

The IIPP – The Start of a Great Safety Program

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Yorke Engineering, LLC

- Yorke assists Industrial and Government clients with safety, industrial hygiene, air quality, hazardous waste, and storm water under regulations issued by the local, state, and federal agencies
- Founded in 1996 and has worked for over 1,450 customers at well over 2,000 facilities
- Over 7,500 air, water, waste, and safety projects completed in CA



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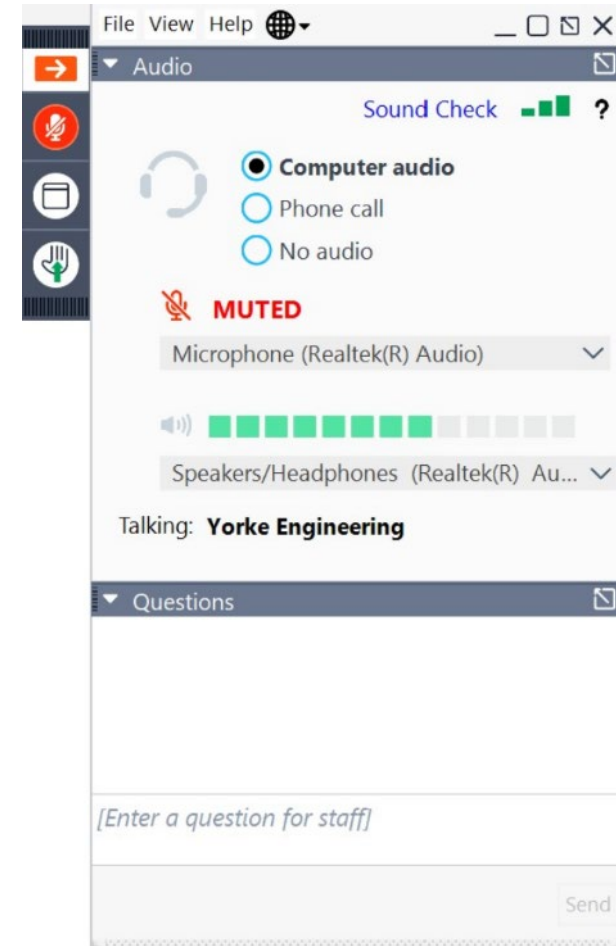
Yorke Presenter

Jaime Steedman-Lyde, CIH, CSP

- Certified Industrial Hygienist and Certified Safety Professional
- LEED AP
- Over 25 years of experience in the field of industrial hygiene
- Professional Organizations:
 - Southern California Industrial Hygiene Association (SCAIHA)
 - California Industrial Hygiene Council (CIHC)
 - California State University Northridge Environmental Occupational Health Advisory Board

Using GoToWebinar

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- We have everyone muted.
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- Polling question:
 - Helps us provide appropriate content.



Injury and Illness Prevention Program

- Case for requiring an IIPP
- Regulatory Framework
- Elements of an IIPP
- Resources
- Safety Management Systems



Injury and Illness Prevention Program

- An IIPP is:
 - A proactive process to help employers find and fix workplace hazards before workers are hurt

Benefits

- Provides for a safe workplace for employees
- Reduces losses from accidents and injuries
- Improves workplace safety and health
- Increases morale
- Increases productivity
- Reduces costs of doing business

Workplace Injury and Illness

- 4,763 workers died on the job in 2020
<https://www.bls.gov/news.release/cfoi.nr0.htm>
 - A worker died every 111 minutes in 2020
 - National fatality rate was 3.4 per 100,000 FTE workers
 - California fatality rate was 2.9 per 100,000 FTE workers
- 1,176,340 non-fatal occupational injuries and illnesses involving days away from work in 2020 – up 32.4% from 2019

Workplace Injury and Illness (Cont.)

- Accidents cost money
 - Productive time lost by an injured employee
 - Productive time lost by employees and supervisors attending the victim, clean up, and start up
 - Time and cost for repair or replacement of any damaged equipment or materials
 - Time to hire or to retrain
 - Reduced morale among your employees and perhaps lower efficiency
 - Increased worker's compensation insurance rates



IIPP in California

- California injuries and illnesses decreased 19% within 5 years of requiring an IIPP
- More than a dusty binder on a shelf
- Should be an active, current document in use every day
- All employees should be able to tell you where it is, recognize the name, and indicate they were trained on the program

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Federal OSHA – Key Regulation

- Federal OSHA considered an IIPP program – I2P2, but did not complete the regulatory process
- **General Duty Clause (Section 5 of OSH Act)**
 - (a) Each employer
 - 1) Shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.

