



Ethics, Organization & Personnel Committee

# Safety Program Update and Response to Public Comments

Item 6a  
September 10, 2024

## Item # 6A

### Subject

Safety Program Update and Response to Public Comments

### Purpose

Response to public comments made during 8/20/2024 Ethics, Organization, and Personnel Committee Meeting

# Collaborative Approach to Success

## Management Commitment



# Health & Safety Overview



# State Audit Process



- H&S Programs Review
  - Injury reporting
  - Incident Investigations
  - Personal Protective Equipment
  - Training Program
- Employee Interviews
- Site Visits at Gene and Weymouth

# State Audit Findings

## Injury Reporting

- Follows Cal/OSHA regulations and Metropolitan's policies.
- Reviewed safety incidents from 2017–2021 and did not note any patterns that raised concerns

## Incident Investigations

- Incidents were reviewed, staff involved was interviewed and corrective actions implemented

# State Audit Findings

## Personal Protective Equipment (PPE)

- Follows Cal/OSHA regulations
- Employees interviews stated able to obtain PPE when needed

## Training Program

- Complied with regulatory requirements



# State Audit Recommendations



*“Although MWD’s safety program generally aligns with the state laws, we identified opportunities for policy improvements”*

1. Require more consistent collaboration and communication to ensure safety
2. Clearly articulate who is responsible for responding to retaliation concerns and clearly listing steps to be taken



# HSE 101.4 Safety Communications



## State Audit Findings Implemented

- Written Policies and Procedures for Communication
- Stop Work Authority
- Non-Retaliation Policy

### HSE 101.4

#### Safety Communications

Injury and Illness Prevention Program

MWD Health, Safety, and Environmental Manual

Revised October 2022

#### 1.0 PURPOSE

Metropolitan values every employee's input and strives to provide a work environment of collaboration and communication related to health and safety (H&S).

This procedure outlines systems of communication that create avenues for regular H&S discussion and collaboration between management, Operational Safety and Regulatory Services (SRS) staff, and employees (including interns, contractors and volunteers). This includes minimum levels of collaboration between SRS Site Representatives and management. Also, this procedure encourages employee reporting of hazards in the workplace without fear of retaliation.

#### 1.1 AVENUES OF COMMUNICATION

- Managers and Supervisors
- Planning Meetings, All Hands Meetings, and other related meetings
- Regular Toolbox/Safety Talk Meetings
- Shutdown or Special Project Toolbox Meetings
- Local Safety Committees
- SRS Site Representatives or other SRS Staff
- Open and Non-Retaliation H&S Communication Protections
- Stop Work Authority (Take 5 For Safety)
- Confidential Hotline – (213) 217-5504 or Extension 75504

#### 2.0 ROLES AND RESPONSIBILITIES

##### 2.1 FIELD UNIT AND FACILITY MANAGERS

Field Unit Managers and Facility Managers (Facility Managers) must include SRS Site Representatives in the meetings described below to encourage open communication and collaboration in developing effective H&S solutions.

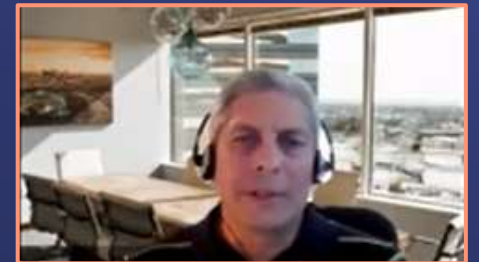
##### 2.1.1 PLANNING AND/OR MANAGEMENT MEETINGS (TYPICALLY WEEKLY)

- Facility Managers must require that their Team Managers, Supervisors and other lead staff include SRS Site Representative(s) in planning meetings and project review meetings. Integrating and discussing H&S issues during these meetings provides for ongoing collaboration among managers, planner/schedulers, and SRS Site Representatives.

