

State of California  
Department of Industrial Relations  
Cal/OSHA Consultation Services Branch  
2424 Arden Way #410  
Sacramento, CA 95824  
Phone: (916) 263-0704  
Fax: (916) 263-2858

Edmund G. Brown, Jr., Governor



**Certificate #G2496**

**Recognition Date: May 1, 2018**

To: Chuck Siroin  
Safety Supervisor  
Villara Building Systems  
4700 Lang Avenue  
McClellan, CA 95652

**GOLDEN GATE RECOGNITION SITE:**

4700 Lang Avenue  
McClellan, CA 95652

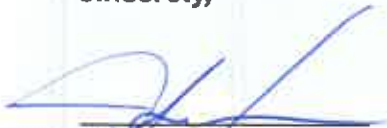
**GOLDEN GATE PARTNERSHIP RECOGNITION**

Dear Mr. Siroin:

Congratulations, your company has been recognized by the Cal/OSHA Consultation Service for its effort in implementing and maintaining an effective Injury and Illness Prevention Program (IIPP) during the Cal/OSHA Consultation Service visit on May 1, 2018.

Golden Gate recognition was developed to provide motivation and support to employers who proactively work with their employees and the Cal/OSHA Consultation Service. During our consultative visit to your company, your managers and employees demonstrated a commitment to continuously improve the effectiveness of its workplace safety and health management system. This commitment to workplace safety and health is being commended by the Cal/OSHA Consultation Service. Thank you for taking an active participation in occupational safety and health in your workplace.

Sincerely,

  
John Husmann  
Area Manager

  
Patrick Corcoran  
Senior Safety Consultant

  
Sue Pipes  
Safety Consultant



This letter does not exempt your company from future enforcement activities, nor does this letter mean that your workplace is free from potential workplace safety and health hazards. The Cal/OSHA Consultation Service is available to provide advice and assistance in reducing workplace safety and health hazards and improving your safety and health management systems.

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Cal/OSHA Consultation Services Branch  
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May 20, 2018

Chuck Siroin  
Safety Supervisor  
Villara Building Systems  
4700 Lang Avenue  
McClellan, CA 95652

Dear Mr. Siroin,

Congratulations! Based on our comprehensive onsite and review of your programs, your business has achieved the Cal/OSHA Consultation Golden Gate Recognition.

On May 1, 2018, Susan Pipes, Consultant, and Patrick Corcoran, Senior Industrial Hygienist, performed an onsite consultation regarding an assessment of your Injury and Illness Prevention Program (IIPP) and other related safety and health programs. As a result of our positive findings, I have enclosed the Golden Gate Letter of Recognition for you. This recognition is given to those employers whose Injury and Illness Prevention Program meets the requirements and is fully implemented.

Feel free to call our office if you have questions or need further assistance.

Sincerely,

---

John Husmann  
Area Manager

JH/rh

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May 20, 2018

Chuck Siroin, Safety Supervisor  
Villara Building Systems  
4700 Lang Avenue  
McClellan, CA 95652

Case #18266

Dear Mr. Siroin,

In response to your request on May 1, 2018, Patrick Corcoran, Senior Industrial Hygienist, and I met with Kyle Madak, Foreman, on May 1, 2018, to conduct a full-service safety and health consultation visit for your project located at 2805 Iron Point Road in Folsom. The visit included an analysis of past injuries and illnesses, an evaluation of safety and health programs, and a hazard survey of this worksite. You currently employ approximately 700 employees company-wide, with approximately 11 employees at this project. Your company has been contracted to perform plumbing installation in connection with this multi-family residential project under development.

The following outlines the findings, requirements, recommendations and additional information as it relates to our visit:

- **Cal/OSHA Consultation Onsite Visit Report**
- **Attachment A – Hazards Not in Compliance With Title 8, California Code of Regulations** – This includes a description of all hazards identified during the consultation visit, their location, and recommended action for correction. For those hazards categorized as serious, an agreed upon correction due date is noted and interim protective measures are specified.
- **Attachment B – Employer Report of Correction of Serious Hazards Found** – This attachment is the form used to report back to us regarding the action you've taken to correct any serious hazards identified during the consultation visit. This attachment must be posted, unedited, in a prominent location where it is readily observable by all employees for three working days or until the hazard(s) have been corrected, whichever is later. If we agree to an extension to the correction due dates, a new updated attachment will be sent to you showing the revised date(s).
- **Attachment C – Consultation Process Fact Sheet**
- **Attachment D – Safety and Health Program Assessment Worksheet**

Should you have any questions about our visit or this report, please refer to the Consultation Process Fact Sheet provided with this report or contact me at (916) 307-0987.

