



INJURY AND ILLNESS PREVENTION PLAN (IIP)

Meets California OSHA Requirements
Integrated Water Services, Inc.
(the Company)



Scope

This document applies to all employees performing work in California.

Responsibility

A responsible person for the Injury and Illness Prevention Program (IIPP) must be assigned.

Executive Management

Ultimate authority and responsibility for the IIPP lies with Executive Management. They ensure that adequate resources are available to accomplish the goals of the Company IIPP and that the system is incorporated in the day-to-day conduct of business.

Safety Manager

The Company Safety Manager is the responsible person for the IIPP and should and has the authority, responsibility and overall accountability for the injury and illness prevention program (IIPP). Responsibilities include, but are not limited to:

- Sets an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Company and client safety policies and procedures
- Conducts incident analysis to identify incident trends
- Ensures that investigations are conducted and conducting site inspections
- Acts as a liaison between management and outside agencies
- Assures training programs are established and tracked for employees and supervisors
- Develops technical guidance and programs to identify worksite hazards
- Ensures corporate compliance with legal and other requirements.
- Monitors health and safety, environment and quality assurance policies, procedures, protocols and legal requirements and assists site management in implementation
- Liaison with client's Health and Safety department, governmental agencies (i.e. Public Health, etc.).
- Ensures due diligence records are maintained incl. audits are conducted
- Monitors and address all program shortcomings
- Performs all risk management requirements including workers compensation procedures are followed
- Prepares reports including key performance indicators to management and to the client as needed
- Monitors corrective actions determined from audits, inspections, etc.
- Central point of contact for units in regards safety concerns

Managers

- All managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for addressing worker questions about the IIPP.
- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Company and client safety policies and procedures;
- Investigating (or assisting in) incidents;
- Enforcing all Company and client safety rules, policies or procedures in a consistent manner;
- Ensuring safety meetings are conducted and documented;
- Incorporating safety performance in the personnel evaluation/appraisal process;
- Assuring that adequate resources are available to incorporate safety into their operations;



- Monitoring and ensuring those supervisors within their responsible area are performing their duties in accordance with this safety management system.

Supervisors/Foremen

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all Company and client safety policies and procedures;
- Enforcing all Company and client safety rules, policies or procedures in a consistent manner;
- Assuring that safety devices and PPE are available and properly utilized;
- Promptly addressing safety concerns and issues brought to their attention by employees;
- Assuring that injuries/illnesses are treated promptly and management being notified immediately;
- Assisting in investigating all incidents and near misses;
- Assuring that no unsafe condition exists in their area of responsibility;
- Assuring that employees are properly oriented and trained for hazards and equipment at their location;
- Performing safety orientations and documenting the orientation before allowing any employee to begin work at their location.

Every Employee

Working safely is a condition of employment. Employees must comply with safe work practices. Every employee will comply with safe and healthy work practices by incentives, training, re-training programs and disciplinary programs. Each employee has personal responsibility and accountability for safety on the job. All employees are responsible for:

- Following all Company and client safety policies and procedures and to perform assigned work duties in a safe manner;
- Stopping work immediately if they consider conditions or work methods to be unsafe and notifying their supervisor of the problem;
- Immediately reporting any injury, suspected injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the employee is then to immediately notify the project manager.

Code of Safe Practices

The Company shall ensure a Code of Safe Practices, applicable to the job, will be developed. The Company has adopted a written Code of Safe Practices which relates to our operations.

Supervisors will post or maintain the applicable set of Code of Safe Practices during the entire project and the Code of Safe Practices shall be posted at a conspicuous location at each job site office or be provided to each supervisory employee who shall have it readily available.

Company Code of Safe Practices

- 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.
- Foremen shall insist on employees observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work, and shall take such action as is necessary to obtain observance.



