

INJURY AND ILLNESS PREVENTION PROGRAM



HPS Mechanical, Inc.

3100 E Belle Terrace, Bakersfield, CA 93307 | (661) 397-2121

REVISION EFFECTIVE DATE: JANUARY 4, 2021

TABLE OF CONTENTS

PURPOSE	2
SCOPE.....	2
ROLES & RESPONSIBILITIES.....	2
COMPLIANCE	5
COMMUNICATION	8
HAZARD ASSESSMENT.....	8
NEAR MISS, INCIDENT, AND EXPOSURE INVESTIGATIONS.....	9
HAZARD CORRECTION.....	10
TRAINING AND INSTRUCTION.....	11
RECORDKEEPING.....	11
REVIEW AND ACKNOWLEDGEMENT	12

PURPOSE

The purpose of this Injury and Illness Prevention Program (hereafter referred to as "IIPP") is to manage the safety and health of the workforce at HPS Mechanical, Inc. (hereafter referred to as "HPS"). This IIPP was developed to meet the requirements of [Title 8, CCR § 3203](#) for non-high hazard industries. HPS may require sub-contracting by other companies for projects. In those instances, the contracted companies' IIPP and related programs will be required to be in place under their own safety program.

SCOPE

This IIPP is relevant to activities occurring at HPS' facilities and work sites of HPS employees. It is intended to be used in coordination with site safety plans of other clients and contractors. This IIPP also references HPS' Code of Safe Work Practices and other procedures. The respective requirements of those practices and procedures are referenced in those documents.

ROLES & RESPONSIBILITIES

All employees of HPS contribute to the management of this IIPP. Below is an overview of the specific roles and responsibilities.

- **Program Administrator:** Scott DenHerder is ultimately accountable for implementing and maintaining the IIPP for HPS. This includes setting expectations for its use and compliance with the requirements of the program. Responsibilities to meet the requirements and deliverables of the IIPP may be delegated to HPS employees, but the Program Administrator is ultimately accountable for the program and has the authority to approve all revisions.
- **Program Facilitator:** Frank Martinez is responsible for coordination of the IIPP's elements with the appropriate stakeholders. He also provides oversight for the deliverables of each element, such as the Hazard Correction Log and incident reports.
- **Supervisors:** HPS Supervisors are responsible for implementing and maintaining the IIPP and Code of Safe Work Practices on their worksites and ensuring requirements are clearly communicated and understood by all workers. Supervisors are expected to enforce requirements consistently amongst employees and contractors, equally holding themselves and others accountable. If hazardous conditions, near misses, or incidents are reported, supervisors are responsible for initial investigation and communication to HPS Management. Additional responsibilities for supervisors are referenced in other elements of the IIPP.
- **Employees and Contractors:** Employees and contractors are responsible for using safe work practices, following all policies and procedures, and assisting in maintaining a safe work environment. Employees are also required to complete all assigned safety and health related trainings. Employees must report any hazardous conditions, near misses, or incidents to their supervisor as soon as they occur.

All employees and contractors also play the most critical role in the success of Stop Work Authority, by reporting to their supervisor any adverse safety or health conditions that put themselves or their coworkers at risk. This includes any individual health conditions which may impair their ability to safely perform their job duties.

To ensure each element of HPS' IIPP is meeting the program requirements, the table below delegates responsibility for maintenance and updates of each element amongst HPS' staff.

