

**Performance Audit:
Department of Public Works
Solid Waste Safety Practices**

April 2014

**City Auditor's Office
City of Atlanta**

File #13.07



CITY OF ATLANTA
City Auditor's Office
Leslie Ward, City Auditor
404.330.6452

Why We Did This Audit

Our analysis of workers' compensation data suggested that targeted efforts to improve training, supervision, and use of protective equipment could reduce the number and cost of injury claims. The Department of Public Works had the highest number of claims per 100 full-time employees in the city.

What We Recommended

To improve the safety culture in solid waste and to help reduce injuries, the commissioner of public works should:

- Draft legislation for city council consideration to discontinue allowing customers to use non city-issued cans.
- Revise job descriptions for laborers and operators to indicate the weight that candidates should be able to lift repetitively.
- Establish disciplinary actions for safety violations and incorporate compliance with safety procedures in performance appraisals.

To support department and citywide safety efforts, the city's executive director of safety should:

- Document required safety training in a written policy and work with departments to ensure that all employees receive required training.
- Develop a structured safety training program that includes clear hiring criteria, is developed and delivered in compliance with the city's safety-related training policy, and provides for ongoing and post-accident training.

The commissioner of human resources should:

- Document the designation of safety-sensitive positions through written communications to facilitate accurate information and ongoing implementation of drug testing efforts.
- Conduct random drug and alcohol testing of all solid waste employees quarterly, consistent with best practices.

For more information regarding this report, please contact Stephanie Jackson at 404.330.6678 or sjackson@atlantaga.gov

April 2014

Performance Audit:

Department of Public Works

Solid Waste Safety Practices

What We Found

The number of injuries among solid waste collectors and drivers is high. Our September 2013 audit of workers' compensation found that the number of claims reported by city employees was much higher than the national average for local governments. Public works employees accounted for 22% of the overall claims filed by city employees from fiscal year 2010 through March 2013, and solid waste employees accounted for 83% of public works' total claims.

Employees told us that management emphasizes completing garbage routes and makes safety a lower priority. We observed collection crews using unsafe collection techniques while on routes, including:

- jumping on and off garbage trucks while the trucks were moving
- using cell phones and headphones, and smoking while collecting garbage
- failing to hold on to truck handrails and keep both feet on the platforms while the trucks were in motion
- rolling herbie curbies in front of oncoming cars
- serving both sides of the street in heavy traffic
- using poor lifting techniques

Risk of injury could also be increased because city residents may use non-city-issued cans, which require more lifting and limit the efficiency gained by using semi-automated pick-up methods.

Solid waste has no written policy that describes consequences for employees who violate safety procedures and has no written policy for safety training requirements. Some employees have not had safety training in over a year. Although solid waste officials told us that they have disciplined employees for violating safety procedures, management was unable to provide records of any corrective action taken.

Human resources conducted random drug and alcohol testing once a year during 2012 and 2013. One or more employees tested positive for alcohol or drugs in each year.