# State Audit Document Review and Findings

## Open Communication of health and safety without fear of reprisal

- ✓ Non-Retaliation Training partnered with Ethics Completed 2022
  - Why Preventing Retaliation Matters
  - Reviewed MWD Retaliation Policy (Admin Code 7128)
  - Tips for Employees and Managers
  - How to File a Retaliation Complaint
  - Investigation Procedures

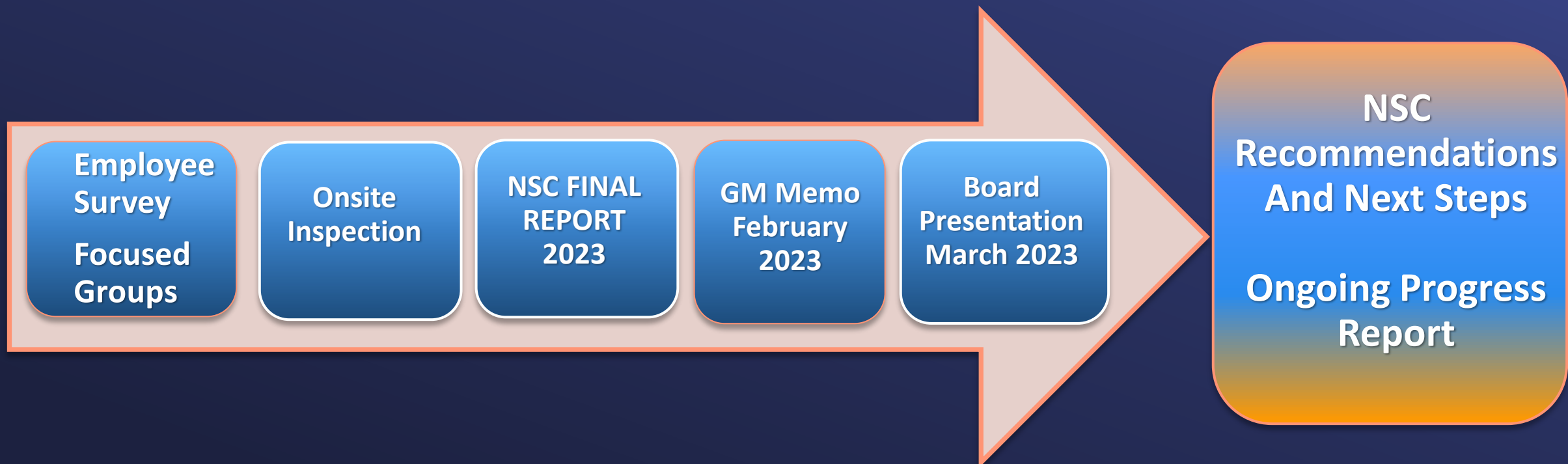


# Health & Safety Overview



# National Safety Council (NSC) Initiative

- Stand alone initiative for continuous improvement of safety
- Not part of the state audit recommendation
- Found that Safety Program complies with regulations
- Provided 7 recommendations for safety culture improvement



# Health & Safety Overview





Top  
Priority  
Recommendations

## NSC Top 3 Priorities

1. Set safety vision and annual safety goals
2. Adopt a continuous improvement process and regularly assess progress
3. Review organizational structure to enable Safety to operate as independent function



# Health & Safety Overview





Top  
Priority  
Recommendations

## NSC Top Priority #1

### Set safety vision and annual safety goals

- NSC conducted site visits and focus group
- NSC facilitated developing Safety Vision and Guiding Principles

# Safety Vision

Through high standards and leadership at all levels, we are committed to achieving zero harm to employees, partners, public, environment, and infrastructure

“We are One. We are Empowered.  
Safety starts with Me”



The graphic features the logos of the Metropolitan Water District of Southern California and the United Brotherhood of Carpenters and Joiners of America at the top. Below the logos, the text 'SAFETY VISION' is followed by a commitment to zero harm. A row of diverse human silhouettes is shown, with the slogan 'We are ONE. We are EMPOWERED. SAFETY starts with ME.' underneath. The bottom section lists five safety guiding principles.

**SAFETY VISION**  
Through high standards and leadership at all levels, we are committed to achieving zero harm to employees, partners, public, environment, and infrastructure.

We are ONE. We are EMPOWERED. SAFETY starts with ME.

**Safety Guiding Principles**

- Establish and maintain a clear focus on reducing risk to foster the safest work environment possible that will ensure all employees leave at the end of each day without injury.
- Advance safety culture through teamwork and collaboration, addressing safety challenges with mutual respect, civility, and professionalism.
- Create an atmosphere that invites employees to offer their experience and advice to improve safety by raising concerns and questions about work procedures without fear of retaliation, and in a forum that appreciates their contributions.
- Comply with applicable laws and regulations, while empowering work teams to resolve safety issues at the lowest practical level in the organization.
- Celebrate successes and recognize the contribution of employees, work teams and partners who advance safety performance.

