

Injury & Illness Prevention Program



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Section 1 Program Implementation

1.1. Purpose of the Program

The City of Wildomar ("City"), strives to maintain a work environment that protects the health and safety of its City personnel and prevents workplace injuries. As such, the purpose of this Injury and Illness Prevention Program ("IIPP") is for the continual improvement of health and safety in City operations and to prevent work-related injuries, accidents, and illnesses. This IIPP applies to all City personnel, including employees, interns, and volunteers, and complies with specific regulatory requirements of the California Occupational Safety and Health Administration (Cal/OSHA), specifically those provided under the California Code of Regulations, Title 8, Section 3203.

1.2. Department – Specific Policies and Procedures

The Administrator, in conjunction with each Department Head is responsible for the development of specific policies and procedures, as necessary, to cover hazards unique to their department, provide training on the written policies and procedures applicable to their department.

1.3. Responsibilities

Administrator

The Administrator has overall responsibility for ensuring the implementation of the IIPP for City personnel. The Administrator is appointed by the City Manager.

As the representative of the City for health and safety issues, the responsibilities of the Administrator include:

- Fully supporting this IIPP and ensuring its full implementation for City operations
- Ensuring adequate resources are available to provide for training, equipment, etc., for the effective implementation of this IIPP
- Tracking hazard reports and safety concerns through resolution. Providing technical assistance on health and safety issues and assisting Department Heads with the enforcement of health and safety rules and policies.
- Ensuring incident/accident investigations and reports are completed in a timely manner



- Performing periodic workplace evaluations to determine compliance with this IIPP and assess IIPP effectiveness
- Provide statistical reports regarding work-related injuries to Department Heads.
- Conducting regular workplace inspections for hazard identification and tracking hazard reports and safety concerns through resolution.
- Taking action to mitigate identified hazards.
- Ensuring availability of appropriate safety training for all personnel.
- Maintaining records of City personnel accidents, injuries, and medical records. reviewing revisions or additions of new procedures to assure that adequate health and safety measures are developed and implemented.
- Collecting, printing, and posting Cal-OSHA 300 Illness and Injury Log data.
- Investigating and reporting to Cal-OSHA serious injuries resulting in hospitalization or fatality and providing recommendations to prevent reoccurrence.

Department Heads

Each Department Head is responsible for implementing the IIPP within his/her department. Responsibilities include:

- Identifying safety and health hazards associated with their operations
- Implementing a system of periodic inspections, investigations, and incidents and correcting deficiencies according to this IIPP
- Ensuring department personnel receive pertinent health and safety training, including, discussion of any applicable safety and health policies and procedures and review of this IIPP during orientation, and when applicable, job-specific safety training prior to the assignment of City personnel to hazardous duties.
- Complying with recordkeeping requirements as specified by this IIPP
- Demonstrating leadership by following all safety rules, policies and procedures themselves
- Ensuring department compliance with health and safety rules, policies, and procedures
- Investigating accidents or *near misses* that result in, or may result in, personnel injuries and completing accident investigation reports



- Routinely inspecting their workplace for health and safety hazards and correcting these hazards

City Personnel

Ultimately, the responsibility for ensuring the effectiveness of the IIPP rests with all City personnel. All City personnel are responsible for:

- Fully complying with all elements of this IIPP
- Participating in training sessions and becoming familiar with the information provided
- Using protective equipment and devices as required
- Reporting unsafe practices/conditions to their Department Head
- Reporting all injuries, regardless of the severity, to their Department Head as soon as possible

1.4. Communication and City Personnel Participation

City Personnel Suggestions

All City personnel are required to notify their Department Head or the Administrator of any condition they perceive as a potential hazard. All City personnel are also encouraged to submit suggestions to the Administrator to enhance workplace health and safety. City personnel may also submit a suggestion, concern, or question (anonymously, if desired) using the form in Appendix A, "City Personnel Suggestion/Request for Safety Review" to their supervisors, department heads, or Administrator. In accordance with federal and state law, no City personnel will be retaliated against for reporting hazards or making suggestions related to health and safety.

Postings

Information related to health and safety will periodically be posted on City bulletin boards, via emails, posters or other means. City personnel should check regularly for updated information. Questions regarding postings should be directed to a Department Head.