Management Responses to Audit Recommendations

Summary of Management Responses

| | | |
|-----------------------------|--|------------------------|
| Recommendation #1: | The commissioner of public works should draft legislation for city council consideration to establish a weight limit for herbie curbies and to discontinue allowing customers to use non city-issued cans. | |
| Response & Proposed Action: | Will draft legislation to add "32 gallon container" to Code 130-36-7(6)(d) | Partially Agree |
| Timeframe: | May 2014 based on legislative time frame | |
| Recommendation #2: | The commissioner of public works should revise the job descriptions to include the physical requirements for laborers and operators to indicate the weight that candidates should be able to lift at least repetitively. | |
| Response & Proposed Action: | Will revise job descriptions to add the ability to lift a minimum of 35 lbs to SWS positions and a test requirement on the pre-employment physical. | Agree |
| Timeframe: | April 1, 2014 | |
| Recommendation #3: | The commissioner of public works should develop procedures that outline what actions the Department of Public Works will take to discipline employees who violate safety procedures. Public works should keep documentation of corrective actions taken in a location that is easily accessible. | |
| Response & Proposed Action: | Will use the current PPB on PPE and incident policy and city vehicle use policy. Written violations will be kept at person's sub-stations. | Partially Agree |
| Timeframe: | April 1, 2014 | |
| Recommendation #4: | The commissioner of public works should incorporate employees' compliance with safety procedures in annual performance appraisals. | |
| Response & Proposed Action: | Will add a Critical Job Element to job performance with ratings based on number of occurrences. | Agree |
| Timeframe: | July 1, 2014 | |
| Recommendation #5: | The commissioner of human resources should conduct random drug and alcohol testing of all solid waste employees on a quarterly basis, consistent with best practices. | |
| Response & Proposed Action: | Testing will be implemented quarterly within solid waste in addition to the ongoing testing across other city departments. | Agree |
| Timeframe: | April 2014 | |
| Recommendation #6: | The commissioner of human resources should document the designation of safety-sensitive positions through written communications to facilitate accurate information and ongoing implementation of drug testing efforts. | |
| Response & Proposed Action: | Will provide written notice to respective departments concerning the designation of safety-sensitive positions that have been identified for testing. | Agree |
| Timeframe: | April 2014 | |
| Recommendation #7: | The executive director of safety should determine the safety training courses, including any refreshers, that employees should receive and incorporate it into a written policy. The executive director should work with the public works department to ensure that all employees receive required training. | |
| Response & Proposed Action: | Develop "Safety Related Training Profiles" for all Solid Waste positions in coordination with the Citywide Workplace Safety Committee policies. | Agree |
| Timeframe: | July 2014 | |
| Recommendation #8: | The executive director of safety should develop a structured safety training program that includes clear hiring criteria, is developed and delivered in compliance with the city's safety related training policy where applicable, provides for ongoing training, and includes post-accident training. | |
| Response & Proposed Action: | Develop a training calendar utilizing the SRTPs for DPW Solid Waste Division with necessary safety related training. | Agree |
| Timeframe: | July 2014 | |



CITY OF ATLANTA

LESLIE WARD
City Auditor
lward1@atlantaga.gov

AMANDA NOBLE
Deputy City Auditor
anoble@atlantaga.gov

CITY AUDITOR'S OFFICE
68 MITCHELL STREET SW, SUITE 12100
ATLANTA, GEORGIA 30303-0312
(404) 330-6452
FAX: (404) 658-6077

AUDIT COMMITTEE
Fred Williams, CPA, Chair
Donald T. Penovi, CPA, Vice Chair
Marion Cameron, CPA
C.O. Hollis, Jr., CPA, CIA
Ex-Officio: Mayor Kasim Reed

April 21, 2014

Honorable Mayor and Members of the City Council:

This audit builds on the work we did in our audit of workers' compensation, released in September 2013. In that report we concluded that targeted efforts to improve training, supervision, and the use of protective equipment could help to reduce the volume and cost of injury claims. Because public works had the highest number of claims per 100 full-time employees in the city and most of the department's claims were within the Office of Solid Waste, we looked in depth at safety practices in the office.

Our observations of collection crews, interviews, and review of available records indicate a weak safety culture. Our recommendations focus on organizational efforts to improve workplace safety in the Office of Solid Waste but are also applicable citywide. The commissioner of human resources and the executive director of safety agreed with the recommendations we made to them. The commissioner of public works agreed with two recommendations but only partially agreed with two others. The commissioner states in his responses that certain portions of his department's policies and the city's code of ordinances are adequate and do not require the revisions we suggest. The policy documents in question are attached as Appendix B.

The Audit Committee has reviewed this report and is releasing it in accordance with Article 2, Chapter 6 of the City Charter. We appreciate the courtesy and cooperation of city staff throughout the audit. The team for this project was Kwasi Obeng, Jamie Amos, Brad Garvey, and Stephanie Jackson.

A handwritten signature in cursive script, appearing to read "Leslie Ward".

Leslie Ward
City Auditor

A handwritten signature in cursive script, appearing to read "Fred Williams".

