
City of Modesto

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Modesto, CA 95353

Safety Compliance Assessment April/May 2012

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- 1) Draft Plan of Action
- 2) Draft Safety Training Matrix
- 3) Facility Inspection Report

EXECUTIVE SUMMARY

This safety assessment documents observations and gap analysis-type findings include a number of written program recommendations for improvement at City of Modesto. These observations indicate that City of Modesto is not in substantial compliance with most CAL/SHA written safety program requirements.

Even though the City may not be in *total* compliance with all regulatory agency requirements at any one time, a system should be established that demonstrates due diligence by conducting regular safety committee meetings, periodic inspections, updates the written programs as needed, and provides for regular safety training.

A City Wide safety committee and a high hazard safety committee (public works and select groups in Parks and Recreation) should be established to begin updating the master written safety programs for each subject requirement. The development priority of these safety programs is recommended later in this assessment's attachments. This priority is based on the list of program discrepancies also provided later in this report. We recommend that these programs should be updated at a rate of one a month until complete. Safety committee meetings can become less frequent once all the written programs are in place and a safety training schedule is set.

We recommend that the City consider employing a part-time safety professional or enter into an agreement with a reputable safety consultation firm to assist the safety committee and help provide for an annual safety schedule/plan of action. We further recommend that Risk Management Department take the lead role to assist in the coordination of the safety training schedule and its requisite recordkeeping, medical surveillance, and testing.

A recommended written program update schedule, based on priority is enclosed with this assessment report as a recommended 2012-13 safety plan of action. Management should:

- Select safety committee representation for each "job-safety classification" with the responsibility and authority to provide for safety in their area(s).
- Provide the safety committee with training on their responsibilities and authority.
- Amend/approve an annual safety plan of action that primarily focuses on written program development/updates, inspection schedules, and training (draft enclosed).
- Develop a master employee safety-training matrix to determine new and/or current regulatory requirements employees need to be trained (draft enclosed).
- Develop an annual safety training schedule that includes all required subjects (identified on the safety-training matrix).

1.0 INTRODUCTION

Du-All Safety was requested to perform a Safety Assessment (Assessment) of its operations by City of Modesto. The Assessment included a review of activities conducted by employees at various City locations (herein referred to collectively as the “Facility”). The Assessment consisted of a brief review of the City’s operations and safety related documentation including programs, policies, inspection records, and accident investigation records. The safety compliance topics that are presented in this Assessment are required by California Occupational Health and Safety Administration (Cal/OSHA) which include the following areas:

Safety compliance topics are presented in this assessment covering the following areas:

- Injury and Illness Prevention
- Hazard Communication
- Emergency Response Contingency Plan
- Hearing Conservation
- Confined Space
- Fall Protection Program
- Ergonomics Program
- Safety Committee Minutes
- Inspections and audits
- Heat Illness Prevention
- Lockout/Tagout
- Chemical Hygiene Plan
- Bloodborne Pathogen
- Respiratory Protection
- Personal Protective Equipment
- Hot Work
- Workplace Violence
- CAL/OSHA 300 Logs
- Accident Investigations
- Employee Safety Training

1.1 PURPOSE

The purpose of this Assessment is to assist City of Modesto in identifying applicable health and safety regulations and assessing the compliance status to those regulations at the Facility. This Assessment has been prepared at the direction of City of Modesto and is intended to identify potential health and safety issues that may warrant additional actions and recommended methods to address these potential concerns.

1.2 METHODOLOGY AND LIMITING CONDITIONS

This Assessment focuses strictly on apparent health and safety issues related to the Facility’s operations and are not intended to provide a detailed comprehensive discussion of all observed compliance activities. The information and opinions rendered in this Assessment are exclusively for use by City of Modesto. Du-All Safety will not distribute or publish this Assessment without consent except as required by law or court order. Professional judgments provided are based on the facts currently available within the limits of the existing compliance documentation, scope of work, budget, and schedule. The information provided in this Assessment is not to be construed as legal advice.

The services provided by Du-All Safety in completing this project have been provided in a manner consistent with the normal standards of this type of compliance review. No other warranty, expressed or implied, is made.

2.0 SITE VISIT

A site visit to City of Modesto was conducted on April, 5, 9, 11, and 18, 2012 and consisted of a meeting with management, a walkthrough of high hazard areas, discussions with personnel, and a review of safety documentation.

The individuals who participated in the Assessment were cooperative and committed to compliance with safety regulations. Du-All Safety observed and noted potential safety hazards during the walkthrough of the high hazard areas. A copy of an inspection report of specific facility issues noted during the walkthrough is included as an attachment to this report. This inspection was a cursory walkthrough, and was not intended to be a detailed inspection of all safety hazards. The following summarizes the areas visited by Du-All Safety:

Date	Location	Department or Division Contact
Day 1: Sutter Wastewater Treatment Plant, Fire Station 1 and Police Headquarters		
4/5/12	PW - Wastewater Treatment Plant, 1221 Sutter Avenue	Nick Schuller, Aaron Trott, Randy Johnson, and Linda Ng
4/5/12	Fire Department – Station One, 610 11 th street	Sean Slamon, Ray Jackson
4/5/12	Police Department – Headquarters, 600 10 th STREET	Rick Armendariz, Karen Robertson
Day 2: Corporation Yard, Elm Street, and Senior Center		
4/9/12	PW- Fleet/Streets, 501 N. Jefferson Street	Steve Fischio
4/9/12	PW – Water, 501 N. Jefferson Street	Dave Savidge
4/9/12	PRN – Parks, 501 N. Jefferson Street	Todd Rocha
4/9/12	PRN – Forestry, 501 N. Jefferson Street	Mike Hoesch
4/9/12	PRN - Building Services, 501 N. Jefferson/ 110 Elm Street	Todd Rocha, Darren Sims
4/9/12	C&ED – Traffic Electrical, 501 N. Jefferson Street	Debbie Magdaleno, Rodney Nelson
4/9/12	C&ED - Traffic Operations, 113 Elm St.	Mark Murphy, Debbie Magdaleno
4/9/12	PRN - Senior Center, 211 Bodem Street	Shannon Parker
Day 3: Jennings Wastewater Treatment Plant, Compost Facility, Firing Range, Corporation Yard - Streets		
4/11/12	PW – Wastewater Treatment Plant, 7007 Jennings Road	Terry Spurgeon
4/11/12	PRN - Compost Facility, 7007 Jennings Road	Nathan Gorth
4/11/12	Police Department - MPD Firing Range, 3000 W. Main St.	Rick Armendariz
4/11/12	PW – Streets, 501 N. Jefferson Street	Jack Hunt
4/11/12	PW – Wastewater, Field Observations	Nick Schuller
4/11/12	PW – Water, Field Observations	Dave Savidge
Day 4: Airport and Maddux Community Center		
4/18/12	PW - Airport 617 AIRPORT WAY	Jerome Thiele
4/18/12	Fire Department - Airport Fire Station, 617 Airport Way	Sean Slamon
4/18/12	PRN - Maddux Community Center – 615 Sierra Drive	Bruce Lockhard

3.0 SAFETY PROGRAM REVIEW

3.1 INJURY & ILLNESS PREVENTION PROGRAM

8 CCR §3203. The Injury & Illness Prevention Program (IIPP) is the framework safety program that applies to all workplace environments with 10 or more employees. The IIPP outlines the over-all responsibilities and program elements, which applies to all other programs that are task-specific and/or regulation-specific.

3.1.1 Program Elements

- Current name of person or person(s) with the responsibility and authority for implementing and maintaining the program
- Communication (e.g., safety committee, hazard reports, tailgate meetings, etc.)
- Written safety rules or "Codes of Safe Practice" for each piece of construction equipment and/or construction activity
- Regularly scheduled or "periodic" safety inspections of each area and corrective action documentation
- Accident investigation including root cause analysis, corrective actions, recording & reporting procedures
- Employee training
- Enforcement and recognition procedures
- Recordkeeping

3.1.2 Departments that are required to participate in this program and training

All city employees are affected by the injury and illness prevention program (IIPP). Typical municipalities the size of Modesto will choose to develop one IIPP for all city operations and will assign Safety Coordinators/Representatives from individual departments or locations to be responsible for program implementation. Employees in the following departments/divisions are required to receive training and be included in the IIPP:

- All city employees

3.1.3 Findings

1) Written program

Issue

Multiple copies of IIPP's were present throughout the City by individual departments. Many of the documents presented to Du-All were older versions of the IIPP that held document revision dates ranging from 1978 to 1998. Risk management advised that the most current IIPP was available to employees via the City of Modesto employee intranet. The following comments are directed as a review of the most recent version of the published IIPP.

The IIPP became effective on 2/19/09 and from all information provided the document has not been revised since and is in need of significant revisions. The IIPP addresses the majority of the program elements, but is lacking specific details and content that is needed. Furthermore, activities onsite did not indicate that the plan as written has been fully implemented since the effective date. Du-All Safety has provided suggestions below to improve the document and shift it from noncompliance status to substantial compliance.

Corrective Actions

- a) Recommend to add a revision history log to the program that identifies revision dates and details (i.e. sections that were updated, the date, the person who conducted the update, and if necessary why the update was necessary). This finding can be generalized for the majority of the City's written programs.
- b) Training: Persons given the responsibility and authority for areas of safety should receive formal training on their responsibilities (i.e. recordkeeping, required trainings for employees, complete safety program overview, etc.). The Du-All Safety course titled *Safety Responsibilities for Supervisors* may be conducted to satisfy this need.
- c) Responsibility (Section II): The IIPP identifies responsibilities by title (i.e. Risk Manager, Supervisor, etc.). The responsibilities listed are similar among different titles. Revise the IIPP to clearly identify the responsible personnel by name (i.e. John Doe, Supervisor) with the authority of implementing the IIPP. Identify their specific responsibilities as they related to the following specific tasks:
 - Safety Training;
 - Tailgate meetings;
 - Periodic safety inspections;
 - Accident investigations;
 - Record keeping;
 - Enforcement & recognition;
 - Safety committee.
- d) Communication (Section III): The IIPP states that safety communication will occur during "staff meetings". Documentation that safety discussions during staff meetings actually occur is infrequent at best and a more formal way of allowing employees to communicate observed hazards or provide safety suggestions should be embraced. This includes; safety suggestion boxes, reporting hotline, Dept. safety committee meetings, etc.
- e) The IIPP identifies the requirement and a method for employees to anonymously report hazards but does not identify how the employee reporting would be informed of the resolution. We recommend adding to the program how a reply would be available. For example, a reply will be written and posted on the lunchroom bulletin board; discussed in the safety committee meeting minutes; City of Modesto newsletter; or at the next staff meeting, etc.

