



Town Hall Drywall Inc.

3720 Skypark Drive, Torrance, CA 90505
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Injury & Illness Prevention Plan

Town Hall Drywall Inc.

Protect your employees and your business.
(T8CCR) section 3203

DISCLAIMER:

This Injury & Illness Prevention Program is offered in good faith and is believed to be accurate and reliable at the time of completion.

However, the program is made without warranty, claims, or guarantees as to its accuracy or the completeness, either expressed or implied, as to its condition or fitness for a particular purpose, merchantability, or any other matter. M Squared Safety, LLC assumes no liability for any loss, whether direct, indirect, special, consequential, exemplary, incidental, or of any kind or for any reason whatsoever arising out of its use.

Injury & Illness Prevention Plan

Town Hall Drywall Inc.

Responsibilities

The Injury and Illness Prevention Program (IIPP) administrator, Archy Kotoyantz, has the authority and responsibility for implementing the provisions of this program for Town Hall Drywall Inc.

All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available at Town Hall Drywall's headquarters. Town Hall Drywall will provide our employees with access to the IIPP within 5 business days, from the date of the request, free of charge.

Compliance

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of all workers.
- Recognizing employees who perform safe and healthy work practices. This recognition is accomplished by:
 - Informal recognition of safety practice
 - Formal recognition of individuals or groups for safety performance
 - Material recognition: gifts, products, services, & money, including raises & bonuses
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process:
 - Verbal Warning (documented) for minor offenses
 - Written warning for more severe or repeated violations
 - Suspension without pay, if verbal and written warnings do not prove to be sufficient
 - If none of the above measures achieve satisfactory corrective results and no other solution can be found, the Town Hall Drywall will have no choice but to terminate employment for those who continue to jeopardize their own safety and the safety of others
- Other means that we use to ensure employee compliance with safe and healthful work practices include:
- Informing workers of the provisions of IIPP
 - Evaluating the safety performance of all workers
 - Recognizing superintendents who perform safe/healthful work practices
 - Providing training to workers whose safety performance is deficient
 - Disciplining workers for failure to comply with safe/healthful work practices
 - Terminating any employee who receives more than two written warnings

Communication

The following is our system of communication, designed to facilitate a continuous flow of two-way (management, supervision and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- New worker orientation, including a discussion of site-specific safety and health policies and procedures.
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training.
- Safety meetings held at least every quarter – more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses:
 - With Safety Consultants, M Squared Safety, on a traditional business quarter schedule (every three months). These meetings have moderate length (20-40 min) and will review the previous quarter's areas of concern with safety. These meetings will be documented.
 - Toolbox talks are conducted weekly. These meetings are short (10-15 min) and will cover 1-2 subjects.
- Effective communication of safety and health concerns between workers and supervisors, including language translation where appropriate.
- Posted and distributed safety information.
- A system for workers to anonymously inform management about workplace hazards. This is accommodated by:
 - Managers, supervisors, and employees will report any hazardous conditions or activities noted:
 - As a result of formal inspections, and
 - During daily routine operations. Hazards can be reported to supervisors anonymously. There will be a safety suggestion box at each location where notices can be deposited
- Vehicle and site-specific codes of safe work practices.
- Other means we use to ensure communication with employees include:
 - Conduct new worker orientation, including a discussion of safety and health policies and procedures & our IIPP
 - Authorized instructor will conduct workplace safety and health training
 - Superintendent will conduct "Tailgate" meetings
 - Posting and/or distributing safety information
 - Suggestion box

Our organization elects to use a labor/management safety and health committee meeting all the requirements of [T8CCR 3203 \(7\)\(c\)\(1\) – \(7\)](#) to comply with the communication requirements of subsection (a)(3) of T8CCR 3203.

Hazard Assessment

Periodic inspections to identify and evaluate workplace hazards shall be performed by Archy Kotoyantz and/or safety consultant, M Squared Safety according to the following schedule:

- When our Injury and Illness Prevention Program was first established;
- At least four times a month through M Squared Safety and prior to beginning of the shifts
- When new substances, processes, procedures or equipment that 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.

Periodic inspections consist of identification and evaluation of workplace hazards through M Squared Safety and any other effective methods to identify and evaluate workplace hazards.

Accident & Exposure Investigation

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be done by Archy Kotoyantz, and will include:

- Visiting the scene as soon as possible;
- Interviewing affected workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure/near-accident;
- Determining the causes of the accident/exposure/near-accident;
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- Recording the findings and corrective actions taken on the OSHA Form 301.

Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on Safety-Reports, or in some cases manually.

Training

All workers, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To all new workers;
- To all workers given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we become aware of a new or previously unrecognized hazard;
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.

This training will include (but is not limited to):

- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, handwashing, and drinking water facilities.
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
 - stacking goods in an unstable manner
 - storing materials and goods against doors, exits, for extinguishing equipment and electrical panels.

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques.
- 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.
- Proper food and beverage storage to prevent them from becoming contaminated.

In addition, **we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.**

Employee Access to the IIPP

Our employees – or their designated representatives - have the right to examine and receive a copy of our IIPP. This will be accomplished by:

1. Provide access in a reasonable time, place, and manner, but in no event later than five (5) business days after the request for access is received from an employee or designated representative.
 - a. Whenever an employee or designated representative requests a copy of the Program, we will provide the requester with a printed copy of the Program, unless the employee or designated representative agrees to receive an electronic copy of the Program.
 - b. One printed copy of the Program will be provided free of charge. If the employee or designated representative requests additional copies of the Program within one (1) year of the previous request and the Program has not been updated with new information since the prior copy was provided, we may charge reasonable, non-discriminatory reproduction costs for the additional copies.

Employees are given a copy of the IIPP at hiring and are notified of their right to access.

Any copy provided to an employee, or their designated representative need not include any of the records of the steps taken to implement and maintain the written IIPP.

Where we have distinctly different and separate operations with distinctly separate and different IIPPs, we may limit access to the IIPP applicable to the employee requesting it.

An employee must provide written authorization in order to make someone their “designated representative.” A recognized or certified collective bargaining agent will be treated automatically as a

designated representative for the purpose of access to the company IIPP. The written authorization must include the following information:

- The name and signature of the employee authorizing the designated representative.
- The date of the request.
- The name of the designated representative.
- The date upon which the written authorization will expire (if less than 1 year).

Recordkeeping

Our organization has taken the following steps to implement and maintain our IIPP:

Our organization has ten or more employees and keeps records as follows:

1. Records of scheduled and periodic inspections including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions and work practices that have been identified) and the action(s) taken to correct the identified unsafe conditions and work practices, are recorded on Safety-Reports. These records are maintained for at least one (1) year.



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Addendum A - Wildfire Smoke Plan

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Protect your employees and your business.
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Addendum A - Wildfire Smoke Plan

Town Hall Drywall, Inc.

Introduction

Smoke from wildfires contains gases, chemicals, and fine particles that can have adverse health effects. The most significant hazard comes from breathing fine particles in the air, which can cause coughing, wheezing, difficulty breathing, and impact lung function as well as existing respiratory and heart conditions. Fine particulate matter of the 2.5 micrometer diameter or smaller size (PM 2.5) are considered to be the most harmful.

The California Division of Occupational Safety and Health (Cal/OSHA) has established regulatory requirements for employers to protect outdoor workers from wildfire smoke exposure. This regulation, 8 CCR §5141.1. Protection from Wildfire Smoke applies to workplaces where the 2.5 PM Air Quality Index (AQI) is 151 or greater and the employee may be exposed to wildfire smoke.

Purpose, Scope, and Application

The objective of this Wildfire Smoke Exposure Plan is to protect Town Hall Drywall employees from exposure to wildfire smoke and to ensure that Town Hall Drywall is following 8 CCR §5141.1. Protection from Wildfire Smoke.

At Town Hall Drywall, employees may need to work outdoors for an extended period during a wildfire. Protection from Wildfire Smoke does not apply to:

- Enclosed buildings or structures in which the air is filtered by a mechanical ventilation system and the employer ensures that windows, doors, bays, and other openings are kept closed to minimize contamination by outdoor or unfiltered air.
- Enclosed vehicles in which the air is filtered by a cabin air filter and the employer ensures that windows, doors, and other openings are kept closed to minimize contamination by outdoor or unfiltered air.
- The employer demonstrates that the concentration of PM 2.5 in the air does not exceed a concentration that corresponds to a current AQI of 151 or greater by measuring PM 2.5 levels at the worksite in accordance with Appendix A of 8 CCR §5141.1.
- Employees exposed to a current AQI for PM 2.5 of 151 or greater for a total of one hour or less during a shift.

