name of the person initiating the action and date, a description of the unsafe condition, the corrective action needed, who will perform the corrective action and the expected date for completion.
2. Engineering controls will be used first to eliminate or minimize unsafe or unhealthy work conditions. If engineering controls are impractical or unfeasible, administrative controls will be used. If engineering controls alone, or in combination with the administrative controls cannot adequately minimize the hazard, personal protective equipment shall be used.
3. Unsafe work practices will immediately be corrected by providing the affected employees with retraining to be provided by the Safety Director.

All operating procedures will be reviewed at least annually and whenever new chemicals or equipment are introduced into the system, or when there is a process change. When changes are made, affected employees will receive additional instruction.

IX. TRAINING AND INSTRUCTION, SAFETY MEETINGS AND AWARENESS (8 CCR 3202 (a) (7))

All employees shall receive training and instruction in the following areas:

1. General safety and health practices.
2. Specific instruction with respect to hazards unique to the job assignment.

Training of employees at the Company under this IIPP shall occur:

1. To all new employees.
2. To all employees given a new job assignment for which training has not previously been received.
3. Whenever new substances, processes, procedures, or equipment are introduced to the work place and represent a new hazard.
4. Whenever the Company is made aware of new or previously unrecognized hazards.

In accordance with this IIPP, training shall be provided by the Superintendent who will conduct safety training at the site with all new employees or retraining to any new employee who feels it is needed. In addition, the following safety meetings will be conducted:

- The Superintendent will conduct biweekly job site (tailgate) meetings with all employees.

This IIPP shall be made an integral part of existing occupational safety and health training programs at the Company.

Additional training shall be provided to Superintendents to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.

X. RESPONSIBLE PERSON (8 CCR 3203 (a) (1))

The Company will designate a senior staff member as the Safety Director and a responsible person for the IIPP. It is the responsibility of the Safety Director to ensure overall implementation and enforcement of the Program.

The duties of the Safety Director are:

- Identify and evaluate workplace hazards and include procedures for investigating occupational injuries and illnesses.
- Establish and/or review methods and procedures for corrected unsafe and unhealthy conditions and work practices.
- Ensure that employees receive training programs on general and specific safety and health practices for the Company and on each of their job assignments.
- Ensure there is a procedure for communicating to employees, in an understandable manner, the Company's safety and health rules and procedures.
- Ensure compliance with safety and health work practices.

- Ensure that records on training, inspections, and corrective measures are properly maintained, as required by this IIPP and other Cal/OSHA required programs in accordance with Title 8 CCR.

XI. MAINTENANCE OF RECORDS (8 CCR 3203 (b))

The Company will keep records of the actions taken to implement and maintain this IIPP. They will be maintained on file for a minimum of three years. The records kept by the Company relating to this IIPP will not adversely affect the retention of medical and exposure records in accordance with Title 8, California Code of Regulations, Section 3204, "Access to Employee Exposure and Medical Records".

Records of scheduled and unscheduled periodic inspections as well as other records, including methods used to identify and evaluate workplace conditions and work practices, shall also be retained.

Records relating to the IIPP shall include, at a minimum, the name of the person conducting the inspections or evaluation, the unsafe conditions and work practices that have been identified, and actions taken to correct the identified conditions or work practices.

Records and documentation of safety and health training shall include, at a minimum, the name of the employee and/or employee number, date of training, training topic(s), training format, and instructor name.

Records of employees who have worked for less than one year with the Company may be turned over to the employee upon termination providing the terminated employee signs the acknowledgement letter documenting the records have been turned over to him or her.

CODE OF SAFE PRACTICES

THIS CODE OF SAFE PRACTICES SHALL BE POSTED AT A CONSPICUOUS LOCATION AT EACH JOB SITE OFFICE AND BE PROVIDED TO EACH SUPERVISORY EMPLOYEE WHO SHALL HAVE IT READILY AVAILABLE.

GENERAL

1. All persons shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the Foreman or Superintendent.
2. The Foreman shall insist on employees observing and obeying every rule, regulation, and order as is necessary for the safe conduct of the work, and shall take such actions as are necessary to obtain observance.
3. All employees shall be given accident prevention instructions at least every ten (10) working days.
4. Anyone known to be under the influence of drugs, alcohol or intoxicating substances shall not be allowed on the job while in that condition and are subject to immediate termination.
5. 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 the equipment.
7. No one shall knowingly be permitted or required to work while his/her ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose him/her or others to injury.
8. Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless the Superintendent has determined it is safe to enter.
9. 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 Foreman or Superintendent.
10. Crowding or pushing when boarding or leaving any vehicle or other conveyance shall be prohibited.
11. Employees whose job responsibilities include regular or occasional driving and who are issued a cell phone for business use are expected to refrain from using the phone while driving. Regardless of the circumstances, including slow or stopped traffic, employees are strongly encouraged to pull off to the side of the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is unavoidable and pulling over is not an option, employees are expected to keep the call short, use hands-free options, refrain from complicated or emotional discussions and keep their eyes on the road.
12. Workers 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 foreman.
13. All injuries shall be reported promptly to the Foreman or Superintendent so that arrangements can be made for medical or first aid treatment.

14. When lifting heavy objects, the large muscles of the leg shall be used rather than the smaller muscles of the back.
15. Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.
16. Materials, tools, or other objects shall not be thrown from the buildings or structures until proper precautions are taken to protect others from falling objects.
17. Employees shall cleanse thoroughly after handling hazardous substances and follow special instructions from authorized sources.
18. Work shall be so arranged such that employees are able to face the ladder and use both hands while climbing.
19. Gasoline shall not be used for cleaning purposes.
20. No burning, welding, or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the Foreman or Superintendent.
21. Any damage to scaffolds, falsework, or other supporting structures shall be immediately reported to the Foreman and repaired before use.
22. Trenches, pits or other excavations more than five (5) feet deep shall not be entered by any person unless adequate shoring is in place or the sides of the excavation have been adequately sloped.

USE OF TOOLS AND EQUIPMENT

23. All tools and equipment shall be maintained in good condition.
24. Damaged tools or equipment shall be removed from service and tagged "DEFECTIVE".
25. Pipe or Stillson wrenches shall not be used as a substitute for other wrenches.
26. Only appropriate tools shall be used for the job.
27. Wrenches shall not be altered by the addition of handle-extensions or "cheaters".
28. Files shall be equipped with handles and not used to punch or pry.
29. A screwdriver shall not be used as a chisel.
30. Portable electric tools shall not be lifted or lowered by means of the power cord. Ropes shall be used.
31. Electric cords shall not be exposed to damage from vehicles.
32. In locations where the use of a portable power tool is difficult, the tool shall be supported by means of a rope or similar support of adequate strength.

MACHINERY AND VEHICLES

33. Only authorized persons shall operate machinery or equipment.

34. Loose or frayed clothing, long hair, dangling ties, finger rings, etc., shall not be worn around moving machinery or other sources of entanglement.
35. Machinery shall not be serviced, repaired or adjusted while in operation, nor shall oiling of moving parts be attempted, except on equipment that is designed or fitted with safeguards to protect the person performing the work.
36. Where appropriate, lockout procedures shall be used.
37. Employees shall not work under vehicles supported by jacks or chain hoists without protective blocking that will prevent injury if jacks or hoists should fail.
38. Air hoses shall not be disconnected at compressors until the hose line has been bled.