- f) Communication element is silent regarding the requirement for Tailgate meetings. Tailgate meetings are designed and only required for employees who perform “construction” activities. The IIPP should provide the definition for “construction” activities as well as determine the groups that occasionally perform “construction” activities (i.e. Facilities Maintenance, Streets, Sewers, and Wastewater Treatment Plant personnel, etc.). The employees performing “construction” activities are required to participate in a tailgate meeting every ten working days to review the hazards associated with construction work in the coming two weeks (concrete grinding, scaffolding, etc.).

THE STATE OF CALIFORNIA DEFINES “CONSTRUCTION” AS OCCURRING “whenever employment exists in connection with the construction, alteration, painting, repairing, construction maintenance, renovation, removal, or wrecking of any fixed structure or its parts.” (8CCR1500)

It is possible for employees to be governed by those codes titled “Construction Safety Orders” (8CCR Chapter 4 Subchapter 4) during certain activities, and by the “General Industrial Safety Orders” during other portions of the workday. As well as having an IIPP as defined above, there are additional requirements for the IIPP for employers whose employees engage in “construction” activities. Even though most work will not fall under the definition of “construction” activities, some will and should be identified as such in the IIPP.

- g) Du-All Safety recommends that the communication section include a safety committee and charter. The only active safety committee that was observed is the Community and Economic Development (C&ED) Department, which meets regularly. Safety committee should represent the entire City. The minimum meeting frequency is quarterly. We recommend reestablishing the safety committee and schedule meetings to be held monthly until a training schedule and written programs are in place. The safety committee should also identify a standard agenda and minute format, the charter of a safety committee including the meeting frequency, and the chair person’s responsibilities.
- h) Inspections (Section VI): The IIPP states that inspections are to be conducted “at least quarterly in all work areas”. Other than the security inspection document used regularly at the Maddux Youth Center and wastewater treatment plant inspection, documentation showing that quarterly inspections are conducted is limited. We advocate that the inspection frequency be re-established as follows: annual for low-hazard areas (office, community center, storage areas, recreation centers, etc.) and quarterly for high-hazard areas (corporation yard, chemical storage areas, etc.). Any person conducting inspections should receive formal training (what to look for, codes and regulations, documentation requirements, etc.). There should be a corrective action time-frame included by assigning risk level to each finding. A simple Risk Assessment Class system should be in place with a corresponding correction time-frame. For example:

The Risk Assessment Class is determined as follows:

Class 1 - Critical (may cause death, serious injury, significant environmental impact, or substantial financial losses) and/or is likely to occur soon. Corrective action within the day.

Class 2 - Serious (may cause injury, occupational illness, or environmental or property damage) and/or probably will occur in time. Corrective action within 30 days.

Class 3 - Minor (probably would not significantly affect personnel or environmental safety or health, but is a violation of specific criteria). Corrective action within three months.

- i) Periodic Inspections (page 4): In addition to the above comments, the manufactures of specific equipment (crane, vactor truck, forklift, etc.) require additional inspection / maintenance frequencies identified in the owner's manual. Hazardous waste storage areas and emergency response equipment (fire extinguishers, eyewash stations, first aid kits, automated external defibrillators, etc.) also require scheduled inspections. Revise the IIPP to include these inspection frequencies.
- j) Injury and Investigation (section VII): This section should identify that serious injuries must be reported to Cal/OSHA within 8 hours after management learns of the incident. The following revisions are suggested:

1) Management in this case is defined as a supervisor or above.

2) The definition of "serious" should be provided so management can determine if a call to CAL/OSHA is needed.

CAL/OSHA defines a serious injury as: *an injury or illness which requires hospitalization for more than 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement.*

3) Contact information for the local Cal/OSHA district office should be listed. The contact information for the local office for Modesto is: Modesto, 4206 Technology Drive, Ste. 3, Modesto 95356, (209) 545-7310, fax (209) 545-7313.

4) Recommend a Cal/OSHA calling protocol be listed. Example verbiage could include, "management is to contact the Risk Management office and speak with a live person. Risk Management will then make the call to Cal/OSHA. If management cannot speak with a live person in Risk Management, then they are to leave a detailed message with Risk Management; management is to then make the call to Cal/OSHA."

5) Recommend listing the reporting exemptions, example verbiage could be "a serious injury report is exempt when it is caused by a vehicular accident or happens during the course of a crime (penal code violation)."

6) It should be mentioned that all recordable injuries are to be logged on the address-specific employer OSHA Log 300 within 6 days of the injury.

- k) Training (section IX): A Safety Training Matrix should be developed to identify job-safety classifications and corresponding required training and their refresher frequency.
- l) The IIPP states that “The Department Director shall assure that supervisors receive training to familiarize them with safety, health,”... There was no documentation provided that this has occurred, nor does any supervisor we met with remember this taking place.
- m) Codes of Safe Practices/COSP (section IX & IIX): This section only provides COSP’s for office and general industry and is not required for these job-safety classifications. COSP’s are only required for construction activities as discussed above in item f. This section should primarily discuss the Construction Safety Orders (CSO) requirement for written Codes of Safe Practices (COSP’s) (sometime referred to as standard operating procedures or safety rules) for all construction activities and equipment.
- n) Du-All Safety suggests revising the IIPP to include a reference to the Construction Safety Orders. Conduct a complete inventory of the activities that require COSP’s and scheduling them to be developed. The COSP’s are a tool that may be reviewed at the regular tailgate meetings. For example, if the upcoming two weeks of work included concrete grinding and scaffold erection, those are the COSP’s that are to be reviewed at the tailgate meeting. The COSP’s need to be updated and inventoried; identify missing COSP’s for construction equipment and activities and develop them.
- o) The IIPP is silent about the safety discipline and employee recognition elements as required under 8, CCR, 3203 (a) (2). Du-All Safety recommends that the City reference discipline procedures to the employee MOU or applicable Policy and Procedure Manual. Similarly, add a section that shows how the City recognized employees that may contribute to the safety programs by providing hazard reports, safety suggestions, etc for example with a certificate of appreciation from the Safety Committee. There were some forms being used by the City Parks, Recreation, and Neighborhoods Department that could be used to help satisfy this program element. They are: the Employee Verbal Warning form and the Coaching Memo. These are excellent tools that can be incorporated into the City-wide IIPP.

2) **Safety Committee Structure**

Issue

The City of Modesto is lacking a safety committee. Some individual departments and division meet regularly to discuss safety related topics and discuss hazards with employees; but the structure of these groups/meetings are not a committee. For those departments that do meet, meeting notes and sign in sheets were observed. An exception to this is the C&ED Safety Committee that appears to be meeting regularly and promotes safety throughout its department.

Corrective Action

Develop a minimum of two safety committees for the City. One committee should include a representative from each Department (C&ED, PW, City Hall, PD, FD, PR&N) where the focus would be on general industry hazards. A second committee should be

formed for the Public Works Department and selected work groups in Parks Recreation and Neighborhoods department to focus on both General industry and construction safety orders. If necessary, additional division lead safety committees may be beneficial for the higher hazard groups such as Wastewater.

3.2 AEROSOL TRANSMISSIBLE DISEASES

8 CCR 5199. Aerosol Transmissible Diseases (ATDs) are diseases for which droplet or airborne precautions are required. These diseases include, but are not limited to tuberculosis, whooping cough or meningitis. The ATD program is designed to protect employees who have occupational exposure to these diseases such as paramedics, police departments or health care workers. Employers are required to develop written procedures to screen for these ATDs and refer suspected or known cases to healthcare facilities.

3.2.1 Program Elements

- Job classifications/tasks in which employees have occupational exposure to an ATD.
- A list of all assignments or tasks requiring personal or respiratory protection.
- The methods of implementation as they apply to that facility, service or work operation. Specific control measures shall be listed for each operation or work area in which occupational exposure occurs.
- A description of the source control measures to be implemented in the facility, service or operation, and the method of informing people entering the work setting of the source control measures.
- The procedures the employer will use to identify, temporarily isolate, and refer or transfer Airborne Infectious Disease cases or suspected cases to Airborne Infection Isolation rooms, areas or facilities.
- The procedures the employer will use to provide medical services, including recommended vaccinations and follow-up.
- The procedures for employees and supervisors to follow in the event of an exposure incident, including how the employer will determine which employees had a significant exposure.
- The procedures the employer will use to evaluate each exposure incident, to determine the cause, and to revise existing procedures to prevent future incidents.
- The procedures the employer will use to communicate with its employees and other employers regarding the suspected or confirmed infectious disease status of persons to whom employees are exposed in the course of their duties.
- The procedures the employer will use to communicate with other employers regarding exposure incidents, including procedures for providing or receiving notification to and from health care providers about the disease status of referred or transferred patients.
- The procedures the employer will use to provide initial and annual training.

3.2.2 Departments that are required to participate in this program and training

- Fire Department
- Police Department

3.2.3 Findings

1) No Written Program

Issue

Employees in the Police Department and Fire Department conduct activities that could potentially exposed them to an ATD. No written program was provided for review by either Department. The Fire Department provided blank reporting procedures and template for supervisors and employees to complete when a possible exposure occurs.

Corrective Action

Identify the groups of employees within the Fire Department and Police Department that are potentially exposed to ATDs. Develop a written program and provide subsequent employee training on the program. Incorporate in the written program the reporting documentation available from the Fire Department.

3.3 CHEMICAL HYGIENE PLAN

8 CCR 5191. Employers engaged in the laboratory use of hazardous chemicals are required to develop and implement a Chemical Hygiene Plan. A few of the elements of the plan include standard operating procedures, control measures, engineering controls and personal protective equipment. The plan establishes provisions for employee training, fume hood compliance, and provisions for medical evaluations.

