



YOUR BEST PROTECTION

August 26, 2021

Mr. Federico Barajas, Executive Director/General Manager
San Luis & Delta-Mendota Water Authority
P.O. Box 2157
Los Banos, California 93635-2157

**Re: Liability, Property, Workers' Compensation Risk Assessment
and Occupational Safety and Health Status Updates**

Dear Mr. Barajas:

It was a pleasure meeting with Pablo Arroyave, Chief Operating Officer; Laures Stiles, Director of Human Resources and Administration; and Frank Ramos, Safety Officer on August 3, 2021. The purpose was to obtain an update on operations, discuss prior risk assessment or consultation visits, and identify Authority requests for assistance. Below are highlights of our discussions and related JPIA resources.

SLMDWA Operational Updates

Frank shared that immediate health and safety improvements were with the Authority's Confined Space program. Frank learned that the Authority did not have a Confined Space rescue plan or team. In our meeting, I learned that the Authority now has a trained and equipped rescue team at its O'Neill Pumping Plant and when necessary, they can be onsite at other Authority facilities when entries require a rescue team. I strongly encourage the Authority to submit this leading indicator of safety to the [JPIA's H.R. LaBounty Safety Awards Program](#). The Authority's efforts to support our Safety Awards Program [criteria](#) of an annual review of confined space entry permits resulted in corrective actions to improve the program. The Safety Awards Program nomination form can be downloaded [here](#).

Frank shared that the Authority's high voltage insulated gloves are now part of a regular inspection, and he is the Authority's competent person to inspect fall protection systems semi-annually. Frank showed me his weekly tailgate topic resources sent to departments that include sign-in sheets. I reminded Frank that he can use the JPIA's *Source* articles and [CPWR's Toolbox Talks](#) as additional subjects for tailgate training.

Please extend our appreciation to Laures for completing her Professional Development Program. The JPIA's Professional Development Program (PDP) provides an opportunity for a member's staff to enhance their knowledge and perform their job safely, legally, and efficiently. Our goal is to help members reduce losses by providing all staff levels with the skills needed to

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maximize personal and organizational success. There are three areas or tracks within the PDP: Operations, Supervisor Basic, and Human Resources. Each area focuses on risk identification, effective leadership skills, and can prepare staff for advancement. The Authority is encouraged to enroll its staff in the JPIA's PDP. For more information, please visit our [webpage](#) or contact our Training Department at training@acwaipia.com.

We discussed the Authority's Valley Fever program. This relatively new Cal/OSHA standard requires employers located or working in endemic counties to develop and train workers in its Valley Fever Exposure Control Plan. The Authority can evaluate its written plan to Cal/OSHA's requirements by reviewing "*How Can Valley Fever be Prevented*" on this DOSH [webpage](#). Additional resources, including training materials, can be reviewed and downloaded on the California Department of Public Health Valley Fever [webpage](#). As a friendly reminder, workplace training was to occur no later than May 1, 2020, and annual training is required thereafter.

We discussed a prior visit on the Authority's Cal/OSHA compliance plans. During this visit, Frank provided me with the Authority's Injury Illness Prevention Program (IIPP) revised in 2019. I again offered to review the Authority's IIPP using Cal/OSHA's [IIPP self-assessment checklist](#), which is a tool designed to compare an employer's written plan to the eight program elements required in the standard. My review is enclosed. While an updated IIPP meets certain parts of the [8 CCR 3203 standards](#), Cal/OSHA highlights that an IIPP is not a paper program. **How well your IIPP meets Cal/OSHA's standard depends on an employer addressing all program elements and effectively putting them into place.** Cal/OSHA has a webpage with [Effectiveness Questions](#) so employers can evaluate their IIPP.

We connected on a past Silica training class where staff had questions related to the use of filtering facepiece type respirators and PAPR. At that time, I shared that compliance with Cal/OSHA's Respiratory Protection Program (RPP) applied to their questions. After the training class, I requested a review of the Authority's RPP written plan, and below are highlights in prior communications:

- The Authority should include a *Voluntary Use* form in its written plan.
- Ensure that employees currently using filtering facepiece respirators are trained in the Authority's RPP and confirm his/her signed voluntary use form is on file.
- Through an appropriate medical clinic or service provider, conduct employee medical evaluations via the questionnaire.
- Ensure employees receive a copy of [8 CCR 5144 Appendix D](#).
- Review Cal/OSHA's [Respiratory Protection in the Workplace](#) practical guide to ensure the Authority's respiratory protection program is designed to identify, evaluate, and control exposure to respiratory hazards; select and provide the appropriate respirators; and coordinate all aspects required for proper use, care, and maintenance of the equipment. By reviewing the practical guide and viewing OSHA's video on respirator types, including PAPRs, the Authority can identify the PAPR used by its employees in its written plan. You can access the video [here](#).

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Similar to the IIPP, a successful respiratory protection program must be regularly evaluated to ensure that it is up-to-date and effective. The frequency in which an employer evaluates its respirator program will depend on the complexity and the extent of respiratory hazards in your workplace.

Site Tour: C.W. “Bill” Jones Pumping Plant

Our last status update is related to items discussed during our January 9, 2020, risk assessment. Frank shared that he is working on installing or replacing emergency eyewash and shower stations. He is also ensuring these items are regularly inspected.

Pablo, Laures, Frank, and I toured the Jones Control Building and Jones Pumping Plant to assess if past safety hazards were corrected. In both facilities, we observed portable ladders properly stored throughout the Pumping Plant; however, many had missing or worn warning labels. [General inspection](#) of portable ladders shall be conducted pre-use by trained employees. According to [8 CCR 3276](#), “Ladders shall be inspected by a qualified person for visible defects frequently and after any occurrence that could affect their safe use.” In addition to Cal/OSHA’s portable ladder maintenance, care, and inspection standard, the Authority should review each manufacturer’s manual for its recommended maintenance schedule and inspection procedures.

