

DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH
Headquarters Office
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(510) 286-7000 Fax: (510) 286-7037



Juliann Sum, Chief

December 4, 2014

Christopher Lee
[REDACTED]
[REDACTED]
[REDACTED]

Re: Title 8 Section 1509 Model High Hazard IIPP for Construction

Dear Mr. Lee;

This letter is provided in response to your inquiry to the Division of Occupational Safety and Health (Cal/OSHA) on November 25, 2014 regarding the model IIPP for high hazard employers in the construction industry.

In your inquiry you asked the following:

1. When must a construction employer implement the high hazard IIPP mentioned in Title 8 section 1509?
2. What are the criteria or threshold requirements?

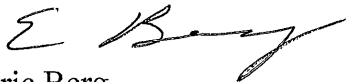
The *Model Injury and Illness Prevention Program for High Hazards Employers* is prepared to provide the essential framework necessary for development of an Injury and Illness Prevention Program (IIPP) for employers in high hazard industries. Use of the model program is not required by Cal/OSHA. However, it is important to recognize that it is an employer's responsibility to develop, implement and maintain an effective IIPP that meet all the requirements of Title 8 section 3203.

The model IIPP was written for a broad spectrum of employers and it may not match the employer's exact needs. Therefore, the employer must carefully review the requirements for each of the eight IIP Program elements found in the model program and fill in the appropriate blank spaces to ensure that it addresses the hazards specific to their workplace if they use a model program. Adopting a model IIPP does not eliminate the employer's obligation to assess its effectiveness, and to make modifications when necessary.

The annual list of high hazard industries is based on nonfatal lost-time incidence rates for private sector employers as provided by Office of Policy, Research and Legislation (OPRL). The current list of high hazard industries is located at http://www.dir.ca.gov/dosh/HHU_List.pdf.

We hope this provides you with information you need. If you have any further questions regarding this or related safety concerns, please contact me at 510-286-7010.

Sincerely,

A handwritten signature in black ink, appearing to read "E Berg". The signature is written in a cursive style with a large initial "E" and a long, sweeping underline.

Eric Berg
Acting Principal Safety Engineer