# Guiding Principles

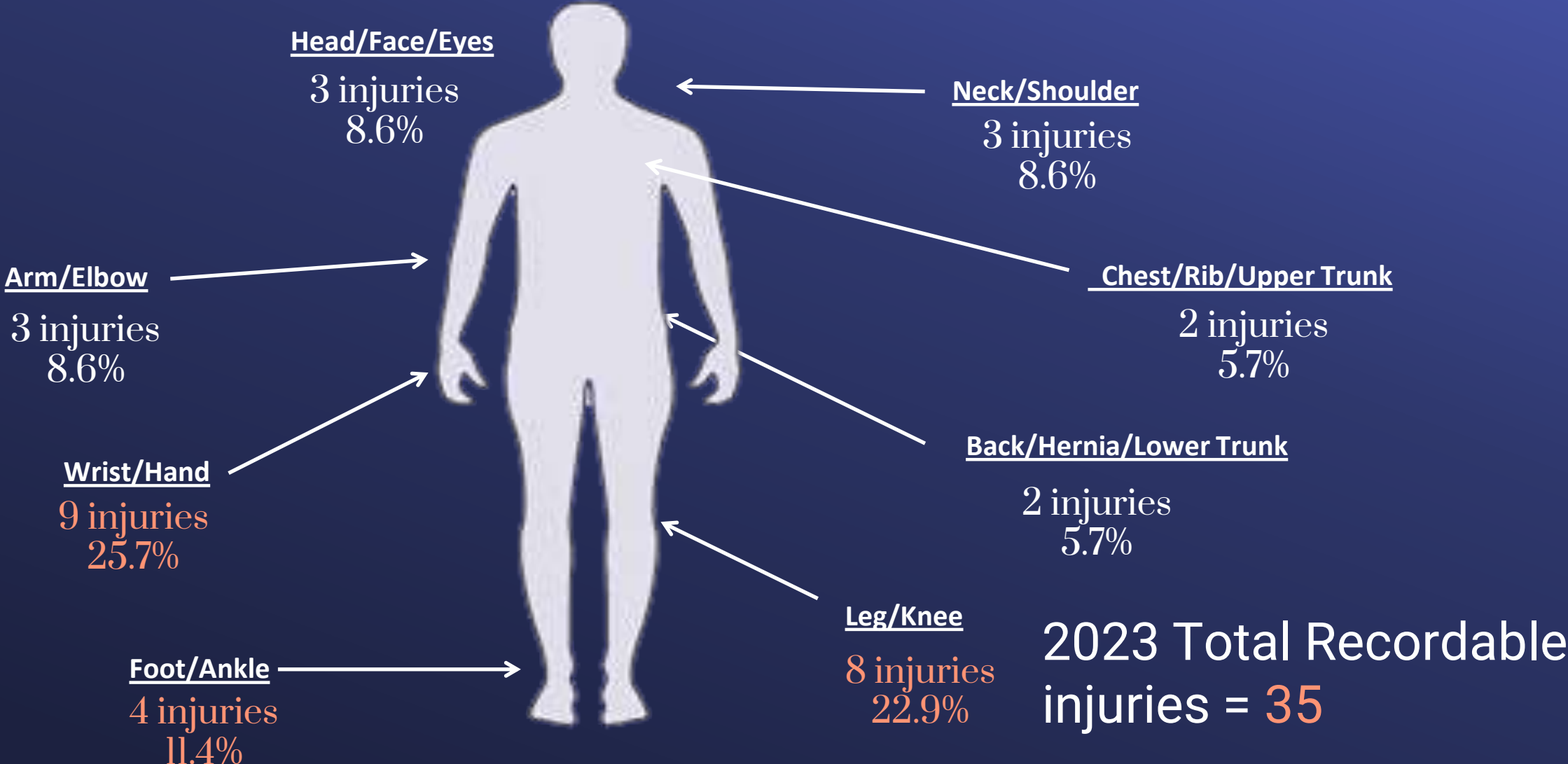
- Maintain a clear focus on reducing risk
- Advance safety culture through teamwork and collaboration
- Invite employees to offer their experience to improve safety
- Empower teams to resolve safety at the lowest practical level
- Celebrate successes and recognize employee contribution