Sincerely

A handwritten signature in blue ink that reads "Susan Pipes".

Susan Pipes  
Safety Consultant

# Cal/OSHA Consultation On-Site Visit Report

## Analysis of Past Injuries and Illnesses

Your current Experience Modification Rate (ExMod) is 110% for the year 2018. Your ExMod was determined by the Workers' Compensation Insurance Rating Bureau and is a factor in determining your insurance premiums. It is a comparison of your injury rates with those of other employers performing similar work as you; ExMod rates above 100 indicate you have higher injury rates than other similar employers, while ExMod rates below 100 indicate you have fewer and less severe injuries than other similar companies. Employers with ExMod rates above 125 are considered High Hazard by Cal/OSHA. Your ExMod is based on three years' worth of claims data, not including claims from the current or previous policy year.

Analysis of claims impacting your experience modification were reviewed in connection with a previous consultation visit in May 2017. You have experienced no injuries at this project. Since this project will exceed one year, a separate OSHA 300 Log will be required to be maintained for this project.

*"Employers must keep a Log for each establishment or site. If you have more than one establishment, you must keep a separate Log and Summary for each physical location that is expected to be in operation for one year or longer."*

Additionally, Federal OSHA has directed State plans to begin implementation of electronic recordkeeping for calendar year 2017 information, beginning July 1, 2018. I am providing a link to the Federal website that provides specifics related to this new recordkeeping requirement.  
<https://www.osha.gov/recordkeeping/finalrule/index.html>

Because of the physical demands of the construction activities that you perform, I recommend that you continue to provide refresher training on strain/sprain type of injuries and ergonomics principles during your safety meetings. You have implemented a "stretch and flex" program to increase awareness of body mechanics and encourage practice of these principles. Strain/sprain type injuries have the potential to require longer recovery times, and result in higher Workers' Compensation costs. I have provided you with a link to several ergonomic publications that may provide you with some additional ideas for preventing strain/sprain type of injuries for your company.

Table 1, below, provides a summary that allows you to compare your organization's Days Away, Restricted or Transferred (DART), Total Recordable Case (TRC), and Experience Modification (ExMod) rates to all other employers in the country who have similar businesses.

**Table 1 – DART/TRC/ExMod Summary**

**NAICS Code: 238220**

<b>Year</b>	<b>Employer DART</b>	<b>National DART</b>	<b>Employer TRC</b>	<b>National TRC</b>	<b>ExMod</b>
2017	Not available	Not available	Not available	Not available	135%
2016	5.5	2.1	6.6	3.8	145%
2015	6.0	2.3	7.6	4.2	135%
2014	5.4	2.1	7.7	4.1	112%
2013	5.4	2.8	7.6	5	111%

*DART and TRC are rates per 100 workers*

## **Injury and Illness Prevention Program (IIPP) Assessment**

**An effective IIPP will help you prevent workplace hazards from recurring. The benefits include cost savings in avoiding lost time injuries and illnesses and Workers' Compensation costs. The California Code of Regulations Section 3203 requires that every employer in California must establish, implement, and maintain a written and effective IIPP. Table 2, on the next page, includes the results of our assessment of your IIPP.**

**Also attached to this report is a copy of the Federal OSHA Safety and Health Program Assessment Worksheet. This worksheet goes beyond the minimum legal requirements in California and is provided as guidance to be used in making safety and health program evaluations. We encourage you to use this worksheet in the future in making self-evaluations of your IIPP, and improving it above and beyond the California requirements.**

**Your IIPP was reviewed and found to contain regulatory required elements. The program should be reviewed periodically and updated to reflect the specific activities your company is using to comply with each of the eight program elements. Establish those methods that make the most sense for you to incorporate into your daily business operation; the key is to implement these methods on an ongoing basis.**