3.3.1 Program Elements

- Standard operating procedures
- Control measures, including engineering controls and PPE
- Performance criteria for fume hoods that are compliant with Regulations
- Provisions for employee communication and training
- Description of circumstances under which a procedure shall require Pre-authorization by the employer
- Provisions for medical consultation and examination
- Designation of a Chemical Hygiene Officer
- Provisions for additional employee protection for work with particularly hazardous substances

3.3.2 Departments that are required to participate in this program and training

- PW - Wastewater Treatment Plant Laboratory – 1221 Sutter Avenue
- PW - Wastewater Treatment Plant Laboratory – 7007 Jennings Road

3.3.3 Findings

1) **No Current Written Program.**

Issue

Laboratories are operated at both wastewater treatment plants. No written chemical hygiene plan was provided for review .

Corrective Action

Develop a Chemical Hygiene Plan that includes specific procedures to be followed at each laboratory. It is recommended that one plan be developed that address both laboratories.

3.4 CONFINED SPACE PROGRAM

8 CCR 5156-59. A Confined Entry Space Program is required when employees engage in activities requiring work in and around the hazards inherent of confined spaces. The program is essential to initiate process and procedures for entering confined spaces and permit required confined spaces. The program details the proper processes and procedures for abating the hazards associated with such work. Typical confined spaces entered by municipal workers include manholes, tanks, and vaults.

3.4.1 Program Elements

- Written policy and procedures
- Assigned roles and responsibilities
- Classroom and practical training
- Approved equipment, Inspection & Maintenance
- Entry permits

3.4.2 Departments that are required to participate in this program and training

- C&ED – Traffic Engineering & Operations
- Fire Department
- PRN - Parks
- PW – Airport Maintenance
- PW – Wastewater, Operations/Maintenance
- PW – Water Division

3.4.3 Findings

1) Written program – City Wide.

Issues

A current City wide confined space program/procedures does not exist. Confine space procedures are determined by individual departments and work groups that conduct confined space activities. The Parks division, C&ED Department and some of the Public Works Divisions (excluding wastewater) presented copies of an IIPP (also called “Safety Manual) from the 1990’s that includes a code of safe practice titled: Section L. Excavations, Trenches, Warning Signs and **Confined Spaces**. The procedures described are lacking sufficient detailed and do not address most of the required program elements.

Corrective Actions

Develop a City wide confined space policy that can be used by all departments that enter confined spaces. Include specific details in accordance with Title 8 CCR 5156-5159 program elements regarding non-entry procedures, alternate entry procedures, specific

on-site or off site rescue procedures and coordination, roles/responsibilities, process/procedures, training, contractor work, required equipment, equipment inspection, equipment maintenance, pre-entry evaluations, entry permits, and post entry documentation.

2) **Written program – Fire Department.**

Issues

The Fire Department presented Fire Authority Procedure V3-E02: Confined Space Rescue as their standard operating procedure (SOP) for entering confined spaces. The SOP is very lean and is lacking detailed procedures that have become the gold standard for Fire Departments. For example, procedures are limited to short bullet points that are not expanded upon; nor are there procedures for prevention of unauthorized entry to the space.

Corrective Actions

Revise the Fire Department procedures to include additional detail for entering confined spaces. Alternatively, create a second document detailing out confined space training that employees could review to gather additional information. For Example, the procedure say to “Monitor and Ventilate” the space. A training program would describe in detail how to conduct these activities.

3) **Review Entry Permits – Fire Department.**

Issues

Entry permits from the least year were available. The permits appeared to be accurate and complete.

Corrective Actions

No corrective action necessary.

4) **Written Program – Wastewater**

Issues

The Wastewater division presented a detailed confine space program that outlines the procedures for the collections, operations, and maintenance work groups. The plan addresses most of the required elements and would be considered complaint by CAL/OSHA except for the lack of procedures for rescue operations. The program is lacking sufficient detail for confined space rescue operations that are required for permit required confined space entries. Conversations with employees indicated that the work groups are not clear on their roles and responsibilities for confined space standby rescue.

Corrective Actions

Update the Wastewater confine space program to include clear instructions for standby rescue. All permit entries must have standby rescue immediately available. Immediately is defined as being at the space (as opposed to calling 9-1-1, or having to page an onsite rescue team). The preferred method for rescue is non-entry; however the space must be properly assessed to determine that non-entry is feasible. If non-entry is not feasible,

then entry rescue is the preferred method, and supplied air system must be provided. Rescue personnel require CPR and First Aid training and annual entry drill.

5) **Confine Space Inventory and Hazard assessments**

Issues

A city wide inventory or hazard assessment of confined spaces has not been completed. A confined space inventory is required to identify all potential and associated hazards within the spaces. Exception: The Wastewater treatment plants are in the process of completing a confine space inventory and assessment of each space.

Corrective Actions

- a) Conduct confined space assessment of City of Modesto and hazard assessments of each confined space. Recommend that the inventory include a detail assessment of each type of confined space, potential hazards, and include photo documentation.
- b) Continue the inventory of confined spaces for the wastewater division.

3.5 EMERGENCY ACTION PLAN

8 CCR § 3220 & 3221. The Emergency Action Plan (EAP) addresses emergencies that the employer may reasonably expect in the workplace. Examples are: fire; toxic chemical releases; earthquakes; hurricanes; tornadoes; blizzards; floods; and bomb threats. The purpose of an EAP is to facilitate and organize employer and employee actions during workplace emergencies. Well-developed plans and proper employee training will result in fewer and less severe employee injuries and less structural damage to the facility during emergencies. A poorly prepared plan, likely will lead to a disorganized evacuation or emergency response, resulting in confusion, injury, and property damage

3.5.1 Program Elements

- Emergency escape procedures and emergency escape route assignments.
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.
- Procedures to account for all employees after emergency evacuation has been completed.
- Rescue and medical duties for those employees who are to perform them.
- The preferred means of reporting fires and other emergencies.
- Names or job titles of person(s) or departments who can be contacted for further information or explanation of duties under the plan.

3.5.2 Locations that are required to participate in this program and training

Each City employee occupied building should have an EAP prepared, and the employees within the building should be trained on the program. The following locations should have an EAP:

- Airport Terminal
- City Hall
- Community Centers and Senior Center
- Compost Station at Jennings
- Corporation Yard (Include North Jefferson and Elm Street Buildings)
- Fire Stations
- Police Headquarters and Garage
- Wastewater Treatment Plant – Sutter and Jennings

3.5.3 Findings

1) Written EAP.

Issue

Emergency plans of one form or another have been developed for selected work groups or areas throughout the City of Modesto. Plans include emergency contingency plans that were developed in conjunction with HMBPs, evacuation plan for Tenth Street Place, action plan for Compost Facility and response plans for the Airport. The programs available were good for their intended purpose, but were lacking some of the elements of a complete Emergency Action Plan.

Corrective Action

Create an emergency action plan for each building or area where City of Modesto employees are stationed. The action plan should include the required program elements described above. Develop and post evacuation maps for each building that does not already have a plan posted.

2) Risk Management Handbook - Emergency Action Plan

Issue

The Risk Management Handbook addressed actions plans for fires, bomb threats, earthquakes and employee injury; however this plan is not site-specific and does not meet all the program elements required by 8 CCR 3220.

Corrective Action

Revise Handbook to include additional action plans, including, but not limited to, severe weather, civil disturbance, chemical spills, etc. Where necessary, action plans should be specific to the group or building it pertains to. For example, evacuations procedures are site specific. Train employees on the contents of the emergency action plan, and conduct emergency drills such as an evacuation drill and/or spill drill so that employees can gain experience and be familiar with the plan.

3) **10th Street Place Emergency Evacuation Plan.**

Issue

10th Street Place office building is considered a high rise, and as such is required to have an emergency evacuation plan. The Evacuation Plan for this location appeared to be appropriate, complete, but potentially out of date. Revision dates listed were from October 30, 2007 and May 18, 2008. As such, some information might not be current.

Corrective Action

The document assigns responsibilities by name to many people. Such a document should be reviewed annually and re-issued to minimize inaccuracies due to turnover.

4) **Water Quality Control Facility - Emergency Planning and Response**

Issue

The Water Quality Control Facility provided several documents supporting emergency response and action plans for the Sutter and Jennings facility. Generally, the emergency plans for each of the facilities are part of the Process Safety Management (PSM) Plan and the Hazardous Materials Business Plan (HMBP) that have been prepared for each site. Du-All conducted a cursory review of these plans and found them to be complete for their intended purpose; however, each the plans require updating. Furthermore, the plans do a good jobs addressing releases, but do not address other action plans that a municipality must address (bomb threats, civil disturbance, etc.)

Corrective Action

Update the PSM and HMBPs to reflect current site conditions. If much of the information is unchanged, then document the review and state that the plan is current.

5) **Shelter In Place Fact Sheet**

Issue

The facility provided Du-All with a fact sheet from the Red Cross describing general “shelter in place” procedures at home or at work. The fact sheet is a good resource for learning about shelter in place; however it does not address specific circumstances for the City of Modesto.

Corrective Action

Develop shelter in place procedures for each City of Modesto location. Procedures should describe scenarios that may trigger a shelter in place command, and identify specific rooms or areas at the facility for employees to congregate.

6) **Evacuation Maps**

Issue

Evacuation maps were observed posted at most, but not all locations visited. At a minimum, evacuation maps should be posted at locations that have hazardous materials, or have 100 more employees working on a second floor or above. The evacuations maps observed were inconsistent of the content included. For example, the maps for the Water Quality Control Facility are lacking fire extinguisher and alarm locations.

Corrective Action

Ensure that all evacuation maps meet have the following information:

- Location of exits and fire alarm initiating stations, if required;
- What the fire alarm, if required, sounds and looks like (audible and visual warning devices);
- Fire department emergency telephone number 911; and,
- The prohibition of elevator use during emergencies, if any.

3.6 ERGONOMICS PROGRAM

8 *CCR 5110*. An ergonomics program addresses the significant risk of work-related musculoskeletal disorders (MSDs) confronting employees in various workplaces. Elements typical of successful ergonomics programs include: management leadership and employee participation, job hazard analysis and control, hazard information and reporting, training, MSD management, and program evaluation. Mandatory implementation of a program will depend on the types of jobs in the workplace and whether a musculoskeletal disorder covered by the standard has occurred. Employers are required to implement a written ergonomics program if the facility has had two or more repetitive motion injuries, in a 12-month period, by employees performing a similar job.