Cal/OSHA Requirements

- All employers in California are required to have an effective IIPP
 - Written if 10 or more employees
- California Code of Regulations (CCR)
Title 8, Section 3203
- Promotes the safety and health of employees at the worksite

IIPP Requirements Elsewhere

- California is not alone on this requirement
- 34 states have established laws or regulations encouraging or requiring some type of IIPP
- 15 states require an IIPP document



Cal/OSHA – IIPP

- Every employer shall:
 - Establish, implement, and maintain an effective IIPP
 - Identify the person(s) with authority and responsibility for implementing the IIPP
 - Include a system for ensuring that employees comply with safe and healthy work practices
 - Include a system for communicating with employees regarding health and safety



Cal/OSHA – IIPP

- If there is not a specific regulation that applies to a hazard, the IIPP puts a system in place to recognize, evaluate, and control those hazards
- IIPP is California's General Duty Clause
- Most cited regulation

Requirements of an IIPP

- Requires employers to:
 - Identify workplace hazards
 - Abate those hazards
 - Inform workers about hazards
 - Train workers in safe work practices

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Elements

- Management commitment [8 CCR 3203(a)(1)]
- Employee Compliance [8 CCR 3203(a)(2)]
- Health & Safety Communication with employees [8 CCR 3203(a)(3)]
- Hazard Assessment and Control
- Procedures for Scheduled Inspections, Evaluations, **AND Corrections** [8 CCR 3203(a)(4)]

Elements (Cont.)

- Accident and Illness Investigation [8 CCR 3203(a)(5)]
- Corrective Actions for unsafe/unhealthy conditions [8 CCR 3203(a)(6)]
- Training [8 CCR 3203(a)(7)]
- Recordkeeping [8 CCR 3203(b)]

Management Commitment – 8 CCR 3203(a)(1)

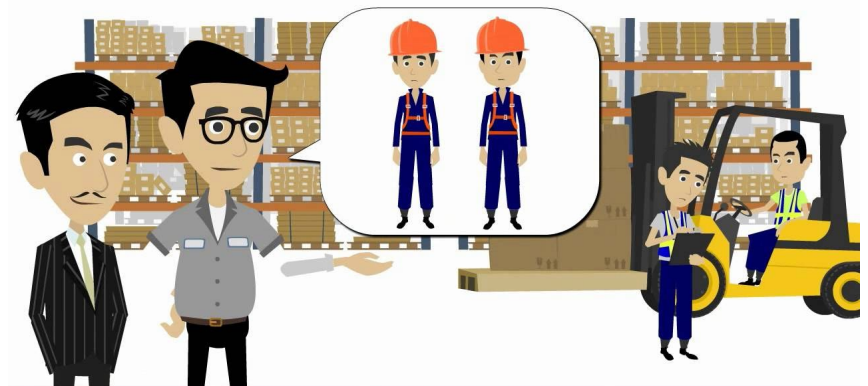
- Must identify the person(s) by name with the authority and responsibility for the IIPP and safety/health program
- Must support the identified person
- Ensure employees know and follow company health and safety policies and procedures (including IIPP)
- Accountability
- Ensure strong policies, procedures, incentives, and disciplinary actions to ensure employee compliance

Management Commitment (Cont.)

- Establish workplace objectives/goals
- Emphasis on staff safety/health responsibilities and recognition that they are accountable
- Encourage, and act upon, employees reporting unsafe conditions
- Allocate resources for hazard identification and correction, controls, and training
- Should lead by example – wear PPE, attend training, LISTEN to employees

Employee Compliance – 8 CCR 3203(a)(2)

- Follow safe work practices and maintain a safe work environment
- Proper job performance and hazard control
- Report safety hazards, injuries, and illnesses
- Use PPE
- Follow emergency procedures
- Attend training



Communication – 8 CCR 3203(a)(3)

- Means of communication regarding safety/health and encouraging employees to report hazards
- Readily understandable (language)
- Two-way system between employee and employer
 - General employee safety meetings
- Safety training

Communication (Cont.)

- Posters and bulletins
 - Cal/OSHA, Worker's Comp insurance, NSC, etc.
- Safety suggestion box
- No employee will be reprimanded for reporting hazards or making safety suggestions
- Safety Committee option (more in a minute)
- Document communications to show a system exists



Safety Committee

- Can use a Safety Committee for communication:
 - Meet regularly, not less than quarterly
 - Prepare, and make available to employees, written records of the issues discussed at meetings
 - Maintain minutes for review for 1 year
 - Review results of periodic worksite inspections
 - Review investigations of accidents and incidents and have a process to submit suggestions to management for the prevention of future incidents

Safety Committee (Cont.)

