



Don H. Mahaffey Drilling Co.

*INJURY AND ILLNESS PREVENTION
PROGRAM (IIPP)*

*Injury and Illness
Prevention Program (IIPP)*



YOUR OSHA COMPLIANCE SOLUTION

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1 OBJECTIVE

Don H. Mahaffey Drilling Co. has adopted this Injury and Illness Prevention Program to establish the minimum safety orders for securing safety in the workplace. Compliance with these orders may not in itself prevent occupational injuries or diseases, but will provide a safe environment which is a fundamental prerequisite in controlling injuries and illness. These orders are designed and consistent with the standards set forth under the California Code of Regulations, Title 8, Section 1509.

2 PERSONNEL RESPONSIBILITY

2.1 Responsible Person

Don H. Mahaffey Drilling Co. has designated Ashley Mahaffey Tullius with the authority and responsibility for the implementation of the Injury and Illness Prevention Program (IIPP). Ashley Mahaffey Tullius will be responsible for:

- a. Establishment and enforcement of all workplace policies for a safe and healthful work environment;
- b. Designation of supervisory and management personnel to assist in the enforcement and supervision of company policies and orders within the IIPP;
- c. Maintaining records pertaining to the program; and
- d. Maintaining, reviewing and updating the IIPP at least annually.

2.2 Supervisors

2.2.1 All supervisors have the responsibility of ensuring that employees under their direct supervision are complying with all company procedures.

2.2.2 When employees fail to follow company safety procedures, it is the supervisor's responsibility to dispense disciplinary action that is in accordance with company policy.

2.3 Employees

All employees have the responsibility for complying with safe and healthful work practices, including applicable regulations, company policies and department safety procedures. Employees who fail to follow these safe work practices will be subject to disciplinary action, up to and including termination.

3 METHODS OF ENSURING EMPLOYEE COMPLIANCE

Methods for ensuring that employees comply with safe and healthy work practices may include one or a combination of the following:

- a. Recognition and noted performance evaluation of employees who follow safe and healthful work practices,
- b. Training and retraining programs,
- c. Disciplinary action, or
- d. Any other such means to encourage compliance.

4 SYSTEM FOR COMMUNICATING WITH EMPLOYEES

4.1 General

Employees will be communicated through a form readily understandable on matters relating to occupational safety and health. In addition, all employees are encouraged to communicate safety concerns to their supervisor without fear of reprisal.

4.2 Code of Safe Practices

Code of safe work practices which relate to company operations will be adopted and utilized. The codes of safe work practices will be posted at a conspicuous location at each job site office or be provided to each supervisory employee who will have it readily available.

4.3 Safety Meetings

Supervisory employees will conduct safety meetings, or equivalent, with their crews at least every 10 working days to emphasize safety.

Note: Supervisors may use the form found in Appendix 4 to document these meetings.

4.4 Other Methods of Communication

Employees will be informed through one or a combination of the following methods:

- a. Company safety handbook;
- b. Training programs,
- c. Postings/Written communications,
- d. Anonymous notification by employees about hazards, or
- e. Any other means that ensures communication with employees.

4.5 Hazard Communication

Employees will be provided access to hazard information pertinent to their work assignments. Information concerning the health and safety hazards of tasks performed by department staff will be available from several sources. These sources include, but are not limited to Safety Data Sheets (SDSs), equipment operating manuals, container labels and work area warning postings.

5 IDENTIFYING AND EVALUATING WORK PLACE HAZARDS

5.1 Job Hazard Assessment/Safety Analysis

5.1.1 Initial Assessment

Prior to the presence of its employees, a Don H. Mahaffey Drilling Co. supervisor will make a thorough survey of the conditions of the site to determine, so far as practicable, the predictable hazards to employees and the kind and extent of safeguards necessary to conduct the work in a safe manner.

5.1.2 Additional Assessments

A hazard assessment may be conducted to review workplace conditions, as well as potential hazards that might not be recognized otherwise. Hazard assessments may be performed:

- a. When new processes are implemented; and
- b. When new materials and/or equipment are introduced in the workplace.

NOTE: These job hazard assessments may be recorded using the Job Hazard Analysis form located in Appendix 1.

5.2 Additional Inspections

Periodic inspections will be performed and recorded to identify and evaluate hazards:

- a. When this program is first established;
- b. Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represent a new occupational safety and health hazard; and
- c. Whenever management is made aware of a new or previously unrecognized hazard.

Note: Inspectors may utilize the form found in Appendix 2 to document their findings.

5.3 Hazard Identification by Employees

5.3.1 Employees are often the first to recognize hazards. All employees are required to actively participate in safe practices, which may include one or a combination of the following:

- a. Immediate notification of hazards to immediate supervisors and/or upper management;
- b. Stopping the work that is causing the hazard;
- c. Submission of work orders to the maintenance department for those hazards; and
- d. Submission of safety suggestions.

5.3.2 Employees are assured that management will guard against reprisals and will take positive steps to correct those potential hazards or workplace injuries that are brought to their attention.

5.4 Periodic Supervisory Meetings

Periodic meetings of supervisory members will be held under the direction of management for the discussion of safety problems and accidents that have occurred. Management may use the form found in Appendix 3 to document these meetings.

6 CORRECTING WORKPLACE HAZARDS

6.1 Corrective Response and Action

Hazards discovered either as a result of a scheduled periodic inspection or during normal operations will be corrected when observed or discovered. The methods

and/or procedures for correcting unsafe or unhealthy conditions, work practices and work procedures will be executed by designated personnel in a timely manner based on the severity of the hazard. The designated personnel responsible for the completion of remedial action and follow-up will be required to document the processes taken.