Summary of Program Roles and Responsibilities

Program Element	Managed By	Key Responsibilities
Roles and Responsibilities	Scott DenHerder	<ul style="list-style-type: none"> • Ensure expectations for IIPP compliance and safety culture have been communicated to HPS' employees and contractor leadership. • Delegate responsibility of management for each program element. • Review and hold final decision authority for all changes requested for the program.
Compliance	Frank Martinez	<ul style="list-style-type: none"> • Monitor project requirements and changes to regulatory requirements that may trigger changes or updates to the IIPP and Code of Safe Work Practices to maintain compliance. • Maintain Scope of Requirements to summarize HPS' most significant risks, the applicable regulatory requirement (to the "Article" level), and the relevant Code of Safe Work Practice or procedure used by HPS to meet the applicable requirements. • Track safety performance of employees and contractors and provide performance-based recommendations to HPS' Management (e.g., corrective action or recognition).
Communication	Frank Martinez / Beatriz Diaz	<ul style="list-style-type: none"> • Distribute and maintain access of HPS' IIPP and Code of Safe Work Practices to employees and contractors. • Schedule and facilitate HPS' Monthly Safety Meetings. • Maintain communication channels and documentation of completed communications (e.g., minutes of safety meetings, worksite safety recommendations).
Hazard Assessment	Frank Martinez	<ul style="list-style-type: none"> • Understand HPS' most significant risks by conducting hazard assessments of project work plans, job tasks, and sites, then provide recommendations to correct hazards. • Verify requirements of HPS' Code of Safe Work Practices are being met by employees and contractors using inspections and contractor audits. • Provide recommendations for updates to the compliance scope of the IIPP and Code of Safe Work Practices, based on risk assessments and inspection findings.

Investigations	Frank Martinez	<ul style="list-style-type: none"> • Encourage reporting of near misses, incidents, and exposures to allow HPS to learn and improve from these events. • Lead investigations with involved personnel to seek understanding of events and recommended solutions to correct hazards and prevent repeat incidents. • Maintain documentation of investigation outcomes and ensure corrective actions are documented in HPS' Hazard Correction Log.
Hazard Correction	Frank Martinez	<ul style="list-style-type: none"> • Consolidate safety improvement suggestions, hazard assessment recommendations, and investigation corrective actions into a centralized Hazard Correction Log. • Report status of progress for corrections at monthly safety meetings. • Delegate hazard correction actions to responsible parties; verify and document completion.
Training	Frank Martinez / Beatriz Diaz	<ul style="list-style-type: none"> • Maintain training matrix for HPS employees and contractors based on the Scope of Requirements in the IIPP's Compliance element. • Track completion of required training in employee training records. • Audit completion of training and required certifications for contractors.
Recordkeeping	Beatriz Diaz	<ul style="list-style-type: none"> • Update documentation required by CalOSHA by the mandated deadlines or revision frequency. • Ensure required records are stored based on retention requirements and properly disposed of after the retention period is completed. • Provide specific documents upon request by CalOSHA.

COMPLIANCE

All employees, including managers and supervisors, are responsible for complying with safe work practices and contributing to HPS' safety culture. To achieve this, HPS is committed to:

- Informing employees and contractors of the requirements in HPS' IIPP and Code of Safe Work Practices.
- Providing resources to meet the requirements.
- Evaluating the safety performance of all employees and contractors.
- Recognizing individuals who consistently meet requirements and contribute to HPS' safety culture.
- Understanding why employees fail to meet the requirements and applying learning or discipline, as needed.
- Continually improving safety culture by soliciting feedback from employees, contractors, and clients, then incorporating that feedback in monthly safety committee meetings.

To prioritize CalOSHA regulations most relevant to HPS' operations, risk assessments and project requirements are used to populate the following Scope of Requirements table. This does not reflect all requirements that are applicable to HPS. It is intended to take a risk-based approach to inform HPS of its most significant risks for injury, illness, and compliance violations. HPS' Code of Safe Work Practices is maintained based on those risks to direct how controls are implemented.

The Scope of Requirements table also supports HPS' prioritization of activities in the Hazard Assessments and Training elements of the IIPP.

