




**W. Bradley Electric, Inc.**

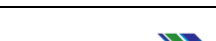
**Illness and Injury Prevention  
Program (IIPP)**

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	W. Bradley Electric, Inc. (WBE)		Doc No:	IIPP
			Initial Issue Date	1 JUL 1991
			Revision Date:	4/12/19
	<b>ILLNESS AND INJURY PREVENTION PROGRAM (IIPP)</b>		Revision No.	2
Preparation: Safety Dir		Authority: CEO	Next Review Date:	4/12/20
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## 1.0 Safety Policy Statement

W. Bradley Electric will conduct its operations so that injuries to people, damage to property and adverse impact on the environment will be avoided. This program is being implemented in an effort to prevent workplace accidents and related illness.

Our objective is to provide a clean, safe and healthy working environment for all employees. It is our intention to comply with all safety and health standards that are enforced by local, state and federal authorities. We will provide engineering controls, administrative controls, personal protective equipment and training to abate and reduce exposure to hazards and prevent injury and illness. We have developed policies, rules and procedures that will contribute to the safety of all employees. We expect all employees to work according to good safe practices as posted, instructed, and discussed.

Employees will contribute to the company safety program by following all safety rules, bringing unsafe conditions to the attention of management, and recommending actions to improve the effectiveness of the program. Foremen shall insist that employees observe and obey every rule, regulation and order necessary for the safe conduct of work, and shall take such action necessary to obtain compliance.



Ken DeGraca, Vice President Operations & Safety

## 2.0 Executive Management Commitment

W. Bradley Electric, Inc. considers that "Zero Incidents" is the only acceptable safety goal. To have any other goal is to expect that we will allow our employees to injure themselves or someone else. This, of course, is unacceptable.

The Zero Incident philosophy is one that must be embraced by all WBE personnel and shall be extended to all of our subcontractors and vendors as well. This is a doctrine we wholeheartedly endorse and expect all management personnel to establish it as our operating policy at each of our jobsites.

Each manager and Foreman must lead by example and employees have a responsibility to be proactive in safe behavior and conditions. Our goal is to reach the individual worker via this Injury and Illness Prevention Program and have them properly indoctrinated into this culture. When all WBE team members understand that senior management's expectation is their total commitment, it will become easier for them to develop and display a Zero Incident attitude.

All personnel are empowered and required to stop work being performed by themselves or others if they observe any condition or action that may be hazardous to health or safety or the environment.


Please ensure that WBE's Zero Incident goal remains the centerpiece of our safety culture at all levels of management and throughout the workforce at your project site.



Leslie Murphy, Chief Executive Officer



Mike Murphy, Chief Operating Officer

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### 3.0 Drug and Alcohol Policy Statement

WBE strives to maintain a safe and efficient work environment, to protect company operations, and to maintain high standards of job performance. Employees who are involved with illegal drugs or other controlled substances or who abuse alcohol pose unacceptable risks to safe and efficient operations. Such employee behavior also may undermine public or client confidence in safe and efficient company operations. For these reasons, drug-related activity and alcohol use are prohibited as outlined below.

The company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol, or being under the influence of such controlled substances is strictly prohibited while on duty, while on the company's premises or worksites, or while operating the company's equipment or vehicles. The use of illegal drugs as well as the illegal use of legal drugs is a threat to us all because it promotes problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug that affects your ability to perform your job duties, you are required to discuss possible accommodations with Human Resources. Violation of this policy will result in disciplinary action, up to and including termination.

The manufacture, distribution, dispensation, possession, or use of any drugs or other controlled substances not medically prescribed is prohibited on Company property, including parking lots and adjacent grounds, in any other Company work environment, and before or during the operation of a vehicle or potentially dangerous equipment owned or leased by WBE. Use of these substances is also prohibited throughout the workday, including lunch breaks, whether employees are on or off Company property. Employees under the influence of any such substances are prohibited from Company premises and any other Company work environment.


In accordance with federal law, employees are required to abide by the terms of this policy and notify their manager, human resources or operations, within five days of any criminal drug statute conviction.

Any employee who is under the influence of any prescribed medication, which may endanger the employee's health or safety or that of others, must advise his or her supervisor of that fact before reporting to work.

The use of alcohol is prohibited on Company property, including parking lots and adjacent grounds, in any other Company work environment, and before or during the operation of a vehicle or potentially dangerous equipment owned or leased by WBE. Employees under the influence of alcohol are prohibited from Company premises and any other Company work environment. The only exception to this alcohol policy is official company-sponsored social or business functions at which alcoholic beverages are served.

