



Safety Program Assessment



July 1, 2019

Executive Summary

Introduction

This report provides the results of a Safety Program Assessment as requested by Sam Rose, Operations Superintendent of South Placer Municipal Utilities District (SPMUD).

Safety Assessment Objectives:

The safety program assessment was conducted by Russell Rocha, Safety Consultant from Core Safety Group. The assessment was conducted between the dates of May 15-31, 2019. The purpose of the Safety Program Assessment is to provide SPMUD with an evaluation of their current safety program as it compares to the requirements set forth by CAL-OSHA standards and other best management practices commonly used in general industry.

The Safety Program Assessment was directed towards identifying safety management and loss control practices and briefly addresses safety hazards observed during reviews of the office/shop area and one of their pump stations. The Program Assessment focuses on the following observations:

- Safety Manual
- Safety Audits/Inspections
- Safety Training
- Hiring Practices
- Substance Abuse Program
- Accident Investigation & Claims Management
- Contract Agreements & OSHA Interaction
- Disciplinary Policy
- Employee Involvement
- Leadership Commitment

Safety Assessment Summary:

South Placer Municipal Utility District was formed in the 1950's and they provide utility service to over 21,000 sewer connections, serving an equivalent population of approximately 75,000. Service is provided by maintaining "pipes and pumps" of the roughly 255 miles of mainline sanitary sewer collection piping and 12 sewer lift stations. SPMUD is operated via a Board of Directors working with their total staff of 27 employees who are led by the General Manager Herb Niederberger with their main office located in Rocklin, CA.

Conditions during the Safety Program Assessment were considered normal. Findings and recommendations in this report are based on an onsite meeting with Same Rose, Superintendent and a conference call with Sam and Joanna Belanger, Administrative Services Manager. Office and corresponding shop area along with 1 pump station were also reviewed during this process.

I. Company Safety Manual

Summary:

SPMUD currently has an IIPP in place to include various programs such as heat illness prevention, confined space entry, energy control and fall protection. The IIPP appears to be created from a template and needs to incorporate company specific information and updated to comply with CAL-OSHA requirements. A comprehensive employee handbook which includes information such as the company drug and alcohol policy is given to employees during their onboarding process and they must sign that they have received, read and understand this handbook. The IIPP will be available electronically very soon as this will be a great way to ensure employees have easy access.

Recommendations:

- Update the current IIPP to ensure it aligns with specific company procedures and CAL-OSHA requirements.
- Appoint an IIPP coordinator (as required by CAL-OSHA) to oversee the program.
- Develop and implement a written emergency action plan.
- Update current energy control program (LOTO) to include specific written procedures for equipment at fixed pump stations.
- Develop and implement a written silica exposure program as employees will at times disturb concrete.
- Develop procedures for an OSHA inspection.
- Review the safety manual policies and procedures annually to ensure all updates have been added.

Score: 7/10

II. Safety Inspections / Audits

Summary:

SPMUD does not conduct facility or location safety inspections although it is listed within their IIPP when they are to be conducted. The IIPP does not list who is to conduct these inspections nor does it list a specific time frame of when to conduct them. The IIPP lists the general requirements of CAL-OSHA inspection requirements, but as stated they are not being conducted, thus there are no records of any inspections. Sam Rose and his team do review work areas and make improvements as needed, but this is not a formal process. Although a formal inspection process is not in place, the observations made during this assessment showed very clean, orderly and well-maintained sites and equipment. It does appear that the SPMUD team takes corrective action when they see potential hazards and then strives to maintain a safe working environment.

Recommendations:

- Update current IIPP to include a schedule to conduct workplace safety reviews and who is responsible for conducting them.
- Conduct unannounced safety reviews on a frequent basis.
- Document safety reviews and ensure action items are listed and completed as necessary.
- Update the current report format to include SPMUD specific hazards and work locations to better capture relevant information.
- Distribute reviews to all leadership employees.
- Develop a file and keep a record of all reviews and abatement for future reference.
- Consider using an outside source such as your current insurance loss control team or a 3rd party safety consulting business for assistance in these reviews as they can give you an outside perspective.

Score: 4/10

III. Safety Training

Summary:

Training is currently being conducted by the SPMUD staff and at times by outside vendors. Training is based on needs to include confined space entry, confined space rescue and energy control. Tailgate safety training is conducted with field teams every other week. All training is documented and listed within a company-controlled matrix.

New employee training is conducted via a team effort with each new employee signing off on items they were trained on. Field employees will undertake much more extensive training and will be supervised until they have completed necessary training and are signed off as completed. On the job training appears to be working well with their team.

Due to the nature of their work, training such as confined space entry and rescue, LOTO, fall protection, working in and around traffic, bloodborne pathogens and excavations are the most relevant.

