



YOUR BEST PROTECTION

July 24, 2019

Mr. Tim Kerr, General Manager
American River Flood Control District
185 Commerce Circle
Sacramento, California 95815-4201

RE: LIABILITY, PROPERTY, AND WORKERS' COMPENSATION RISK ASSESSMENT

Dear Mr. Kerr:

It was a pleasure meeting with you and your staff on July 11, 2019. The purpose was to obtain an update on District operations, provide an update on JPIA resources, and assess any risk exposures. Please thank Malane Chapman, Office Manager; and Ross Kawamura, Field Supervisor; for their time and consideration during my visit.

Last year we discussed staff's occupational exposure to unsanitary conditions when doing maintenance or repair on the levees. Many of these biohazard wastes are associated with unsheltered homeless, transients, or homeless encampments. We agreed that the appropriate county or city agency should handle all relocation and clean-up of these areas, and the District should develop a formal bloodborne pathogens exposure control plan. I would like to extend my appreciation to the District for establishing work practice controls of the appropriate protective clothing and footwear, trash picker and grabber tools, and placing Sharps containers on vehicles. As part of its exposure determination assessment, the District offered staff to receive the Hepatitis B vaccine and elected to go beyond the Cal/OSHA standard, by reimbursing staff who elected to receive the Hepatitis A vaccine.

In addition to discussing bloodborne pathogens, we spoke on Cal/OSHA's Heat Illness Prevention Program. Ross was provided resources and web links to the JPIA's Risk Control Manual, so he could download our template and create a District specific written compliance plan. Ross shared that he recently attended a Heat Illness Prevention Training class conducted by the JPIA, and has implemented formal heat illness prevention procedures as well as a written plan.

As referenced above, the District continues to demonstrate its commitment to eliminating workplace hazards, and protecting its workers and continuously improving its workplace safety and health programs.

We discussed [SB 1343](#), *Employers: Sexual Harassment Training* that amends and extends this training requirement by California employers. This bill now requires an employer who employs

Mr. Tim Kerr, General Manager
 American River Flood Control District
 July 24, 2019
 Page 2

five or more employees, including temporary or seasonal employees, to provide at least two hours of sexual harassment training to all supervisory employees, and at least one hour of sexual harassment training to all non-supervisory employees by January 1, 2020, and once every two years thereafter. Click [here](#) to find JPIA training resources for AB 1825 and SB 1343.

Thank you for allowing me to do a review of the District's written Injury Illness Prevention Program (IIPP). During my review I shared three suggestions: revise the name and title of the program administrator; revise the recordkeeping program element by inserting a minimum number of years training and hazard assessment records to be maintained; and ensure that an annual review of the written plan is conducted.

While an updated IIPP meets certain parts of the [8 CCR 3203 standard](#), Cal/OSHA highlights an IIPP is not a paper program. **How well the District's IPP meets Cal/OSHA's standard depends on an employer addressing all program elements and effectively putting them into place.** Cal/OSHA has a webpage with [Effectiveness Questions](#) and [IIPP self-assessment checklist](#), which is a tool designed to compare an employer's written plan to the eight program elements required in the standard.

After our meeting, Ross escorted me on a tour of the levees. We visited the north area (Steelhead Creek), Del Paso (Arcade Creek), and Richards Blvd. American River Flood Control District continues to manage the maintenance and repair of its levees very well. I was able to see firsthand the homeless community in, on, and around the levee system; and can only encourage the District to sustain its efforts to work with city, county, and law enforcement so your work areas can be safely managed.

I will return to your District later this fall to conduct Defensive Driver and Ergonomic Training classes. Heat Illness Prevention Training will be scheduled for your staff next spring. The District may want to assess sending staff to Cal/OSHA 10-Hour training classes when offered by the JPIA. This OSHA Outreach course provides training on the recognition, avoidance, abatement, and prevention of workplace hazards. Its purpose is to promote workplace safety and health, and to make workers more knowledgeable about workplace hazards and their rights.

In the meantime, should you have any questions or need assistance, please contact me at (800) 231.5742, Ext. 3137, or via email at rflint@acwajpia.com.

Sincerely,



Robin Flint, ARM, CSP, CEAS I
 Senior Risk Management Advisor

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c: Ross Kawamura, Field Supervisor
 Steve Johns, JPIA Director
 JPIA Risk Management Committee