# NSC Top Priority #1: Set Performance Metrics and Goals

Consistent communication and review of performance metrics

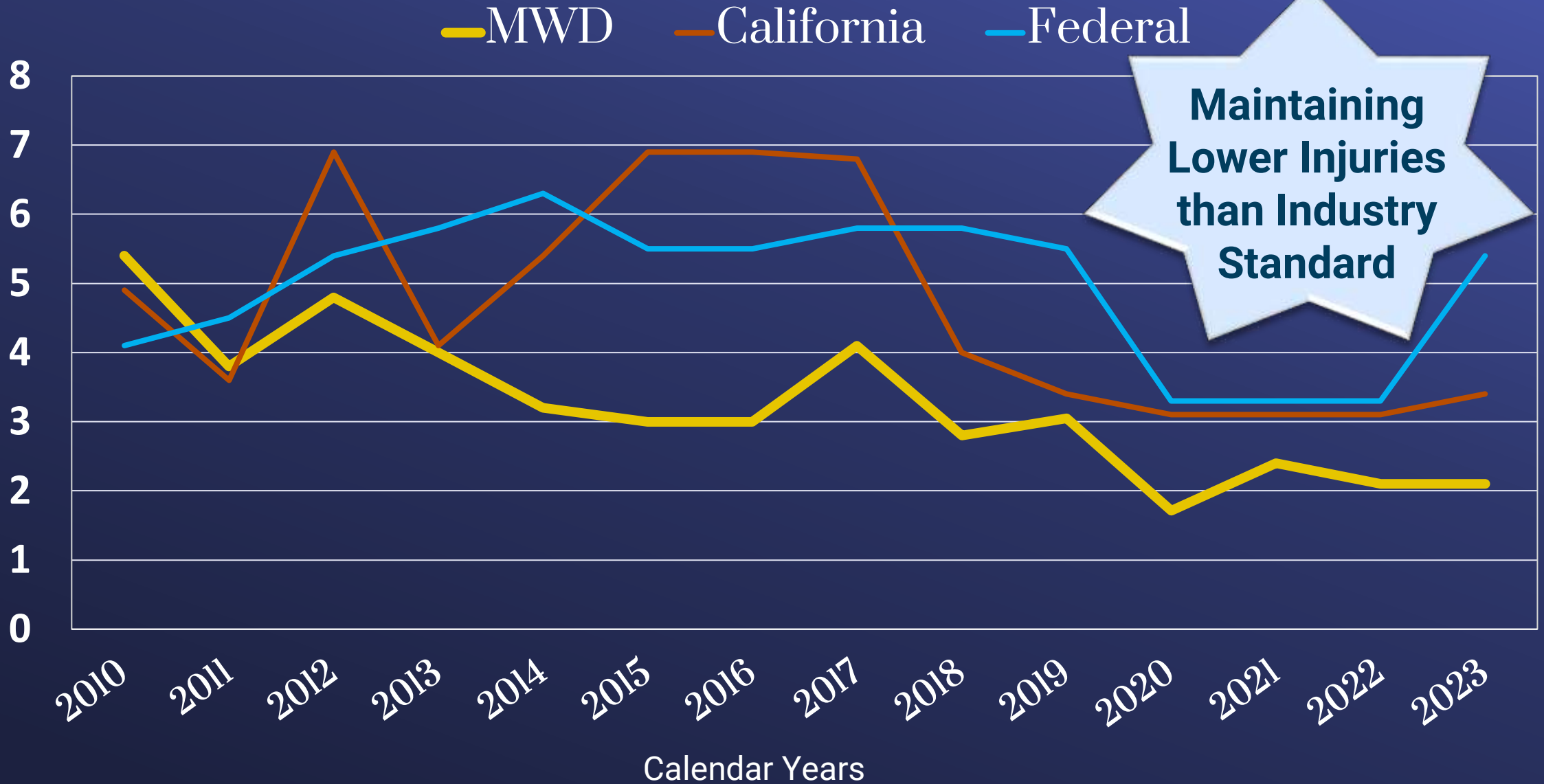
Date of Last Update:		7/17/2024		<h2 style="text-align: center;">EHS Performance Chart</h2> <p style="text-align: center;">Calendar Year <u>2024</u></p>																													
Includes Data Up To:		2nd Qtr 2024																															
<table border="1" style="font-size: small;"> <tr> <td style="background-color: #28a745; color: white;">Goal Met</td> </tr> <tr> <td style="background-color: #ffc107;">Goal Not Met</td> </tr> </table>		Goal Met	Goal Not Met	Leading Indicators																Lagging Indicators													
		Goal Met																															
		Goal Not Met																															
Safety Inspection Completion Rate (%) <sup>1</sup>				Training Completion Rate (Running % for CY) <sup>2</sup>				Toolbox Completion Rate (%) <sup>3</sup>				Safety Committee Meeting Rate (%) <sup>4</sup>				JSH Checklist Completion Count <sup>5</sup>				Hazard & Near-miss Recognition <sup>6</sup> (Safety Review Request)				Recordable Injury Count <sup>7</sup>				Reportable Chemical Release or Spill Count <sup>8</sup>					
GOAL		90%		90%		90%		100%		5		1		0		0																	
QUARTER		1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>				
T&WQ - Diemer Unit		100	100			98	96			100	100			100	100			9	10			1	1			1	0			0	0		
T&WQ - Jensen Unit		100	100			96	93			100	100			100	100			1	1			1	3			0	0			2	0		
T&WQ - Mills Unit		90	100			96	96			100	100			100	100			3	5			4	4			0	0			1	0		
T&WQ - Skinner Unit		100	100			98	98			100	100			100	100			3	5			2	1			0	0			1	2		
T&WQ - Weymouth Unit		100	100			92	95			100	100			100	100			3	4			6	0			0	0			1	1		
T&WQ - Water Quality Section		100	100			92	83			78	94			100	100			0	0			1	0			0	0			0	0		
C&D - Desert Pump Operations Unit		79	96			89	89			100	100			100	100			1	4			0	8			0	0			0	0		
C&D - Desert Support Services Unit		85	74			90	90			100	100			100	100			4	0			0	3			0	0			0	0		
C&D - Eastern Region Unit		100	100			90	91			100	100			100	100			6	3			1	3			1	0			0	0		
C&D - Western Region Unit		100	100			84	85			100	66			100	100			20	14			5	4			0	1			0	0		
IOPSS - Construction Services Unit		100	89			94	91			100	100			100	100			41	43			2	3			0	0			0	0		
IOPSS - Fleet Unit		100	100			76	80			52	22			100	100			0	0			0	1			0	0			0	0		
IOPSS - Manufacturing Services Unit		100	100			94	92			100	100			100	100			2	5			3	1			0	1			0	0		
IOPSS - Power & Equipment Reliability Unit		100	100			92	90			82	100			100	100			2	9			0	5			0	0			0	0		
IOPSS - System Operations Unit (Eagle Rock)		100	100			92	90			N/A	N/A			0	100			0	0			0	0			0	0			0	0		