3.6.1 Program Elements

- Recommend written program.
- Control of exposures.
- Worksite evaluation.
- Employee Training.

3.6.2 Departments that are required to participate in this program and training

- All City employees who are spend the majority of their work day in an office environment

3.6.3 Findings

1) Written Program

Issue

No written program was provided for review. A program is not required; however, City of Modesto may benefit from developing and implementing such a program.

Corrective Action

An ergonomics written program is suggested to evaluate the workplace for ergonomic related injuries. The program should address the elements noted above.

2) Ergonomic Evaluations.

Issue

Ergonomic evaluations have not been conducted for employees.

Corrective Action

It is recommended that individual employees be offered work station ergonomic evaluations so that they are more comfortable and less likely to have an ergonomic related injury.

3.7 EXPOSURE CONTROL PLAN/BLOODBORNE PATHOGEN PROGRAM

8 CCR 5193. Bloodborne pathogens are pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV). Employers are required to develop and implement an Exposure Control Plan for employees who may have occupational exposure to blood or other potentially infectious materials (OPIM). This written plan is designed to prevent or minimize employees' occupational exposure.

3.7.1 Program Elements

- Exposure determination. A list of all job classifications in which all employees in those job classifications have occupational exposure; a list of job classifications in which some employees have occupational exposure; and a list of all tasks and procedures or groups of closely related task and procedures in which occupational exposure occurs and that are performed by employees in the job classifications listed.
- The schedule and method of implementation for each of the applicable subsections: Methods of Compliance, Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up, Communication of Hazards to Employees, and Recordkeeping.
- The procedure for the evaluation of circumstances surrounding exposure incidents.
- An effective procedure for gathering the information required by the Sharps Injury Log.
- An effective procedure for periodic determination of the frequency of use of the types and brands of sharps involved in the exposure incidents documented on the Sharps Injury Log.
- An effective procedure for identifying currently available engineering controls, and selecting such controls, where appropriate, for the procedures performed by employees in their respective work areas or departments.
- An effective procedure for obtaining the active involvement of employees in reviewing and updating the exposure control plan with respect to the procedures performed by employees in their respective work areas or departments.

3.7.2 Departments that are required to participate in this program and training

- Fire Department
- Police Department
- PRN - Recreation
- PRN - Parks
- PW – Water
- PW – Wastewater

3.7.3 Findings

1) Written Program.

Issues

City employees conduct activities that may potential expose them to blood or infectious material. This exposure is possible when cleaning of public parks, areas where hypodermic needles maybe found, and working with wastewater. The City Wide policy is mentioned in the Risk Management Handbook; however, the information provided does not constitute a written program. Department specific Safety Polices address elements of the exposure control plan; however many of these policies have revisions dates in the 1990's. Exception: Fire and Police department have prepared plans.

Corrective Actions

Determine the employees within the PRN and PW Departments that conduct activities that have potential exposure. Develop an exposure control plan and train employees.

2) Fire Department Exposure Control Plan.

Issues

The Exposure Control Plan for the fire department meet the requirements and program elements described above. This plan is in substantial compliance with the regulation.

Corrective Actions

No corrective action required.

3) Police Department Exposure Control Plan.

Issues

Police Officers conduct activities that may potential expose them to blood or infectious material. Modesto PD has prepared an Exposure Control Plan that includes some, but not all of the necessary elements required under CAL/OSHA's guidelines. Du-All Safety has made some suggestions below to improve the document.

Corrective Actions

- a) This program is to be reviewed annually. It was last reviewed in 2003.
- b) The program is lacking identification of responsibilities.
- c) Exposure control plans include terms that employees may not be familiar with. It is therefore recommend to include definitions as part the plan.

- d) The plan does not make an exposure determination for the job classifications that are potentially exposed.
- e) At the beginning of this program, there is mentioned some diseases that are airborne/droplet issues (meningitis, TB), but there is no expansion as to how to protect against them. This information is to be included in a comprehensive Aerosol Transmissible Disease program. (See Section 3.2.3 of this Assessment.)
- f) The training section does not identify all that is supposed to be covered in the standard (i.e. routes of exposure).

4) **Water Quality Control Facility – BBP Training Document.**

Issues

The Water Quality Control Facility has prepared a tailgate safety training document for BBP. The document is a good training aid; however, it does not constitute a written program for exposure control.

Corrective Actions

Prepare an exposure control plan for the Water Quality Control Facility.

3.8 FALL PROTECTION PROGRAM

8 CCR 1602-1672, 3200-3215, & 3636-3657. The Fall Protection Program addresses, assesses, and minimizes the fall hazards within job categories, work duties, and equipment used while working at elevated heights and locations. Employers engaged in leading edge work, precast concrete construction work, and new construction work are required to develop and follow a fall protection plan under specific circumstances. Generally, fall protection protocols apply to employees working at elevated heights from ladders to skyscrapers.

3.8.1 Program Elements

- Identification of Key People
- Inventory and Assessment
- Assigned Roles and Responsibilities
- Regulatory Requirements
- Written Process and Procedures
- Approved Equipment, Inspection, Maintenance
- Training and Certification

3.8.2 Departments that are required to participate in this program and training

- C&ED – Building Inspectors
- C&ED – Traffic Control & Electrical
- Fire Department
- PRN – Building Services
- PRN - Forestry
- PW – Fleet (Bus maintenance)
- PW – Waste Water, Operations/Maintenance
- PW – Water Division

3.8.3 Findings

1) Written Program

Issues

City employees conduct work that requires them to be in areas that necessitate the use of fall protection. Written programs addressing fall protection issues provided for review were limited to general safety rules developed in the 1990's for departments at the Corporation Yard and a C&ED Safety Policy for building inspectors. The policies for ladders and step stools are not sufficient to meet the fall protection needs of employees. Furthermore, departments such as the Forestry stated that they follow the ANSI standard for fall protection, but do not have a specific written program.

Corrective Actions

The ladder and safety policies are sufficient for employees who only climb ladders. However, a comprehensive fall protection program that addresses the needs of all employees in higher hazard areas needs to be developed. A general fall protection plan could be developed for the entire City.

2) Assessments.

Issues

The City has not conducted written fall hazard assessments or an inventory of elevated work site locations.

Corrective Actions

Complete fall hazard assessments for work that is completed at elevated site locations. Within the assessment, assign duties and responsibilities for employees.

3) **Equipment status**

Issues

The facility had fall protection equipment available onsite for employees to use. No records were available that documented that the equipment had undergone the required inspections.

Corrective Actions

Inspect fall protection equipment in accordance with Cal/OSHA requirements. Maintain documentation that the required inspection are conducted.

3.9 HAZARD COMMUNICATION

8 CCR § 5194. This written program provides employees with information regarding hazardous substances in the workplace and outlines the measures they may take to protect themselves from the hazards associated with these materials. This program should be reviewed and updated periodically to reflect changes and new hazards associated with the materials in each area. Each facility's chemical inventory also needs to be reviewed and updated periodically. This program requires employees to be trained on hazardous substances in their work area at time of initial assignment and whenever a new hazard is introduced into their work area.

3.9.1 Program Elements

- An explanation of employee rights
- A complete chemical inventory, regardless of quantity
- Complete set of Material Safety Data Sheets (MSDSs) for each chemical onsite
- Container management - including labeling, storage and handling requirements
- Personal Protective Equipment (PPE) requirements
- Basic toxicology and routes of entry into the body
- Employee training covering the written program, chemical inventory, MSDSs, container management, physical and health hazards.

3.9.2 Departments that are required to participate in this program and training

- C&ED – All Employees except administrative staff
- Fire Department – All employees
- Police Department – All Employees
- PRN – Parks
- PRN – Forestry
- PRN - Building Services
- PRN – Solid Waste
- Public Works – All employees except administrative staff

3.9.3 **Findings**

1) **Written Program**

Issue

Employees use and are exposed to hazardous substances. The substances include flammable materials (gasoline and solvents), corrosive materials (lead acid batteries), and toxic materials (cleaners, detergents, and disinfectant). The Risk Management Employee Handbook includes a brief section on hazard communication which specifies that each department is responsible for managing their hazard communication program. No written programs were provided for review.

Corrective Action

Develop a city wide hazard communication program. Upcoming changes in the hazard communication regulation will require that the program include information about the Global Harmonized System for labeling and safety data sheets.

2) **Chemical Inventory**

Issue

Hazardous substances are both used and stored at areas such as the Corporation Yard, Wastewater Treatment Plants, police department, fire stations, janitorial closets and other areas throughout City of Modesto. A chemical inventory that includes a description of the hazardous substance and the location of where it is used and/or stored is required. The City requires individual branches within each department (i.e. Fleet, Compost, Parks, etc) to maintain the chemical inventory for their work group. City groups are inconsistent with maintaining their inventory. Some work groups such as wastewater have a current and up to date inventory; some inventory observed had gone several years without an update, while other groups had no inventory.

Corrective Action

Conduct a comprehensive chemical inventory that includes all hazardous substances used or stored by City of Modesto. Consumer type products used in a consumer quantity are exempt. Include in the inventory the name of the hazardous substance, and the area it is primarily used and/or stored. The inventory is to be updated as new chemicals are introduced into the workplace.

3) **Material Safety Data Sheets (MSDS) or Safety Data Sheets (SDS)**

Issue

The City requires individual branches within each department (i.e. Fleet, Compost, Parks, etc) to maintain the Safety Data Sheets for their work group. Most groups had an MSDS binder; however the contents were consistently out of date (except for wastewater) and in some cases materials were observed for which no MSDS was present. Furthermore, within the next two to three years, updated regulatory standards are going to require most manufacturers to make significant changes to their existing safety data sheets. As new sheets are issued, the City will be required to replace their existing sheets.

Corrective Action

Upon completion of the chemical inventory, ensure that there is a current MSDS for each hazardous substance. Archive MSDSs for materials that are no longer used. Maintain records of chemicals that were used for 30 years (e.g archive MSDSs for 30 years).

