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# **INJURY AND ILLNESS PREVENTION PROGRAM**

IIPP Manual Revision 5.0

**[www.rahindustries.com](http://www.rahindustries.com)**

**1-800-421-7070**

Rahn Industries, Inc. Injury and Illness  
Prevention Program Rev. 1/15/2020

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## 1.0 Program Description

California Code of Regulations, Title 8, Section 3203 state that a workplace must devise and implement an Injury and Illness Prevention Program (IIPP) for all employees within the organization. Environment, Risk Management and Safety meets these requirements through the implementation of the Rahn Industries IIPP. The objectives of the Rahn Industries IIPP are to:

- Create, maintain and reinforce a safe working environment to protect the health and safety of employees, and visitors.
- Demonstrate management commitment and concern for employee safety.
- Provide information to personnel about health and safety hazards.
- Maintain compliance with health and safety codes.
- Improve efficiency by reducing lost work time due to illness and injuries.
- Reduce workers' compensation claims and costs.

## 2.0 Responsibilities

It is important that all responsible parties of this program understand their individual responsibilities and carry them out so that the “communication” link is not broken, allowing all program requirements to be met. A successful Injury and Illness Prevention Program requires a commitment at every level of Rahn Industries.

### 2.1 Risk Management and Safety

The primary Responsibilities of Risk Management and Safety will include, but are not limited to:

- A. Advising upper management on safety and health issues.
- B. Working with upper management to develop safety and health guidelines and policies.
- C. Preparing and distributing Rahn Industries guidelines, policies and procedures on safety and health issues.
- D. Maintaining current information on local, state and federal safety and health regulations.
- E. Serving as liaison with governmental agencies.
- F. Planning, organizing and coordinating safety trainings.
- G. Developing a code of safe practices and inspection guidelines.
- H. Arranging for safety and health inspections and follow up to insure necessary corrective action is completed.
- I. Establishing, conducting and maintaining an injury/illness/accident report and investigation procedure.
- J. Maintaining injury and illness records (OSHA log 300).
- K. Reviewing injury and illness trends.
- L. Establishing a system for maintaining the records of inspection, hazard abatement and training.

### 2.2 Department Supervisors

The primary Responsibilities of the department supervisors will include, but are not limited to:

- A. Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and Rahn Industries policies, and programs.

- B. Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs.
- C. Enforcing health and safety rules fairly and uniformly relating to job performance.
- D. Evaluating employees on compliance with safe work practices.
- E. Acknowledging employees who make a significant contribution to maintenance of a safe workplace and disciplining employees who fail to follow safe work practices.
- F. Encouraging employees to report workplace hazards without fear of reprisals.
- G. Ensuring that periodic, scheduled workplace inspections are conducted and that identified health and safety deficiencies are corrected in a timely fashion.
- H. Ensuring that workplace incidents (injuries, exposures, or illnesses) are reported, investigated, and that corrective actions are taken promptly. See Sections 7.1 and 7.2 regarding procedures for reporting serious and non-serious incidents.
- I. Ensuring that inspections/investigations and employee health and safety records are kept for the designated period(s) of time.

## **2.3 Employees**

The primary Responsibilities of the employees will include, but are not limited to:

- A. Keeping themselves informed of conditions affecting their health and safety.
- B. Participating in training programs as required.
- C. Adhering to healthy and safe practices in their workplace.
- D. Promptly reporting to their supervisors of potential hazards in the workplace and workplace incidents (injuries, exposures, or illnesses).

## **2.4 Environmental Health and Safety Officer (EHSO)**

The primary Responsibilities of the Environmental Health and Safety Officer will include, but are not limited to:

- A. Providing training and technical assistance to managers and supervisors on implementation of the IIPP.
- B. Assisting supervisors in conducting workplace hazard assessments to identify, evaluate, and correct hazards.
- C. Reviewing, updating and evaluating the overall effectiveness of the IIPP.
- D. Evaluating the adequacy and consistency of training designed by schools, departments, etc. (i.e., Tier 2 Training - See Section 9.2).

## **3.0 Program Compliance**

Rahn Industries shall ensure that employees comply with safe and healthy work practices. Managers and department supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance:

- Employees are recognized for following safe and healthful work practices (e.g., oral acknowledgments at receptions, letters of commendation, etc.).
- Employees are trained and retrained, as necessary or as required.
- Health and safety practices are integrated into new employee job descriptions and performance appraisals.
- Disciplinary actions with employees for failure to follow safe and healthful work practices are taken, when appropriate.
- An anti-reprisal policy for employees reporting safety and health concerns is enforced.