# 2023 Recordable Injuries by Body Parts





# Metropolitan's Recordable Injury Rate vs. Industry Average



## NSC Top Priority #2

Adopt a continuous improvement process and regularly assess progress (ongoing)

- Initiated regular labor-management meeting
- Developed Safety Review Request EForm
- Improved Performance Chart



Top  
Priority  
Recommendations

## NSC Top Priority #3

Review organizational structure to enable Safety to operate as independent function

Formed new Office of Safety, Security and Protection

- Safety directly reports to executive office
- Safety provides support enterprise-wide
- Synergy created with safety, environmental, security, and emergency management in same Group

# Health & Safety Overview





## Other Additional Recommendations

2024 to 2025

# NSC Additional Recommendations

4. Review current coaching methods and incentive programs
5. Increase management participation in safety activities
6. Strengthen hazard and near-miss reporting
7. Increase employee participation

# Recommendation #5 – Executive Safety Committee

## Increase management participation in safety activities

- Advance safety through initiatives enterprise wide
- Provide executive level decisions on priorities and resources
- Create overarching safety messaging



Executive Safety Committee  
Inauguration Meeting  
July 29, 2024



# Recommendation #5 – Executive Safety Committee (cont.)

## Safety Committee Hierarchy and Next Steps

- Develop Safety Recognition Program
- Initiate Safety Leadership Training



# Recommendation #6 - Safety Advisory – Near Miss

## Strengthen hazard and near-miss reporting

- Recognize employees who identify “Near Miss” situations and resolve the potential hazard
- Advisory is shared with all affected work forces across the District

 **SAFETY ADVISORY** March 2024

---

**NEAR MISS RECOGNITION**

Safety, Regulatory, and Training (SRT) Section recognizes C&D Eastern Region Unit and SRT Site Representative for identifying potential lead and/or asbestos containing abandoned waste. Sharing lessons-learned is a good example of how reporting near misses helps improve safety and brings awareness to others.