4) **Chemical Inventory – Laboratory**

Issue

The laboratory provided a chemical inventory for substances used within the laboratory. The inventory appears complete and meets the requirements of the hazard communication and chemical hygiene standard for inventorying chemicals. However, there is no date code for the inventory.

Corrective action

Continue to maintain the chemical inventory for the laboratory. Insert date code on the document and review periodically to ensure that it is current.

3.10 HEAT ILLNESS PREVENTION PROGRAM

8 CCR 3395. The Heat Illness Prevention Program establishes process and procedures to control the risk of occurrence of heat related illnesses in the workplace. Highlights of the program include procedures for water replenishment, employee access to shade, and emergency response protocols. California requires a written program for outdoor places of employment.

3.10.1 Program Elements

- Provision of water and access to shade.
- The importance of acclimatization.
- Recognition of signs and symptoms of heat related illnesses.
- Recovery periods.
- Emergency medical notification.
- Manager, Supervisor, and Employee training.

3.10.2 Departments that are required to participate in this program and training

- All City employees except administrative staff who work indoor full time.

3.10.3 Findings

1) Written Program

Issue

City of Modesto is considered an outdoor place of employment. The City has prepared a Heat Illness Prevention Program that includes some, but not all of the necessary elements required under CAL/OSHA's guidelines. The program is incomplete. Du-All Safety has made some suggestions below to improve the document.

Corrective Action

- a) Include city specific procedures for carrying out heat illness related duties. The program as written is general.
- b) Revise the program to include specific procedures for the 85 and 95 degree temperature triggers.
- c) The program is required to describe emergency services that are available in the event that an employee shows signs and symptoms of heat illness.
- d) Revise program to include a through description of heat illness.

3.11 HEARING CONSERVATION PROGRAM

8 CCR § 5099. Employers are required to protect employees against the effects of noise exposure. An effective hearing conservation program must be implemented whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A-scale (dba) or, equivalently, a dose of fifty percent. Employees enrolled in the hearing conservation program will be required to undergo baseline and annual audiometric testing. A noise survey of work areas and equipment is essential to determine the hearing protection and program needs.

3.11.1 Program Elements

- Written policy and procedures
- Noise assessment and identification
- Personal protective equipment
- Employee baseline and annual audiograms
- Employee training

3.11.2 Departments that are required to participate in this program and training

- Police Department – Gun Range Master
- PRN – Building Services
- PRN – Forestry
- PRN – Parks
- PRN – Solid Waste
- PW – Airport Maintenance
- PW – Fleet
- PW – Streets
- PW – Water
- PW – Wastewater

3.11.3 Findings

1) Written Program.

Issue

The City has operations that exposed employees to noise levels that necessitate a hearing conservation program. No written program was provided for review.

Corrective Action

Develop a written hearing conservation program that describes the measures the City has established and continues to implement to protect employees hearing.

2) Medical Surveillance

Issue

The City requires a wide range of employees to participate in the baseline and annual audiograms as is required for those employees who are exposed to noise above the action level of 85 dba. Based on conversations with management, it is possible that there are individuals in the program who are not exposed to noise levels above 85 dba, and conversely there may be individuals who are not participating who are exposed to noise levels at or above the action level.

Corrective Action

- a) Continue medical surveillance/audiogram program for employees who are exposed to noise levels that are above the action level.
- b) Conduct a detail review of operations conducted by employees to determine if the participation requires change. This could be done using noise exposure monitoring.

3) Noise Exposure Monitoring

Issue

Employees use equipment and work around machinery that generates noise at levels that are greater than 85 dba. No testing or measurements have been conducted to determine the exact noise levels employees are exposed, and which equipment exactly produces those levels.

Corrective Action

Conduct noise surveys and determine the duration of exposure to each employee of noise levels greater than 85 dBa. Include those employees in the hearing conservation program.

3.12 HOT WORK PROGRAM

This program is intended to prevent accidental fires from being started by the performance of "Hot Work." "Hot Work" is any work involving gas or electric welding, cutting, brazing, grinding, or other similar operations that produce spark or flame. It does not include electric soldering irons, or cooking operations. It is described in 8 CCR 4848, which in turn calls out the American National Standards Institute ANSI Z49.1: 1999, "Safety in Welding, Cutting and Allied Processes," and the National Fire Code 51B, "Hot Work," both of which are incorporated into law. Hot Work program elements include:

3.12.1 Program Elements

- General description of fire protection during hot work
- Requirement that all work be done either in a designated area or by permit
- Definition of requirements for a designated hot work area
- Hot work permit and identification of the Permit Authorizing Individual(s)
- Description of fire watch
- Record retention requirements

3.12.2 Departments that are required to participate in this program and training

- C&ED – Traffic Electrical
- C&ED – Traffic Operations
- Fire Department
- Police Department – Gun Range Master
- PRN – Building Services
- PRN – Parks
- PRN – Solid Waste, Compost
- PW – Airport Maintenance

- PW – Fleet
- PW – Water
- PW – Wastewater

3.12.3 Findings

1) **Written Program.**

Issues

Several departments throughout the City conduct hot work activities. C&ED provided an IIP program dated January 1, 1992 that included a codes of safe practice on welding and cutting. The safe practice description meets most of the requirements of a hot work program, it requires some updates to be in compliance with the current regulations. Furthermore, interviews with personnel indicated that most were not aware that the program existed, nor were they familiar with key requirements such as completing a hot work permit. No other hot work programs were provided for review.

Corrective Actions

It is recommended that a comprehensive written hot work program including a permit system meeting the requirements for all of the respective regulatory agencies be developed and that the program be implemented through training.

3.13 **LOCKOUT / TAGOUT PROGRAM**

8 CCR § 2320.4 & 3314. This program covers the servicing and maintenance of machines and equipment in which the unexpected energization or start up of the machines or equipment, or release of stored energy could cause injury to employees. This standard establishes minimum performance requirements for the control of such hazardous energy. For example, if equipment is under maintenance, repair, or is otherwise unsafe to use, it must be “locked” and “tagged out” to render it safe and inoperable.

3.13.1 Program Elements

- Lock and tag devices used
- Procedures for applying and removing locks and tags
- Temporary removal and emergency removal procedures
- Tagout-only procedures
- Equipment-specific written procedures for *each* machine unless exempt
- Annual program review

3.13.2 Departments that are required to participate in this program and training

- C&ED – Traffic Electrical
- PRN – Building Services
- PRN – Solid Waste, Compost
- PW – Airport Maintenance
- PW – Wastewater
- PW – Water

3.13.3 Findings

1) Written Program

Issue

Activities performed by personnel indicate that Lockout Tagout (LOTO) functions are performed by several departments. With the exception of the Wastewater division, no written LOTO programs were provided for review.

Corrective Action

- a) The wastewater LOTO program is appropriate for its operations. The only adjustment that we suggest is to revise the program so that it is specific to Cal/OSHA regulations as opposed to federal OSHA.
- b) Develop a City wide written LOTO Program. Include within the program the individuals responsible for the implementation of the LOTO program. It is recommended that specific employee positions or actual employee names be inserted into the program.

2) Equipment Specific Procedures

Issue

No written equipment specific procedures were provided for review with the exception of the wastewater department. The wastewater department LOTO specific procedures meet the requirements of the regulation.

Corrective Action

Write equipment specific LOTO procedures. Develop a standard format so that employees may write additional procedures when new equipment is purchased or placed in service. The wastewater format would be appropriate for use by other departments.

3.14 PERSONAL PROTECTIVE EQUIPMENT POLICY (PPE)

8 CCR § 3380, 3382, 3383, 3384, 3385. The PPE policy determines what PPE (safety glasses, safety shoes, gloves, etc.) are to be worn by which group of employees under what circumstances. The policy is to require PPE be provided at no additional cost to the employees and the frequency in which PPE can be obtained.

3.14.1 Program Elements

- Responsibilities
- Hazard Assessment and PPE Selection
- Protective Devices
- Inspection & Maintenance of PPE
- Storage of PPE
- Training and Recordkeeping

3.14.2 Departments that are required to participate in this program and training

- C&ED – All Employees except administrative staff
- Fire Department – All employees
- Police Department – All Employees
- PRN – Parks
- PRN – Forestry
- PRN - Building Services
- PRN – Solid Waste
- PW – All employees except administrative staff

3.14.3 Findings

1) Written Program

Issue

City of Modesto employees are required to wear personal protective equipment to perform certain job functions. City of Modesto provides the equipment at no cost to employees. The PPE Programs submitted for were part of an IIPP program that was developed in 1992. The program addresses PPE available to employees, but does not address all the required program elements. Discussions with employees indicated that they were not familiar with outdated document. Exception: The Fire department has a complete personal protective policy.

Corrective Action

- a) Develop a City wide personal protective equipment policy that addresses each of the program elements listed above. Upon completion of the program, train all affected employees.
- b) No Corrective action is necessary for the Fire Departments program.

2) PPE Hazard Assessments

Issue

No completed PPE hazard assessments were provided for review. Some departments included elements of a hazard assessment in their standard operating procedures; but consistency throughout the City is lacking. Note: The Fire Departments PPE program meets the requirements of the hazard assessment.

Corrective Action

- a) Conduct PPE assessments (i.e. hazard assessment) to identify what type of PPE is required when performing each job duty and/or when using each piece of hazardous equipment. The assessment must include the area assessed, date, and name of the person who performed the assessment.
- b) No corrective action required for the fire department.

3) PPE/Gloves SOP - Laboratory

Issue

The laboratory has prepared an SOP to address the wearing of gloves within the laboratory and while conducting activities outside the laboratory. The SOP is sufficient for describing when and where to use gloves for laboratory duties. However, sections of the document also reference respiratory protection and eye protection. The references do not provide the same detail that is provided for the gloves.

Corrective Action

Develop an SOP for safety glasses and other PPE used within the laboratory. A single policy could be written that address all of the PPE (except for respirators) that is required to be used within the laboratory.

3.15 RESPIRATORY PROTECTION PROGRAM

8 CCR § 5144. The standard requires the employer to designate a program administrator who is qualified to administer the program. The employer must identify and evaluate respiratory hazards in the workplace. Employees must be fit tested annually with the respirators they will be using. Prior to being fit tested all employees must undergo a medical evaluation by a physician (or other professionally licensed healthcare provider). As part of the medical evaluation, it is strongly recommended that employees undergo pulmonary function testing.

