



Performance Mechanical, Inc.

INJURY ILLNESS PREVENTION PROGRAM

I. Purpose

Safety is an essential element of Performance Mechanical Inc.'s (PMI) construction operations. To support this philosophy, PMI has developed and maintains an Injury Illness Prevention Program in compliance with Title 8 section, 3203 General Industry Safety Order (GISO) and Senate Bill (SB)198.

A copy of this IIP Program is available from each manager and supervisor. The IIPP is also available on every job site.

The purpose of this program is to:

- A. Provide a safe and healthful work environment.
- B. Ensure safe work performance for all PMI operations
- C. Establish and maintain a system to anticipate, recognize, evaluate and control occupational Health and Safety hazards.
- D. Provide employees with appropriate information, training and protective equipment relating to potential Health and Safety hazards associated with their job assignments.
- E. Comply with all applicable local, state and federal regulations.

II. Responsibilities

- A. President, Don Silva and Safety Manager, Kevin Parker share the authority and responsibility to implement and maintain the IIP Program.
- B. Job Site Supervisors and Frontline Foremen

It is the responsibility of all frontline foremen and superintendents to implement, on a day-to-day basis, the PMI IIP Program. Which includes the following eight basic elements:

1. Responsibility
2. Compliance
3. Communication
4. Hazard Assessment
5. Accident/Exposure Investigation
6. Hazard Correction
7. Training and Instruction
8. Record keeping

C. Corporate Safety Manager

Kevin Parker acting as the Corporate Safety Manager is responsible to:

1. Interpret new and existing local, state and federal Health and Safety regulations.
2. Inform supervisors and managers of any legally required procedures, inspections, training, etc.
3. Review incident reports and categorize them as to their severity and analyze resulting trends.
4. Provide appropriate incident summaries, safety bulletins, training materials and other applicable information that enhances individual and group safety performance.
5. Provide chemical and physical hazard evaluation and control services to PMI personnel.
6. Consult and assist job site supervisors in developing and implementing appropriate Health and Safety programs.
7. Coordinate all OSHA (or equivalent) visits or inquiries.
8. Audit PMI Health and Safety Programs

D. Employees

It is the responsibility of each employee to:

1. Comply with PMI Health and Safety policies and procedures
2. Participate in new and existing Health and Safety programs
3. Report any occupational injury or illness or any potentially hazardous condition immediately to his/her supervisor
4. Assist in the correction of unsafe acts and conditions

III. Compliance

A. Health and Safety Management

1. PMI is committed to insuring that all work is done safely.
2. This is accomplished by clearly stating our expectations, providing necessary resources and following up to insure that the expectations are met.
3. Procedures and controls are established and implemented to facilitate this goal.

4. These actions must be performed with the employee in mind. A predisposition towards disciplining as a result of incident investigations or audits will discourage employees from disclosing facts, and facts are essential to determination of cause.
5. A predisposition towards correcting conditions, procedures and job direction will encourage employees to discuss facts.
6. PMI will not apply discipline as a result of an employee filing a workers' compensation claim or notifying management of a safety or health hazard.
7. Key elements of the PMI's Health and Safety Management System include:
 - a) Visible management commitment and involvement in the PMI Health and Safety Program
 - b) The company wide utilization of a behavior based safety observation system called the "PMI Card".
 - c) PMI Safety Incentive Program directly tied to the participation of each employee in the "PMI Card" program.
 - d) Pre-job conferences are held for each new project and attended by all levels of management prior to mobilization. A site specific safety plan is developed from the information derived at the pre-job conference.
 - e) Safety management system mobilization kits are then implemented by all lead foremen or designated Site Safety Personnel at the mobilization of each new project.
 - f) Workplace health and safety objectives, similar to those established for other business functions.
 - g) A management performance appraisal system to measure and confirm health and Safety accountability.
 - h) Consistent disciplinary procedures which help to ensure that Health and Safety rules and procedures are put into practice and enforced.
 - i) A quarterly review of safety related problems and successes occurring on various projects will be reviewed at the Quarterly Supervisors Meetings held by PMI safety management.
 - j) All subcontractors shall have, implement and abide by an effective Injury Illness Prevention Program and industry appropriate safety procedure manual, prior to subcontract approval.

B. Health and Safety Rules and Procedures

Procedures are necessary to delineate the minimum requirements to perform work safely and correctly. Procedures are documented and employees are trained on correct implementation of their work. Those procedures include:

1. PMI Code of Safe Practices
2. CAL OSHA Construction Pocket Guide
3. Site Specific Safety Procedures
4. Job Safety Analysis
5. New Hire Orientation
6. Specific Equipment Operation Training
7. Accident Investigation Guidelines
8. Emergency Response Plan
9. Near Miss Program
10. Compliance With Customer Safety Plans And Requirements

IV. Communication

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of the following items:

- A. New employee orientation including a discussion of safety and health policies and procedures.
- B. Review of our IIP Program.
- C. Workplace safety and health training programs.
- D. Regularly scheduled safety meetings.
- E. Effective communication of safety and health concerns between employees and supervisors, including translation where appropriate.
- F. Posted or distributed safety information.

- G. A system for employees to anonymously inform management about workplace hazards by means of provided "PMI Card" receptacle boxes or by mailed correspondence.
- H. Corporate Safety Manager meets with the Operations group regularly, prepares written records of the safety and health issues, reviews results of the periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents, reviews investigations of alleged hazardous conditions, and submits recommendations to assist in the evaluation of employee safety suggestion.