It is the general policy at Rahn Industries that all employees possess equal authority to report safety violations. This includes but is not limited to notifying coworkers when they are in violation

of safety policies and/or practicing unsafe work behavior that puts themselves and their coworkers' safety at risk.

#### **4.0 Program Communication**

Rahn Industries shall communicate with employees in a form readily understandable by all affected employees on matters related to occupational safety and health, including provisions designed to encourage employees to inform their supervisors of hazards at the worksite without fear of reprisal.

The various communication systems Rahn Industries uses to disseminate information to all employees on matters relating to occupational safety and health include:

- A. A Three-tier training program is an integral component of the communication system. The training program is described in Section 9.
- B. Health and safety publications are available from the Risk Management and Safety Department.
- C. Health and Safety meetings at the department level are conducted to reinforce important concepts including, but not limited to the following:
  - Clearly communicate health and safety programs and procedures to the employees.
  - Encourage employees to report workplace hazards to management without fear of reprisal as described in Section 4.7.
  - Encourage employees to report workplace incidents (injuries, exposures, and illnesses).
- D. Anonymous Hazard Reporting. Hazard reporting may be done anonymously or confidentially.
- E. Anti-Reprisal Policy. Employees shall not be discharged or discriminated against in any manner for the reporting of health and safety hazards to Risk Management and Safety or to appropriate governmental agencies. Supervisors shall inform employees of this policy and encourage reporting of workplace hazards to the management.

#### **5.0 Violence in the Workplace Policy**

Rahn Industries has developed a policy which provides guidelines for responding to violence or threats of violence in the workplace - see Emergency Action Plan, section 6.6

The general roles and responsibilities of employees, supervisors, and Administrative staff are dictated by the type of situation. There are specific procedures for responding to:

- Threats of violence.
- Acts of violence not involving injuries or weapons.
- Acts of violence involving injuries or weapons.
- Hostile Intruder
- Armed Subjects/Active Shooter
- Criminal Activity

#### **6.0 Scheduled and Periodic Inspections**

Rahn Industries shall have procedures for identifying and evaluating work place hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. Supervisors are responsible for seeing that periodic inspections are conducted. To assist supervisors, the Risk Management and Safety department has developed self-inspection checklists that can be adapted for local use.

## **6.1 Work Area Inspection Schedule**

Work area inspections shall be conducted according to the following schedule:

- Monthly workplace safety inspection
- When new substances, processes, procedures or equipment which present potential new hazards are introduced.
- When new, previously unrecognized hazards are identified.
- When occupational injuries or illnesses occur.
- Quarterly safety inspection of the entire facility and operation.

## **6.2 Internal Annual IIPP Audit**

To assist supervisors in identifying and correcting potential hazards, the Risk Management and Safety Department conducts surveys (e.g., baseline occupational health and safety surveys of operating units, inspections of hazardous materials storage/disposal, fire safety).

Rahn Industries Internal Audit includes a review of safety compliance with health and safety issues related to the implementation of this IIPP.

## **6.3 Outside Agencies**

When necessary outside agencies conduct regular, periodic inspections at Rahn Industries, which assist in achieving some of its inspectional responsibilities. These include:

- Forklift training and certifying agencies
- Fire extinguisher testing and certifying agencies
- Safety compliance consulting agencies
- Local fire department

## **6.4 Recordkeeping of Scheduled Inspections**

Records of scheduled and periodic inspections to identify unsafe conditions and work practices shall be maintained by the Risk Management and Safety department for a minimum of two years (unless otherwise specified). The records shall include:

- The person(s) conducting the inspection
- Any description of the unsafe conditions and work practices
- Photos of the unsafe condition if applicable
- The actions taken to correct the identified unsafe conditions and work practices.

## **7.0 Injury and Illness Reporting and Investigation**

Rahn Industries shall investigate workplace incidents (injuries exposures, or illnesses). The following standardized procedures for reporting and investigating workplace injuries, illnesses, and incidents are reviewed below.

### **7.1 Reporting Procedures**

Employees are to report workplace incidents (injuries, exposures, or illnesses) to their supervisor as soon as possible.

### **A. Serious Injuries/Illnesses or Fatalities**

- Supervisor immediately contacts the Risk Management and Safety department to report work related death, serious injury, or illness.