3.15.1 Program Elements

- Proper respirator use
- Cartridge selection for materials used
- Cartridge life determination
- Permissible exposure limits
- Cleaning and storage of requirements
- Medical testing, fit testing, and access to medical records

3.15.2 Departments that are required to participate in this program and training

- C&ED – Traffic Operations
- Fire Department
- Police Department
- PW – Airport Maintenance
- PW – Fleet
- PW – Streets
- PW – Wastewater
- PW – Water

3.15.3 Findings

1) Written Program – Fire Department.

Issue

The Fire Department provided a written Respiratory Protection program and procedures for cleaning and maintaining respirators. The program addresses all of the required elements by CAL/OSHA. The program is lacking in that it does not reference department related procedures such as V3-A28 and V3-A51 that describe cleaning and maintenance and SCBA procedures; appendices that are referenced in the program were not included in the document; and there does not appear to be an annual review for the program's effectiveness.

Corrective Action

- a) Review program annually to ensure that the program is effective. Document each annual review.
- b) Incorporate by reference all existing procedures related to respiratory protection.
- c) Include appendices that are referenced in the program.

2) Written Program – City Wide

Issue

Employees wear filtering face pieces (e.g. N95 dust mask), NIOSH approved tight fitting respirators, and supplied air respirators to protect against respiratory hazards they may come in contact with during the course of their job duties. No written program (excluding the Fire Department) was available for review.

Corrective Action

Develop a written Respiratory Protection Program for the employees who wear respirators during the course of their duties and/or as voluntary use. Include written procedures and methodologies for determining containment concentrations and what constitutes normal work conditions.

3) Medical Evaluations

Issue

Interviews with management indicate that medical evaluations have been conducted for employees who are required to wear respirators to determine if they are medically cleared to wear a respirator. Du-All Safety was unable to confirm whether or not all employees wearing respirators have in fact been medically evaluated.

Corrective Action

All employees who wear a respirator (excluding dust masks or N95 filtering face pieces when used for nuisance dust) are required to be medically evaluated by a physician or a licensed health care professional (PLHCP). Managers and Supervisors of employees who are required to wear, or voluntarily wear respirators must ensure that the employees are medically cleared. The City can require employees to complete the CAL/OSHA medical questionnaire and submit them to PLHCP for review.

4) Fit Testing

Issue

Employees wear NIOSH approved respirators to protect against respiratory hazards. The City provides fit testing for all individuals who are required to wear respirators.

Corrective Action

No corrective action necessary. Continue to conduct fit testing is to be conducted annually.

5) Water Quality Control Facility Written Program - General

Issue

The Respiratory Protection program for the Water Quality Control Facility is a comprehensive document that includes general procedures for the development of a respiratory protection program and selection of all types of respirators available to

industry. The document is a combination of a “how to manual” and program that requires revisions to address the specific circumstances for the Water Quality Control Facility. In reviewing the program, several passages in Sections 1 – 10 are taken directly from the publically available resource “Respiratory Protection in the Work Place, A Practical Guide for Small Business Employer” prepared by CAL/OSHA Consultation Services Educational Unit. While this material is not copyright protected, the guide is meant to assist in the development of a respiratory program, and not a template to be adopted as the program. Furthermore, the inclusion of such verbiage in the program does not add to the understanding for employees as to when and where they are to wear respirators.

Corrective Action

Delete passages in program that describe how to develop and implement a respiratory program. This will considerably shorten the program and make it easier for an employee to read and understand. The CAL/OSHA Consultation Services Education Unit respiratory protection guide can be included as an appendix rather than broken up in the body of the program.

6) Water Quality Control Facility Written Program – Facility Specific Information

Issue

The tables at the end of the document have not been completed. For this program, the tables are the portion of the document that distinguishes the program from being generic to being facility specific. Completion of the tables is required for the program to be considered complaint.

Corrective Action

Revise the respiratory protection program to address specific circumstances for the water quality control division. Revisions are to at a minimum include the following: name a program administrator, describe specific respirators used at the facility, describe the activities that require the use of a respirator, establish a change out schedule for cartridges and canisters, name the PLHCP, include a list of all employees in the program, and conduct an annual program evaluation. Completion of the tables at the end of the document would be sufficient.

3.16 WORKPLACE VIOLENCE

8 CCR 3203. A Workplace Violence program should be developed under the general guidelines of the Injury and Illness Prevention Program if the employer has determined that workplace violence is a potential safety hazard. The policy establishes the responsibilities of managers, supervisors and employees with regards to incidents involving workplace violence

3.16.1 Elements

- Responsibilities of managers and supervisors in training employees on procedures to follow if they are a witness to or victim of workplace violence.
- Investigation procedures into claims of workplace violence.
- Practices that are prohibited by employees such as threats or bringing certain weapons on city owned property.
- Procedures to protect employees from retaliation.

3.16.2 Departments that are required to participate in this program and training

- All City employees

3.16.3 Findings

1) Written Program

Issue

The workplace violence policy is included as part of the Risk Management Handbook that is issued to employees. The policy is clear, concise and addresses the program elements listed above except for procedures to protect employees from retaliation.

Corrective Action

Revise the workplace violence policy to include procedures that protect employees from retaliation.

4.0 EMPLOYEE SAFETY TRAINING

Quality safety training for employees is a key element of an effective safety program. Training needs to be the consistent and ongoing to meet employees' needs. Safety coordinators and supervisors need to be trained on their responsibilities and the rights of the employees. Individual employee plans mentioned in the previous sections each have a training component. In addition to these program training requirements, the following is a list of classes that are required for certain operations, but are not required to have written programs.

- Crane & Hoist: Employees who use cranes and hoists need to be trained, and retrained annually.
- Department of Transportation (DOT): Employees responsible for operating certain regulated vehicles need to be properly trained and licensed, and their supervisors must also have specific training.
- Hazardous Waste: Personnel who handle hazardous waste have mandatory training requirements, with annual refresher training.
- Forklift Training: Power Industrial Trucks are required to be conducted.
- First Aid/CPR: This training must be provided to some employees if a medical facility or other emergency medical assistance is not in near proximity to the workplace or worksite.
- New Employees: New employees should be trained before they are assigned to high-hazard work. New employee safety orientation material should include overviews of all of the environmental health and safety programs in the departments and the persons to contact (safety coordinators) for more information on it.
- Codes of Safe Practice: The "Code of Safe Practices" is part of this training for work that is regulated under California's Construction Safety Orders.
- Work Zone Safety: Employee responsible for closing streets, acting as flaggers, and working in traffic area.

4.1.1 Findings

1) Training Matrix

Issue

The City does not use a safety- training matrix and/or training log that shows the dates and topics of training completed. Some individual departments such as the Wastewater division, Fire Department, Water, and Streets Division have a training calendar or list of required trainings that their group participates in on a regular basis. However, there is no standard format City Wide.

Corrective Action

Use a standard format throughout the City to document employee training requirements. Attached to this report is a training matrix that can be revised to accommodate the City.

2) **Recordkeeping**

Issue

City of Modesto has records that indicated that employee training is being conducted on a regular basis. The records included sign in sheets, certifications, and an Excel spreadsheet summarizing employee attendance. Some of the sign in sheets were lacking required information such as the time the training took place and the length of the class.

Corrective Action

Continue to maintain copies of certifications awarded from trainings and the Excel spread sheet to track training. Create a standard format that is to be utilized by City personnel for a training sign in sheet for classes that are conducted at City of Modesto.

5.0 ENVIRONMENTAL COMPLAINTS

The safety assessment is limited to those programs that primarily fall under the jurisdiction of Cal/OSHA. However, many programs that are part of environmental compliance also have components to them that overlap with safety. As such, it is important for those who are responsible for safety compliance to also be aware of the environmental compliance, particularly when there is overlap. Upon request, Du-All Safety can conduct an Environmental Assessment to determine the compliance status for City of Modesto operations. The following is a list of environmental compliance programs that are applicable to the operations at City of Modesto.

Clean Air Act (CAA), Air Permit Compliance: Facilities that generate emissions regulated by the local air district (San Joaquin Valley Air District or SJVAD) (e.g. back-up power generators, laboratory chemicals, paint booths, gasoline tanks, etc.). **City of Modesto has generators, above ground storage tanks that require air permits.**

Clean Air Act (CAA), Section 609 and 608: Facilities that maintain or repair, motor vehicle air conditioners (MVAC) or stationary air conditioners. **City of Modesto conducts building maintenance and vehicle maintenance.**

Hazard Communication (employee Right to Know): Facilities where the employees are exposed to hazardous materials as part of their job. **See Section 3.9.**

Hazardous Materials Business (or management) Plan (HMBP or HMMP): Facilities that use/store regulated materials in quantities equal to or greater than 55 gallons for liquids, 200 cubic feet for gases and 500 pounds for solids. **The Corporation Yard and Elm Street buildings, swimming pool, wastewater treatment plants, fire stations, police station, police garage, numerous pump stations and other locations have materials above the reporting threshold.**

Hazardous Waste Management Program (Resource Conservation and Recovery Act (RCRA)): Facilities that generate hazardous waste. **The Corporation Yard, Fire Stations, Wastewater plants, police garage, and the Compost Facility generate hazardous waste.**

Spill Prevention, Control and Countermeasure (SPCC) Plan: Facilities with an aggregate aboveground oil (i.e. motor oil, gasoline, diesel fuel, transmission fluid, etc) storage capacity of the facility exceeds 1,320 gallons or underground capacity exceeding 42,000 gallons. **The Corporation Yard and Wastewater Plant require an SPCC.**

Storm Water Pollution Prevention Plan (SWPPP): Any facility that has outdoor operations or storage of hazardous materials that may come into contact with storm water. **The corporation yard will be required to have a SWPPP when servicing buses.**

6.0 CONCLUSION

The safety assessment for the City of Modesto identified areas of compliance that need improvement and/or revision. Meeting and sustaining compliance will involve continually updating the identified written programs, employee training, and routine inspections to identify and correct hazards. Du-All Safety recommends that City of Modesto develop and approve a plan of action to address the findings in this assessment to aid in reaching its safety compliance goals. Du-All Safety has provided a draft plan of action to assist in this process. The draft plan of action is included (Attachment 2).