**Event Details**

**Background:** While performing a routine inspection of MWD right-of-way, C&D staff came across abandoned waste. Staff loaded the waste into two trucks and hauled it back to the facility. Often, C&D staff encounter abandoned waste that is recognizable and in small quantity, such as a piece of furniture, appliance, tires, etc.. These types of waste can be thrown in the back of their truck and brought back to a Metropolitan facility for disposal. However, in this incident, employees encountered a large amount of abandoned waste with mixture of various kinds of debris with unrecognizable contents.



**Large Amount of Construction Debris with Mixed Items in MWD Right-of-Way**



**Safety Issue:** Although construction debris or household hazardous waste may appear to be harmless, paints, electronic wastes, aerosol cans, oils, concrete, painted cabinets, and old floor tiles potentially contain hazardous chemicals including asbestos, lead, PCB, etc. These types of abandoned waste may require sampling prior to pick-up to assess proper removal and disposal. Therefore, bringing back abandoned waste to a Metropolitan facility, must be limited to only small amount of recognizable, non-suspect, known materials, such as furniture, appliances, tires, wood, etc. Never pick up large quantity of debris, such as construction-related waste, especially if the debris contents are mixed items. These may contain hazardous material, including asbestos, lead, PCB, coal tar, etc.

**Resolution:** Contact your SRT Site Rep. when there is a LARGE quantity of debris or when the debris is mixed with many different types of household or construction-type materials. The SRT Site Rep. may need to collect samples and arrange for a hazardous waste vendor to pick-up for disposal.

<b>Safety Improvements</b>	<ul style="list-style-type: none"><li>• SRT updated the “Abandoned Hazardous and Regulated Waste Bulletin” to give more examples and pictures of abandoned waste that should not be picked up and transported back to Metropolitan facility.</li><li>• SRT Site Representatives will review the updated bulletin with C&amp;D teams.</li></ul>
<b>Key Take-Aways</b>	<ol style="list-style-type: none"><li>1. Evaluate abandoned waste from a safe distance. <b>DO NOT</b> pick-up large amount, with mixed and/or unrecognizable items to avoid any potential exposure to hazardous material.</li><li>2. Follow the “Abandoned Hazardous and Regulated Waste Bulletin” guidance and reach out to SRT to assist with evaluating if abandoned waste should be tested for hazardous constituents such as lead, asbestos and/or PCBs prior to the waste being moved.</li></ol>

# Recommendation #6 - Safety Review Requests (SRR)

## Increase employee participation

- Streamline reporting of safety hazards and concerns
- Track safety items from submittal to completion of corrective actions
- Received more than 65 SRR since inception

The screenshot shows the 'Safety Review Request (SRR)' form from the Metropolitan Water District of Southern California. The form includes a header with the district's logo and name. Below the title, there are links for additional information: 'Safety Review Request Process Flowchart', 'E-Form Frequently Ask Questions, Including How to Check the Status of Your E-Form Request', and 'Safety Committee Chair, Co-Chair and SRT Site Support Reps List'. A paragraph explains that the form is for reporting safety-related items like safety concerns, near-miss recognition, best practice, safety suggestions, or other requests. It also provides contact information for reporting injuries or illnesses (IR Hotline at (213) 217-7715 or Ext. 77715) and for immediate attention or imminent danger (contact local SRT Site Support Representative or supervisor). The form has several sections: 'Anonymous Request' with a toggle switch set to 'No'; 'Requestor Information' with fields for 'Employee Name' and 'Preferred Method of Contact' (with radio buttons for Phone, E-mail, In-person, and Teams); and 'Safety Review Request Information' with a 'Location' dropdown menu.