Table 2 - Injury and Illness Prevention Program (IIPP) Assessment Results

IIPP Elements	Requirements (reference Cal/OSHA Enforcement Policy)	Written	Implemented	Effective	Comments/Suggestions (Specific to your operation)
<b>Responsibility</b>	Persons with authority and responsibility for implementing program are properly identified	Yes	Yes	Yes	Individuals responsible for program oversight and daily implementation of safety policies at your jobsites are identified in your IIPP.
<b>Compliance</b>	System for ensuring employees comply with safe and healthful work practices	Yes	Yes	Yes	Procedures for ensuring compliance with safe work practices are included in your IIPP, including a multi-step disciplinary system and recognition program. Performance appraisals do incorporate safety performance objectives.
<b>Communication</b>	System for communicating with employees in a form readily understandable by all affected employees about safety and health	Yes	Yes	Yes	Safety meetings are conducted weekly. You support an open-door policy for communication on safety issues and instruct employees on means for reporting of hazards.
<b>Hazard Assessment</b>	Procedures for identifying and evaluating workplace hazards to include scheduled inspections	Yes	Yes	Partial	You have developed written safe operating rules for routine construction tasks and equipment. These procedures should be updated to reflect excavation hazards and controls, as well as identifying the competent person for overseeing excavation activities at your project. Foreman is responsible for conducting daily site walkthroughs and issues are noted on a daily log. More formalized inspections are conducted twice a month. The CANVAS application is used to assist with this process.
<b>Accident/ Exposure Investigation</b>	Procedure to investigate occurrence of injuries or illnesses	Yes	Yes	Yes	Every accident and near miss incident should be evaluated as an opportunity to improve the safety program either through providing new training to employees, developing new procedures on how to perform tasks, or procuring new tools to improve safety.
<b>Hazard Correction</b>	Methods for correcting unsafe work conditions and work practices in a timely manner	Yes	Yes	Yes	Hazards are tracked through to completion via inspection tool utilized.
<b>Training and Instruction</b>	Training program to instruct on general and job-specific safety and health practices	Yes	Yes	Yes	You provide an eight hour orientation for new employees. Specific task/equipment training is provided on the job by Foreman. Supervisory training is provided using hands-on approach by Superintendents. Refresher training provided via safety meetings.
<b>Recordkeeping</b>	Adequate documentation for inspections, training, and other standard-specific requirements	Yes	Yes	Yes	Documentation of training, safety meetings, and inspections is maintained.

## Other Findings and Recommendations

**Heat Illness Prevention Program** – You have established procedures for preventing heat illnesses. To most effectively implement these procedures, we require that your procedures reflect specifics for each jobsite. We provided an addendum that may be used to provide this level of specificity. Your Foreman completed this information during our site visit. We recommend that you incorporate something similar for each of your jobsites.

**Excavations** – You do perform excavation activities in connection with installation of plumbing systems for this project. Your Code of Safe Practices does not currently reflect safe rules for employees to follow while performing excavation work. Cal/OSHA considers work performed within excavations as higher risk. We require that a competent person be onsite to direct work and address issues that may arise. Specifics related to utility location process, soil classification, types of acceptable protective systems, and means of access/egress while working within excavations should be incorporated into these procedures. During our initial visit to the site we observed an excavation for a plumbing clean out connection. This excavation was determined to be greater than five feet in depth and was not benched/sloped sufficiently to comply with protective system requirements. Additionally, spoils piles were not cut back a minimum of two feet away from the face of the excavation. These are examples of the types of issues that should be addressed by your procedures and enforced by the competent person at the worksite.

**Exposure to Noise** – For the construction trades, Cal/OSHA requires employee noise exposures to be kept below 90 dBA averaged throughout an eight hour day. Where that is not feasible, hearing protection must be used. I have provided a handout that provides approximate noise levels associated with some of the more common tools used at a construction site. Because tools may be used for different lengths of time during different phases of the project, it is recommended that hearing protection be required during operation of these types of tools to ensure protection for employees.