Cal/OSHA defines an injury or illness as “serious” if it:

- a) Requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation; or
  - b) An employee suffers a loss of any member of the body; or
  - c) An employee suffers any serious degree of permanent disfigurement.
- Risk Management and Safety department immediately reports any serious injury, illness, or fatality to Cal-OSHA. Other incidents may be reported on a case-by-case basis

### **B. Standardized forms for reporting and investigating workplace incidents (injuries, exposures, or illnesses)**

- Incident Investigation Report Form must be complete within 24 hours of the occurrence.

## **7.2 Investigation Procedures**

Within 24 hours of occurrence, supervisors must investigate any workplace incident (injury, exposure, or illness) involving their staff and follow-up with corrective measures via completion of safety corrective action form.

### **A. EHSO Review of Incidents:**

- All serious accidents (described in Section 7.1) and overexposures to chemical, biological, radiation, and physical stressors are investigated immediately by EHSO and the Risk Management and Safety Department.
- For other incidents where additional follow-up is appropriate, Risk Management and Safety Program reviews submitted information to help ensure adequate corrective actions have been identified and implemented.

## **8.0 Hazard Correction**

Rahn Industries is committed to correct unsafe or unhealthy work conditions in a timely manner, based on the severity of the hazards.

### **A. Schedules for Correcting Hazards**

Hazards shall be corrected according the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area, except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with necessary safeguards.

### **B. Recordkeeping**

As corrective actions are implemented, supervisors shall document the effort and maintain such record for at least one year.

## C. Resources

Unsafe conditions that cannot be corrected with resources available to the supervisor or manager must be reported to the next higher level of management. Resources to correct hazards include the following:

- Facility Maintenance - If the correction required is part of Facility Maintenance responsibilities, Facility Maintenance will address the repair.
- Risk Management and Safety - If the corrective action does not fall into the category of maintenance, the Risk Management and Safety department will correct the discrepancy through a policy or procedure change.
- Engineering Department - If the corrective action involves an engineering procedure or process the engineering department will aid Risk Management and Safety in developing new engineering procedures that will resolve any safety hazards or violations.

## 9.0 Training and Instruction

Rahn Industries policy requires that all personnel shall be trained to protect themselves from hazards in their working environment. This includes initial newly hired personnel training and scheduled monthly training

### A. Training Content

Risk Management and Safety shall train employees in:

- General health and safety practices;
- Job-specific health and safety practices and hazards;
- Recognition and assessment of health and safety risks;
- Minimization of risks through sound safety practices and use of protective equipment;
- Regulations and statutes applicable to their work; and,
- Rahn Industries, Inc health and safety policies.

### B. Three-Tier Training Program

Rahn Industries has organized its training system into a Three-tier program, which is described below:

Tier 1: General orientation safety training provided by Risk Management and Safety to all new employees.

- Includes information on Rahn Industries health and safety policies and practices, employee health and safety rights and responsibilities, health and safety services at Rahn Industries, and what the employee should expect in terms of further training.

Tier 2: Hazard-Specific Training

- Provided by the Risk Management and Safety department in conjunction with EHSO to employees where special hazards may be encountered.
- Training topics include ergonomics, hazard communication, departmental emergency response/evacuation procedures, forklift safety, ect.

Tier 3: Job-Specific Training

- Provided by the department supervisor. Training consists of information specific to the hazards and equipment used by these individuals. Training is

communicated by one or more of the following methods: safety meetings, material safety data sheets, videos, pamphlets, booklets, and postings.

### **C. Training Schedule**

Training shall be provided to all employees:

- When the IIPP is first established;
- When new employees are hired;
- When employees are given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed).
- Scheduled monthly training.

### **D. Training Resources provided by the Risk Management and Safety Department**

- Risk Management and Safety has developed standardized forms for training recordkeeping. These are available from the EHSO.
- Risk Management and Safety has developed a collection of safety publications, and training guides to assist supervisors and departments in implementing training programs.
- Outside contractors have been selected to assist supervisors in forklift training, fire extinguisher training and respirator protection training including fit test procedures.

### **E. Recordkeeping**

- Documentation of health and safety training for each employee shall include:
  - a) Employee name or other identifier,
  - b) Training date
  - c) Training dates, type(s) of training, and
  - d) Training providers. This documentation shall be maintained for one year.
- Training records of employees who have worked less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.
- The Risk Management and Safety department is responsible for maintaining these records.