1.5. Enforcement Procedures and Incentives

All City personnel are expected to comply with all safety and health policies, procedures and rules, including this IIPP. Failure to do so may result in disciplinary action according to the City's Personnel Rules and Regulations.



Section 2 City Personnel Training

2.1. City Personnel Training

All City personnel, including supervisors, are provided training and instruction on general and job-specific safety and health practices. Training and instruction are provided according to the following schedule: .

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

2.2. Training Resources

A number of resources are available for preparing City personnel training. A few web sites include:

www.dir.ca.gov/dosh/PubOrder.asp

www.cira-jpa.org

The CIRA web site has safety training resources in the Members Section.



Section 3 Recordkeeping and Documentation

3.1. General Recordkeeping Requirements

The City maintains records to document and track implementation of the City's IIPP in coordination with the City's adopted Records Retention Policy. In addition, health and safety records provide information necessary to learn from experience and determine actions necessary to improve the IIPP.

The Administrator is responsible for establishing and maintaining a system for maintaining the records described by this section.

The following records shall be retained on file for at least three (3) years, or as stated:

- Minutes of health and safety meetings.
- Documents that verify the City has maintained on-going two-way communication with all City personnel, i.e., information to City personnel on safety and health issues, new City personnel health and safety orientation checklists, City personnel suggestions and responses, City personnel submitted Corrective Action Requests
- All records of inspections/investigations including: date(s), person(s) who performed the inspection(s)/investigation(s), the unsafe conditions and work practices identified, and the corrective action(s) taken and date(s) of correction.
- Records reflecting the safety and health training received by City personnel. These records should contain the City personnel's name, training date, type of training, training materials, and identification of the trainer.
- Cal/OSHA injury and illness records must be retained for five (5) years.
- Exposure and medical records must be maintained for the duration of employment plus 30 years in accordance with Cal/OSHA regulations. This includes industrial hygiene monitoring reports and SDS information. This 30-year retention requirement does not apply to the following types of records:
 - Health insurance claims records maintained separately from the employer's medical program and its records;
 - First aid records (not including medical histories) of one-time treatment and subsequent observation of minor scratches, cuts, burns, splinters, and the like which do not involve medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job,



if made on site by a non-physician and if maintained separately from the employer's medical program and its records; and

- The medical records of City personnel who have worked for less than (1) year for the City need not be retained beyond the term of work if they are provided to the City personnel upon the termination of the working relationship.

3.2. Cal/OSHA Injury and Illness Reports

General

Cal/OSHA Injury and Illness Records must be completed for every injury and illness other than those requiring only first aid. Compliance with the regulations involves three important steps:

- Obtain a record on every injury or illness requiring medical treatment. For recordable cases, prepare an employer's report of occupational injury and illness (provided by the claims administrator/carrier).
- Record each injury or illness on the Cal/OSHA Log and Summary of Occupational Injuries or Illnesses, Cal/OSHA Form No. 300, according to the instructions provided.
- Complete a Cal/OSHA 301 Incident Report form.
- Every year, prepare the summary Cal/OSHA Form No. 300A, certify it (see below), post it no later than February 1, and keep it posted until April 30th in an area where City personnel can review it.

Record Retention

Per Cal/OSHA, the records listed above must be retained for at least five (5) years. The log and summary must be available for inspection and copying by representatives of Cal/OSHA and other specifically designated agencies. The log and annual summary must also be available to any present or former City personnel, or their designated representatives.

Incident Report Form

The Incident Report Form (301) must be completed whenever a recordable injury/illness occurs. The report must be completed within seven calendar days after it is determined that a recordable case has occurred.