Fred Williams
Audit Committee Chair

Solid Waste Safety Practices

Table of Contents

| | |
|---|----|
| Introduction..... | 1 |
| Background..... | 1 |
| Solid Waste Uses Semi-Automated Garbage Collection | 2 |
| Solid Waste Collection is a High-Risk Industry..... | 2 |
| Audit Objectives..... | 2 |
| Scope and Methodology..... | 2 |
| Findings and Analysis | 5 |
| Weak Controls and Lack of Enforcement Contribute to High Risk Behavior | 5 |
| Employees Engage in Unsafe Collection Practices..... | 6 |
| Unclear Safety Requirements May Hinder Enforcement..... | 13 |
| No Evidence of Corrective Action When Injuries Occur | 15 |
| Employees Indicated Safety Is Not Top Priority..... | 16 |
| Human Resources Conducts Random Drug Testing Annually | 17 |
| Recommendations | 19 |
| Appendices..... | 21 |
| Appendix A Management Review and Response to Audit Recommendations..... | 23 |
| Appendix B Department of Public Works Safety Policy and Procedures Bulletins..... | 27 |

List of Exhibits

| | |
|--|----|
| Exhibit 1 Waste Collection Observations..... | 12 |
|--|----|

List of Figures

| | |
|--|---|
| Figure 1 Worker Jumping Off Moving Truck | 6 |
| Figure 2 Worker Riding Backwards and Not Using Handrails | 6 |
| Figure 3 Worker Riding with One Leg Off Platform..... | 7 |
| Figure 4 Employee Using Cell Phone While on Route | 7 |

| | |
|--|----|
| Figure 5 Employee Using Headphones on Route..... | 7 |
| Figure 6 Employee Smoking on Truck..... | 8 |
| Figure 7 Employee Out of Uniform and Throwing Recycling Bin..... | 8 |
| Figure 8 Employee Wearing Garbage Bag over Reflective Gear..... | 9 |
| Figure 9 Employees in Uniform with Hands and Feet on Truck | 9 |
| Figure 10 Employee Walking in Front of Traffic..... | 9 |
| Figure 11 Employees Rolling Herbie Curbies Across Traffic | 9 |
| Figure 12 Worker Back of a Truck on a Major Roadway (DeKalb Avenue) | 10 |
| Figure 13 Employee Twisting to Sling Tabletop into Truck | 10 |
| Figure 14 Employee Bending with Back Instead of Legs..... | 10 |
| Figure 15 Employee Throwing Load Above Head..... | 11 |
| Figure 16 Employee Handling Multiple Herbie Curbies at a Time | 11 |
| Figure 17 Employee Bending at Back and Reaching into Herbie to Remove Garbage Bag .. | 11 |
| Figure 18 Employee Lifting Non-City Container Above Head | 11 |

Introduction

This audit assesses the safety practices of the Department of Public Works' Office of Solid Waste. Our September 2013 audit of workers' compensation found that public works employees accounted for 22% of the overall claims filed by city employees from fiscal year 2010 through March 2013. Public works' employees filed 979 claims - the second highest number of workers' compensation claims in the city. At 36.9 percent, the department also had the highest number of claims per 100 full-time employees. Its employees also had the highest number of repeat injury claims; employees who filed repeat claims filed a total of 720 claims.

Solid waste employees reported 813 (83%) of public works' 979 total claims. The number of repeat claims among solid waste employees was also high. About 51% of the solid waste claims were filed by employees who filed more than one claim during the 45 months we reviewed; 418 of 813 claims were filed by employees who filed more than one claim.

Background

The Office of Solid Waste is responsible for collecting and disposing of residential and commercial solid waste within the city limits. The office collects household garbage, recycling, and yard trimmings once a week and bulk waste once a month. Solid waste is also responsible for sweeping streets, removing and disposing of dead animals when needed, enforcing lawn maintenance codes, and assisting in citywide emergency operations.

The office carries out its waste collection functions from three main facilities - Chester Avenue, Lakewood Avenue, and Maddox Park. The Lakewood and Maddox facilities manage household garbage, yard trimming, and recycling operations. The Chester facility handles special operations, which include bulk rubbish, animal collection, and street cleaning.

Solid waste has 348 staff, including 174 waste collectors, 153 drivers, and 21 supervisors. The staff consists of regular, temporary, and extra help positions.