Any employee who violates these rules is subject to discipline, up to and including immediate discharge.

This policy is to be posted in all WBE facilities.

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## 4.0 Responsibility

The Corporate Safety Director has general responsibility for the implementation and maintenance of this plan.

Ken DeGraca, VP Operations, has the authority and responsibility for implementing the provisions of the IIPP for WBE.

All departmental managers, supervisors and foremen are responsible for implementing and maintaining the IIPP in their work areas and for addressing worker questions about the IIPP.

A copy of this IIPP is available from the Corporate Safety Director and shall be posted in the break room or other accessible area(s) of the various WBE facilities.

Copies will be provided to any employee who requests the same.

### Chief Executive Officer


Ultimate authority and responsibility for the IIPP lies with the Chief Executive Officer. The Chief Executive Officer ensures that adequate resources are available to accomplish the goals of the WBE IIPP and that the system is incorporated in the day-to-day conduct of business.

### Safety Director

The WBE Safety Director is responsible for ensuring development, implementation and maintenance of the safety and health management system within WBE operations. This position reports to the WBE Chief Operations Officer for responsibility of performance.

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 WBE 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 to safety concerns.

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#### Departmental Vice Presidents or Operational Managers

These positions report to either the Chief Executive Officer, Chief Operations Officer, or to the WBE VP Operations who reports to the Chief Operations Officer.

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all WBE and client safety policies and procedures;
- Investigating (or assisting in) incidents;
- Enforcing all WBE and client safety rules, policies or procedures in a consistent manner;
- Ensuring weekly 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.

#### Foremen


Foremen report to operations managers, and project managers.

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all WBE and client safety policies and procedures;
- Enforcing all WBE 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.

#### All Employees

Working safely is a condition of employment. Each employee has personal responsibility and accountability for safety on the job. All employees are responsible for:

- Following all WBE 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 foremen or project manager 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 foreman is not available the employee is then to immediately notify the project manager.

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## 5.0 Compliance

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. All managers and foremen are expected to enforce the rules fairly and uniformly. All employees will comply with safe and healthy work practices by incentives, training, re-training programs and disciplinary programs. Our system of ensuring that all employees comply with the rules and maintain a safe work environment includes:

- Informing employees of the provisions of our IIPP.
- Evaluating the safety performance of all employees.
- Recognizing employees who perform safe and healthful work practices.
- Providing training to employees whose safety performance is deficient.
- Disciplining employees for failure to comply with safe and healthful work practices.

### 5.1 Code of Safe Work 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, project manager or the safety director.
- 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 weekly safety meeting 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.
- 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, operations or human resources 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.
- Housekeeping is a serious safety concern, and WBE employees must clean up after themselves during and at the end of each work day, which includes putting away tools and equipment, securing and/or rolling up extension cords and discarding of trash.
- If the housekeeping of another company creates a hazardous work condition for a WBE employee, you must notify the other company immediately, or general contractor to resolve this condition.

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## 5.2 Disciplinary System

Management is committed to the safety excellence of its employees by providing an injury and incident free workplace. All employees are to abide by the regulations, safety rules and the use of safe work practices and procedures. Refer to the WBE Disciplinary Action Procedure.

Safety violations will be handled in an objective but firm manner. The enforcement progression follows the steps outlined below with documentation at each stage:

- Verbal Warning
- Written Warning
- Dismissal

Violation of any of the below rules will not be tolerated on the job and are additional grounds for immediate discipline up to and including dismissal:


- Consuming or being in possession of alcohol or illegal drugs on company premises, or on any company job-site, is prohibited.
- No weapons or firearms of any type are allowed on the worksite.
- Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited.
- Theft, vandalism or any other abuse or misuse of company property is prohibited.
- All unsafe acts and conditions, including “near miss” incidents, are to be reported to appropriate supervision promptly.
- Hard hats, safety boots and safety glasses are to be worn at all times on all job-sites as required.
- All work shall be carried out in accordance with appropriate safe work practices and your foreman’s direction.
- Only those tools that are in good repair, with all guards and safety devices in place, shall be used.
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury are grounds for discipline up to and possibly including termination.