Cal/OSHA Log Form 300

The Cal/OSHA Form 300 is a running log of recordable injuries and illnesses during the year. A recordable injury or illness is any work-related injury or illness that results in:



- Fatality
- Lost workdays
- Injuries or illnesses resulting in a transfer to another job or in termination of employment
- Injuries or illnesses requiring medical treatment (other than first aid)
- Injuries or illnesses that involve a loss of consciousness or restriction of work (or motion)
- A diagnosed occupational illness reported by a physician

The entries on the log must be made as early as practicable but no later than seven calendar days after learning that a recordable injury/illness has occurred. When recording the injury or illness on the Cal/OSHA Form 300, the City personnel's name must be omitted if the injury or illness raises a privacy concern, the following injuries or illnesses are the only injuries or illnesses that are considered privacy concerns:

- An injury or illness to an intimate body part or the reproductive;
- An injury or illness resulting from a sexual assault;
- Mental illnesses;
- HIV infection, hepatitis, or tuberculosis;
- Needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material; and
- Other illnesses, if the City personnel independently and voluntarily requests that his or her name not be entered on the log.



Reporting a Death or Serious Injury

Cal/OSHA regulations require employers to report via phone call to the nearest Cal/OSHA district office if any of the following occurs:

- any City personnel is seriously injured on the job
- any City personnel suffers a serious job-related illness
- any City personnel suffers a fatal injury

The nearest Cal/OSHA district office is:

<p>San Bernardino Office 464 W. 4th Street, Ste. 332 San Bernardino, CA 92401 909-383-4321 Fax 909-383-6789</p>

The injury or illness is defined as serious if:

- the City personnel is hospitalized for more than 24 hours for reasons other than medical observation
- the City personnel loses any part of the body or suffers permanent disfigurement, broken bone, etc.

The report must be made immediately but not longer than eight (8) hours after the employer knows or with diligent inquiry would have known of the death or serious injury or illness. The report can be by telephone, or fax and must include:

- Time and date of the accident
- Employer's name, address, and telephone number
- Name and job title of the person reporting the accident
- Address where the accident occurred
- Name of contact person
- Name and address of the injured City personnel
- Nature of the injury
- Location where the injured person was moved (hospital)
- A description of the accident and whether the accident scene or any of the equipment or machinery has been altered



3.3. Exposure and Medical Records

General Requirements

All City personnel exposure and appropriate medical records are retained in files managed by the City Manager, or designee. Exposure and medical records will be retained for the duration of employment plus thirty years, according to Cal/OSHA regulations.

Current and former City personnel, or their designees, who wish to have a copy of their records may do so by submitting a written request to the City Manager, or designee. The records will be provided within fifteen days according to the regulations.

Medical and Exposure Records

Medical records consist of physician and employment questionnaires or histories, medical laboratory results, medical opinions, diagnoses, treatments, etc., including any medical surveillance records for respirator users.

Exposure records consist of industrial hygiene monitoring data, environmental monitoring data, biological monitoring data, incident and accident reports relating to exposure to a hazardous substance, and material safety data sheets.



Section 4 Hazard Identification and Control

4.1. Periodic Inspections of Workplace Hazards

Periodic inspections to identify and evaluate workplace hazards shall be completed. These periodic inspections aim to identify potential hazards so that they can be corrected before an accident occurs. Regular self-inspections are an essential part of this IIPP. Inspections should include a physical inspection of the premises, as well as identification of unsafe work practices.

Periodic inspections are performed according to the following schedule:

- Annual audit of all City facilities.
- When the City initially established this IIPP.
- When new substances, processes, procedures, or equipment that present potential new hazards are introduced into the workplace.
- When new, previously unidentified hazards are recognized.
- When occupational injuries and illnesses occur.
- When the City hires and/or reassigns permanent or intermittent City personnel to processes, operations, or tasks for which a hazard evaluation has not been previously conducted.
- Whenever workplace conditions warrant an inspection.

Periodic inspections can be performed by any of the following:

- Department Heads
- Supervisors
- Administrators

Periodic inspections consist of identifying and evaluating workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist in Appendix B and other effective methods to identify and evaluate workplace hazards.

Departments engaged in hazardous operations are strongly encouraged to schedule more frequent monthly, weekly, or daily inspections, depending on the operation. Inspection recommendations will be made to the Department Head and shared with the Administrator.

Supervisors are responsible for the safety of the physical conditions in which their subordinates work. Each supervisor will make frequent work area



inspections, and recommendations for correcting unsafe conditions will be made through normal channels of authority and procedures.

Monthly inspections are required for the following items:

- all emergency and first aid equipment
- emergency eyewashes
- fire extinguishers
- first aid kits

Inspections should also evaluate the effectiveness of specific programs and procedures.

