



INJURY & ILLNESS PREVENTION PROGRAM

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1.0 Purpose

The purpose of the Injury & Illness Prevention Program (IIPP) is to minimize or eliminate potentially hazardous occupational exposures in compliance with California Occupational Safety and Health Administration's (CAL/OSHA) T8CCR3203 and the intent of Federal Occupational Safety and Health Administration's (OSHA) FCR1910. The IIPP covers:

- WM Safety Policy
- Responsibility
- Compliance
- Disciplinary Policy
- Code of Safe Practices (Rules Book)
- Communication
- Hazard Assessment
- Hazard Correction
- Training and Instruction
- Recordkeeping
- Accident/Exposure Investigation
- Safety Programs

2.0 Applicability

The Injury & Illness Prevention Program applies to all WM employees who work at WM-owned or operated facilities and to personnel who are directly supervised by WM staff.

This program does not apply to:

- Personnel who report to a contract supervisor.
- Contractors who operate independently.
- Contractors who are not directly supervised by WM staff.

3.0 Safety Policy

The health and well-being of our employees and the general public are first and foremost above all other considerations at all of our Collection and Post-Collection sites.

We want to provide a clean and healthful workplace for our employees and avoid the needless pain and suffering associated with accidents. We are committed to a successful injury and illness prevention program that includes the identification and

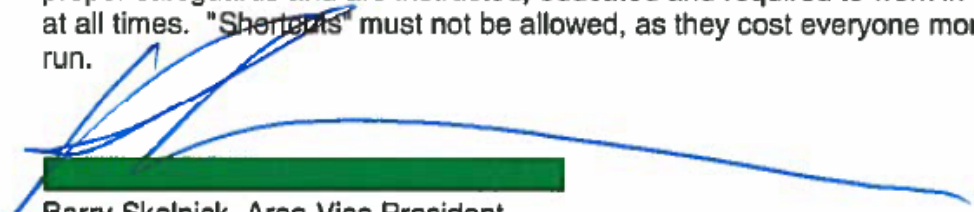
correction of hazards and training of employees in safe work practices. We strive to comply with all safety and health standards, hold safety as a company value and we also expect the full cooperation of our employees so that we can be proud of our safety record.

Waste Management of the Northern California/Nevada territory has developed a comprehensive Injury and Illness Prevention Program. The goal of this program is to minimize the frequency and severity of employee accidents and comply with the laws and regulations that pertain to our operation. The program has been designed to eliminate or minimize physical hazards from the work environment and train employees in safe work practices.

Incident prevention is an integral part of any successful organization. We recognize that accidents not only cause physical and mental pain to employees, but also are costly in terms of dollars and lost production. Efficient accident prevention can be directly related to increased profitability for our business.

Although the ultimate responsibility for the safety program lies with the managers and supervisors, the program cannot succeed without the cooperation of all our employees. Everyone must be one hundred percent safety conscious in everything he or she does while on the job. We are confident that with a sincere and concentrated effort from everyone, our safety goals can be achieved.

It is the responsibility of each of us to see that our employees are provided with the proper safeguards and are instructed, educated and required to work in a safe manner at all times. "Shortcuts" must not be allowed, as they cost everyone more in the long run.


Barry Skolnick, Area Vice President

4.0 Responsibility

4.1 WM Safety Services

WM Safety Services is responsible for maintaining the Injury & Illness Prevention Program in accordance with federal Occupational Safety and Health Administration (OSHA) requirements.

4.2 Site Management

Site Management is responsible for establishing and implementing the Injury & Illness Prevention Program in accordance with applicable federal and state OSHA requirements, and other local governmental requirements.

Richard Spediacci, District Manager, has been assigned the responsibility and authority to manage the Injury and Illness Prevention Program for Davis Street Transfer Station. We realize that the ultimate responsibility for safety and health in the workplace still rests with:

4.2.1 Senior Management

Senior Management has the ongoing responsibility to ensure departmental implementation of the IIP Program and to ensure the health and safety of our employees. This is accomplished by communicating Davis Street Transfer Station's emphasis on health and safety, analyzing work procedures for high hazard identification and correction, ensuring regular workplace inspections, providing health and safety training, and encouraging prompt employee reporting of health and safety concerns without fear of reprisal.