- Review investigations of alleged hazardous conditions
 - The committee may conduct its own inspection and investigation
- Evaluate employee safety suggestions
- Upon request from Cal/OSHA, verify abatement actions taken by the employer to abate any citations

Hazard Assessment and Control – 8 CCR 3203(a)(4)

- Periodic inspections
- Procedures for corrections
- **Identify/eliminate/control** hazards
- A hazard control system is the basis for:
 - Developing safe work procedures
 - Training on injury/illness prevention



Hazard Assessment and Control (Cont.)

- Refer to applicable Title 8 regulations to identify all potential hazards
- Address potential hazards not covered by Title 8
- Encourage employee reporting of potential hazards by correcting the hazards promptly, discussing with the employee, and following up
- Evaluate equipment and PPE for potential hazards and good working condition

Inspection – 8 CCR 3203(a)(4)

- Periodic inspections
- Quarterly, monthly, as needed
- Abate hazards found during inspections
 - Prioritize based on risk and type of hazard
- Do what you say you are going to do
- Keep records

Hazard Assessment and Control

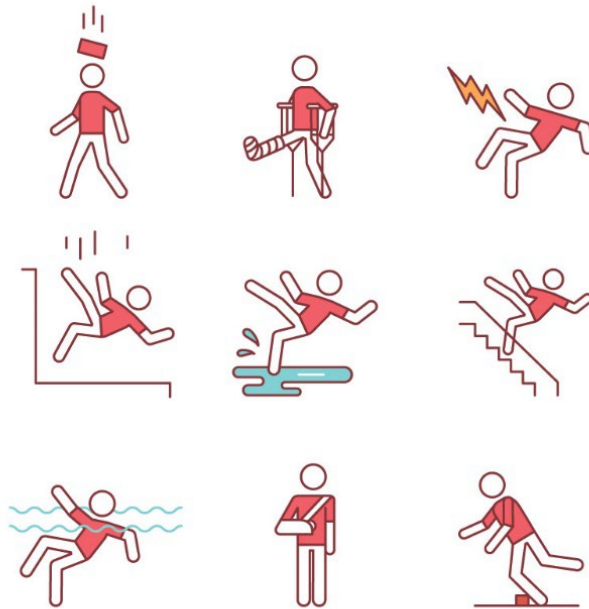
- Monitor workplace conditions
 - Self inspections, safe work practices, correction
- Written inspection reports must be reviewed by management and/or the safety committee
 - Prioritize corrections/preventions
 - Verify completion
 - Review for trends

Accident/Incident Investigation – 8 CCR 3203(a)(5)

- Have a process in place for investigation
- Determine the Root Cause
- Formulate actions to prevent recurrence
- Questions to ask:
 - Who, what, why, when, and how?
 - Were training and procedures, etc., followed?
 - What should be done now?
 - Were actions already taken, are there actions to be taken, or are actions pending? Why?

Accident/Incident Investigation (Cont.)

- Corrective action should prevent recurrence **AND** improve the overall operation
- Safety committee – review and input



Training – 8 CCR 3203(a)(7)

- Informs employees of hazard and controls
- Essential to develop safety skills and knowledge
- Reduces stress and exposures
- Reduces workplace injuries and illnesses
- Increases productivity/lowers cost
- More cohesive and dependable work force
- Required for **both** supervisors and employees

Training (Cont.)

- Supervisors are responsible for:
 - The success of the IIPP
 - Familiarity with hazards, recognition, effects, rules, procedures, and controlling exposures
 - Setting good examples, instructing, ensuring employees understand and follow procedures
 - **Supervisors are the primary safety trainers for their employees**
 - Investigating accidents and correcting and/or preventing

Training (Cont.)

- Employees are also responsible for the success of the IIPP:
 - Safe work procedures and how these protect them
 - How to use and maintain PPE
 - Emergency response
 - How to work properly and safely and be authorized to do a particular task
 - Chemical hazards and how to work safely

Employee Access – 8 CCR 3203(a)(8)

- Employer must provide employees access to the written program
- Provide a copy
- Inform employees of this right
- Can be an electronic copy if they have routine access to a computer

Recordkeeping – 8 CCR 3203(b)

■ Recordkeeping – Logic

- Learn from the past – patterns, trends, high risk areas/tasks
- Plan for the future
- Demonstrate the effectiveness of your program
- Requested at inspections by agency inspectors



Recordkeeping (Cont.)