**Multi-Employer Worksites** – At construction projects, your employees may work with other employers, such as other subcontractors. A multi-employer work site, permanent or temporary, is one where more than one employer (and his or her employees) work, usually but not necessarily at the same time. T8 CCR Section 336.10 permits Cal/OSHA Field Enforcement to cite employers for the existence of hazards at a work site, even though the cited employer may not have any employees exposed to the hazard. You can also be cited for hazards created by other employers if your employees are exposed, and you do not take reasonable steps to prevent exposure to those hazards. A copy of the Cal/OSHA enforcement policy and procedure for multi-employer worksites is enclosed.

**Updates** – Periodic reviews of your overall safety program should be conducted. Special attention should be paid to non-routine tasks that may need to be performed to assess hazards and develop safe means for performance of work. Additionally, any time new equipment is purchased, an assessment of the equipment should be performed to ensure equipment has required safety components and that current safe operating procedures are updated to accommodate any changes or additional information pertaining to equipment operation. Equipment manufacturer operator manuals are a wealth of information and are a good source to assist with this process.

Regulatory changes do take place over time. To keep apprised of these changes, our website will normally highlight new requirements. You may also sign up to receive email communications by subscribing to various distribution lists at: <http://www.dir.ca.gov/email/listsab.asp?choice=1>. Title 8 regulations that California employers must comply with can be found at: <http://www.dir.ca.gov/title8/index/T8index.asp>. Our office is also available to answer any questions that you might have at any time.

**Reporting Serious Injuries** – During the visit we reviewed requirements for reporting any serious injury, illness, or fatality to the nearest District Office within eight hours of knowledge of the injury. It is important for all of your supervisory staff to be aware of this requirement to ensure timely notification.

**Training** – As part of the onsite consultation, training was provided and covered existing programs as they apply to your operations. The training included:

- Injury and Illness Prevention Program
- Heat Illness Prevention Program

**Publications** – As part of the onsite consultation, the following written materials were provided that apply to your operations:

- User's Guide to Cal/OSHA
- On-site Consultation Process – Fact Sheet
- Multi-Employer Worksite Handout
- Contractor Pre-Job Planning Handout
- Sample Code of Safe Practices
- Heat Illness Prevention Program – Sample Addendum
- Controlling Silica Fact Sheet
- Portable Ladders Handout

**Web Resources** – The following websites may also provide resources applicable to your operations:

- Simple Solutions for Home Builder Workers  
<https://www.cdc.gov/niosh/docs/2013-111/default.html>
- Simple Solutions-Ergonomics for Construction Workers  
<https://www.cdc.gov/niosh/docs/2007-122/>
- Controlling Silica Exposures in Construction Publication  
<https://www.osha.gov/Publications/3362silica-exposures.pdf>
- Additional guidance materials can be downloaded from the Cal/OSHA Website at  
<http://www.dir.ca.gov/dosh/PubOrder.asp>



## Cal/OSHA Consultation Partnership Programs

It is the policy of Cal/OSHA Consultation Service to provide opportunities for individual establishments to work as partners with labor and Cal/OSHA Consultation Service in implementing and maintaining high standards of workplace safety and health management. The resulting partnership offers three levels of recognition to qualified companies and their employees:

- **VPP (Voluntary Protection Program)** – The leadership recognition level for companies with highly advanced safety and health management systems.
- **SHARP** – For companies with advanced safety and health management systems.
- **Golden Gate** – For companies with an effective safety and health management system.

During the consultation visit, your IIPP and all other required safety and health programs were evaluated. All required programs were in writing and considered effective. Your IIPP lays out a system for addressing each of the eight regulatory required elements. You are actively implementing each aspect of your program. We would like to commend both management and crewmembers on your safety efforts by presenting your organization with our Golden Gate Recognition Commendation. Congratulations!

## Conclusions

Some of the findings of the consultation visit include hazardous conditions that may not be in compliance with Title 8 of the California Code of Regulations (T8CCR). Though onsite consultations can be comprehensive in nature, their main objective is to focus upon the management of your overall Injury and Illness Prevention Program, rather than "OSHA Proofing" the workplace. Consequently, it is possible that not all T8CCR related issues have been addressed. Title 8 related hazards identified during the consultation visit to your facilities and recommended actions to correct those hazards are listed in Attachment A of this report.