**ATTACHMENT 1
PLAN OF ACTION**



2012/2013 Safety Plan of Action

Month	Safety Compliance Activity
June '12	<ul style="list-style-type: none"> • Develop two safety committee (City Wide & Public Works) and conduct training • Approve Safety Plan of Action(s) • Approve EH&S Training Matrix • Update Injury & Illness Prevention Program
July '12	<ul style="list-style-type: none"> • Conduct Safety Inspection – of all City-owned buildings • Safety Committee Meeting • Update Injury & Illness Prevention Program continued • Develop Heat Illness Prevention Program • Training: Traffic and Flagger Training (Work Zone)
August '12	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Confined Space Program & Rescue Procedures • Confined Space Program Hazard Assessments • Training: Heat Illness Prevention (Multiple Sessions)
September '12	<ul style="list-style-type: none"> • Safety Committee Meeting • Confined Space Program Hazard Assessments continued • Develop Emergency Action Plans • Training: Injury and Illness Prevention Program (Multiple Sessions)
October '12	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Emergency Action Plans continued • Training: Confined Space Entry (Multiple Sessions)
November '12	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Exposure Control Plan (AKA Bloodborne Pathogen Program) • Training: Emergency Action Plan (Multiple Sessions)
December '12	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Fall Protection Program • Fall Protection Hazard Assessments • Offer Hepatitis B Vaccine to employees identified in the Exposure Control Program • Training: Ergonomics and Back Safety (Multiple Sessions)
January '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Fall Protection Hazard Assessments continued • Develop Hazard Communication Program • Conduct Chemical Inventory • Obtain Material Safety Data Sheets • Training: Exposure Control Plan/Bloodborne Pathogens (Multiple Sessions)



2012/2013 Safety Plan of Action

Month	Safety Compliance Activity
February '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Conduct Safety Inspection – High-hazard areas every 6 months as identified in the IIPP • Conduct Chemical Inventory continued • Obtain Material Safety Data Sheets continued • Training: Fall Protection (Multiple Sessions)
March '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Hearing Conservation Program • Conduct noise monitoring of equipment • Training: Heavy Equipment Operators (Earth-moving Equip) • Training: Hazard Communication (Multiple Sessions)
April '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Hot Work Program • Training: Supervisor's Accident Investigation (1 class) • Training: Title 22 Hazard Waste Management (1 class)
May '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop Lockout Tagout Program • Equipment specific procedures • Training: Hearing Conservation (Multiple Sessions) • Conduct annual hearing testing of employees exposed to loud equipment
June '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Lockout Tagout Equipment specific procedures continued • Develop Personal Protective Equipment Policy • Training: Hot work Program
July '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Conduct Annual Safety Inspection – of all City owned buildings • Develop Respiratory Protection Program • Training: Lockout Tagout and Electrical Safety (Multiple Sessions)
August '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Develop ATD Policy • Medical clearance for employees identified in the Respiratory Protection Program • Training: Personal Protective Equipment (Multiple Sessions)
September '13	<ul style="list-style-type: none"> • Safety Committee Meeting • Training: Respiratory Protection & qualitative fit testing (Multiple Sessions) • Training: ATD (Multiple Sessions) • Develop Workplace Violence Policy • Develop Plan of Action and Training Schedule for 2013/14

ATTACHMENT 2
DRAFT SAFETY TRAINING MATRIX

DRAFT The City of Modesto Environmental Health & Safety Training Matrix		Administration	C&ED Building Inspectors	C&ED - Traffic Electrical	C&ED - Traffic Operations	Fire Department	Police Department - Headquarters	PRN - Recreation	PRN - Building Services	PRN - Forestry	PRN - Parks	PRN - Solid Waste - Compost	PRN - Solid Waste - Greenwaste	PW - Airport Bldg. Maintenance	PW - Fleet	PW - Streets	PW - Wastewater - Collections	PW - Wastewater - Laboratory	PW - Wastewater - Maintenance & Ops	PW - Water	
Rev. 05.23.2012																					
Aerosol Transmissible Diseases - 8 CCR 5199	AT,I,W					X	X														
Asbestos - 8CCR 5208	AT, W		X						X								X		X	X	
Bloodborne Pathogens - 8 CCR 5193	AT,W					X	X	X			X						X	X	X	X	
Chemical Hygiene Plan - 8 CCR 5191	AO,I,W																	X			
Concrete Dust - 8 CCR 1530 - AT	AT,W								X							X			X	X	
Confined Space - 8 CCR 5157-5158	I,AO,W				X	X					X		X				X		X	X	
Fire Extinguisher - 8 CCR 6151	AT		X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X
First Aid/CPR/AED - 8 CCR 3400	B				X	X	X	X			X		X				X		X	X	
Hazardous Waste Management Title 22 CCR 66264.16	AT					X								X	X						
HazWoper (First Responder) - 8 CCR 5192	AT, W					X								X							
Hearing Conservation - 8 CCR 5095	AO, AT, W						X		X	X	X	X		X	X	X	X		X	X	
Heavy Equipment - 8 CCR 3664	AT			X	X							X	X	X	X	X	X		X	X	
Lead - 8 CCR 5198	AT, W																				
Lockout Tagout - 8 CCR 3314&2320	AO,I,W		X	X		X			X			X		X					X	X	
Pesticide Handler 8 CCR 5195	AT, W									X	X								X		
Respiratory Protection - 8 CCR 5144	AO,AT,I,W				X	X	X				X		X	X	X	X	X		X	X	
Spill Prev. Control and Countermeasure 40 CFR 112	AT, W													X	X				X		
Storm Water Pollution Prev. Plan	AT, W									X	X			X	X	X	X		X	X	
Accident Investigation - 8 CCR 3203	J																				
Back Safety - 8 CCR 5110 & 3203	J	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Crane or Hoisting Operations - 8 CCR 4485	J			X	X												X		X	X	
Driver Safety	J	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Electrical Safety - 8 CCR 2299 - 2974	I																				
Electrical Safety - High Voltage - 8 CCR 2700-2989	I																				
Electrical Safety - Low Voltage - 8 CCR 2299-2599	I																				

AT=Annual Training Required
AO= Annual Other Required

B= Two Year Certificate
C= Three Year Certificate

I = Initially; W=written program
J= As Needed

DRAFT The City of Modesto Environmental Health & Safety Training Matrix		Administration	C&ED Building Inspectors	C&ED - Traffic Electrical	C&ED - Traffic Operations	Fire Department	Police Department - Headquarters	PRN - Recreation	PRN - Building Services	PRN - Forestry	PRN - Parks	PRN - Solid Waste - Compost	PRN - Solid Waste - Greenwaste	PW - Airport Bldg. Maintenance	PW - Fleet	PW - Streets	PW - Wastewater - Collections	PW - Wastewater - Laboratory	PW - Wastewater - Maintenance & Ops	PW - Water	
Elevating Work Platforms - 8 CCR Article 24	I																				
Emergency Action Plan - 8 CCR 3220	I,W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Ergonomics - 8 CCR 5110	J	X																			
Excavation, Trenching & Shoring - 8 CCR 1541; GC 4216	I					X											X		X	X	
Fall Protection - 8 CCR 1669 - 1678, 3210	I,W		X	X	X	X			X	X					X		X		X	X	
Forklift & Powered Industrial Trucks - 8 CCR 3649	I,C					X			X	X		X	X	X	X	X	X		X	X	
HazCom/Right to Know - 8 CCR 5194	I, W		X	X	X	X	X		X	X	X	X		X	X	X	X	X	X	X	X
Heat Illness Prevention - 8 CCR 3395	I, W		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Hot Work - 8 CCR 4848	I, W			X	X	X			X			X		X	X				X	X	
Injury & Illness Prevention Program - 8 CCR 3203	W	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Poison Oak & Bug Bites - 8 CCR 3203	I							X		X	X		X								
Portable Ladder Safety - 8 CCR 3276	I	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Power Lawn Mowers - 8 CCR 3563	I										X			X						X	
PPE: Personal Protective Equip. - 8 CCR 3380-3385	I		X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X
Safety for the Veteran Employee		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Safety Responsibilities for Supervisors - 8 CCR 3203	J																				
Scaffold Safety - 8 CCR 1637	J																				
Traffic Ops/Flagging/Lane Closure - 8 CCR 1598 & 1599	I															X	X				X
Tree Work - 8 CCR 3427	I									X											
Underground Locator - Operator - 8 CCR 1541				X	X											X	X				X
Underground Locator - Awareness - 8 CCR 1541				X	X											X	X				X
Workplace Violence - 8 CCR 3203	J	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

AT=Annual Training Required
AO= Annual Other Required

B= Two Year Certificate
C= Three Year Certificate

I = Initially; W=written program
J= As Needed

ATTACHMENT 3
FACILITY INSPECTION REPORT



City of Modesto SAFETY INSPECTION

Report Date: May 15, 2012

Date of Inspection: April 5, 2012

Locations Inspected: Sutter Wastewater Plant + two well sites
Fire Station 1
Police Department Headquarters

Point(s) of Contact: Nick Schuller, Wastewater; Ray Jackson, Fire Station 1;
Karen Robertson, Police Department

Inspected By: Joe Moulton, Du-All Safety

In accordance with City of Modesto's desire to maintain a safe work environment, a safety inspection was made of the location(s) listed above. Areas not in compliance have been indicated. A photo of the hazard may also be included. Items reported fall under one of the following: City of Modesto's , Injury and Illness Prevention Program (IIPP), Uniform Building and Fire Codes; Insurance Safety Rules and Guidelines; and Cal/OSHA regulations. These conditions require corrective action so as to ensure a safe and healthful workplace for employees and employer, and in some cases for the public.

The inspection table on the following pages can be used to track the hazard corrections for each finding. Simply initial the box next to the risk assessment number and note the date the hazard was corrected. The following Risk Assessment Classes were used to rate the hazards or violations identified during the safety inspection.

Risk Assessment Class

Class 1 - Critical (may cause death, serious injury, significant environmental impact, or substantial financial losses) and/or is likely to occur soon.

Class 2 - Serious (may cause injury, occupational illness, or environmental or property damage) and/or probably will occur in time.