## 6.0 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 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.
- Weekly safety meetings.
- Effective communication of safety and health concerns between employees and foremen, including translation where appropriate. Several shop personnel are bi-lingual (English/Spanish).
- Posted and/or distributed safety information via the main bulletin board in the lunchroom.
- Suggestion Box for those employees who may not be comfortable speaking up at safety meetings or taking advantage of our “open door” policy. Suggestions may include the employee’s name if he/she wishes or may be made anonymously. All suggestions are reviewed and discussed at subsequent safety meetings where all ideas for implementation (if indicated) are considered and agreed upon.
- Company newsletter which is distributed periodically and contains information regarding company projects, safety messages from executive management and/or Corporate Safety Director, and other items of interest from other departments including HR and Legal.



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- WBE Intranet Site has been developed to make information available to employees whether at work or home. Articles from company officers and department heads, other job sites and other employees are available for viewing.

## 6.1 Open Door Policy

It is preferred that the immediate foreman and/or project management be consulted for resolution of the concern; however, WBE maintains a strong open door policy to report problems or concerns to any level of management without fear of reprisal of any employee.

## 6.2 Incident Notice Form

This communicates lessons learned from incidents, is posted on employee bulletin boards and shall be distributed via email and discussed in weekly safety meetings.

## 6.3 Weekly 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.

# 7.0 Hazard Assessment

### Initial Hazard Assessment

Once gathered, the hazard identification data will be recorded by the Safety Director on the Worksite Hazard Assessment form.

### Periodic Inspections

Periodic inspections to identify and evaluate workplace hazards shall be performed by the following competent observer(s) in the following areas of our workplace.

Periodic inspections to identify and evaluate workplace hazards shall be performed by the following competent observer in the following areas of our workplace (this will be updated as needed) utilizing either the WBE Jobsite Safety Inspection Form or WBE JHA Form:


Competent Observer	Area	Frequency
Safety Director	WBE Jobsites	<ul style="list-style-type: none"> <li>• As needed</li> </ul>
Field Operations Manager	WBE Jobsites	<ul style="list-style-type: none"> <li>• Weekly at established job sites</li> <li>• Initially at new job sites</li> </ul>
Foreman	WBE Jobsites	<ul style="list-style-type: none"> <li>• First day at new job sites</li> </ul>

Additional inspections are required when:

- 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 workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Inspection reports must be reviewed by management and the Safety Committee.

Hazard assessments are formally reviewed annually.

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## 8.0 Incident/Exposure Investigations

Refer to the WBE Incident Investigation and Reporting Procedure.

After considering the well-being of all personnel involved, an incident investigation will be conducted as soon as possible, but no more than 24 hours after receiving knowledge of its occurrence.

All incident/exposures will be documented via reports, interviews and an inspection of the incident/exposure scene by the Safety Director or his designee.

The Safety Committee will review all incidents and incident investigations and causes of incidents resulting in injuries, illnesses or exposure to hazardous substances. Recommendations and/or procedural changes may result from the Safety Committee reviews.


Procedures for investigating workplace incidents and hazardous substance exposures include:

- Visiting the incident scene as soon as possible;
- Interviewing injured workers and witnesses;
- Examining the workplace for factors associated with the incident/exposure;
- Determining the root cause of the incident/exposure;
- Taking corrective action to prevent the incident/exposure from recurring; and
- Recording the findings, corrective actions taken, and the date the corrective actions were taken.

## 9.0 Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered either by workers or during a management walk-around job site hazard assessments.
- Workers have the authority and obligation to stop work and report their finding to their foreman. Foremen shall investigate all reports from employees to determine the existence of a hazard and to categorize its severity. Foremen shall request the Corporate Safety Director's or Field Operations Manager 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 departmental manager, foreman and workers when the corrective action is completed.
- When an imminent danger hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed workers shall be immediately removed from the area except those employees necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary training and protection; and all such actions taken and dates they are completed shall be documented and discussed in the next weekly safety meeting. All

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workers shall be encouraged to participate in finding a solution to ensure the hazard has been mitigated to the lowest level or eliminated altogether.

## 10.0 Training and Instruction

All employees, including managers and supervisors, shall have training and instruction on general and job-specific safety and health practices provided prior to or at the time of initial job assignment. Training and instruction shall be provided as follows:

- When the IIPP is first established.
- To all new employees.
- To all employees given new job assignments for which training has not been previously provided.
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard.
- Whenever WBE is made aware of a new or previously unrecognized hazard.
- To foremen to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed.
- To all employees with respect to hazards specific to each employee's job assignment.
- Workplace safety and health training practices include, but are not limited to, the following:
  - Explanation of WBE'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.

In addition, WBE shall provide specific instructions to all employees regarding hazards unique to their job assignment; to the extent such information was not previously covered in other training.