4.2.2 Line Supervisors

Line Supervisors are responsible for implementing and maintaining the IIP Program in their work areas and for answering worker questions about the Program.

4.3 Employees

ALL EMPLOYEES are responsible for the timely reporting of safety hazards in the workplace. Employees are also responsible for following general safe work practices, as well as the safe work practices specific to their jobs. Employees are required to comply with the Life Critical Rules and the Rules Book for their line of business.

5.0 Acronyms and Definitions

Acronym	Definition
IIPP	Injury & Illness Prevention Program
ASM	Area Safety Manager
AVP	Area Vice President
JHA	Job Hazard Analysis
OSHA	Occupational Safety and Health Administration
CAL/OSHA	California Occupational Safety and Health Administration
WM	Waste Management

6.0 Compliance

6.1 Management Responsibility

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly. Management must, at a minimum, review the IIPP and all of the safety programs incorporated therein on an annual basis, but no later than January 20th of each year. Should any updates or changes to the safety program occur it shall be noted on the Annual Program Review form and signed by Management.

6.2 Employees Responsibility

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

6.2.1 Rule Compliance

Our system for ensuring that all employees comply with the rules and maintain a safe work environment include:

- Informing employees of the provision of our IIP Program
- Evaluating the safety performance of all employees
- Recognizing employees who perform safe and healthful work practices
- Providing training to employees whose safety performance is deficient
- Conducting Observation Behavior Assessments
- Coaching employees for failure to comply with safe and healthful work practices; and
- Discipline or corrective action.
- Appropriate discipline, as per company policy and the Collective Bargaining Agreements, will be used for corrective action if necessary.

7.0 Disciplinary Policy

The objective of the progressive discipline system is to correct unsatisfactory behavior or performance and through the efforts of the supervisor, to instruct, guide counsel and direct employees to meeting or comply with WM rules and policies. The key principles of the progressive discipline system are:

- Employees are expected to be familiar with the progressive discipline policy and how it is administered.
- Supervisors are expected to uphold all policies and rules. These rules and policies are communicated to the employees in the courses of orientation, job training and ongoing on-the-job discussions. When an employee fails to meet or comply with rules, policies and performance standards, the matter will be investigated. Following an investigation, if it is determined that an employee is blameworthy, the progressive discipline system will be followed.
- The primary responsibility to correcting unsatisfactory performance and behavioral problems rests with the employee. The supervisor carries the primary management responsibility for discipline through to the correction of unsatisfactory behavior or performance.

7.1 Supervisor Requirements

The supervisor has a multiple role when employees fail to meet or comply with department rules and policies: first to determine why the employee is not meeting the requirements, then to determine the appropriate corrective measures. Also, the supervisor is required to maintain documentation at all times and through all the steps in this process. This documentation includes, but may not be limited to: providing employees with policies, both formal and informal investigation notes and formal disciplinary letters.

7.1.1 Corrective Measures

Corrective measures will be determined based on the factors relating to each case. Such measures may or may not be disciplinary. They could be an offer of assistance, counseling and coaching or a review of policies or rules and/or providing a letter of expectation.

7.2 Involvement

7.2.1 The Union

If the employee is a Union employee, the employee shall be provided with a Union shop steward to represent the employee during each step of the progressive disciplinary process, and whenever a formal investigative interview is conducted. The presence of a shop steward is mandatory.

Union involvement at an early stage of the process is essential to avoid any misunderstanding at a later date.

7.2.2 The Supervisor

The supervisor is required to supervise his or her employees to ensure adherence to WM policies and work standards. The supervisor is responsible to:

- Know their due diligence and legal responsibilities as a manager

- Ensure all employees know their work expectations
- Complete investigations
- Keep records of all meeting minutes
- Document all relevant observations
- Schedule meetings
- Ensure proper union representation at all meetings
- Be the final authority on discipline decisions
- Issue disciplinary letters
- Inform Human Resources of all suspensions and terminations issued
- Attend arbitrations/mediations as required

7.2.3 Management Representative

Whenever the supervisor arranges to meet with an employee and a shop steward to discuss unsatisfactory performance, behavioral problems or to conduct an investigative interview, there should also be a management representative present. The management representative may be any other non-unionized employee and should keep an accurate record of the discussion and prepare a file note of the meeting specifying date, time, participants, a summary of discussion, disciplinary action taken and commitments made.