Scope of Requirements	
Most-Applicable Standard (CalOSHA)	Code of Safe Work Practice or Plan
Elevated Work Platforms and Aerial Devices (<i>GISO Art. 24</i>)	Mobile Elevated Work Platforms
Scaffolds – General & Various (<i>CSO Art. 21 & 22</i>)	Scaffolds
Access, Workspaces, and Work Areas (<i>GSIO Art. 4</i>)	Portable Ladders
Fall Protection (<i>CSO Art. 24</i>)	Fall Protection
Cranes and Derricks in Construction (<i>CSO Art. 15</i>)	Rigging Equipment for Material Handling
	Signaling
Excavations (<i>CSO Art. 6</i>)	Excavation and Trenching
Vehicles and Traffic Control (<i>CSO Art. 11</i>)	Driving Safety
	Traffic Control
Industrial Trucks, Tractors.... (<i>GISO Art. 25</i>)	Forklifts and Powered Industrial Trucks
Industrial Trucks - General (<i>GISO §3650</i>)	Hand Trucks and Pallet Jacks
Manual Material Handling (<i>CalOSHA Guidance</i>)	Manual Material Handling
Control of Hazardous Energy (<i>GISO §3314</i>)	Isolation of Hazardous Energy
Electrical Work Procedures (<i>ESO Art. 3</i>)	Electrical Safety Awareness
Temporary Wiring (<i>ESO Art. 13</i>)	Ground Fault Protection (GFCI)
Electric Welding, Cutting and Heating (<i>GSIO Art. 90</i>)	Hot Work, Welding and Cutting
Fire Protection and Prevention (<i>CSO Art. 36</i>)	Fire Protection and Extinguishers
Hand and Portable Powered Tools and Equip. (<i>GISO Art. 20</i>)	Hand Tools and Power Tools
Metal Working Machines <i>GISO Art. 6</i>)	Fixed Equip. and Point of Operation Hazards
Use of Compressed Air or Gases (<i>GISO §3301</i>)	Compressed Air
Hazard Communication (<i>GISO Art. 109</i>)	Hazard Communication (HAZCOM)
Occ. Exposure to Respirable Crystalline Silica (<i>CSO §1532.3</i>)	Silica Exposure
Control of Harmful Exposure (<i>GISO Art. 107 §5141</i>)	Valley Fever Awareness
Protection from Wildfire Smoke (<i>GISO Art 107 §5141.1</i>)	Protection from Wildfire Smoke
Heat Illness Prevention (<i>GISO Art. 10 §3395</i>)	Heat Illness Prevention
COVID-19 Infection Prevention (<i>GISO §3205</i>)	COVID-19 Prevention Plan (CPP)
Biological Hazards (<i>CalOSHA Guidance</i>)	Biological Hazards (Insects, Spiders, Snakes)
Emergency Medical Services (<i>CSO Art. 3 §1512</i>)	First Aid, CPR, AED and Emergency Resp.
Sanitation General Requirements (<i>GISO §3205</i>)	Housekeeping
Disposal of Waste Material (<i>CSO Art. 31</i>)	Disposal of Waste Material
General Duty Clause / Practices Developed by HPS	Office Safety
Personal Protective Devices (<i>CSO Art. 3 §1514</i>)	Personal Protective Equipment
Lead (<i>CSO Art 4 §5132.1</i>)	Lead Awareness
Asbestos (<i>CSO Art 4 §5129</i>)	Asbestos Awareness
Confined Space (<i>GISO Art 108</i>)	Confined Space
Bloodborne Pathogens (<i>GISO Art 109 §5193</i>)	Bloodborne Pathogen

To maintain discipline and compliance with requirements, HPS uses Dr. James Reason's Culpability Model (Figure 1) to assess if instances of noncompliance or unsafe work practices are a result of intentional acts to cause harm, reckless violations, negligent error, and/or organizationally induced error. HPS' Management will make the final determination of the outcome, with input from HPS employees and outside professionals, as appropriate.