### 10.1 Identification of Training and Competency Needs

Training is identified in our training matrix which specifies safety and health training needs by job title. Our training matrix is updated based on changing risks.


### 10.2 Training Records

All training records are maintained by the WBE Safety Director or designee.

### 10.3 Delivery of Induction, Transfer and Refresher Training

Employees receive initial induction training. No work by any employee is allowed to begin until the orientation is completed. See Training Induction Record form.

Training requirements are tracked by the WBE Safety Director and formal training sessions are conducted either on or off site by the Safety Director or competent/qualified instructor for the required subject matter.

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## 10.4 Training Documentation

All training must be documented with: date; employee name, employee signature; instructor name; instructor signature and title. Each new employee shall receive an orientation prior to beginning any work.

## 10.5 Safety Management Training


Foremen and managers receive annual, documented safety management system training.

## 10.6 WBE Training Matrix

Additional training for identified hazards must be completed prior to employee exposure based upon a hazard assessment.

	LOCATION	FREQUENCY	Admin	Management	Field
Asbestos-Class III Operations and Maintenance	All WBE	A			PRN
Bloodborne Pathogens	All WBE	A	PRN	PRN	PRN
Boom Lift	All WBE	3			PRN
Bucket Truck	All WBE	3			PRN
Confined Spaces	All WBE	I/C			X
CPR	All WBE	2	PRN	PRN	PRN
Electrical Safety	All WBE	A			PRN
Emergency Action Plan	All WBE	I/C	X	X	X
Fall Protection	All WBE	I/C			X
First Aid	All WBE	2	PRN	PRN	PRN
Flagger/Traffic Control	All WBE	I			PRN
GFCI/Assured Equipment Grounding	All WBE	I			X
Hand and Power Tools	All WBE	I			X
HAZCOM	All WBE	I/C			X
Heat Illness Prevention Employee & Supervisor	All WBE	I		PRN	PRN
Hearing Conservation	All WBE	A			PRN
Illness and Injury Prevention Program	All WBE	I/C	X	X	X
Incident Investigation and Reporting	All WBE	I		X	X
Industrial Lift Truck	All WBE	3			X
Ladder Safety	All WBE	I			X
Lock Out Tagout / Guarding	All WBE	I/C			X
NFPA 70E	All WBE	A			X
Personal Protective Equipment	All WBE	I		X	X
Respiratory Protection	All WBE	A			PRN
Scaffold Awareness	All WBE	I			X
Scissor Lift	All WBE	3			PRN
Trenching/Shoring/Excavation	All WBE	I			PRN

PRN = As Required    Frequency: I = Initial    I/C = Initial & If Any Changes    A = Annual    2 = 2 Years    3 = 3 years

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## 11.0 Recordkeeping

WBE 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 Director for 5 years.
- WBE's practices for maintaining records of incident investigations and other activities are mandated by California standard specific requirements.

### 11.1 Cal/OSHA Recordkeeping

See Injury and Occupational Illness Recordkeeping Procedure.

At the end of each calendar year, Ken DeGraca, Corporate Safety Director, provides a copy of the Cal/OSHA 300 logs to WBE's HR Department and distributes the Cal/OSHA 300A Summary Reports to the individual WBE facility no later than January 30 to ensure all Cal/OSHA 300 forms are posted in a conspicuous location from February 1 to April 30 at which time they are to be removed from posting.

The Corporate Safety Director is responsible for maintaining the following records and documentation:

- Cal/OSHA 300 Log set
- Employer's First Report of Injury


### 11.2 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 WBE management on a quarterly 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

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### 11.3 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, Employee observations
- Incident investigations

## **WBE SAFE WORK PROCEDURE ADDENDUMS**

Aerial Lifts (bucket truck, boom lifts, scissors lift)  
 Assured Equipment Grounding  
 Bloodborne Pathogens  
 Confined Spaces  
 Electrical Low Voltage (600V or Less)  
 Electrical High Voltage (600V or More)  
 Emergency Action Plan  
 Fall Protection  
 Flagging – Traffic Control  
 Hand and Power Tools  
 HAZCOM  
 Hearing Conservation  
 Heat Illness Prevention  
 Incident Investigation and Reporting  
 Industrial Lift Truck  
 Injury Illness Recordkeeping  
 Ladder Safety  
 Lockout Tagout  
 NFPA 70E  
 Personal Protective Equipment  
 Respiratory Protection  
 Scaffolding  
 Trenching & Excavations  
 Vehicle Use Policy