We encourage you to involve your employees in the implementation process of the recommendations described in this report. Such involvement can contribute to the effectiveness of your Injury and Illness Prevention Program and communicate to your employees the value you place on a safe workplace.

As a reminder, an employer may not discriminate and/or retaliate against an employee for exercising their rights as it relates to workplace safety and health and/or any other labor laws.

Also accompanying this report you will find **Attachment B – Employer Report of Correction of Serious Hazards** which provides a description of the serious hazards observed, the date we agreed each hazard would be corrected, and space for you to indicate the actions you have taken to correct each hazard. Please mail/fax a completed Attachment B to our office before the correction due date.

DEPARTMENT OF INDUSTRIAL RELATIONS  
 Cal/OSHA Consultation Services Branch  
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 Sacramento, CA 95825  
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## ATTACHMENT A – HAZARDS NOT IN COMPLIANCE WITH TITLE 8, CALIFORNIA CODE OF REGULATIONS

Cal/OSHA Consultation conducted an onsite consultation with Villara Building Systems at a jobsite located at 2805 Iron Point Road in Folsom on May 1, 2018. Some of the findings of the onsite consultation include conditions that, besides costing you in terms of injuries and illnesses, were not in compliance with Title 8 of the California Code of Regulations (T8CCR). The following is a listing of those findings. The potential effects of each of these hazards were discussed with you during the onsite consultation.

Ensure a copy of this Attachment A is provided to affected employees or their representative(s), along with any modifications or extensions to correction due dates.

Section 6407 of the California Labor Code obligates all employers to comply with T8CCR. Consequently, you should adhere as much as possible to the implementation timeframes identified for each of the *Imminent* and *Serious* hazards. Interim measures were discussed with you during the onsite consultation. Those listed as *other* or *regulatory* will not have completion due dates, but should be corrected as soon as possible.

**For those hazards described as *Imminent* or *Serious*, please complete and mail/fax a signed copy of Attachment B – Employer Report of Correction of Serious Hazards to our office before the agreed upon correction date.**

Item Number	0001	Correction Due Date	6/1/18
Hazards Type	Serious	Standard	T8CCR – 3384(a)

**Condition:** Villara Building Systems employees were engaged in pipe threading with a RIGID 300 pipe-threader without eye protection. Employee wore prescription eyeglasses that were not ANSI Z87.1 compliant.

**Recommended Action:** Provide eyeglass covers or prescription safety eyewear for employees using the pipe threader.

- (a) *Employers shall select, provide and require employees to use appropriate hand protection when employee's hands are exposed to hazards such as those from skin absorption of harmful substances, cuts or lacerations, abrasions, punctures, chemical burns, thermal burns, radioactive materials, and harmful temperature extremes.*

**Interim Control:** Employee donned non-prescription safety eyewear over his glasses while we watched. Abated on site.

Item Number	0002		
Hazards Type	General	Standard	T8CCR – 1509(b)

**Condition:** Your Code of Safe Practices does not include safety procedures to be followed associated with excavation activities.

**Recommended Action:** Update your Code of Safe Practices to incorporate procedures for performing utility location, soil classification, protective systems to be used, and means for providing access for those entering excavations, etc. A competent person should also be identified for the project. Your Foreman promptly updated the Code of Safe Practices to incorporate this information while still on-site. Great job!

*Injury and Illness Prevention Program. (b) Every employer shall adopt a written Code of Safe Practices which relates to the employer's operations. The Code shall contain language equivalent to the relevant parts of Plate A-3 of the Appendix.*

*Reference Plate A-3 for examples <http://www.dir.ca.gov/Title8/1938a.html>*

Item Number	0003		
Hazards Type	General	Standard	T8CCR – 3395(i)

**Condition:** Heat Illness Prevention Procedures do not reflect specifics for implementing your procedures at this site.

**Recommended Action:** Procedures must be site specific. Examples include WHO is responsible for water availability and replenishment, WHAT is shade source, and WHO will be responsible for erecting it (portable units), WHO is responsible for conducting pre-shift meetings during high heat periods, etc. A sample addendum that may be used was provided during the visit and your Foreman promptly completed this document for use at this worksite. Great job!