7.2.4 Human Resources

HR must be informed of all suspensions or terminations, as these disciplinary actions are often grieved by the Union and may end up as part of the arbitration process. Also, Human Resources may be contacted at any time for consultation purposes to define the disciplinary process, standards for discipline, disciplinary letters and employee work records

7.3 The Disciplinary Process

The Area management team will use the same process for coaching and improving our employees' compliance with our safety rules book. This will ensure fair, consistent application of the coaching process and we will reduce the volume of rules failures and consequently improve our safety performance.

A rules failure is anytime an employee is observed not following a rule as defined in our rules book and/or specific instructions from a manager that increases their risk of a safety incident. The rating used on the OBA, ("Needs Improvement" or "Non-Compliant") does not affect the status of the failure. Life Critical Rule (LCR) violations are considered more severe and are addressed separately.

When an employee commits a rule failure, we will adhere to the following process:

- | | |
|---------------------------------------|----------------|
| 1 st failure: | Coaching |
| 2 nd failure of same rule: | Verbal Warning |

3 rd failure of same rule:	Written warning
4 th failure of same rule:	Final written warning & 3 day suspension
5 th failure of same rule:	Termination

The rule failures must be of the same rule and occur within a rolling 12 month period.

Life Critical Rules or Disposal Operations Critical 8 is considered more severe as failures have an increased risk of serious injury or death. For violations of any Life Critical rule within a 12 month rolling period we will follow the company outlined process:

1 st failure of any LCR:	Final written warning & 3 day suspension
2 nd failure of any LCR:	Termination

It is important to note that the above processes are a minimum, and the district management team has the ability to elevate/accelerate the process based on the level of negligence, employee's lack of improvement, failure of multiple rules, etc. The district team should consult with the Area Safety Manager and/or DO in order to ensure consistency and process integrity.

New employees will be held accountable for the above processed once they have completed their initial 90 days of employment and/or are approved to operate on their own.

Union districts will follow the steps outlined in their collective bargaining agreement. If the CBA does not specifically address the above issues, this policy applies.

7.4 Definitions

Verbal Warning

The supervisor, after completing an investigation will, as soon as possible, arrange a meeting with the employee, a shop steward and a management representative. The employee's performance will be reviewed and the employee will be asked to provide an explanation for his or her failure to meet standards, policies or rules. After this hearing, the management representative and the supervisor (and any others they may consult) will consider the explanation. If the employee fails to provide a satisfactory explanation to the supervisor, a verbal warning will be issued to the employee. A letter will be given to the employee notifying him or her that the verbal warning has been issued. A copy of the letter will be provided to the union and the employee's file.

Written Warning

Where, in the opinion of the supervisor, an employee's failure to comply with work standards or policies continues, the supervisor will, as soon as possible arrange another meeting with the employee, a shop steward and a management representative. If after an investigation and a review of the employee's work history, the employee cannot

provide an explanation that is acceptable to the supervisor, a written warning will be issued to the employee, the union and the employee's file.

Suspension

If a similar incident or another serious incident occurs, the supervisor will, as soon as possible, convene another meeting with the employee, a shop steward and a management representative. If after an investigation and a review of the employee's work history, the employee cannot provide an explanation that is acceptable to the supervisor, the employee will be issued a suspension of a specified length. The supervisor will issue a letter of suspension to the employee, the union, the employee's file and Human Resources.

Suspension and final warning

When unacceptable performance continues or for a serious incident, the supervisor will, as soon as possible, convene another meeting with the employee, a shop steward and a management representative. If after an investigation and a review of the employee's work history, the employee cannot provide an explanation that is acceptable to the supervisor, the employee will be issued a suspension of a specified length. The supervisor will issue a letter of suspension to the employee, the union, the employee's file and Human Resources. The letter must state that another repeat of poor work performance or violations of policy will result in termination for cause.