- Records establishment and maintenance
 - Inspections and correction
 - Training – employee and supervisor
 - Responsible official
 - IIPP reviews

Recordkeeping (Cont.)

- Injuries and Illnesses (8 CCR 14300)
- Exposure Records/Industrial Hygiene
- Carcinogen Report of Usage (8 CCR 5203)
- Recordkeeping web page:
<https://www.dir.ca.gov/dosh/etools/recordkeeping/CaStandard/CalStandard.htm>

Maintenance – 8 CCR 3203(a)

- Schedule a review of the IIPP to determine effectiveness and identify any needs
 - Periodically
 - At least annually
- Get input from others involved – improvements and suggestions
- Keep records on maintenance
- Be prepared to show an agency inspector

IIPP Exceptions

- 10 employees – can be verbal
- 20 employees only require:
 - Written documentation of responsible party
 - Written documentation of scheduled periodic inspections
 - Written documentation of training
- Local government entities are not required to keep records concerning the steps taken to implement and maintain the IIPP

Supporting Documentation

- Safety planning, rules, and work procedures
 - Rules – PPE, clothing, behavior, emergencies
 - Safe procedures for each job (JHA)
 - Discipline and rewards
 - Emergency procedures
 - Hazardous substances – emergency response

Poll – IIPP

- The last time I reviewed my IIPP was:
 - a) This month
 - b) This year
 - c) Last year
 - d) More than 2 years
 - e) We don't have an IIPP

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Resources

■ E-tool

- <https://www.dir.ca.gov/dosh/etools/09-031/how.htm>
- <https://www.dir.ca.gov/dosh/etools/09-031/index.htm>
- Answer specific questions and the IIPP auto populates

■ Effectiveness questionnaires

- <https://www.dir.ca.gov/dosh/etools/09-031/effectiveness.pdf>

■ Guides

■ Sample forms and Checklists

- <https://www.dir.ca.gov/dosh/etools/09-031/tools.htm>
- Investigations, Training, Self-Assessment, Hazard Assessment

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What is a Safety Management System?

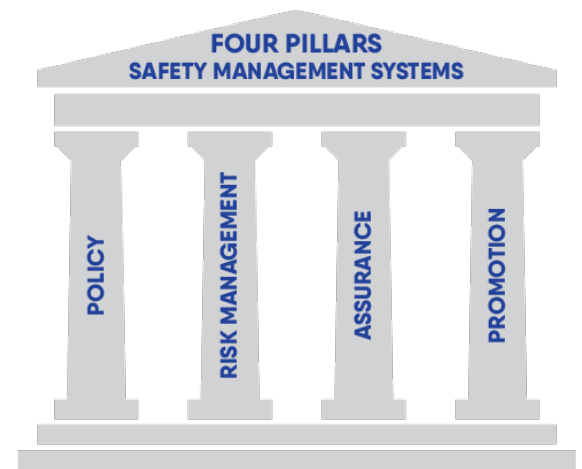
- Safety Management System (SMS)
 - A systematic and continuous management process based on proactive identification of hazards and analyses of their risk
 - Sounds familiar? Similar to an IIPP

Qualities of an Effective System

- Systematic – a predetermined plan applied in a consistent manner throughout the organization
- Proactive – emphasizes hazard identification, risk control, and mitigation before events that affect safety occur
- Fully documented – all safety management activities are documented and visible

Components of an Effective Safety Management System

- Sometimes called the four pillars:
 - Safety Policy and Management Practices
 - Safety Assurance Processes
 - Safety Promotion Practices
 - Safety Risk Management Process



Contents of a Safety Management System

- Have procedures in place for:
 - Hazard Identification and Assessment
 - Hazard Control
 - Ongoing Inspections
 - Qualifications, Orientation, and Training
 - Emergency Response
 - Incident Investigation
 - Program Administration

Conclusion

- **A great Cal/OSHA-compliant IIPP will guide you to a solid safety management system**
- Use the tools built into the IIPP regulation to assess and control hazards in your workplace
- Make the IIPP a living, usable document that everyone in your workplace knows is the backbone of your program
 - Set up an annual IIPP review process
 - Update each element of the IIPP annually

Questions?

- IH Webinar Questions

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- Other General Environmental Questions

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