Solid Waste Uses Semi-Automated Garbage Collection

Solid waste operates approximately 56 semi-automated collection vehicles for waste collections, which typically occur Monday through Thursday. The trucks use a hydraulic mechanism to lift and empty city-issued garbage cans. According to industry literature, semi-automated trucks improve productivity and reduce injuries because workers are not required to lift the cans.

Solid Waste Collection is a High-Risk Industry

The Federal Bureau of Labor Statistics ranked waste collection as the sixth most dangerous occupation in the country in 2012, with a 27.1 fatal work injury rate (per 100,000 full-time workers), compared to 3.2 for all workers. The non-fatal injury incident rate for waste management employees was 4.7 (per 100 full-time workers) during 2011, according to the Bureau. Solid waste employees filed 61 claims per 100 full-time workers during the same year. According to a 2012 Bureau of Labor Statistics survey, local governments reported 6.1 occupation injuries and illnesses per 100 employees during 2011.

Audit Objectives

This report addresses the following objectives:

- How does the Office of Solid Waste ensure that employees are trained on and follow safety procedures?
- Does the Office take appropriate corrective action when injuries occur?

Scope and Methodology

We conducted this audit in accordance with generally accepted government auditing standards. We focused on information related to the city's solid waste collections. Our analysis covered public works claims and injury data from July 2009 through March 2013. We observed waste collection during November and December 2013.

Our audit methods included:

- Interviewing solid waste management and staff to understand safety policies, procedures, and practices
- Interviewing solid waste employees to assess their understanding and awareness of safety policies and procedures
- Observing waste collection to assess whether employees were following safety procedures
- Reviewing injury data and training records to assess the nature of injuries and training provided to employees
- Visiting the solid waste facilities to observe and understand vehicles types and capabilities
- Researching best practices for solid waste collections, safety procedures, and training methods

Generally accepted government auditing standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Findings and Analysis

Weak Controls and Lack of Enforcement Contribute to High Risk Behavior

The number of injuries among solid waste collectors and drivers is high. Management enforcement is weak and does little to ensure that employees consistently follow safety procedures. As a result, employees engage in behavior that is likely to result in injuries. We observed collection crews using unsafe collection techniques while on routes.

Employees told us that management emphasizes completing garbage routes and makes safety a lower priority. Solid waste has no written policy that describes consequences for employees who violate safety procedures. Also, although solid waste officials told us that they have disciplined employees for violating safety procedures, management was unable to provide records of any corrective action taken.

Human resources conducted random drug and alcohol testing once a year during 2012 and 2013. One or more employees tested positive for alcohol or drugs during both years.

Solid waste has no written policy for safety training requirements and some employees have not had safety training in over a year. Also, solid waste allows customers to use garbage cans that are not issued by the city. This could increase the risk of injury because collectors must lift these containers. It also limits the efficiency gained by using semi-automated pick up methods. Finally, solid waste's job descriptions for laborers do not specify physical requirements for the job.

We recommend that the city's executive director of safety determine the type and frequency of safety training needed and direct training staff to provide the training to employees. Supervisors should also observe employees in the field to ensure they adhere to safety procedures. Management should take appropriate corrective action when employees do not follow those procedures. Solid waste should also revise the job descriptions for laborers to indicate a weight minimum that candidates should be able to repetitively lift.

We also recommend that the commissioner of public works draft legislation to require customers to use only containers issued by the city.

Employees Engage in Unsafe Collection Practices

We observed employees jumping on and off garbage trucks while the trucks were moving, using cell phones and headphones, and smoking while collecting garbage. Workers failed to hold onto truck handrails and keep both feet on the platforms while the trucks were in motion. Employees also failed to consistently manage traffic, rolled herbie curbies in front of oncoming cars, and serviced both sides of the street during heavy traffic. The lifting techniques employees used could also contribute to injuries. Workers threw trash into the trucks, lifted loads above their heads, and used their backs instead of legs to pick up garbage. These behaviors are likely to result in injuries. Additionally, employees collected garbage contained in non-city issued cans. Drivers and collectors wore personal protective equipment most of the time. We observed 37 collection crews in each quadrant on regular collection days in November and December 2013 that included garbage, recycling, yard trimmings, and bulk pickups. During our observations, we compared solid waste procedures and training guidelines for proper collection techniques with employees' behavior.