Termination

After an employee has received a suspension and final warning and an investigation shows that unacceptable performance continues, the supervisor will, as soon as possible, convene another meeting with the employee, a shop steward and a management representative. If after a review of the employee's work history, the employee cannot provide an explanation that is acceptable to the supervisor, the employee will be terminated for cause. The supervisor will issue a letter of termination to the employee, the union, the employee's file and Human Resources. The supervisor will then escort the employee from the site, and if required, arrange for a later time for the employee to return to the WM site to obtain any personal items stored at the worksite.

7.4.1 1st Life Critical Violation- Final Written Warning and Suspension

Employee receives a written final warning and an unpaid suspension if he or she commits a Life Critical violation.

The following steps MUST be followed:

- Human Resources must review all counseling prior to any action.
- The Supervisor will counsel the employee, utilizing the Safety Incident Intervention Checklist to guide the discussion.
- The Supervisor will document the discussion with a final written warning and suspension letter that includes a corrective action plan to prevent reoccurrence;

the final written warning and suspension letter should be placed in the employee's personnel file.

- The Supervisor should perform three unannounced OBA's for each of the next two months.

The preparation of the final written warning document and the suspension should be reviewed with Human Resources prior to delivery to the respective employee.

7.4.2 2nd Life Critical Violation– Termination

Except under extraordinary circumstances, an employee who commits two Life Critical violations within any twelve (12) month period should be terminated. The termination can only occur after consultation and documentation review with the Human Resources Representative. The description of the violation should be documented and placed in the employee's personnel file.

The supervisor, in consideration of mitigating the level of discipline, may consider all safety violations committed by the Employee before adoption of this policy.

There are additional considerations that must be taken into account when managing employee performance. Such considerations may include Human Rights, Employment Standards, worker compensation laws, collective agreements and other state and federal laws.

7.5 Policy Change

This policy may, at the sole discretion of the company, be modified, revoked or changed at any time with or without notice.

8.0 Code of Safe Practices

The Code of Safe Practices for our Waste Management operations consists of the Life Critical Rules and applicable Rules Book for each line of business. These rules are to be complied with by every employee.

8.1 Life Critical Rules Recycling (Post Collection)

1. Lockout / Tagout Equipment
2. Follow Bloodborne Pathogens Procedures
3. Do Not Walk on Conveyors
4. Wear Seat Belts
5. Prevent Fires – No Smoking, Use Hot Work Permits
6. Report Incidents Immediately
7. Never Modify or Disable Safety Devices

8. Follow Traffic Control Plan (Tipping Floor Policy)

8.2 Life Critical Rules – Collection

1. Never back a vehicle with someone on the riding steps.
2. Never back a dual drive vehicle from the right side without the proper mirrors, camera(s)/monitor.
3. Never exceed the speed limits posted or set by policy for school zones, riding steps, and stand-up right-side driving.
4. Always safely secure the vehicle.
5. Always comply with the seat belt rules.
6. Never zigzag.
7. Never double side unless approved by DM and specific conditions met.
8. Never modify or disable equipment safety devices.
9. Always comply with tipping floor or workface rules.
10. Always apply parking brakes when exiting a vehicle.

8.3 Rules Book(s)

The Rules Book(s) will be given to each affected employee and can be found on VISOR.

9.0 Communication

Supervisors are responsible for communicating with all employees about safety and health issues in a form readily understandable by all employees. All department personnel are encouraged to communicate safety concerns to their supervisor without fear of reprisal.

We recognize that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of the following items:

- New work orientation including a discussion of safety and health policies and procedures. [Employee Orientation Form]
- Review of our Injury and Illness Prevention Program.

- Code of Safe Practices (Rules Book).
- Workplace safety and health training programs.
- Regularly scheduled safety meetings.
- Effective communication of safety and health concerns between employees and supervisors, including translation where appropriate.
- Posted or distributed safety information.
- A system for employees to anonymously inform management about workplace hazards. [Employee Report of Unsafe Condition or Hazard Form]
- A labor/management safety and health committee that meets regularly, prepares written records of the safety and health committees meetings, reviews results of periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents. Refer to Section 8 for Safety Committee information.