- All employees shall be given frequent accident prevention instructions. Instructions shall be given at safety meetings and other craft safety training sessions.
- Anyone known to be under the influence of drugs or intoxicating substances that impair the employee's ability to safely perform the assigned duties shall not be allowed on the job while in that condition.
- Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well-being of the employees shall be prohibited.
- Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
- No one shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
- Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that is safe to enter.
- 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 their foreman or plant manager.
- 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.
- All injuries shall be reported promptly to the foreman or superintendent so that arrangements can be made for medical or first aid treatment.
- When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back shall be used. Please ask for assistance when handling heavy (greater than 50 pounds) or awkward pieces.
- Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.
- Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.

Communication System by the Company for Safety Information

The Company must ensure an adequate system must be in place to communicate to affected employees on safety and health matters. Examples include: safety meetings, written communications, postings, etc.

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 one or more of the following checked items:

- New employee orientation including a discussion of safety and health policies and procedures.
- Review of our IIPP, workplace safety and health training programs.
- Daily morning tool box meetings where task assignments are made and special hazard potentials are discussed.
- Safety meetings.
- Effective communication of safety and health concerns between employees and supervisors.
- Posted and/or distributed safety information.

Lack of Reprisal

Employees can report safety hazards anonymously and without fear for reprimand or reprisal. The Company has a system must be in place for employees to report safety and health hazards/problems without fear of reprimand or reprisal.



It is preferred that the immediate supervisor and/or project management be consulted for resolution of the concern; however, the Company maintains a strong open door policy to report problems or concerns to any level of management without fear of reprisal of any employee. Reports can be made anonymously as well.

Safety Meetings

Employees are required to attend safety meetings and the meetings shall be documented. Management is to attend all safety meetings if present on site.

Hazard Identification/Assessment Process

It is the Company's responsibility to have a system for identifying and evaluating workplace hazards whenever new substances, procedures or processes are introduced into the workplace and to meet all applicable Cal/OSHA requirements.

The Company has a system must be in place for identifying and evaluating workplace hazards. Both physical and chemical hazards should be included in the assessment process.

Defining Hazards

A hazard is anything with the potential to harm life, health or property. Classifications of workplace hazards are divided into six groups:

- Physical hazards such as noise, electricity, heat and cold
- Chemical hazards such as toxic gases, noxious fumes and corrosive liquids
- Ergonomic hazards such as the height of a workbench, the shape of a vehicle seat
- Radiation hazards, for example, from x-ray machines, high powered lasers, radioactive materials
- Biological hazards such as syringes containing potentially infected blood, etc.

Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions

Formal Process for Identifying & Evaluating Workplace Hazards

The Company has procedures for identifying and evaluating workplace hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards.



A complete inspection of all work site tasks will be carried out by the Safety Manager in conjunction with employees. This will develop an inventory of all of the hazards and appropriate tasks conducted throughout the work site. Areas for hazard identification include:

- Activities of all persons having access to the workplace including contractors and visitors.
- Infrastructure, equipment and materials at the workplace
- Changes or proposed changes in the Company, its activities or materials
- The design of work areas, processes, installations, machinery, operating procedures including their adaption to staff capabilities.
- Job scope change – if there is a change to a job scope then the hazards associated with the change shall be assessed. A job scope change should be discussed with effected personnel and documented. This can be documented via a standard safety meeting form.

At existing locations employees shall be continually involved in the identification of hazards. Unidentified hazards are to be reported immediately and assessed for risk. Additional sources for ongoing hazard identification shall include:

- Routine Activities
- Job Hazard Analyses
- Ergonomic assessments
- Industrial hygiene surveys
- Workplace Inspections
- Job observations
- Audits
- Document review

Non-routine Activities

- Accident/incident investigations
- Following emergency situations

Workplace Safety Inspections

Workplace safety inspections are completed. Safety inspections should be periodic and documented. Documentation should include the name of the inspector, date of inspection and findings and are performed according to the following schedule:

- When new substances, processes, procedures, or, equipment which 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 employees to processes, operations, or tasks for which a hazard evaluation has not been previously conducted.
- Whenever workplace conditions warrant an inspection. Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable documentation and any other effective methods to identify and evaluate workplace hazards.