Documentation

All inspections will be documented and records of all inspections, including documentation of any follow-up measures, will be submitted to the Administrator for review and filing. Corrective action will be tracked using the form supplied in Appendix A. The Administrator is responsible for ensuring all deficiencies are documented on this form and tracking the progress and completion of corrective actions.

4.2. Incident and Accident Investigations

In general, all incidents should be investigated even if no injury occurs. The underlying cause of a non-injury may contribute to a more serious accident if the cause is not corrected. The Department Head, in conjunction with the Administrator, is responsible for investigation of all accidents and incidents.

In the event of a serious injury, illness, or fatality, the Administrator will report the incident immediately to the City Manager. The City Manager will ensure the incident is reported by phone or facsimile to the nearest office of the Cal/OSHA's Division of Occupational Safety and Health.

Accident Investigation

It is the policy of the City to carry out a thorough program of workplace accident, injury, illness, and hazardous substance exposure investigation. The Administrator will be primarily responsible for making an investigation of all such occurrences. Investigation of near-miss incidents should also be performed when reported.

All investigation facts, findings, and recommendations will be fully documented. The report will be submitted to the Administrator for review and filing. An example report is provided in Appendix A.



The following forms must be completed, as applicable, in relation to an Accident Investigation Report:

- Short Form Accident or Injury (injuries not requiring medical attention);
- Employer's Report of Occupational Injury or Illness (Form 5020) (Injuries requiring medical attention)
- Workers' Compensation Claim Form (DWC1) (Injuries requiring medical attention)

Moreover, the Administrator, or designee, must complete the Cal/OSHA Log Form 300 and the Incident Report Form 301. They must also provide a copy of all information to the insurance claims adjuster and discuss the file with him/her.

The following procedure applies to investigating accidents, injuries and illnesses and hazardous substance exposures:

- Contact emergency medical assistance if necessary;
- Visit the scene as soon as possible;
- Interview injured City personnel and witnesses
- Determine the causes(s) of the accident or exposure
- Take corrective action to prevent the accident or exposure from reoccurring

4.3. Correction of Identified Hazards

To the extent feasible, management will eliminate or correct all unsafe or unhealthy work conditions in a timely manner when a hazard is observed or as soon as it is discovered. However, some corrective actions may be more protracted; the priority will be assigned to serious or imminent hazards. When an imminent hazard exists which cannot be immediately abated without endangering City personnel and/or property, the City will remove all exposed City personnel from the area except those necessary to correct the existing condition. City personnel who are required to correct the hazardous condition will be provided with the necessary protection and training. .

When deficiencies are found during inspections, a "Corrective Action Request" (Appendix A) must be completed and issued to the Administrator. The person assigned to the task shall be given a time to complete the action. The Administrator shall re-inspect the problem area to ensure that adequate corrective actions have been taken. The results shall be submitted to the Administrator for review and evaluation.



Steps implemented and completion dates shall be documented on the “Corrective Action Request”, Appendix A. While a corrective measure is in progress, precautions will be implemented to protect affected City personnel.



Section 5 Health and Safety Rules and Procedures

5.1. General Rules

Health and safety is a cooperative undertaking requiring participation by all City personnel.

All City personnel are responsible for knowing and following health & safety rules; compliance with safe work practices will be evaluated continuously.

The following general rules will be provided to all City personnel when first hired and during the IIPP training. Department-specific rules should be developed to be more applicable to the respective hazards of the department's workplace, including field work as applicable.

- City personnel will be informed of the provisions of this IIPP
- City personnel will receive recognition for performing safe and healthful work practices. This recognition may be accomplished by providing positive comments on City personnel's performance reviews.
- City personnel who fail to comply with safe and healthful work practices may be subject to fair and consistent discipline in accordance with the City's Personnel Rules and Regulations
- Report any work-related injury or illness.
- All work must be performed only by personnel who have been trained in the specific tasks.
- All safety rules and procedures must be followed. Whenever personal protective equipment is issued to City personnel, appropriate training in use and care of the equipment will be provided.
- Computer workstations should be designed according to the Cal/OSHA ergonomic guidelines.
- No equipment will be used that requires repair or is otherwise unsafe.
- Keep aisles, exit doors and stairways clear at all times; these areas should not be used for storage, even temporarily.
- Secure items for earthquake safety.
- Keep fire extinguisher stations clear and accessible. Do not store materials in front of fire extinguishers or other emergency equipment.
- Know the location of the evacuation plan and emergency exits.