# APPENDICES



# ACCIDENT INVESTIGATION FORM

Injury and Illness Prevention Program

**Instructions:** Complete this form as soon as possible after an incident that results in serious injury or illness. (Optional: Use to investigate a minor injury or near miss that *could have resulted in a serious injury or illness.*)

Accident investigation for a work related:				<input type="checkbox"/> Injury	<input type="checkbox"/> Illness	<input type="checkbox"/> Near miss
Name of Injured Person:			Job title:			
Check one: <input type="checkbox"/> Male <input type="checkbox"/> Female			Date of injury/near miss:			
Supervisor:			location of event:			
Has the supervisor been informed about this injury/near miss?				<input type="checkbox"/> Yes	<input type="checkbox"/> No	
What part of the body was injured? Describe in detail:						
What was the nature of the injury? Describe in detail:						
Describe step by step what led up to the injury/near miss. What was employee doing prior to the event? What equipment, tools being using?						
Names of witnesses (if any):						
Were safety regulations in place and used? If not, what was wrong?						
Employee went to doctor/hospital? <input type="checkbox"/> Yes <input type="checkbox"/> No			Date:		Time:	
Doctor's Name:			Hospital Name:			
Has this part of your body been injured before? <input type="checkbox"/> Yes <input type="checkbox"/> No				If yes, when?		
Recommended preventive action to take in the future to prevent reoccurrence:						

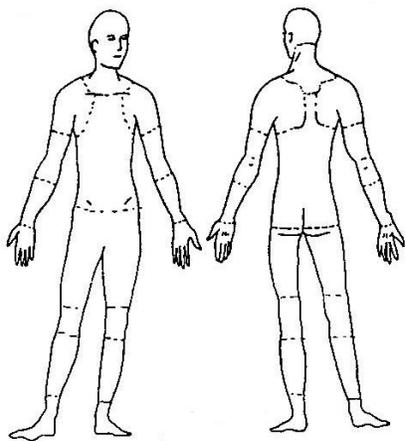
Use the information collected in this accident investigation to complete the OSHA 300 and 301 Injury and Illness report forms.

Investigation by: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Instructions:** Complete this form as soon as possible after an incident that results in serious injury or illness. (Optional: Use to investigate a minor injury or near miss that *could have resulted in a serious injury or illness.*)

Accident investigation for work related: <input type="checkbox"/> Death <input type="checkbox"/> Lost Time <input type="checkbox"/> First Aid Only <input type="checkbox"/> Near Miss
This report is made by: <input type="checkbox"/> Employee <input type="checkbox"/> Supervisor <input type="checkbox"/> Team <input type="checkbox"/> Other _____

**Step 1: Injured employee (complete this part for each injured employee)**

<b>Name of Injured Person:</b>	<b>Job title:</b>	
<b>Check one:</b> <input type="checkbox"/> Male <input type="checkbox"/> Female	<b>Date of injury/near miss:</b>	
<b>Supervisor:</b>	<b>location of event:</b>	
Has the supervisor been informed about this injury/near miss? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Part of body affected: (shade all that apply)  	<b>Nature of injury:</b> <input type="checkbox"/> Abrasion, scrapes <input type="checkbox"/> Amputation <input type="checkbox"/> Broken bone <input type="checkbox"/> Bruise <input type="checkbox"/> Burn (heat) <input type="checkbox"/> Burn (chemical) <input type="checkbox"/> Concussion (to the head) <input type="checkbox"/> Crushing Injury <input type="checkbox"/> Cut, laceration, puncture <input type="checkbox"/> Hernia <input type="checkbox"/> Illness <input type="checkbox"/> Sprain, strain <input type="checkbox"/> Other _____	<b>This employee works:</b> <input type="checkbox"/> Regular full time <input type="checkbox"/> Regular part time <input type="checkbox"/> Seasonal <input type="checkbox"/> Temporary  Months with this employer: _____  Months doing this job: _____

**Step 2: Describe the incident**

<b>Location of the incident:</b>	<b>Exact time:</b>
<b>What part of employee's workday?</b> <input type="checkbox"/> Entering or leaving work <input type="checkbox"/> Doing normal work activities <input type="checkbox"/> During break <input type="checkbox"/> Working overtime <input type="checkbox"/> Other _____	<b>Names of witnesses (if any):</b>   
<b>What part of the body was injured? Describe in detail:</b>  	
<b>What was the nature of the injury? Describe in detail:</b>  	