Evaluating and Recording Hazard Identification Data

Once gathered, the hazard identification data will be recorded by the Safety Manager on the Worksite Hazard Assessment form (see end of this document). It shall be dated and signed. The Company Safety Manager signs the certification portion of Worksite Hazard Assessment Form and includes it within the site specific HSE plan. Also see the Identified Hazards and Correction Record at the end of this document.

Review of Hazard Assessment

Hazard assessments are formally reviewed annually.

Documenting Safety and Health Hazard Inspections and Records of Facility Safety Inspections and Resulting Corrective Actions are Maintained - Records of scheduled and periodic inspections required by subsection (a)(4) of the California regulations to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. These records shall be maintained for at least one (1) year. See Identified Hazards and Correction Record at the end of this document.

Methods to be Used for Performing Accident, Close Call and Exposure Investigations

All accidents shall be investigated promptly regardless of their severity. Promptness of the investigation is essential since conditions at the accident scene change. Moreover, witnesses are more likely to relate circumstances as they were, without the added conjecture that comes late from discussions of the accident with other employees. The type of investigation depends on the nature and magnitude of the accident.

Each department supervisor/manager shall promptly investigate, thoroughly analyze, and report in writing to (add name) all accidents involving personal injury and/or property damage or the potential there for, once they occur.

Accident investigation reports shall be submitted within 24 hours of the first notice to the supervisor/manager.

Injury Reporting

- Employees who are injured at work must report the injury immediately to their supervisor.
- The supervisor of the injured employee must work with the Safety Manager to ensure that the "Employer's Report of Occupational Injury or Illness" and a "Workers' Compensation Claim Form" are completed properly and submitted.
- If the injured employee saw a physician, the supervisor should obtain a medical release form before allowing the employee to return to work. The health care provider may stipulate work tasks that must be avoided or work conditions that must be altered before the employee resumes his or her full duties.

Injury Investigation

The employee's supervisor and Safety Manager are responsible for performing an investigation to determine and correct the cause(s) of the incident. Specific procedures that can be used to investigate workplace accidents and hazardous substance exposures include:

- Interviewing injured personnel and witnesses
- Examining the injured employee's workstation for causative factors
- Reviewing established procedures to ensure they are adequate and were followed
- Reviewing training records of affected employees



- Determining all contributing causes to the accident
- Taking corrective actions to prevent the accident/exposure from reoccurring
- Recording the findings, corrective actions taken, and the date the corrective actions were taken.

Investigations reports will include recommendations for corrective action(s) if necessary to prevent the accident or exposure from reoccurring. The Company will review investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submit suggestions to management for the prevention of future incidents.

Methods to be Used to Ensure that Hazards Identified During Safety Inspection, Accident, Close Call and Exposure Investigations are Corrected

Methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures include the following and addresses the personnel responsible for corrective actions:

- During inspection or hazard reviews any area requiring correction will be noted and the correction actions identified, who is responsible for the corrective actions, when will the corrective action be completed and how will the corrective action completion be proven. See Identified Hazards and Correction Record at the end of this document.
- When observed or discovered either by workers or during a management walk-around or by the Corporate Safety Manager or workers any unsafe act or condition shall be noted and corrected.
- Workers have the authority and obligation to stop work and report their finding to their supervisor. Supervisors shall investigate all reports from employees to determine the existence of a hazard and to categorize its severity. Supervisors shall request the Safety Manager's assistance in any matter they feel is beyond their level of training for making a clear determination of how best to abate the newly-recognized hazard.
- Hazards which cannot be mitigated or eliminated immediately shall be assigned to a competent person who will be responsible for barricading, locking out, or other appropriate controls to limit exposure to the potential hazard. The competent person shall then be responsible for ensuring completion of the corrective action and notification to the Safety Manager, supervisors and workers when the corrective action is completed.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided the necessary safeguards.