Class 3 - Minor (probably would not affect personnel or environmental safety or health, but is a violation of specific criteria or best management practice).

The following observation/findings were identified during the current safety inspection.

Item #	Finding Description	Risk Class	Date fixed	Initial
Sutter Wastewater Plant – 4/5/2012				
1.	Building C: Hot work is being conducted without appropriate hot work permit. Conduct all hot work outside of designated areas under permit.	2		
2.	Building C: Air compressor permit for the maintenance building expires on May 24, 2012. Ensure that new permit is posted.	NA		
3.	Building C: Recommend revising NFPA diamond placard to include the Oxygen in the maintenance building.	3		
4.	Building C: Recommend developing SOP that requires individuals who are mixing herbicides near eyewash.	3		
5.	Laboratory: Recommend secondary containment for acid.	2		
6.	Laboratory: There is an eyewash station located in a closet area. The eyewash is blocked by equipment. Determine if this is supposed to be a functional eyewash. If yes, then provided clearance to access the unit. If not, then Tagout from use.	2		
Well Site - Torrid/Diablo – 4/5/2012				
7.	Ensure that the air is tested for all wet well sites prior to opening man holes covers regardless if a person is actually entering the space or not.	NA		
Well Site – Woodland/Poust – 4/5/2012				
8.	Woodland/Poust well site has a 260 gallon diesel fuel tank. No hazardous materials business plan with the required emergency contingency plan was on site. The site contact stated that at least nine (9) well sites have back up power standby generators onsite. Prepare an HMBP with the required contingency plan for each site that has a generator with fuel storage capacity of 55 gallons or greater. Keep a copy of the plan at the well site.	3		
9.	Label the exterior of the diesel fuel storage tank as “Diesel Fuel”.	3		
Police Department – 4/5/2012				
10.	Post Evacuation maps on the second floor of both buildings at head quarters.			
Fire Station 1 – 4/5/2012				
11.	Obtain Air Compressor Permits for all compressors. Post permit under glass near compressor	3		
12.	Oil was observed outside near the oil storage. Oil should be in closed containers.	2		

END OF REPORT.



City of Modesto

SAFETY INSPECTION

Report Date: May 15, 2012

Date of Inspection: April 9, 2012

Locations Inspected: Corporation Yard
Traffic Operations at Elm Street
Senior Center

Point(s) of Contact: Steve Fischio, Fleet; Dave Savidge, Water; Todd Rocha, Green Waste, Building Services, and Parks; Mike Hoesch, Forestry; Rodney Nelson, Traffic Electrical; Debbie Magdaleno, Traffic Operations; Shannon Park, Senior Center, Linda Adams, Risk Management

Inspected By: Joe Moulton, Du-All Safety

In accordance with City of Modesto's desire to maintain a safe work environment, a safety inspection was made of the location(s) listed above. Areas not in compliance have been indicated. A photo of the hazard may also be included. Items reported fall under one of the following: City of Modesto's , Injury and Illness Prevention Program (IIPP), Uniform Building and Fire Codes; Insurance Safety Rules and Guidelines; and Cal/OSHA regulations. These conditions require corrective action so as to ensure a safe and healthful workplace for employees and employer, and in some cases for the public.

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Class 3 - Minor (probably would not affect personnel or environmental safety or health, but is a violation of specific criteria or best management practice).

The following observation/findings were identified during the current safety inspection.

Item #	Finding Description	Risk Class	Date fixed	Initial
	Fleet – 4/9/2012			
1.	Welding Area: A Safety Kleen solvent was observed in the welding room. Designated welding areas are required to be free and clear of flammables and combustibles. Relocate the solvent tank.	1		
2.	Welding Area: Hot work appears to be conduct without a hot work permit. Ensure all hot work not conducted in the designated area is done under permit	3		
3.	Machine Room: Install anti-slip surface in front of grinders and machine tools.	3		
4.	Main Shop: Improve housekeeping indoors of the waste oil area. Oil was observed inside the secondary containment area.	2		
5.	Main Shop: Label all piping/lines that run into the shop that carry water, oil/ waste oil, etc. Lines are to be labeled every 20 feet, change of direction, or upon entry/exit though walls.	3		
6.	Main Shop: Circuit breakers require 36 inches of clearance. The panels in the shop are partially blocked.	3		
	Senior Center – 4/9/2012			
7.	The facility has an AED but is hesitant about making it available to all; currently it is in the office area. Recommend moving it to a location where all will see it and have access. The front lobby is a good spot.	Na		
	Elm Street – Traffic Operations – 4/9/2012			
8.	Obtain a pressure vessel permit for the air compressor at Elm Street. Post the permit behind glass near the compressor unit.	3		
9.	Parks, Forestry, Green Waste, buildings services – No deficiencies identified	NA		

END OF REPORT.



City of Modesto
SAFETY INSPECTION
Report Date: May 15, 2012

Date of Inspection: April 11, 2012

Locations Inspected: Jennings Wastewater Plant
Compost Facility at Jennings
PD Firing Range
Field Visits (Collections Crew and Water Division)
Pump Stations

Point(s) of Contact: Nick Schuller, Wastewater; Terry Spurgeon, Wastewater; Nathan Gorth, Compost; Linda Adams, Risk Management; Ronnie Flood, Water Division;

Inspected By: Joe Moulton, Du-All Safety

In accordance with City of Modesto's desire to maintain a safe work environment, a safety inspection was made of the location(s) listed above. Areas not in compliance have been indicated. A photo of the hazard may also be included. Items reported fall under one of the following: City of Modesto's , Injury and Illness Prevention Program (IIPP), Uniform Building and Fire Codes; Insurance Safety Rules and Guidelines; and Cal/OSHA regulations. These conditions require corrective action so as to ensure a safe and healthful workplace for employees and employer, and in some cases for the public.

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Class 3 - Minor (probably would not affect personnel or environmental safety or health, but is a violation of specific criteria or best management practice).

The following observation/findings were identified during the current safety inspection.

Item #	Finding Description	Risk Class	Date fixed	Initial
1.	Jennings Wastewater Plant – 4/11/2012			
2.	Shop A&B: Label the exterior doors to the oil room to notify other of the hazards associated with the room. Install NFPA placard.	2		
3.	Shop A&B: Install anti slip surface/mats in front of machinery shut as grinders and presses.	3		
4.	Contact Basin: Some areas contain a large amount of bird droppings. Employees who are responsible for cleaning these areas should receive specific training on the hazards associated with the droppings.			
	Field Visit – Collections Constructions – 4/11/2012			
5.	Du- All Safety observed the Collection Crew in the field. The Senior Equipment operator Marvin Cain was the lead onsite. Potential safety concerns onsite included lane closure in residential neighborhood, trench and shoring	Na		
	Field Visit – Water Division, El Vista and Miller – 4/11/2012			
6.	Traffic lane closure signage and cone usage was not sufficient. Review lane closure requirements with all employees. Specific deficiencies included failure to close left lane, failure to notify oncoming traffic on Miller that lanes ahead were closed.	3		
	Glendale-Colfax – Pump Station – 4/11/2012			
7.	No Significant safety discrepancies observed	NA		
	Tank 6 Yard – Pump Station – 4/11/2012			
8.	Label the exterior of the diesel storage tank. The tank needs to be labeled as diesel fuel and the hazard warning	2		
9.	Several 1 gallon containers observed onsite that appear to be waste. The containers were outside and exposed to the rain. Relocate indoors or under cover to protect from the elements. Recommend disposing the containers.	2		
	Compost Facility at Jennings – 4/11/2012			
10.	The compost facility has over 1320 gallons of aboveground storage capacity for oils (gasoline, diesel fuel, motor oil, etc.). As such they are required to prepare and implement a spill prevention control and counter measure plan (SPCC); no such plan was onsite. Develop and implement an SPCC plan.	2		
11.	Improving housekeeping of used oil area.	3		
12.	Conducted hazard assessment for cleaning out heavy equipment.	2		
	PD -firing Range – 4/11/2012			
13.	The maintenance area/yard at the police department firing range was not properly secured. Access to the equipment such as welding equipment and other items was not secured.	2		

END OF REPORT.



City of Modesto

SAFETY INSPECTION

Report Date: May 3, 2012

Date of Inspection: April 18, 2012

Locations Inspected: Airport Maintenance Shop
Airport Fire Department
Maddux Youth Center

Inspected By: Terry McCarthy, Du-All Safety

In accordance with City of Modesto's desire to maintain a safe work environment, a safety inspection was made of the location(s) listed above. Areas not in compliance have been indicated. A photo of the hazard may also be included. Items reported fall under one of the following: City of Modesto, Injury and Illness Prevention Program (IIPP), Uniform Building and Fire Codes; Insurance Safety Rules and Guidelines; and Cal/OSHA regulations. These conditions require corrective action so as to ensure a safe and healthful workplace for employees and employer, and in some cases for the public.

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Class 3 - Minor (probably would not affect personnel or environmental safety or health, but is a violation of specific criteria or best management practice).

The following observation/findings were identified during the current safety inspection.

Item #	Finding Description	Risk Class	Date fixed	Initial
Airport Maintenance Shop				
1.	Eyewash station should have monthly inspection and flush test documented.	2		
2.	Anti-slip surface needed for machine tools (saw, grinder, drill press).	2		
3.	Placard building needed to identify flammable gasses stored (welding tanks).	3		
4.	OSHA permit is needed for the air compressor and should be mounted at the compressor.	3		
5.	Tool rest is needed for grinder and should be adjusted within 1/8" of the wheel.	2		
6.	Clear the electrical panel 36"	2		
7.	Mount fire extinguishers every 75' and one within 10' of the flammable cabinet.	2		
8.	Repair the self-closing feature of the flammable cabinet and do not store materials in the bottom spill tray.	2		
Airport Fire Department				
9.	Anti-slip surface needed for machine tool (grinder).	2		
10.	Chain the compressed gas cylinders individually to the structure, not as a large group.	2		
Maddux Youth Center				
11.	Clear the sprinkler head 18" of all stored material in the kitchen.	3		
12.	Clean the microwave oven of illness hazards	3		
13.	Provide tags to clearly identify unsafe equipment as "Do Not Use", for example the Gym equipment with frayed cables	3		

END OF REPORT.