# Future Initiatives

- Recognition Program
- Safety Leadership Training
- Quantitative Metrics
- Metropolitan-wide training plan review
- Establish clear goals and charter for safety committees
- Third Party Audit of High-Risk Programs
  - Electrical
  - High Voltage
  - Clearance Procedures

# Ongoing Activities

- Safety Moments at Start of Meetings.
- Weekly Toolbox Safety Meetings
- Safety Review Requests
- Key Performance Metrics
- Near Miss Reporting and Communication
- Executive Safety Committee
- GM Site Visits and Coffee with GM
- Report to the Board on Status of NSC Initiatives



# Response to Public Comments Regarding Safety Concerns



# Response to Public Comments

## Weymouth Bridge Crane

### Event Reported: 10/13/2023

- Difficult access to bridge crane for service activities
- Currently, mobile platforms used to perform inspections and maintenance but has limitations

### Action

- Continue to have 3rd party vendor perform all servicing and repairs of the crane until improvements are completed

Status: **Completed 2/21/2024**

- Install catwalk swing gate(s) and additional tie-offs at sections of the crane and overhead beams to provide enhanced access across the equipment

Status: **In Progress**

# Response to Public Comments

## Weymouth Basement Passage to Softening Bldg. 2 and 3

Event Reported: 10/16/2023

- Report of pooling water and concrete degradation in passageway

### Actions

- Restricted access to the passageway  
Status: **Completed 10/19/2023**
- Mitigated the water intrusion and increased lighting  
Status: **Completed 10/20/2023**
- Basement is unoccupied. Restricted access to the basement of Softening Buildings  
Status: **Completed 3/27/2024**
- Notified employees of restricted access to the basement and new access request procedures. Status: **Completed 3/27/2024**
- Requested Engineering to assess remediation  
Status: **Pending**

# Response to Public Comments

## Access to Weymouth Basin for Maintenance

### Event Reported: 10/10/2023

- Difficulty accessing basin for cleaning
- Engineering approved anchor point for revised fall protection plan
- Safety provided fall prevention plan options which included scaffolding

### Actions

- Rented scaffold for access during project  
Status: **Completed 12/18/2023**
- Near Miss Advisory sent and discussed with staff  
Status: **Completed 4/2/2024**
- Installed permanent ladder with catwalk to the basin  
Status: **In progress**
- Improved project planning with staff  
Status: **Ongoing**

# Response to Public Comments

Managers without PPE in construction area

Event Reported: 3/5/2024

- Contractor work zone not clearly delineated

## Actions

- Establish well defined work zones with signage

Status: Completed 3/13/2024

- Communication sent to plant staff with reminders to wear PPE

Status: Completed 3/27/2024

# Response to Public Comments

## Mills Chlorine Scrubber System Malfunction

### Event Reported: 1/9/2024

- Exhaust damper was stuck in open position, employee exposed to scrubber discharge material

### Actions

- Near Miss Advisory sent and discussed with affected staff  
Status: **Completed 6/13/2024**
- \*Increased scrubber filter maintenance and replacement
- \*Upgraded PPE for scrubber maintenance and retrain staff
- \*Issued Safety Advisory and discussed with employees
- \*Interim SOP in place until permanent fix completed  
Status: **Completed 5/21/2024**
- Submitted CIP to upgrade the scrubber system  
Status: **In progress**

# Response to Public Comments

Employee witnessed a sudden flood event when working within member agency facility.

Event Reported: 11/17/23

- Near Miss: Employee was not in substructure at time of flooding
- Substructure is in agency's facility near an overflow discharge

## Actions

- Rapid Root Cause Investigation
- Status: **Completed 2/26/2024**
- Lessons learned shared with staff
- Status: **Completed 4/9/2024**
- Temporary berm placed around the substructure
- Status: **Completed 12/2023**
- Install alarms to notify agency operator and people nearby of imminent overflow
- Status: **Completed operator alarm; audible alarm near structure still pending**
- CIP to raise structure above ground to prevent future flooding
- Status: **Currently in design phase**



# Response to Public Comments

## Concerns about transparency of injury reporting

### Event Reported: 6/21/24

- Employee sustained back injury when performing work
- Manager contacted 911 to provide safe transport of employee on 6/21/2024
- Employees concerned about transparency of event reporting
- Manager protected employee confidentiality

## Actions

- Manager explained confidentiality issues to concerned party
- Conducted toolboxes on stretching and back injury prevention to all staff

Status: **Completed 6/24/2024**