Recommendations:

- Consider using outside vendors more frequently to conduct safety training as employees could respond better to hearing safety items from a 3rd party voice.
- Conduct hands on confined space rescue training utilizing different scenarios. This has been completed in the past, but more training in this field is highly recommended.
- Create an annual training list that will prioritize training based on needs and work schedules.
- Update the formal orientation program and review for approval, ensuring to include any new changes or CAL-OSHA or SPMUD updates.

Score: 8/10

IV. Hiring Practices

Summary:

All new potential hires complete a written application and must submit to a DOJ background check. All new potential hires also must complete a medical review to ensure they are fit to perform tasks for their specific position. Drug and alcohol screening is conducted for all new CDL drivers and drug testing only for any other non CDL employee. If there is a positive drug screen then that person will not complete the hiring process and will not be offered employment.

Potentially new hires are recommended to hire by the HR Manager with the GM having the final approval to hire employees. Per the company handbook: The General Manager shall have the full power and authority to employ and termination all employees, other than officers, pursuant to provisions of Section 11937 of the Public Utilities Code.

Each new employee is given the SPMUD employee manual and they must sign that not only have they received this manual, but they have read it and understand the provisions of it.

New employees will go through at least a 1-day orientation process with field staff having more relevant safety training conducted throughout their new employment. Field employees are signed off when they complete various components of their safety training/orientation and not allowed to operate various pieces of equipment until the training and sign off by their supervisor is completed.

Written job descriptions are in place and viewed by the potential new hires and then reviewed again during the hiring process. This allows the district and their prospective new hires to fully understand what is expected of them for their job description.

Based on the conversations held throughout this process, the new hiring process appears to be working well.

Recommendations:

- Update the employee safety manual as the last update is listed as completed in 2017.

Score: 9/10

V. Substance Abuse Program

Summary:

SPMUD does have a written Substance Abuse Program in its employee handbook, and should it be included into the safety manual as a stand-alone policy. The current policy includes pre-employment, reasonable suspicion, post-accident and random testing. Testing is somewhat different for CDL drivers and non CDL drivers. Occupational injuries with employees seeking treatment are not part of the current program. D&A testing is in place for potential new hires of CDL drivers and drug testing only for class C drivers. The district works via the California Highway Patrol BIT Program with all drug testing records maintained by Sam Rose who acts as the districts drug and alcohol director.

Wording directly from the SPMUD manual as this appears to be very well thought out and reviewed by district legal:

If an employee refuses to cooperate with the administration of any drug and/or alcohol test required under this policy, their refusal will be handled in the same manner as a positive test result, subjecting the employee to discipline, up to and including termination. The employee will also be immediately suspended from performing any safety-sensitive functions pending disciplinary action.

If an employee submits a false or altered test sample, it will be considered both a refusal to test and a positive test result, and the employee will be immediately suspended without pay and will be subject to further discipline, up to and including termination.

If the employee fails a drug and/or alcohol test, refuses to take a drug or alcohol test, the employee will be considered to be in violation of the policy and will be subject to disciplinary action, up to and including termination. Any employee failing a drug and/or alcohol test will be immediately suspended from performing any safety-sensitive functions pending disciplinary action.

Recommendations:

- Incorporate the D&A policy into the district IIPP.
- Consider post injury/accident testing for all employees.

Score: 8/10

VI. Accident Investigation & Claims Management

Summary:

Workplace accidents/incidents are reported via the employee chain of command process with all incidents being investigated by a team that includes the employee, employee supervisor, superintendent and HR manager. Forms are in place and being used for this review process and they do include potential action items that could be part of the review process.

HR Manager Joanna Belanger manages claims for the District by contacting their workers compensation carrier to include any return to work process. She will work with the occupational clinics/doctors/insurance company to ensure all employee injuries are taken care of and then work with staff to place employees who may have restricted duty back to work. The District uses a physician assessment form that is completed to list specific limitations such as weight that can be lifted and includes specific job tasks for each position, thus the physician will know exactly what is the expected of the employee. The District will use Sutter Occupational Health or employees can seek treatment at their own doctor. Loss runs are reviewed annually (please note there are not a lot of injuries to review as the work force is fairly small and employees do not sustain injuries very frequently). As of this review the District EMR is listed at .72 with the last known lost time injury happening in August 2016. OSHA 300 logs are maintained by both Sam and Joanna.

Recommendations:

- Create a more formal written accident/incident investigation program to include near misses.
- Ensure near misses are investigated with the same process as any incident as these can be leading indicators of injuries that could happen and be prevented.
- Outline who is to conduct, when to conduct and the full process for conducting any workplace incident.
- Provide details on who is to contact CAL-OSHA and when to contact them after any serious injury; guidelines need to match current CAL-OSHA requirements; it would be recommended to place this wording within the written procedures.
- Formal accident Investigation training should be conducted for all employees with more comprehensive training given to supervisors.