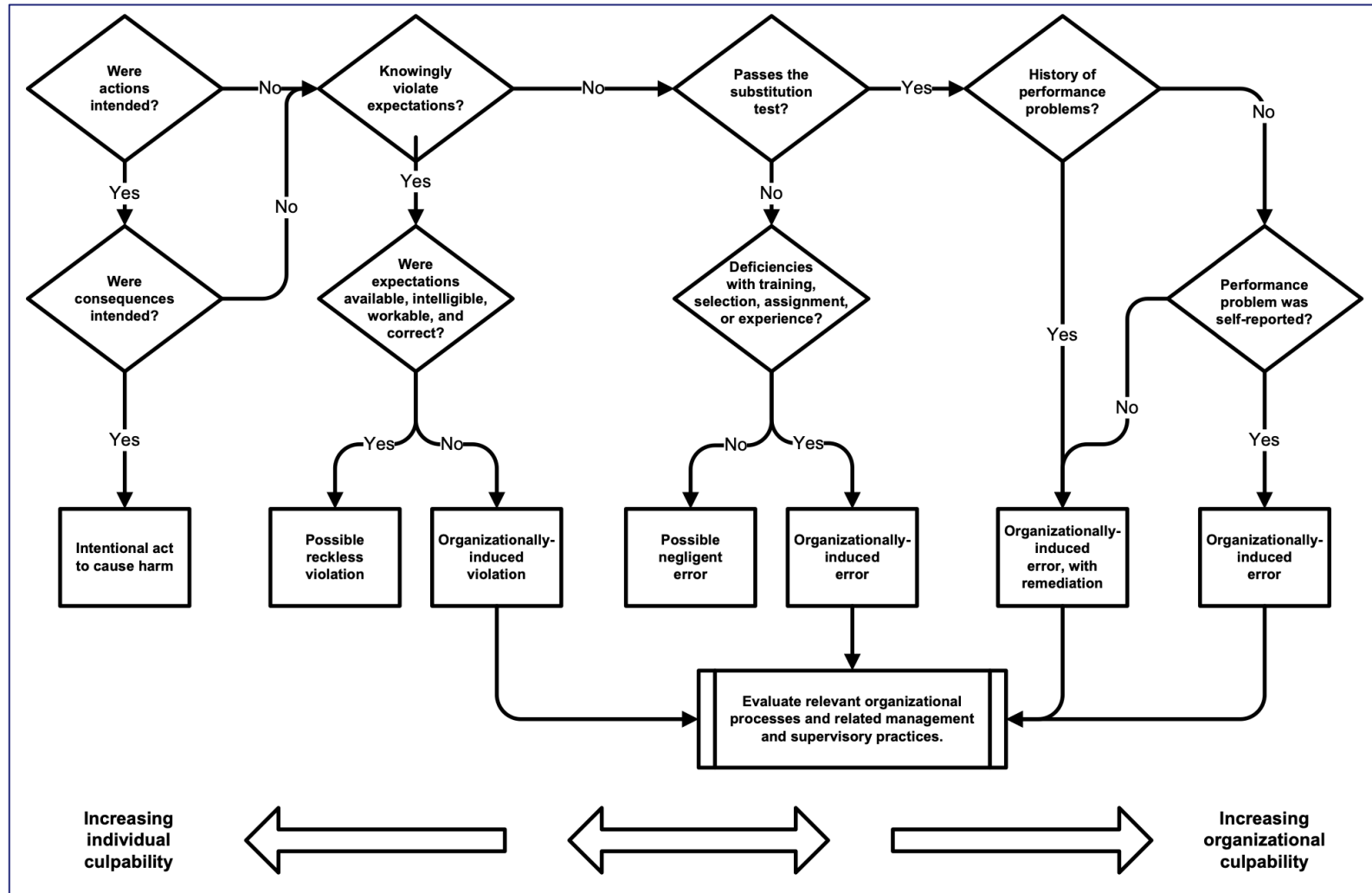


Figure 1: HPS' Culpability Model adopted from Dr. James Reason

COMMUNICATION

All HPS Management and supervisors are responsible for communicating requirements, practices, and procedures in a form readily understandable by all workers. All employees are responsible for communicating unsafe conditions, near misses, or incidents. HPS' communication system encourages a culture of transparent communication and reporting without fear of reprisal.