# INCIDENT INVESTIGATION REPORT

Injury and Illness Prevention Program

<b>Number of attachments:</b>	<b>Written witness statements:</b>	<b>Photographs:</b>	<b>Maps / drawings:</b>
<b>What personal protective equipment was being used (if any)?</b>			
<b>Describe, step-by-step the events that led up to the injury. Include names of any machines, parts, objects, tools, materials and other important details.</b>			
Description continued on attached sheets: <input type="checkbox"/>			

<b>Step 3: Why did the incident happen?</b>	
<b>Unsafe workplace conditions: (Check all that apply)</b> <input type="checkbox"/> Inadequate equipment guards <input type="checkbox"/> Unguarded hazard <input type="checkbox"/> Safety device is defective <input type="checkbox"/> Tool or equipment defective <input type="checkbox"/> Workstation layout is hazardous <input type="checkbox"/> Unsafe lighting <input type="checkbox"/> Unsafe ventilation <input type="checkbox"/> Lack of needed PPE <input type="checkbox"/> Lack of appropriate equipment / tools <input type="checkbox"/> Unsafe clothing <input type="checkbox"/> No training or insufficient training <input type="checkbox"/> Other _____	<b>Unsafe acts by people: (Check all that apply)</b> <input type="checkbox"/> Operating without permission <input type="checkbox"/> Operating at unsafe speed <input type="checkbox"/> Servicing equipment that has power to it <input type="checkbox"/> Making a safety device inoperative <input type="checkbox"/> Using defective equipment <input type="checkbox"/> Using equipment in an unapproved way <input type="checkbox"/> Unsafe lifting <input type="checkbox"/> Taking an unsafe position or posture <input type="checkbox"/> Distraction, teasing, horseplay <input type="checkbox"/> Failure to wear PPE <input type="checkbox"/> Failure to use the correct tools <input type="checkbox"/> Other _____
<b>Why did the unsafe conditions exist?</b>	
<b>Why did the unsafe acts occur?</b>	
Is there a reward (such as “the job can be done more quickly”, or “the product is less likely to be damaged”) that may have encouraged the unsafe conditions or acts? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe:	
<b>Were the unsafe acts or conditions reported prior to the incident?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Have there been similar incidents or near misses prior to this one?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	



# INCIDENT INVESTIGATION REPORT

Injury and Illness Prevention Program

### Step 4: How can future incidents be prevented?

What changes do you suggest to prevent this incident/near miss from happening again?

- Stop this activity
- Guard the hazard
- Train the employee(s)
- Train the supervisor(s)
- Routinely inspect for the hazard
- Other \_\_\_\_\_
- Redesign task steps
- Redesign work station
- Write a new policy/rule
- Enforce existing policy
- Personal Protective Equipment

What should be (or has been) done to carry out the suggestion(s) checked above?

Description continued on attached sheets:

### Step 5: Who completed and reviewed this form? (Please Print)

Report completed by:		Job title:	
Department:		Date report was completed:	

Names of investigation team members:

Use the information collected in this accident investigation to complete the OSHA 300 and 301 Injury and Illness report forms.

Reviewed by: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_



Employee Name: \_\_\_\_\_

Date: \_\_\_\_\_

## EMPLOYEE SAFETY SUGGESTION FORM

### Injury and Illness Prevention Program

**Instructions:** Complete this form to express any safety concerns, complaints or suggestions and submit to the Risk Management and Safety department. You will receive a quick response in regards to your concerns followed up with any applicable corrective actions.

#### Safety Concern / Suggestion:

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#### Unsafe workplace conditions:

Unsafe workplace conditions: (Check all that apply) (Check all that apply)

- Inadequate equipment guards
- Unguarded hazard
- Safety device is defective
- Tool or equipment defective
- Workstation layout is hazardous
- Unsafe lighting
- Unsafe ventilation
- Lack of needed PPE
- Lack of appropriate equipment / tools
- Unsafe clothing
- No training or insufficient training
- Other \_\_\_\_\_

Unsafe acts by people: (Check all that apply)

- Operating without permission
- Operating at unsafe speed
- Servicing equipment that has power to it
- Making a safety device inoperative
- Using defective equipment
- Using equipment in an unapproved way
- Unsafe lifting
- Taking an unsafe position or posture
- Distraction, teasing, horseplay
- Failure to wear PPE
- Failure to use the correct tools
- Non compliance with OSHA regulations
- Other \_\_\_\_\_

#### Required Corrective Action

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\_\_\_\_\_  
Risk Management and Safety

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Int.

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Date

\_\_\_\_\_  
Production Management

\_\_\_\_\_  
Int.

\_\_\_\_\_  
Date



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