10.0 Hazard Assessment

Periodic inspections to identify and evaluate workplace hazards will be performed by a competent observer(s) in the following areas of our workplace: Fill in Specific Areas

Periodic inspections are performed according to the following schedule:

1. When we initially established our IIP Program
2. When new substances, processes, procedures or equipment which present potential new hazards are introduced into our workplace
3. When new, previously unidentified hazards are recognized
4. When occupational injuries and illnesses occur; and
5. Whenever workplace conditions warrant an inspection.

10.1 Periodic Safety Inspections:

Inspection frequency will depend on the type of inspection to be completed - weekly, monthly or quarterly intervals. The following will be used as a guideline:

- Daily: High hazard or frequently changing operations or equipment (Commercial vehicles, forklifts, over the road vehicles, wheel loaders, heavy equipment).
- Monthly: Facility inspection of the entire facility. (Facility Inspection Form)

Refer to Section 11 for more information on specific Job Hazard Analysis and Section 10 for the required monthly facility inspection information and form.

11.0 Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered;
- When an imminent hazard exist which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed employees from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they were completed shall be documented on the “Corrective Action Tracking” (CAT) form.

12.0 Training and Instruction

All employees, including managers and supervisors, will have training and instruction on general and job-specific safety and health practices. Training and instruction will be provided as follows:

- When the IIP Program is first established;
- To all employees given new job assignments for which training has not previously been provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- To supervisors to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed; and
- To all employees with respect to hazards specific to each employee’s job assignment.

12.1 Workplace Safety & Health Practices

Workplace safety and health practices include, but are not limited to, the following:

- Explanation of our IIP Program, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Use of appropriate clothing, including gloves, footwear and personal protective equipment (PPE).
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Availability of toilet, hand-washing and drinking facilities.
- Provisions for medical services and first aid including emergency procedures.

12.2 Additional Training

In addition, we provide specific instructions to all employees regarding hazards unique to their job assignment, to the extent that such information was not already covered in training.

13.0 Recordkeeping

Refer to Section 3 for the WM Recordkeeping policy.

14.0 Accident/Exposure Investigation

Refer to Section 4 for the WM Incident (Accident/Exposure) Investigation procedures.

15.0 Safety Programs

All programs located in this binder are considered a part of our overall Safety Program and an integral part of our Injury and Illness Prevention Program. All required changes shall be made and the binder updated accordingly.

Any questions regarding the Safety Program should be directed to the Area Safety Manager.

16.0 Education & Training

16.1 CAL/OSHA Training Requirements

T8CCR3203, 7(A) through (F)

(7) Provide training and instruction:

(A) When the program is first established;

EXCEPTION: Employers having in place on July 1, 1991, a written Injury and Illness Prevention Program complying with the previously existing Accident Prevention Program in Section 3203.

(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;

(E) Whenever the employer is made aware of a new or previously unrecognized hazard; and,

(F) For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.

16.2 Federal OSHA Training Requirements

There are no federal OSHA training requirements for this sub-element.

16.3 WM Required Training (RT) Module

There are no WM training requirements for this sub-element.

16.4 SkillSoft Online Class(es) Requirements

Injury & Illness Prevention Program (I2P2)

Class Description: In the years since the introduction of the OSH Act, employers in the United States have seen a significant drop in the number of workplace injuries and deaths. However, the number of employee injuries and deaths remains unacceptable. In an effort to further encourage prevention and bring these numbers down, OSHA is working to implement Injury and Illness Prevention Program (I2P2) regulations that will require employers to implement and maintain an I2P2. However, working to implement an I2P2 now, instead of waiting for the regulation, has several benefits. First, your organization will be ready when OSHA's regulations do come into effect. Second, and perhaps more important, an I2P2 will help your organization prevent workplace injuries, illnesses, and fatalities, thereby protecting your employees and reducing the costs of responding to these incidences.

Training Hours: 0 Hours 0 Min

Vendor's Name: 6.Skillsoft

17.0 References

T8CCR3203 – Injury & Illness Prevention Program

18.0 CYCLE Tasks

CYCLE Task	Frequency
Review IIPP & Sign off	Annually
Update IIPP	As needed
Train Management & Employees on IIPP	Annually