To accomplish this, HPS' system includes the following practices:

- New employee orientation of policies, procedures, and leadership expectations
- Annual review of HPS' IIPP and Code of Safe Work Practices for all employees
- Training (refer to training Element in the IIPP)
- Tailgate Safety Meetings every ten days
- Monthly scheduled safety meetings
- Posted or distributed safety information (e.g., Worker's Right to Know)

All employees may inform HPS' Management about unsafe conditions, near misses, and incidents through the following methods:

- **Email:** sd@hpsmechanical.com
- **Call or text:** (661) 201-9295
- **In-person:** Through Scott DenHerder's open-door policy

Employees may also anonymously report safety-related issues or concerns to Arthur & Hansen, LLC through the following methods:

- **Email:** jason@arthurandhansen.com
- **Call or text:** (661) 809-4417
- **Mail:** 4130 Ardmore Avenue STE 202, Bakersfield, CA 93309

Anonymous reports will be shared with HPS' Management with the employee's identity remaining anonymous unless required by law.

Accommodations will be made for language or other communication barriers for safety and health communications. Upon request, HPS will make reasonable efforts to provide Spanish trainers, translated material, and on-site personnel who can assist with translation. If critical safety material or instruction cannot be effectively communicated, the related tasks will not be assigned to the affected employee until the communication barrier can be mitigated.

HAZARD ASSESSMENT

HPS conducts hazard assessments to identify and evaluate workplace hazards and related controls through the following methods:

- **Annual Risk Assessments:** Evaluation of HPS' most significant risks that may not have been previously identified, based on results of inspections, employee engagement, and learnings from near miss and incident investigations.

- **Management of Change:** New processes, procedures, or equipment are introduced to HPS' operations.
- **Hazard Recognition and Communication:** Previously unrecognized hazards are identified by HPS' employees.
- **Near Miss, Incident, and Exposure Investigations:** Previously unrecognized hazards or gaps in controls identified by a near miss or incident (refer to Accident and Exposure Investigation element of the IIPP).
- **Job Safety Analysis:** Site and job-specific hazard assessments to identify risks created by HPS or other workers in a shared workspace using HPS' JSA form.

To ensure controls are in place, HPS will conduct recurring inspections by management, supervisors, employees, contractors, and third-party inspectors (e.g., general contractors, safety professionals). Inspection topics will be based on previous Hazard Assessment results and work activities with the greatest risk for serious injury or fatality.

Inspection results will be risk-ranked (high, medium, and low) based on the severity of the potential consequence. Results will be documented in HPS Hazard Correction Log and used to inform future improvement opportunities (e.g., employee development, procedure updates, investment in safety equipment). Positive results and observations will be used for employee recognition.

Corrective actions development should assess alternative solutions that move mitigations further up the hierarchy of controls and provide multiple layers of protection for controls.

- Elimination
- Substitution
- Engineered
- Administrative
- Personal Protective Equipment

Trends and closure of corrective action will be tracked through the Safety Committee. Summaries of trends and improvement actions taken by HPS are shared with employees and contractors to demonstrate commitment to improve safety behaviors and culture.

NEAR MISS, INCIDENT, AND EXPOSURE INVESTIGATIONS

Near misses, incidents, and exposures must be immediately reported and investigated for HPS to learn from these events and prevent recurrence. External reporting shall also follow all CalOHSAs and client's requirements.

- All incidents shall be reported to the host or client within 24 hours
- Serious incidents or fatalities shall be reported to CalOSHA within 8 hours

The investigation methodology will depend on the severity of the event. Events with minor potential consequences may be investigated in-house by HPS' management. More severe events may require an external facilitator (e.g., TapRoot, Five Why, WhyTree, Human and Organizational Performance) to objectively evaluate potential improvement opportunities. Regardless of the methodology, employees involved will be included in order to understand the event and include their input in corrective actions.

Regardless of investigation methodology, evidence must be collected and preserved to support the investigation. This includes written statements, notes from interviews, pictures, video recordings, physical objects, or other items considered relevant by the investigation team.

Investigation records, including collected data, shall be retained by HPS for five years, unless longer retention is required by clients.

Lessons learned from investigations will be shared with HPS' employees and contractors to prevent recurrence of incidents and apply learnings beyond the initial incident.

Injuries or exposures will be documented in HPS' Accident or Exposure Records.

Results from investigations for a work-related recordable injury or illness will also be documented in a Cal/OSHA 301 form within 7 calendar days of the injury or illness being reported.