Employees engaged in unsafe behavior on garbage routes. We observed several workers jumping off and on moving garbage trucks (see Figure 1). While on routes, workers also rode backwards on the moving truck and did not use handrails (see Figure 2).



Figure 1 Worker Jumping Off Moving Truck



Figure 2 Worker Riding Backwards and Not Using Handrails

Employees did not have both hands on handrails in about one-third of our observations. We noted only one instance in which collectors used hand signals to communicate with drivers. We also saw employees riding with one leg hanging from the platform (see Figure 3).



Figure 3 Worker Riding with One Leg Off Platform

Solid waste training materials state that employees are not to jump on or off trucks while the vehicles are in motion. Training materials also require workers to keep both hands on the handrails and both feet on the platform while riding on the rear of the trucks. If employees do not keep both hands and feet on the trucks, workers could fall from the truck or strike surrounding objects such as tree branches. If drivers and workers do not use hand signals to communicate, as suggested in the training guidelines, the driver may be unaware of the worker's location, which could result in the worker being hit by the truck.

We observed employees using cell phones and headphones as well as smoking while on routes. We saw several employees using cell phones, (see Figure 4) and headphones during observations (see Figure 5). We also saw at least two employees smoking while on routes (see Figure 6), which could be hazardous if flammable substances are in the garbage.



Figure 5 Employee Using Cell Phone While on Route



Figure 4 Employee Using Headphones on Route



Figure 6 Employee Smoking on Truck

We spoke with 13 employees to find out how aware they were of the safety procedures, and they were familiar with the procedures. Solid waste procedures specifically state that workers should not use headphones or cell phones while on duty; they do not address smoking. If employees use headphones and cell phones, they may be unaware of their surroundings, which could result in injury.

Solid waste workers wore personal protective equipment with few exceptions. We saw a few employees who were not wearing uniforms. One worker was out of uniform and had no reflective gear on; this worker also threw a recycling bin toward the curb after emptying it (see Figure 7). One worker wore a garbage bag over his reflective gear, which diminished his visibility to oncoming vehicles (see Figure 8). Full uniform generally consists of at least



Figure 7 Employee Out of Uniform and Throwing Recycling Bin

steel toe boots, safety vests or uniforms with safety reflectors, gloves, and long sleeve shirts (see Figure 9). The workers in this photo are also riding on the truck with both hands on the handrails and both feet on the truck platform. Employees told us they have access to protective equipment and uniforms when they need them. Employees working on routes should wear protective equipment for safety and to be easily identified while performing duties.



Figure 9 Employee Wearing Garbage Bag over Reflective Gear



Figure 8 Employees in Uniform with Hands and Feet on Truck

Employees gave little attention to traffic during collections. During our observations, employees appeared to disregard oncoming traffic. Employees stepped in front of moving cars and provided minimal direction to oncoming cars (see Figure 10). Training guidelines provide no detailed procedures for traffic management. Employees also rolled herbie curbies across traffic while servicing both sides of a busy street (see Figure 11), which the training guidelines prohibit. The safety training materials state that employees should “watch for traffic” when dismounting from trucks and when they are in the street. Workers who disregard traffic risk being struck by a vehicle. We also saw one employee riding on the back of a truck on a major roadway (see Figure 12), also prohibited by safety procedures.



Figure 10 Employee Walking in Front of Traffic



Figure 11 Employees Rolling Herbie Curbies Across Traffic



Figure 12 Worker Back of a Truck on a Major Roadway (DeKalb Avenue)

Workers used lifting techniques that could cause injuries. We observed workers twisting to throw heavy loads into trucks (see Figure 13) and lifting with their backs (see Figure 14).



Figure 13 Employee Twisting to Sling Tabletop into Truck



Figure 14 Employee Bending with Back Instead of Legs

Workers also lifted loads above their heads (Figure 15) and handled more than one herbie curbie at a time (see Figure 16).