- Only trained personnel may attempt to respond to a fire or other emergency.
- Do not use electrical equipment that has frayed cords or is otherwise defective.
- Plug all electrical equipment into appropriate wall receptacles. Extension cords may be used only on a temporary basis when using portable equipment.
- Three-pronged plugs must be used to ensure continuity of ground.
- Do not store materials in front of electrical boxes or controls for a distance of 36".
- Use proper lifting techniques as instructed and get assistance with heavy items.
- Read and follow postings and warning signs.
- Always use rolling step stools or ladders (not chairs, wastebaskets, etc.) to reach elevated or overhead objects or materials.
- Never stack heavy objects or materials precariously on top of file cabinets, bookcases or other relatively high places.

5.2. Specific Department Rules

The Administrator, in conjunction with the Department Heads, shall prepare rules specific to their individual departments and provide training to all City personnel.



Section 6 IIPP Evaluation

The Administrator is responsible for performing, or arranging for, an annual review of this IIPP to ensure its continued effectiveness. The IIPP will be modified as necessary to enhance protection of health and safety for all City personnel. The following checklist was prepared by Cal/OSHA and can be used for the annual review of the IIPP.

- ✓ Is the person or persons with authority and responsibility for implementing the IIPP identified?
- ✓ Is there a system for ensuring that all City personnel comply with safe and healthy work practices (i.e. incentives, training and retraining programs, and or disciplinary measures)?
- ✓ Is there a system that provides communication with affected City personnel on occupational safety and health matters (i.e. meetings, training programs, postings, written communication, a system of anonymous notification concerning hazards)?
- ✓ Does the communication system include provisions designed to encourage all City personnel to inform the employer of hazards at the worksite without fear of reprisal?
- ✓ Is there a system for identifying and evaluating workplace hazards?
- ✓ Were workplace hazards identified when the IIPP was first established?
- ✓ Are periodic inspections for safety and health hazards scheduled?
- ✓ Are records kept of inspections made to identify unsafe conditions and work practices?
- ✓ Is there an accident and near-miss investigation procedure?
- ✓ Are unsafe or unhealthy conditions and work practices corrected expeditiously, with the most hazardous exposures given correction priority?
- ✓ Are all City personnel protected from serious or imminent hazards until they are corrected?
- ✓ Have all City personnel received training in general safe and healthy work practices?
- ✓ Do all City personnel know the safety and health hazards specific to their job assignments?
- ✓ Is training provided for all City personnel when the training IIPP is first established?



- ✓ Is training provided to all new City personnel, and those given new job assignments?
- ✓ Are training needs of all City personnel evaluated whenever new substances, processes, procedures or equipment are introduced to the workplace and whenever the employer receives notification of a new or previously unrecognized hazard?
- ✓ Are Department Heads knowledgeable of the safety and health hazards to which all City personnel under their immediate direction and control may be exposed?
- ✓ Are records kept to document safety and health training for all City personnel by name or other identifier, training dates, type(s) of training and training providers?

Appendix A Health and Safety Forms

Corrective Action Request

City Personnel Suggestion/Request for Safety Review

New City Personnel Orientation Checklist

Health & Safety Training Documentation

Accident/Incident Investigation Forms

CORRECTIVE ACTION REQUEST

Department:

Date:

Item Description/Location:

Description of Condition:

Observer:

The above condition requires prompt action for correction or resolution.

Corrective action or response is requested from:

On or before:

Proposed action to resolve this problem and/or proposed measures to prevent recurrence:

Review of implemented corrective action:

Acceptable: Yes No (Remarks below)

Administrator:

Date:

Distribution:

CITY PERSONNEL SAFETY SUGGESTION/REQUEST FOR SAFETY REVIEW

Instructions: City Personnel should complete the first item and submit the form to their supervisor or the Administrator. This form may be submitted anonymously.