Outside of the administration building, Laures, Frank, and I talked about the guardrail installed on the roof near an access point. According to [8 CCR 3212](#) Floor Openings, Floor Holes, Skylights, and Roofs, “*Every floor and roof opening shall be guarded by a cover, a guardrail, or equivalent on all open sides.*” After my visit, Frank and I are communicating about corrective actions to comply with this standard while also improving employee safety.

We then toured the sewer transfer room to ensure appropriate confined space signage was installed. It was good to see signage labeling this space as a confined space. Since this space is a permit-required confined space (PRCS), the Authority should ensure that staff are aware of this space classification and ensure appropriate precautions are in place before entry.

It was with great pleasure to work with Pablo, Laures, and Frank on this safety and health status update. The Authority’s willingness to participate, identify, discuss, and commit to corrective action of hazards, are examples of management leadership and hazard identification and correction leading indicators of safety. I look forward to our continued collaboration and partnership.

Loss Review

We discussed the Authority’s loss histories and associated Experience Modification (X-mod) rates. In the Workers’ Compensation Program, the Authority’s X-mod for the 2021-22 policy year is 0.21. The X-mod in the Liability Program is 0.89 for the 2020-21 policy year. While there is no X-mod in the Property Program, the Authority has experienced 17 losses in the last five policy years. Common injuries in workers’ compensation claims were sprains and strains. Frequent losses in the Authority’s Liability and Property Program are vehicle accidents. To assist with reducing losses associated with strains, sprains, and vehicle accidents, Frank and

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I will work on ergonomic improvements. The Authority is encouraged to have more employees become Smith System trainers.

I would like to thank San Luis & Delta-Mendota Water Authority for its membership and participation in the pooled programs. Please contact me if you have questions or need further assistance. You can reach me at rflint@acwajpia.com or (800) 231-5742, ext. 3137.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RF', with a horizontal line extending to the right.

Robin Flint, ARM, CSP, CEAS I
Risk Control Manager

826:tl

Enc.: SLDMWA IIPP Review

c: Pablo Arroyave, Chief Operating Officer
Frank Ramos, Safety Officer
Laures Stiles, Director of HR and Administration
JPIA Member Services
JPIA Risk Management Committee
Rick Gilmore, JPIA Board Member

JPIA Member Agency Name: San Luis & Delta-Mendota Water Authority

Date of Review: August 12, 2021

IIPP Date: Revised May, 2019



IIPP Element	Requirements (reference Cal/OSHA Enforcement Policy)				Comments or Suggestions (Specific to your operation)
		Written	Implemented	Effective	
Responsibility 3203 (a)(1)	Persons with authority and responsibility for implementing program are properly identified	X	Review		On page 2, it states the IIPP administrator is the Assistant Executive Director. It's a best practice to include the name and title of the program administrator. There are locations in the document referring to the Safety Engineer. This should be reviewed. If the Authority's Safety Officer is now the IIPP program coordinator this should be referenced on page 2.
Compliance 3203 (a)(2)	System for ensuring employees comply with safe and healthful work practices	X	Review		Confirm if staff have received this IIPP document and/or training. Are EE's evaluated on safety performance (see pg. 3)? If yes, then how?
Communication 3203 (a)(3)	System for communicating with employees in a form readily understandable by all affected employees about safety and health	X	Review		What is the frequency of the plan review? I encourage the Authority to add a review/revision recording page. On page 3 under Communication there are no boxes checked identifying Authority's communication system.
Hazard Assessment 3203 (a)(4)	Procedures for identifying and evaluating workplace hazards to include scheduled inspections	X	Review		I suggest inserting a sentence about the Authority's JHAs and include where to find them. On page 4 the Authority should consider highlighting where past hazard assessments are located for staff review.
Accident/Exposure Incident 3203 (a)(5)	Procedure to investigate occurrences of injuries or illnesses	X	Review		Since my last IIPP review the Authority added Accident and Near Miss Reporting (see pages 11-15). Are there any associated reporting forms? If so, please consider adding them and explaining where staff can find these forms. The Authority is encouraged to include its internal processes with reporting of a serious injury or fatality to Cal/OSHA. Serious injury or fatality reporting is within 8 hours. You can find a list of what is a serious injury at 8 CCR 342.

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Hazard Correction 3203 (a)(6)	Methods for correcting unsafe work conditions, work practices, in a timely manner based on seriousness of hazard	X	Review		On page 4 the Authority should consider highlighting where past hazard assessments are located for staff review.
Training & Instruction 3203 (a)(7)	Training program to instruct on general and job-specific safety and health practices	X	Review		Pages 6-7 has a list of training subjects with checkboxes. I would advise changing the checkboxes to bullet points.
Access and Recordkeeping 3203 (a)(8)	Procedure providing employees with access to the written IIPP within five days of a request. Adequate documentation for inspections, training, and other standard-specific requirements	No	Review		Cal/OSHA added a new requirement to the Injury and Illness Prevention (IIPP) Standard on July 1, 2020. Employers must now inform employees of their right to receive a copy of the written IIPP and how to receive it. The Authority can add this new language to its Recordkeeping content on page 7 or as an addendum. A link to the JPIA's sample IIPP Access Addendum is below.

Other Comments:

1. If the Authority has a Safety Handbook then I suggest a tabbed index binder.
2. On page 1 under General Statement and Policy the Authority should ensure it has a signed signature on file.
3. JPIA Sample IIPP Access Addendum
<https://www.acwajpia.com/wp-content/uploads/IIPP-Addendum.docx>