Figure 15 Employee Throwing Load Above Head



Figure 16 Employee Handling Multiple Herbie Curbs at a Time

Solid waste training materials direct workers to use proper lifting techniques such as lifting with the legs, and avoid twisting with the load or lifting loads above the head. Industry safety experts state that these techniques can minimize injury risks, particularly back injuries. Pushing the containers instead of pulling them can also reduce injuries. We also observed one worker bending to pull a garbage bag from a herbie curbie, instead of rolling the container to the truck (see Figure 17). Pulling bags from the herbies increases the employee's injury risk.



Figure 17 Employee Bending at Back and Reaching into Herbie to Remove Garbage Bag

Employees manually lifted non-city cans, which do not work with the trucks' hydraulic lift. We observed solid waste workers collecting garbage in non-city issued containers (see Figure 18). This practice reduces the safety and efficiency gains that the herbie curbsies and the semi-automated trucks provide. Section 130-37 of the city code states that residential garbage should be placed in city-issued garbage containers, but allows customers to use other containers. In addition, customers may use up to five garbage bags and containers for additional trash. If employees manually lift heavy garbage, it increases their risk of injury.



Figure 18 Employee Lifting Non-City Container Above Head

Exhibit 1 summarizes the safety aspects that we evaluated during our observations of the 37 waste collection crews. We observed crews in each quadrant on regular collection days in November and December 2013 that included garbage, recycling, yard trimmings, and bulk pickups. Employees did not wear all required personal protective equipment in 30.6% of our observations and did not adhere to driving-related guidelines in 67.7% instances. Employees did not use proper collection techniques in 34.1% of our observations and did not employ proper lifting techniques over half the time. Employees did not use proper mounting and dismounting techniques in 36.1% of our observations.

Exhibit 1 Waste Collection Observations

| Solid Waste Safety Requirements | Total Yes | Total No | Total NA | Percent Yes | Percent No |
|--|-----------|----------|----------|-------------|------------|
| PERSONAL PROTECTIVE EQUIPMENT | | | | 69.4% | 30.6% |
| Steel Toe Boots/Shoes | 37 | 0 | 0 | | |
| Uniform (Pants & long sleeves) | 33 | 4 | 0 | | |
| Reflective shirt/vest | 30 | 7 | 0 | | |
| Gloves | 34 | 3 | 0 | | |
| Safety Glasses/Goggles | 3 | 34 | 0 | | |
| Rain Gear (if raining) | 6 | 15 | 16 | | |
| DRIVING | | | | 32.3% | 67.7% |
| All workers in truck while on major roadways? | 9 | 1 | 27 | | |
| Driver and workers use hand signals? | 1 | 30 | 6 | | |
| Servicing only one side of a street (high volume areas)? | 11 | 13 | 13 | | |
| COLLECTION TECHNIQUES | | | | 65.9% | 34.1% |
| Are workers handling one herbie curbie at a time? | 20 | 10 | 7 | | |
| Directing traffic during the collection process? | 9 | 12 | 16 | | |
| Employees refrain from using cell phone/ear phones? | 29 | 8 | 0 | | |
| LIFTING TECHNIQUES | | | | 49.0% | 51.0% |
| Refrained from lifting loads above their heads? | 22 | 5 | 10 | | |
| Refrained from throwing loads into hopper? | 15 | 16 | 6 | | |
| Refrained from twisting with the load? | 20 | 15 | 2 | | |
| Bending with legs instead of with waist? | 15 | 16 | 6 | | |
| Test load before fully lifting it? | 4 | 27 | 6 | | |
| MOUNTING AND DISMOUNTING | | | | 63.9% | 36.1% |
| Workers refrain from jumping on or off the truck? | 10 | 23 | 4 | | |
| Are workers using handrails to mount the truck? | 29 | 3 | 5 | | |
| Do workers have both feet on the platform and both hands on handrails while riding on the rear of the truck? | 23 | 9 | 5 | | |

Note: Percentages calculated only where the safety requirement was applicable.

Source: Results compiled by audit staff during observations; safety procedures from Department of Public Works documents and staff.

Unclear Safety Requirements May Hinder Enforcement

Solid waste has no written policy that describes what safety training is required for employees, and some employees have not had safety training in over a year. Management staff told us inconsistent requirements for safety training. Without standardized and document training requirements, management may be unable to track whether employees have had required training and training for some employees may fall through the cracks. Also, training documents are inconsistent in describing which protective equipment is required versus optional.