*Heat Illness Prevention. Heat Illness Prevention Plan. The employer shall establish, implement, and maintain, an effective heat illness prevention plan. The plan shall be in writing in both English and the language understood by the majority of the employees and shall be made available at the worksite to employees and to representatives of the Division upon request. The Heat Illness Prevention Plan may be included as part of the employer's Illness and Injury Prevention Program required by section 3203, and shall, at a minimum, contain:*

- (1) Procedures for the provision of water and access to shade.*
- (2) The high heat procedures referred to in subsection (e).*
- (3) Emergency Response Procedures in accordance with subsection (f).*
- (4) Acclimatization methods and procedures in accordance with subsection (g).*

## DEPARTMENT OF INDUSTRIAL RELATIONS

Cal/OSHA Consultation Services Branch  
 2424 Arden Way, Suite 410  
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 Tel: (916) 263-0704 Fax: (916) 263-2858



## Attachment B - Employer Report of Correction

In an effort to ensure a safe work place, Villara Building Systems voluntarily participated in a Cal/OSHA Consultation Service onsite evaluation at a jobsite located at 2805 Iron Point Road in Folsom, on May 1, 2018. Listed below are the serious hazards identified during the consultation visit, along with the corresponding agreed upon dates for correction. **This notification is not a citation.** An amended version of this list will be provided should extension dates be requested and granted. Should there be any questions, below is the address of the Cal/OSHA Consultation office that provided the assistance.

**A copy of this attachment must be posted as soon as it is received, unedited, in a prominent location where it is readily observable by all employees for three days or until the hazards have been corrected, whichever is later.**

Consultant ID # – W3381

Visit # – 180315

Case # – 18266

Item Number	0001	Hazard Type	Serious	Standard	T8CCR – 3384(a)
Correction Due Date	6/1/18				
<b>Hazardous Condition</b>					
<b>Condition:</b> Villara Building Systems employees were engaged in pipe threading with a RIGID 300 pipe-threader without eye protection. Employee wore prescription eyeglasses that were not ANSI Z87.1 compliant.					
<b>Action Taken to Correct Hazard</b>					
Abated during visit by employee donning approved safety glasses over his prescription glasses.					
<b>Action Taken to Prevent Recurrence of Hazard</b>					
<b>Date Corrected</b>	5/1/18				

**Printed Name and Title of Person Verifying Correction**

**Name:** \_\_\_\_\_ **Title:** \_\_\_\_\_

**Employer Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Please sign, date and mail/fax a completed copy of this attachment, prior to the correction due date, to the following address to verify that the serious hazards listed above have been corrected:**

**DEPARTMENT OF INDUSTRIAL RELATIONS  
CAL/OSHA CONSULTATION SERVICES BRANCH  
2424 Arden Way, Suite 410  
Sacramento, CA 95825**

**Fax (916) 263-2858**

## Attachment C

### Department of Industrial Relations - Cal/OSHA Consultation Program



## On-site Consultation Process – Fact Sheet

\*Please refer to our website for additional information [www.dir.ca.gov](http://www.dir.ca.gov)

