



Injury and Illness Prevention Program for The Berg Group

RESPONSIBILITY

The Injury and Illness Prevention Program (IIPP) administrator, David Derzab Safety Director has the authority and responsibility for implementing the provisions of this program for The Berg Group

All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available on all Berg Group Jobsites within California

COMPLIANCE

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP.
- Evaluating the safety performance of all workers.
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by: Positive reinforcement and peer /coworker recognition.
- Providing training to workers whose safety performance is deficient.
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process: Enforcement should reinforce the rule rather than punish the employee. However, based on the severity of the incident, Berg has the right to discipline employees who knowingly violate company codes of conduct, safety rules and policies. It is the responsibility of the Safety Director, Southwest regional safety manger, California Safety Coordinator, Foreman, and Superintendent to actively enforce a proper work ethic and the rules of the Safety and Health Program. Violations of company policy are considered unsatisfactory job performance and will be treated accordingly. Any employee who violates the policies and procedures as outlined in Safety Program may be subject to disciplinary action up to and including immediate termination as typically noted below.
- **STEP ONE. FIRST OFFENSE:** Verbal/written warning and instruction on proper procedure that must be followed to avoid future violations. Documented in personnel file
- **STEP TWO. SECOND OFFENSE:** Written warning describing the violation and instruction on proper procedure that must be followed to avoid another violation. Copy to personnel file.



- **STEP THREE. THIRD OFFENSE:** Written warning describing the violation and instruction on proper procedure that must be followed to avoid termination. Copy to personnel file.
- **STEP FOUR. FOURTH OFFENSE:** Termination. Copy to personnel file. Depending on the severity of the violation, Berg reserves the right to bypass steps 1, 2, and 3 in this procedure. If employee actions result in an OSHA citation, the employee could be suspended for up to three (3) days without pay.
- Other means that we use to ensure employee compliance with safe and healthful work practices include Use of daily morning JHA meetings to inform employees of site hazards and promotes safe jobsite work practices. Weekly toolbox talks used as a safety refresher and reminder of company and site safety policy.

COMMUNICATION

The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervision, and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- New worker orientation, including a discussion of site-specific safety and health policies and procedures.
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training.
- Safety meetings held at least every Toolbox safety meeting are held on a weekly basis for all field employees. Quarterly Safety meetings held for Foremen. Companywide Safety meeting held yearly at each regional office location, – more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses.
- Effective communication of safety and health concerns between workers and supervisors, including language translation where appropriate.
- Posted and distributed safety information.
- A system for workers to anonymously inform management about workplace hazards. This is accommodated by 1. Promoting a safe work atmosphere. 2. Promote reporting of jobsite hazards using hazard near miss reporting tool. 3. Effectively training our foremen to coach and respond to employee site safety concerns. 3. Provide a contact list of leadership who may be contacted to report any safety or health concern.
- Vehicle and site-specific codes of safe work practices.
- Other means we use to ensure communication with employees include We promote the reporting of any unsafe condition on the jobsite without fear of reprisal. The Berg Group leadership sees safety as the number one priority and considers any safety suggestion seriously.

Our organization elects to use a labor/management safety and health committee meeting all the requirements of T8CCR 3203 (7)(c)(1) – (7) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.



- general safe work practices with specifics with respect to hazards unique to the employees' job assignment.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by David Derzab, Marco Peralta, Andy Ross, Joe Horstkotte and Specific Jobsite Foremen according to the following schedule:

- When our Injury and Illness Prevention Program was first established.
- At least Monthly prior to beginning of the shifts.
- When new substances, processes, procedures, or equipment that present potential new hazards are introduced into our workplace.
- When new, previously unidentified hazards are recognized.
- When occupational injuries and illnesses occur.
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and

Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist*, and any other effective methods to identify and evaluate workplace hazards.

ACCIDENT/EXPOSURE INVESTIGATIONS

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be done by David Derzab, Marco Peralta, Andy Ross, Joe Horstkotte and Specific Jobsite Foremen., and will include:

- Visiting the scene as soon as possible.
- Interviewing affected workers and witnesses.
- Examining the workplace for factors associated with the accident/exposure/near-accident.
- Determining the causes of the accident/exposure/near-accident.
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- Recording the findings and corrective actions taken on the attached OSHA Form 301.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:



- When observed or discovered.
- When an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the attached Identified Hazards and Correction Record*.

TRAINING AND INSTRUCTION

All workers, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established.
- To all new workers.
- To all workers given new job assignments for which training has not previously provided.
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard.
- Whenever we become aware of a new or previously unrecognized hazard.
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.

This training will include (but is not limited to):

- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, handwashing, and drinking water facilities.
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
 - stacking goods in an unstable manner
 - storing materials and good against doors, exits, for extinguishing equipment and electrical panels.

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques.



- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Proper food and beverage storage to prevent them from becoming contaminated.

In addition, **we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.**

RECORDKEEPING

Written IIPP and Documentation Requirements

Our organization has taken the following steps to implement and maintain our IIPP:

Our organization has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on the Hazard Assessment Checklist* and the Identified Hazards and Correction Record* and the Investigation/Corrective Action Report*. These records are maintained for at least one (1) year.
2. Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the Worker Training and Instruction Record*. This documentation is maintained for at least one (1) year.