HAZARD CORRECTION

Hazards reported by HPS employees or identified in assessments, inspections, or investigations will be tracked in HPS' Hazard Correction Log. Action items for corrective actions of hazards that will require additional time to correct may be assigned to employees, but Frank Martinez is responsible to ensure corrective actions are completed and effective.

Whenever possible, hazards will be corrected when observed or discovered. All HPS employees are empowered to use Stop Work Authority when a hazard is not properly mitigated, or when the appropriate mitigations are not clearly understood.

The steps for Stop Work Authority are: Stop, Notify, Correct, and Resume.

- **Stop** – Safely Stop Work and all affected workers will be removed from the area until the hazard is mitigated.
- **Notify** – Notify the supervisor of the Stop Work and any other affected personnel who may be exposed or will support resolution.
- **Correct** – Working with the affected personnel, align on a method to correct the issue or exposure. If workers must be exposed to the hazard to correct it, a mitigation plan will be put in place to manage the risks while correcting the hazard.
- **Resume** - Work will not resume until the risks are mitigated and affected personnel are in agreement of the safe continuance of work.

No personnel will be reprimanded for utilizing Stop Work Authority. HPS' Management and supervisors will encourage the use of Stop Work Authority and recognize personnel for the appropriate application.

Instances of Stop Work Authority should be documented and reported to HPS' management. This will allow further application of lessons learned for other projects, identify trends of recurring issues, and provide recognition for personnel supporting the proper use of Stop Work Authority.

Corrective actions from Stop Work Authority requiring long-term solutions shall be documented on HPS' Hazard Correction Log and tracked to closure. HPS' management will follow up on the closure of those corrective actions during monthly safety committee meetings.

All employees will be trained on Stop Work Authority as part of their onboarding training. The topic is covered under the IIPP and Safety Culture training in the Training Matrix. Completion will be documented in each employee's training record.

TRAINING AND INSTRUCTION

HPS' employees shall be trained on requirements, work practices, and procedures to safely perform their job duties and manage risk on their worksites. Training will vary by position description and assigned duties. Training schedules, curriculum, and completion documentation are tracked by HPS' Safety Administrator.

Employee Training Records will be used to track completed training. The training plan will be reevaluated as an outcome of Hazard Assessment, investigations, or IIPP updates.

RECORDKEEPING

Beatriz Diaz is responsible for maintaining all required records. The records will be stored at HPS' Belle Terrace office. Electronic records are stored on a backup "cloud" drive. All sensitive employee information is restricted to only authorized administrators.

All work-related injuries, illness, and fatalities that meet CalOSHA's recordability criteria will be documented and retained through the required retention period. This includes:

- Injury Illness Incident Report on a CalOSHA 301 Form within 5 calendar days of being notified of the incident
- Recording in HPS' CalOSHA 300 Log within 7 calendar days of being notified of the incident

From February 1 to April 30, the prior year's CalOSHA 300A summary, certified by Scott DenHerder, will be posted and accessible at HPS' facilities. Outside of the posting period, a copy of the CalOSHA 300A will be available upon request.

Record	How Long to Maintain
Hazard Assessments / Job Safety Analysis	1 year
Hazard Correction Log	1 year
Accident and Exposure Investigations	5 years
CalOSHA Form 301 - Injury and Illness Incident Report	5 years following the year to which they pertain
CalOSHA Form 300 - Log of Work-Related Injuries and Illnesses For recording specific details about work-related injuries and illnesses.	
CalOSHA Form 300A - Summary All employers that are required to maintain injury and illness records must post the Form 300A Summary by February 1 of the year following the year covered by the records. The Summary must remain posted at the worksite until April 30 of that year.	
Medical Surveillance and Exposure Records For personnel in a medical surveillance program or all other occupational exposure records.	30 Years

REVIEW AND ACKNOWLEDGEMENT

Below is the documentation for the review and acknowledgement of HPS' Injury and Illness Protection Program by HPS Management and Safety staff.

Title	Name	Date	Signature