V. Hazard Assessment, Control and Correction

- A. Hazard assessment and control refers to any method of identifying existing or potential hazards in the workplace, and eliminating or controlling them.
- B. Hazard assessment may include "PMI Card", job site audits, written work permits (i.e., lockout-tagout, confined space etc.) industrial hygiene air monitoring, JHA's and engineering processes.
- C. Workplace inspections are an integral aspect of the identification and control of hazards.
- D. Hazard Control methods may include the use of engineering controls such as exhaust ventilation, the specification and use of personal protective equipment (i.e., respirators, gloves, hard hats, safety shoes, safety glasses, goggles, etc.) and safe work procedures.

VI. Accident/Incident Investigation and Reporting

The objectives of a good incident investigation and reporting system are to improve employee safety by preventing the reoccurrence of similar incidents and to enhance our understanding of hazards and control. The incident investigation can result in recommending correction of unsafe conditions, improvement of procedures, refocusing of training or employee actions. The PMI requirements are delineated in Accident Investigation Procedure. We are committed to the follow-up of all incident investigations to ensure that the recommended corrective actions are implemented. Among the actions we take are:

- A. Investigate and report the root cause of an accident, incident or near miss in a timely fashion.

- B. Promptly report and investigate (in no more than 24 hours) any occupational injury or illness, no matter how minor.
- C. Document any accident and near-miss investigation using standard forms provided or their equivalent. Reports will be retained for a minimum of 5 years.
- D. Develop and conduct accident awareness and reduction programs and campaigns related to work-specific hazards.

VII. Training and Instruction:

All employees, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices. Mandatory refresher training will be required at various intervals. Training and instruction shall be provided as follows:

- A. To all new employees;
- B. To all employees given new job assignments for which training has not been previously provided;
- C. Whenever new substances, procedures or equipment are introduced to the workplace and represent a new hazard;
- D. Whenever the employer is made aware of a new or previously unrecognized hazard;
- E. To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed;
- F. To all employees with respect to hazards specific to each employee's job assignment.

Health and Safety training programs will be provided which cover the following subjects and practices:

1. Explanation of PMI IIP Program, code of safe practices, emergency action plan, fire prevention plan, and measures for reporting any unsafe conditions, work practices, and injuries.
2. Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
3. Information about chemical hazards to which employees could be exposed and other hazard communication program information.

4. Provisions for medical services and first aid including emergency procedures.
- G. In addition, employees will be provided with specific instructions regarding hazards that are unique to their job assignment, to the extent that such information was not already covered in other training.

Examples of specific training are:

1. Confined spaces
2. Good housekeeping, fire prevention, safe practices for operating any construction equipment
3. Safe procedures for cleaning, repairing, servicing and adjusting equipment and machinery
4. Safe access to working areas
5. Protection from falls
6. Electrical hazards, including working around high voltage lines
7. Crane operations, signaling and safe rigging practices
8. Trenching and excavation work
9. Proper use of powered tools. Electric and pneumatic
10. Guarding of belts and pulleys, gears and sprockets, and conveyor nip points
11. Machine, machine parts, and prime movers guarding.
12. Lock-out/tag-out procedures
13. Material handling
14. Fall protection from elevated locations
15. Use of elevated work platforms, including scaffolding, JLG's and scissor lifts
16. Driver safety
17. Slips, falls, and back injuries
18. Ergonomic hazards, including proper lifting techniques and working on ladders or in a stooped posture for prolonged periods at one time
19. Personal protective equipment
20. Respiratory protection
21. Hazardous chemical exposures
22. Hazard communication
23. Physical hazards, such as heat/cold stress, noise, and ionizing and non-ionizing radiation
24. Bloodborne pathogens
25. Safe welding and thermal cutting
26. Safety observation training

Training records will be maintained by the safety manager for not less than one year.

VIII. Safety Meetings

Safety meetings are an important part of PMI's Health and Safety training program. All field employees shall attend a minimum of one safety meeting each week within their area of responsibility.

- A. All field supervisors and office personnel (i.e., secretaries, estimators, engineers and upper management) must attend safety meetings a minimum of once per quarter. These meetings must be conducted by the company safety manager or his/her designee.
- B. It is the responsibility of each frontline supervisor to ensure that their employees attend and participate in safety meetings each week and that those meetings are pertinent, effective and of high quality.
- C. First line supervisors are also responsible for documenting those meetings on an Employee Safety Meeting Attendance Roster, and then forwarding all documentation to Safety Department.
- D. Resources and guidelines for providing safety meetings can be found:
 - 1. In the distributed "Weekly Toolbox Topics" provided to each field supervisor
 - 2. Various publications and videos available from the Safety Department. Jobsite specific situations and observations from previous shifts

IX. Record Keeping

- A. The following records are kept at the home office:
 - 1. An individual file is kept on all employees which contains:
 - a) Safety training
 - b) Accidents/incidents
 - c) Disciplinary actions
 - d) Incentives received
 - e) All written communications received
 - 2. An employee safety training database is maintained for reference and updated as needed.
 - 3. All training records are kept a for a minimum of three years
 - 4. All accident/incident reports are kept for 5 years
 - 5. All MSDS and Hazardous Substance Lists are kept for 30 years
 - 6. OSHA 300 Logs are kept for a minimum of 5 years

7. All worker's compensation records
- B. The following records are kept at the job site and returned to the home office for archive storage upon job completion:
1. OSHA 300 log
 2. Test results of any suspected hazardous substances
 3. MSDS
 4. First Aid Log
 5. Safety Training
 6. Site Audits
 7. Completed JHA's
 8. Safety Meeting Attendance Rosters
 9. Hazard Identification and Correction Forms
 10. Disciplinary Actions and Incentives Distributed
- C. All necessary forms for the implementation of this IIP program are contained in the following pages of this manual.

Donald J. Silva, President

Date