Name (optional) _____ Date _____

Area/Department _____

Health and Safety Suggestion/Suspected Hazard:

Response by Dept. Head:

Date

- ☐ Action Required
☐ No Action Required

Reason:

Dept. Head

Signature: _____

Final Disposition:

Action Taken:

Administrator Approval:

Signature: _____ Date _____

CITY PERSONNEL ACKNOWLEDGMENT FORM

I _____ (*print name*), hereby acknowledge that I have received, read, and understand the City of Wildomar Injury and Illness Prevention Program. I agree to conform to all City practices, rules, and regulations related to safe work performance. I understand that my failure to follow these safety procedures, as detailed in this IIPP, will result in disciplinary action, including and up to termination. I further understand that:

- It is my responsibility to report all unsafe conditions or violations of the IIPP to my supervisor or other management personnel to minimize the potential of injury to myself or others.
- I am encouraged to inform my immediate supervisor of any hazards at the worksite without fear of reprisal, however, if for any reason I am not comfortable reporting any such potential hazard to my supervisor I am encouraged to contact the Administrator. If the Administrator is my supervisor, and if for any reason I am not comfortable reporting potential worksite hazard to my supervisor, then I am encouraged to report such hazard to the City Manager.

City Personnel Signature _____ Date _____

Supervisor Signature _____ Date _____

HEALTH & SAFETY TRAINING ATTENDANCE ROSTER	
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Date: _____

Location of Training:

Training Conducted By:

Instructor:

<p>Training Content: See attached summary</p>
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[illegible]

Accident or Incident Investigation Form

Instructions: Department Head should complete this form and process it through the Administrator.

Person's Name

Date & Time of Accident/Incident

Area/Department

Description of the Accident/Incident:

Preventive Actions Recommended:

Corrective Actions Taken:

Management Review & Comments:

Signature:

_____Date_____

Appendix B Cal/OSHA Workplace Inspection Checklist

The following checklist is a summary of an extensive list for workplace inspections and available at the Cal/OSHA web site at:

www.dir.ca.gov/dosh/dosh_publications/iiphihzemp.html

Cal/OSHA HAZARD ASSESSMENT SUMMARY CHECKLIST

*The following topics are summarized from the checklist
available at the Cal/OSHA website at:
www.dir.ca.gov/dosh/dosh_publications/iiphihzemp.html*

- ABRASIVE WHEEL EQUIPMENT GRINDERS
- COMPRESSED AIR RECEIVERS
- COMPRESSED GAS & CYLINDERS
- COMPRESSORS & COMPRESSED AIR
- CONTROL OF HARMFUL SUBSTANCES BY VENTILATION
- ELECTRICAL
- ELEVATED SURFACES
- EMERGENCY ACTION PLAN
- ENTERING CONFINED SPACES
- ENVIRONMENTAL CONTROLS
- ERGONOMICS
- EXIT DOORS
- EXITING OR EGRESS
- FIRE PROTECTION
- FLAMMABLE & COMBUSTIBLE MATERIALS
- FLOOR & WALL OPENINGS
- FUELING
- GENERAL WORK ENVIRONMENT

- HAND TOOLS & EQUIPMENT
- HAZARDOUS CHEMICAL EXPOSURES
- HAZARDOUS SUBSTANCES COMMUNICATION
- HOIST & AUXILIARY EQUIPMENT
- IDENTIFICATION OF PIPING SYSTEMS
- INDUSTRIAL TRUCKS - FORKLIFTS
- INFECTION CONTROL
- LOCKOUT BLOCKOUT PROCEDURES
- MACHINE GUARDING
- MATERIAL HANDLING
- NOISE
- PERSONAL PROTECTIVE EQUIPMENT & CLOTHING
- PORTABLE (POWER OPERATED) TOOLS & EQUIPMENT
- PORTABLE LADDERS
- POWDER ACTUATED TOOLS
- SANITIZING EQUIPMENT & CLOTHING
- SPRAYING OPERATIONS
- STAIRS & STAIRWAYS
- TIRE INFLATION
- TRANSPORTING EMPLOYEES & MATERIALS
- VENTILATION FOR INDOOR AIR QUALITY
- WALKWAYS
- WELDING, CUTTING & BRAZING