Definitions

Current Air Quality Index (Current AQI). The method used by the U.S. Environmental Protection Agency (U.S. EPA) to report air quality on a real-time basis. Current AQI is also referred to as the “NowCast,” and represents data collected over time periods of varying length to reflect present conditions as accurately as possible.

The current AQI is divided into six categories as shown in the table below.

Air Quality Index Levels of Health Concern	Numerical Value	Meaning
Good	0 to 50	Air quality is considered satisfactory, and air pollution poses little or no risk.
Moderate	51 to 100	Air quality is acceptable; however, for some pollutants there may be a moderate health concern for a very small number of people who are unusually sensitive to air pollution.
Unhealthy for Sensitive Groups	101 to 150	Members of sensitive groups may experience health effects. The general public is not likely to be affected.
Unhealthy	151 to 200	Everyone may begin to experience health effects; members of sensitive groups may experience more serious health effects.
Very Unhealthy	201 to 300	Health warnings of emergency conditions. The entire population is more likely to be affected.
Hazardous	301 to 500	Health alert: everyone may experience more serious health effects.

NIOSH. The National Institute for Occupational Safety and Health of the U.S. Centers for Disease Control and Prevention. NIOSH tests and approves respirators for use in the workplace.

PM2.5. Solid particles and liquid droplets suspended in air, known as particulate matter, with an aerodynamic diameter of 2.5 micrometers or smaller.

Wildfire Smoke. Emissions from fires in “wildlands,” as defined in Title 8, section 3402, or in adjacent developed areas.

Responsibilities

- A. Town Hall Drywall Ownership shall:
 1. Maintain and update the written Wildfire Smoke Exposure Plan.
 2. Provide training for employees who perform work activities outdoors during or after wildfires when smoke is present.
 3. Measure PM 2.5 levels at the worksite before each shift and at designated intervals during wildfire events.
- B. Managers and Supervisors of employees who perform work activities outdoors during or after wildfires when smoke is present shall:
 1. Ensure that their employees are made aware of the Town Hall Drywall Wildfire Smoke Exposure Plan.
 2. Ensure that their employees have access to respiratory protection supplies (i.e.- N95s) and are wearing respirators when the AQI is >500.
 3. To the extent feasible, encourage and allow employees to work in enclosed structures or vehicles where the air is filtered.

4. Implement the following control systems for employees that must work outdoors during a wildfire:
 - a. Changing procedures such as moving workers to a place with a lower current AQI for PM2.5;
 - b. Reducing work time in areas with unfiltered air;
 - c. Increasing rest time and frequency, and providing a rest area with filtered air; and
 - d. Reducing the physical intensity of the work to help lower the breathing and heart rates.
5. Notify Town Hall Drywall ownership if their employees inform them that the air quality is getting worse or if they are suffering from any symptoms due to the air quality.

C. Employees working outdoors during a wildfire shall:

1. Understand and follow the requirements of the SDSU Wildfire Smoke Exposure Management Program, including participating in training.
2. Wear respirators when required to do so (i.e.- AQI is >500).
3. Inform their supervisor if the air quality is getting worse.
4. Inform their supervisor if they are suffering from any symptoms due to the air quality.

Exposure Monitoring

Town Hall Drywall shall determine employee exposure to PM2.5 for worksites covered by this section before each shift and periodically thereafter, as needed to protect the health of the employee.

Town Hall Drywall will check the AQI forecasts and the current AQI for PM2.5 using the US EPA AirNow website - www.airnow.gov.

Communication

Town Hall Drywall Foremen shall inform their employees of:

1. The current AQI for PM2.5 as identified in subsection titled DEFINITIONS; and
2. Protective Measures available to employees to reduce their wildfire smoke exposures.

Town Hall Drywall Employees shall inform the employer of:

1. Worsening air quality; and
2. Any adverse symptoms that may be the result of wildfire smoke exposure such as asthma attacks, difficulty breathing, and chest pain.

Training and Instruction

Town Hall Drywall Services shall provide employees with effective training and instruction. At a minimum, the training shall contain the following information:

- A. The health effects of wildfire smoke;
- B. The right to obtain medical treatment without fear of reprisal;
- C. How employees can obtain the current Air Quality Index (AQI) for PM2.5;
- D. The requirements in Title 8, section 5141.1 about wildfire smoke;
- E. The employer's two-way communication system;
- F. The employer's methods to protect employees from wildfire smoke;
- G. The importance, limitations, and benefits of using a respirator when exposed to wildfire smoke; and
- H. How to properly put on, use, and maintain the respirators provided by the employer.