### Opening Conference - The employer's rights and obligations

- **Relationship to Enforcement** – Cal/OSHA Consultation is independent of Enforcement. Findings of an on-site are not shared with Enforcement except where "imminent" or "serious" hazards are not corrected as agreed. In addition:
  - Consultants do not issue citations or penalties.
  - An on-site may not be initiated in a workplace that is being actively evaluated by Enforcement.
  - Cal/OSHA Enforcement officers are not bound by the consultant's recommendations.
  - An employer is not required to inform an Enforcement officer of a prior Consultation visit nor furnish the officer a copy of the report. If provided by the employer, the Enforcement officer may use the report as evidence of good faith, and therefore reduce any proposed penalties.
  - The main objective of an on-site consultation is to focus upon the effectiveness of your overall Injury and Illness Prevention Program, rather than "OSHA Proofing" the workplace. Consequently, it is possible that not all T8CCR related issues will be addressed.
- **Employee participation** – Required during all on-sites by directly talking to employees encountered in the workplace, or indirectly through their recognized union representation.
- **Employee retaliation/discrimination** – Employers can't retaliate or discriminate against an employee for exercising their rights related to workplace safety and health and/or other labor laws.
- **Hazard correction** - Identified hazards must be corrected within agreed time frames.
- **Posting of Identified hazards** - The list of imminent and serious hazards need to be posted in the workplace for either 3 days, or until corrected, whichever is longer. A copy of the entire list of hazards, as outlined in the report to the employer, must be provided to recognized employee representatives.
- **Visit scope and termination** – At the outset, the consultant will confirm the scope of the on-site consultation with the employer. The employer may restrict the scope, or terminate it outright at any time. Regardless, those hazards identified up to that point would require correction.
- **Report findings** - The employer has the right to disagree with correction schedules or the existence of a hazard(s) and may, within 15 working days of receipt of the on-site report present an appeal to the consultant's area manager.
- **Private discussions with the consultant** - The employer has the right to request a private meeting with the consultant to discuss matters that he or she wishes not to discuss in the presence of the employee representative.

### Closing Conference Review

- **Hazard summary** – Hazards are described, correction due dates are agreed upon for serious hazards, and methods of correction, including interim measures, are discussed.
- **Program summary** – The workplace' injury and illness prevention program is addressed, along with how it relates to identified hazards and past injuries and illnesses.
- **Multi and dual employer situations** – Employer obligations will be described for each applicable situation.
- **Partnership programs** – Cal/OSHA formally recognizes employers with exceptional health and safety programs by various recognitions: Voluntary Protection (VPP), Safety and Health Achievement Recognition Program (SHARP) and Golden Gate program will be described.

## Attachment C

# On-site Consultation Process – Fact Sheet

## The Report To The Employer – What's particularly important

### The Injury and Illness Prevention Program (IIPP)

An effective Injury and Illness Prevention Program (IIPP) can help you anticipate and prevent workplace hazards. The benefits include cost savings in avoiding lost time injuries and illnesses and worker's compensation costs; moreover, the California Code of Regulations (T8CCR) Section 3203, requires that every employer in California must establish, implement, and maintain a written and effective IIPP.

To assist you in fully establishing your IIPP a copy of our Injury and Illness Prevention Model Program and our Guide to Developing an IIPP will be provided to you. Also, attached to the on-site consultation report will be a copy of a Safety and Health Program Assessment Worksheet. This worksheet can be used in making self-evaluations to maintain and improve your IIPP.

### Identified Hazards

Some of the findings of the consultation may include hazardous conditions. These hazards will be described in Attachment A of the onsite summary report – *Hazards Not in Compliance With the Title 8 of the California Code of Regulations*.

Where "serious hazards" are identified, the onsite summary report will include an *Employer Report of Correction of Serious Hazards* (Attachment B) that provides a description of the serious hazards observed, the agreed date each hazard would be corrected and space for you to indicate the actions you have taken to correct each hazard. **Please mail or fax this form to our office before the correction due date.** This list of hazards must be posted, unedited, in a prominent location where it is readily observable by all employees for three working days or until the hazard(s) have been corrected, whichever is later. If we approve an extension to the correction due dates, an amended list of serious hazards will be sent to you showing the revised date(s). During the time that you are working on correcting these hazard(s), Cal/OSHA Enforcement may not conduct a scheduled inspection at your worksite, provided that: (a) you are within the correction due dates; (b) interim protection is in place; and (c) the list of hazards is posted. Should these conditions not be met, a scheduled Cal/OSHA Enforcement inspection may be conducted.

The onsite summary report provides recommendations for a safer workplace. You need to share the findings of the report with affected employees and involve them in the implementation process of any necessary hazard controls. Such involvement can contribute to the effectiveness of your health and safety program and communicate to your employees the value you place on a safe workplace.

### Definitions of Hazard Determinations

"Imminent" – Can immediately cause death or serious injury.

"Serious" – Could cause death or serious physical harm

"General" – Lack the potential for causing serious physical harm, but could have a direct impact on employee health and safety.

"Regulatory" – Related to posting, permits, record keeping, reporting requirements