Score: 7/10

VII. Contract Agreements & OSHA Interaction

Summary:

SPMUD uses contractors for various tasks such as fleet maintenance, landscaping around the main office and then field work such as traffic control and excavation. Any contractor hired by the District must have proper insurance in place as set forth in the sub-contractor agreement prior to any work starting. Notice to proceed is not given until the contract and insurance is finalized by all parties, thus the District maintains a good control over this process. Also, contractors are not hired that often, thus the exposure is minimized. The District Engineer working with the Superintendent manage field contracted work.

There has been no known CAL-OSHA interaction with the District and upon review of the OSHA website for past citations, none were viewed. OSHA logs are maintained and posted both by the HR Manager and Superintendent and it appears this process is working well.

Recommendations:

- Review the listed insurance requirements to ensure they still align with the District current standards.
- When hiring contractors for field work such as excavation, it is recommended to ask for and obtain their written safety program (IIPP) and specific polices such as confined space entry. If any contractor is to enter and work within a confined space, then training documentation would also be recommended to be obtained and reviewed.
- Ensure the District GM signs the OSHA 300 log prior to posting.

Score: 8/10

VIII. Disciplinary Policy

Summary:

The District has a fully developed employee disciplinary policy within their current SPMUD Civil Service System Employee Manual (section 6). Based on conversation during this review the policy has been utilized recently with 1 employee being terminated. It appears that this employee had several documented issues that were each dealt with by the District and finally was terminated. Any discipline is based on the chain of command with the direct supervisor working with the HR Manager who will then work with the General Manager. The GM has the final authority to terminate any employee as long as the process is followed through their manual. Each employee is given this manual to review and sign off on as being read and understood during their orientation process. As noted within the manual: Cause: No person employed under civil service provisions of this Personnel Manual or of any rules and regulations in a full-time position shall be removed, suspended or terminated except for cause.

Another example of this policy being followed was of an employee with a vehicle incident being written up.

Employees can appeal any decision as noted within the manual: Request for hearing regarding removal, termination or suspension shall be in accordance with the provisions of Section 12164, 12165 and 12166 of the Public Utilities Code and that hearings on said matters will be conducted by the Board of Directors pursuant to the provisions of Section 54957 of the Government Code. The decision of the Board of Directors is final.

Recommendations:

- No recommendations are being offered.

Score: 10/10

IX. Employee Involvement

Summary:

In general, SPMUD has an “open door” policy for employees who wish to communicate safety related issues. Since the District is a fairly small employer, employees work closely with their supervisors and management team and can simply ask/request anything relating to occupational safety and health. Based on site and field observations, the District is doing a very good job with their safety program as the employees that were viewed had good, clean safety equipment; good, clean equipment; good, clean facilities as this not only driven from management, but you can tell the employees have “bought” into their own safety-very good!

The IIPP does have a section regarding communication, but it does appear to be very generic in nature, thus should be part of their program update to ensure it aligns better with District policy and CAL-OSHA requirements.

Recommendations:

- Update current IIPP communication wording to ensure it aligns with District policy and CAL-OSHA requirements.
- Consider the use of a labor-management safety and health committee. Although not a requirement per CAL-OSHA, this can be a great tool to help all work together towards a goal of zero injuries.
- Consider using an employee perception survey to help understand how current employees feel about the company.

Score: 8/10

X. Leadership Commitment

Summary:

The District is operated via a board of directors who hire and work with a General Manager who then operates day to day operations. A current organization chart lists this exact process. During each monthly board meeting there is a written safety report that will detail any and all safety related items associated with District employees. This report is also orally given by the Superintendent to the Board at this time.

The GM works with their staff that includes the HR Manager, District Engineer and Superintendent with Sam Rose the Superintendent managing most day to day field operations (BTW, Sam has been with SPMUD since 1986). Based on conversation with him and general impression of the District from reviewing the office, shop and 1 pump station, the District is being managed very well. It is the impression of this reviewer that the GM relies on the HR Manager and Superintendent to handle day to day ops and they appear to be doing an outstanding job.