Prioritizing Corrective Action Assignments Based on Severity

The Company will use the following methods and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard.

- Tagging unsafe equipment "Do Not Use Until Repaired," and providing a list of alternatives for employees to use until the item is repaired.
- Stopping unsafe work practices and providing retraining on proper procedures before work resumes.
- Reinforcing and explaining the need for proper personal protective equipment and ensuring its availability.
- Barricading areas that have chemical spills or other hazards and reporting the hazardous conditions to a supervisor.



- If an imminent hazard exists, work in the area should cease, and the appropriate supervisor must be contacted immediately. If the hazard cannot be immediately corrected without endangering employees or property, all personnel need to be removed from the area except those qualified and necessary to correct the condition. These qualified individuals will be equipped with necessary safeguards before addressing the situation.
- See Identified Hazards and Correction Record at the end of this document.

Follow-up Method to Verify Proper Corrective Actions are Taken and Implemented

- Records of the steps taken to implement and maintain the Program shall include records of scheduled and periodic inspections required by subsection (a)(4) to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and action taken to correct the identified unsafe conditions and work practices. See Identified Hazards and Correction Record at the end of this document.

Training and Instruction

The Company provides a training program to all employees in general safety and health work practices and for their specific job assignments.

The training should be provided prior to or at the time of initial job assignment. All employees shall be provided training and instruction:

- When the program is first established;
- To all new employees;
- To all employees given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard; and,
- For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed

Workplace safety and health training practices include, but are not limited to, the following:

- Explanation of the Company's IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, and injuries.
- 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.
- Availability of toilet, hand-washing and drinking water facilities.
- Provisions for medical services and first aid including emergency procedures.

Training on Code of Safe Practices will be provided when necessary. When workers are first employed they shall be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.



Methods to be Used to Ensure that Appropriate Training Records are Maintained

- Employee training, inspection reports and corrective actions resulting from inspections shall be recorded and maintained for one (1) year.

Training Documentation Requirements of Employee's Training Records

- Records shall be kept to document safety and health training for each employee by name or other identifier, training date, types of training and training providers.
- Records of "toolbox" or "tailgate" safety meetings, or equivalent are maintained. Documentation of safety and health training required by subsection (a)(7) for each employee, including employee name or other identifier, training dates, type(s) of training and training providers shall be maintained. This documentation shall be maintained for at least one (1) year.

Recordkeeping

The Company has taken the following steps to implement and maintain our IIPP:

- Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form.
- Documentation of safety and health training for each employee, including the employee's name or other identifier, training dates, type(s) of training, and training providers are recorded on an employee training and instruction form.
- Inspection records and training documentation will be maintained by the Safety Manager for 5 years, except for training records of employees who have worked for less than one year which are provided to the employee upon termination of employment.
- The Company's practices for maintaining records of incident investigations and other activities are mandated by California standard specific requirements.

Cal/OSHA Recordkeeping

- At the end of each calendar year the Safety Manager prepares the Cal/OSHA 300 and makes the Cal/OSHA 300A Summary Reports available to all workers on the online safety support center.

Health and Safety Key Performance Indicators (KPI)

KPIs are used to determine what changes need to be made, to review individual project management success towards compliance and to track progress towards published goals and objectives. KPI results are supplied to Company management on a monthly basis. Safety and health KPIs are tracked for each project manager's responsible area and include:

- Injuries
- Days Away From Work Cases
- Restricted Work Cases; Recordable Medical Cases
- Total Recordable Injuries/Illness and Incident Rate
- First Aid Cases
- Hours Worked
- Vehicle incidents and property damage or loss
- Reportable spills



- Workers compensation data

Monitoring

Monitoring is conducted to confirm and check compliance with safety and health requirements and to ensure the use and effectiveness of operational controls. Activities include:

- Annual Management Review
- Monthly Key Performance Reports
- As needed facility inspections
- Training Records
- Safety Meetings
- Incident investigations