6.2 Imminent Hazards

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 will be provided the necessary safeguards.

6.3 Hazard Correction Tracking

The actions taken to correct an identified hazard will be tracked to ensure success.

7 INJURY/ILLNESS INVESTIGATION

7.1 Injury/Illness Investigation

Designated personnel, or a team of personnel, will be responsible to perform injury/illness investigations. Investigation processes will be utilized to determine and correct the cause(s) of the accident/incident. General procedures that may be used include:

- a. Interviewing Injured personnel and witnesses;
- b. Examining the injured employee's workstation for causative factors;
- c. Reviewing established procedures to ensure they are adequate and were followed;
- d. Reviewing training records of affected employees;
- e. Determining all contributing causes to incident/accident;
- f. Taking corrective actions to prevent the incident/accident from reoccurring; and
- g. Recording all findings and actions taken.

7.2 Injury/Illness Reporting

At the conclusion of each injury/illness investigation, an injury/illness report will be created and archived. The designated investigation personnel will refer to the Accident/Incident Investigation Program for further instruction and requirements.

8 PROGRAM ACCESS

8.1 Employee Access

All employees will have either in person or printed copy access to the program.

8.2 Methods of Access

Access will be provided by doing one of the following:

- 8.2.1 Access will be provided in a reasonable time, place, and manner, but in no event, later than 5 business days after the request for access has been received from an employee or designated representative. Designated representatives must submit a written authorization with their request for access to the program that contains the name and signature of the employee who they are representing, the date of the request, the designated representative's name (either the individual or organization), and the date upon which the request will expire if it is less than 1 year.
- a. A free printed copy of the program will be provided to the requesting employee or designated representative, unless the employee or designated representative agrees to receive an electronic copy.
 - b. A reasonable, non-discriminatory reproduction charge for additional copies may be imposed after the first printed copy is requested if an employee or designated representative request additional copies of the program within 1 year of the previous request and the program has not been updated with new information since the printed copy was provided.
- 8.2.2 Unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the Program.

8.3 Records

Such program access request need not include any of the records of the steps taken to implement and maintain the written program.

8.4 Separate Operations

Access may be limited to the program or programs applicable to the employee requesting the program if there are distinctly different and separate operations that have different programs.

8.5 Communication

All employees will be informed of their right and procedure to access the program.

8.6 Collective Bargaining Agents

Nothing in Section 8 is intended to preclude employees and collective bargaining agents from collectively bargaining to obtain access to information in addition to that available under Section 8.

9 TRAINING

9.1 Employee Training

Training and instruction will be provided, along with specific procedures and hazard awareness associated with the duties to be performed:

- a. When this program is first established;
- b. To all new employees;
- c. To all employees given new job assignments for which training has not previously been received;
- d. Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard; and
- e. Whenever a new or previously unrecognized hazard is made aware.

9.2 Hazard and Safety Precautions

When workers are first employed, they will be given instructions regarding the hazards and safety precautions applicable to the type of work in question and directed to read the Code of Safe Practices.

In addition, where employees are subject to known job site hazards, such as, flammable liquids and gases, poisons, caustics, harmful plants and animals, toxic materials, confined spaces, etc., they will be instructed in the recognition of the hazard, in the procedures for protecting themselves from injury, and in the first aid procedure in the event of injury.

9.3 Management and Supervisory Training

Additional training will be provided for management and supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.

10 RECORDKEEPING

10.1 Training Records

Documentation of all safety and health training for each employee will be maintained. Training records will include, employee name or other identifier, training dates, type(s) of training, and training providers. This documentation will be maintained for at least 1 year.

Exception 1:

If Don H. Mahaffey Drilling Co. has fewer than 10 employees, the company may comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to the hazards unique to the employees' job assignment when first hired or assigned new duties.

Exception 2:

Training records for employees who have worked for less than 1 year for Don H. Mahaffey Drilling Co., may not need to be retained beyond the term of employment if they are provided to the employee upon termination of employment.

10.2 IIPP Activity

Records documenting all IIPP activity will be kept and maintained for at least 1 year, including records of scheduled and periodic inspections to identify unsafe conditions and work practices. These records will include:

- a. Person(s) conducting the inspection,
- b. The unsafe conditions and work practices that have been identified; and
- c. The action taken to correct the identified unsafe conditions and work practices.

Exception: If Don H. Mahaffey Drilling Co. has fewer than 10 employees, the company may elect to maintain the inspection records only until the hazard is corrected.

10.3 Safety Data Sheets

Safety data sheets will be retained as necessary to comply with the provisions of the Hazard Communication program. Where safety data sheets are destroyed, a record of the identity (chemical name if known) of the substance or agent, where it was used, and when it was used will be retained for at least 30 years.

10.4 Employee Medical Records

If applicable, the medical record for each employee will be preserved and maintained for at least the duration of employment plus 30 years, except that the following types of records need not be maintained for any specific period:

- a. Heat insurance claims records maintained separately from Don H. Mahaffey Drilling Co.'s medical program and its records;
- b. 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 Don H. Mahaffey Drilling Co.'s medical programs and its records; and
- c. The medical records of employees who have worked for less than 1 year will not need to be maintained beyond the term of employment if they are provided to the employee upon termination of employment.

10.5 Injury Records

The Cal/OSHA Form 300, the privacy case list (if one exists), the Cal/OSHA Form 300A, and the Cal/OSHA Form 301 Incident Reports will be retained for 5 years following the end of the calendar year that these records cover.