Recommendations:

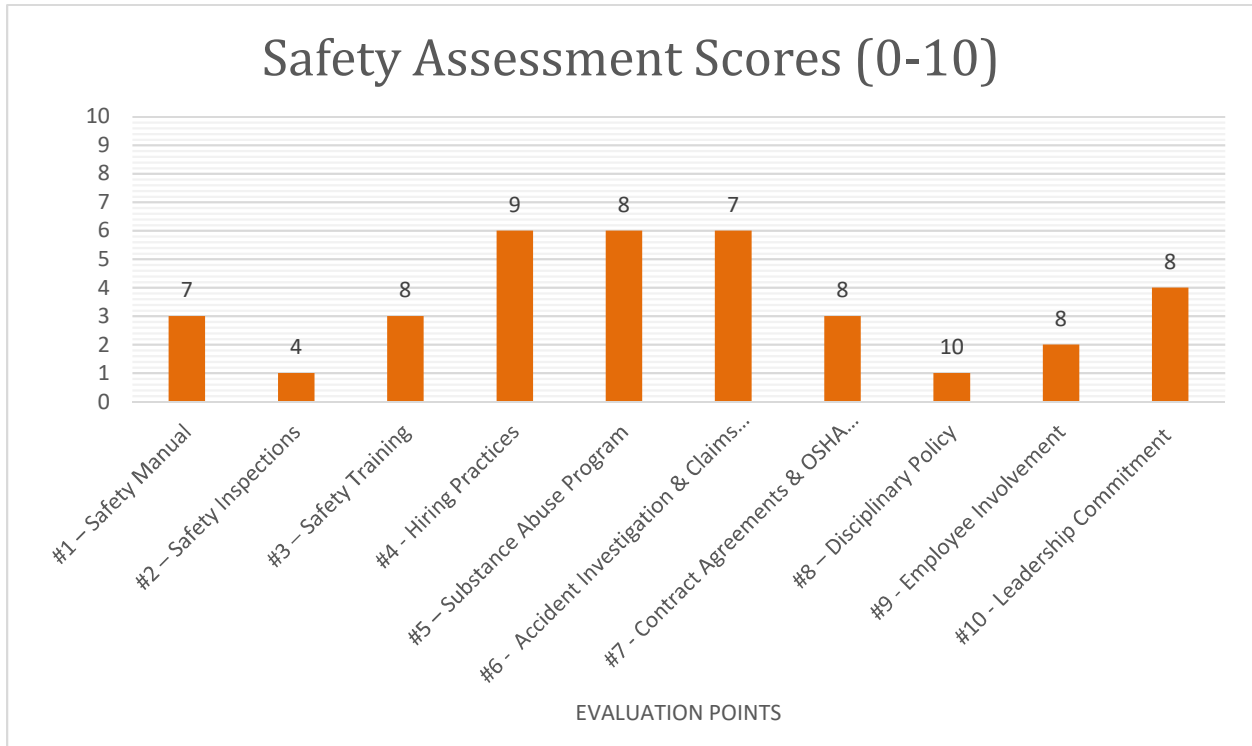
- As noted within this assessment, site safety reviews need to be conducted and once they are in place, then they should be part of the monthly review process with the Board.
- Develop safety goals that can be reviewed monthly by all. Ensure the goals are agreed to and that they are actually obtainable and can be measured.
- Within the listed vision, mission and core values listed on the District website, consider changing this mission statement bullet point (current wording) "Provide outstanding sanitary sewer service"; (propose wording) "Provide outstanding and safe sanitary sewer service".

Score: 8/10

Safety Assessment Score:

Each safety observation is worth 10 points with SPMUD scoring a 77 out of 100.

Evaluation Points	Score (0-10)
#1 – Safety Manual	7
#2 – Safety Inspections	4
#3 – Safety Training	8
#4 - Hiring Practices	9
#5 – Substance Abuse Program	8
#6 - Accident Investigation & Claims Management	7
#7 - Contract Agreements & OSHA Interaction	8
#8 – Disciplinary Policy	10
#9 - Employee Involvement	8
#10 - Leadership Commitment	8
Overall Score	77



Summary:

In conclusion, SPMUD has a very good process in place as noted through their current EMR of .72 and based on conversation, observations and viewing many supplied safety documents. It appears they are striving to be better based on having this assessment being conducted and being very active during this process.

There are a few items as noted within the report and below within the immediate action item list that will only make SPMUD safer and more secure.

Updating the current IIPP and safety programs such as the silica exposure and energy control will also assist with CAL-OSHA compliance. Training is being conducted, but as noted if reputable 3rd parties can be used, this can only assist not only the District, but all employees as they can hear it from another source and help them “buy” into the training being conducted.

Safety reviews/audits are an outstanding tool to use as this process will help view work locations and possibly bring to light safety hazards that might not now be viewed or known by staff.

Overall with the commitment of the Districts leadership and commitment towards safety along with implementing listed action items will only help the District maintain their great safety culture for today and for their future.

Immediate Action Items:

- Update current IIPP and outlying programs to include silica exposure and energy control.
- Develop and implement a written emergency action plan.
- Perform and document safety reviews/audits on a routine basis.
- Update current incident investigation process to include all near misses.
- Enlist outside parties to assist with ongoing safety training.
- Develop safety goals that align with the District vision, mission and core values.

If you have any question on any item mentioned please don't hesitate to call.

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