

INJURY AND ILLNESS PREVENTION PROGRAM



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1. PURPOSE AND SCOPE

- a. To establish guidelines for the implementation and administration of an Injury and Illness prevention program and to assign specific responsibilities for the execution of the program.
- b. Provide a basic Environmental, Safety and Health Action Plan (hereinafter referred to as the Plan) to assist management and supervision in the recognition, evaluation, and control of hazardous activities or conditions within their respective areas of responsibility.

2. ADMINISTRATION

- a. The Corporate Management is responsible for administering a Plan that effectively achieves quantifiable company goals and objectives for safety performance and complies with applicable federal, state, local and owner safety and health requirements.

3. DUTIES AND RESPONSIBILITIES

a. **Corporate Management**

H2 Enterprises, LLC (H2) management has responsibility for implementation and administration of health and safety programs, training procedures, and standards, following corporate guidelines as the minimum requirement. Where corporate standards are not established, it is the responsibility of management to provide those that are needed. Management is specifically responsible for:

- i. Providing a safe and healthful workplace for all employees.
- ii. Conducting operations in ways that prevent safety and health hazards and injuries to employees.
- iii. Complying with all Federal, State, and Local laws and the requirements of all regulatory agencies which relate to health and safety.
- iv. Establishing standards, practices, and procedures that prevent, eliminate, or control recognized hazards, operations, or work practices, and relate to providing a safe and healthful working environment.
- v. Having paramount consideration for the health and safety of employees in the design, construction, or alteration of plant and other facilities, and in the design, installation, and maintenance of processes, machines and equipment.
- vi. Continuously developing and applying new and improved occupational health and safety standards, practices and procedures.
- vii. Establishing quantitative goals and measurement factors to insure the effectiveness of the program.

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- viii. Implementing work performance recognition.
- ix. Cooperating with public and private health and safety organizations in developing and advancing occupational health and safety practices and standards.
- x. Providing supervision and training before any employee performs a task with which he or she is not familiar.
- xi. Initiating appropriate disciplinary action for employees refusing to comply with Company safety rules and procedures.

b. The Environment, Safety, and Health Director (ES&H) shall be responsible for:

- i. Providing loss control assistance, develop and disseminate loss control procedures and programs throughout the Company. The loss control function includes securing, analyzing, and evaluating employee's injury data identifying loss exposures, evaluating the effectiveness of controls and issuing reports pertaining to injuries and property damage for the Company.
- ii. Preparation and distribution of the Corporate Environment, Safety & Health Manual to appropriate field units, issuing loss control bulletins, and communicating loss control information.
- iii. Providing all levels of management services and technical advice needed for proper administration of the Program.
- iv. Developing technical guidance and interim programs to identify and remove physical, chemical or health hazards from construction sites.
- v. Formulating, recommending and administering approved changes to the Environmental Safety & Health program.
- vi. Preparing and distributing regular reports on the status of ES&H.
- vii. Advising all levels of management on matters pertaining to ES&H, to include establishing a "chain of command" and a network to communicate safety matters within the organization.
- viii. Maintaining an adequate accident report system, investigating serious accidents or near miss incidents and taking corrective action to eliminate accident causes.
- ix. Cooperating with project management personnel in the training of employees.
- x. Assuring inspections are routinely conducted to observe, document and correct unsafe conditions or work practices.
- xi. Maintaining outside professional contacts.
- xii. Recommending programs and activities that will develop and maintain recognition and motivation of employees.
- xiii. Recommending disciplinary procedures for violations of project ES&H rules.

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c. Project Superintendent shall be responsible for:

- i. Implementing the provisions of this plan on the project.
- ii. Coordinating and promoting good relations with owner, federal, state, and local representatives.
- iii. Partnering with the ES&H department to ensure an incident and injury free work environment.

d. ES&H Field Manager/Rep shall be responsible for:

- i. Conducting safety and health orientations to acquaint employees with project conditions, safe work practices and procedures.
- ii. Conducting periodic safety and health audits of the project.
- iii. Monitoring employee compliance with the applicable safety and health requirements.
- iv. Correcting any unsafe actions or conditions that are observed during work monitoring or audits.
- v. Coordinating the workers compensation insurance reporting requirements.
- vi. Training and advising personnel on safety and health regulations, inspections and activities.
- vii. Providing information to employees regarding their emergency response responsibilities.
- viii. Conducting and participating in Environmental Safety and Health meetings.
- ix. Maintaining the Project Safety Bulletin Board.
- x. Posting safety notices, bulletins and emergency phone numbers in designated areas.
- xi. Interpreting Environmental Safety and Health requirements for the project.
- xii. Filing performance reports with Corporate ES&H Department.

e. Superintendents/General Foreman/Foreman shall be responsible for:

- i. Providing Environment, Safety and Health training for employees. This training will include as a minimum:
 - 1. Conditions present in the work area.
 - 2. Required personal protective equipment for the work operation.
 - 3. Instructions to each employee on the proper procedure for reporting unsafe conditions they may encounter and avoidance of unsafe conditions.

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4. Instructions regarding the immediate reporting of work related injuries or illness.
5. Proper procedures to complete their work/task(s).
- ii. Implementing immediate action to correct reported or observed substandard safety and health conditions.
- iii. Conducting daily inspections of their work areas and taking necessary corrective actions to eliminate substandard practices and/or conditions.
- iv. Conducting safety meetings and submitting copies of meeting minutes to the Project Superintendent.
- v. Assisting the Project Superintendent and/or ES&H Representative in accident investigations and preparation of required reports.
- vi. Attending safety meetings conducted by the ES&H Representative
- vii. Assisting in the implementation of the Emergency Response Plan.
- viii. Enforcing company, customer and project requirements.
- ix. Evaluating the safety performance of assigned employees and reporting findings to the Project Superintendent/ES&H Representative.
- x. Stop work when a hazard is present or when one is communicated to them, to properly mitigate.

f. Employees shall be responsible for:

- i. Working in a safe manner at all times, using required safety devices and proper personnel protective equipment.
- ii. Learning and abiding by those Environment, Safety and Health rules and procedures which are applicable to their work tasks.
- iii. Stopping work and reporting substandard practices or hazardous conditions to their Supervisor.
- iv. Knowing that/understanding any machinery, tool, material or equipment which is not in compliance with any requirement is prohibited.
- v. Immediately reporting injuries to their Supervisor and First Aid. All personnel must know where first aid and other emergency equipment is located.
- vi. Know and understand that any employee who jeopardizes their safety and health and/or the safety and health of others, will be subject to disciplinary action (including immediate termination).
- vii. Employees can report hazards or unsafe working conditions without fear of reprimand.

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4. GOALS AND MEASUREMENT FACTORS

- a. The corporate goal is to prevent all incidences that could potentially affect the safety and health of our employees and the profitability of our projects. Accidents involving personal injury, illness or property damage are an avoidable waste. The efficiency of a project is directly measured by its ability to control unnecessary loss.
- b. The ES&H Department will collect, record and evaluate data for each project to provide management with knowledge of the company's safety performance. Performance targets will be established annually and data will be maintained on the following:
 - i. Management & supervisory involvement
 - ii. Program visibility and compliance
 - iii. Accident investigation and analysis
 - iv. Injury and illness experience
 - v. Costs (direct and indirect)
 - vi. Training
 - vii. Regulatory inspections
 - viii. Worker's Compensation claims management
 - ix. Disciplinary experience
 - x. Performance trending

The ES&H Department will quantify project safety and health performance monthly. A report will be published and reviewed with management to identify adverse trends and establish specialized training and enforcement needs.