Further, job descriptions for garbage collectors do not list the physical requirements for the position, which could cause the department to hire employees who are unable to meet the physical demands of the job.

No written policy establishes safety training requirements. Public works management staff told us varying safety requirements. Management all stated that at a minimum, employees should receive general safety training as well as safety training tailored to job duties. Some management staff said that employees should also receive safety refresher training at either one or two year intervals and said employees should receive at least 40 hours of safety training before being placed on routes. One member of management told us that employees usually received training and were placed on the routes the same day.

We spoke with 13 employees, all of whom said that they have had some type of safety training since they began working for solid waste. Most of them also said they received minimal training and were placed on their routes on their first day.

Solid waste training employees keep records of staff who attended training from January 2005 through August 2013. We analyzed the training records of 20 solid waste employees who had the highest number of injuries from July 2009 through June 2013. Based on the training records, all 20 employees received general safety training at least once during the period; however, 19 had not had a refresher course within the past two years. Also, four employees had not received any customized safety training during the period, and one driver had not received defensive driving training.

We recommend that the city's executive director of safety determine the safety training courses, including any refreshers, that employees should receive and incorporate it into a written policy.

The department should ensure that all employees receive required training.

Solid waste guidance describing required and optional personal protective equipment is inconsistent. According to solid waste's training materials, required personal protective equipment includes: steel toe boots, a vest or uniform with safety reflectors, gloves, eye wear, hard hat, and long sleeve shirt. However, the department's safety manual says hard hats must be worn only in designated hard hat areas, and one of the department's safety employees gave us a document that listed protective eyewear as optional. The safety manual assigns the same equipment to all job positions regardless of responsibilities. The manual states that employees are to wear goggles, rain gear, insulated body suits and face masks, depending on environmental conditions. Without a clear and consistent policy on required and optional personal protective equipment, employees may not have the right equipment to reduce injury.

During our observations of waste collection we saw no employees wearing hard hats, and we saw only three employees wearing safety glasses or goggles. Protective eyewear reduces the likelihood that liquids and other debris will cause eye injuries; hard hats help to prevent head injuries.

Job descriptions specify no physical requirements for garbage collectors. Only the job description for solid waste drivers (operators), who may also collect garbage, contained a physical requirement that the employee be able to lift 50 pounds. The job descriptions for environmental service workers, who primarily collect garbage, did not indicate a physical requirement. Job descriptions for both positions failed to indicate that the employee would be required to lift the weight repetitively. Without job descriptions that specify employees be able to lift a minimum weight repetitively, the department may hire individuals who are unable to meet the physical demands of the job. Solid waste management told us that a weight minimum of 50 pounds may be too high for physical requirements, partly because the semi-automated trucks eliminate lifting for most garbage; however, they agree that the job descriptions should include physical requirements, including an appropriate lifting requirement.

We recommend that solid waste revise the job descriptions to include the physical requirements for laborers and operators to indicate that candidates should be able to lift a minimum weight limit repetitively.

No Evidence of Corrective Action When Injuries Occur

Public works could produce no employee records indicating they took corrective action when employees violated safety procedures, although they told us that they have disciplined employees in the past for safety violations. Also, solid waste has no written policy that describes consequences for employees who violate safety procedures. Without a written policy describing appropriate corrective action, management may not consistently enforce disciplinary procedures for safety violations.

Management was unable to show that they took corrective action for safety violations. Public works staff told us that solid waste has previously disciplined employees who violated safety procedures. Public works human resource staff told us that records of any corrective action they took against employees should be included in employees' personnel files. Public works management told us the files were located in multiple locations, including central human resources, public works human resources, and at the solid waste facilities; however, when we visited those locations, neither we nor staff could locate any such documents.

Solid waste has no written policy describing consequences for employees who violate safety procedures. Solid waste has a policy that outlines the consequences for employees who fail to wear proper protective equipment; however, it does not have a policy that describes how employees will be disciplined if they violate any other safety procedures, such as improper lifting techniques or hazardous driving. Without a written policy describing appropriate corrective action, management may not be able to consistently enforce disciplinary procedures for safety violations.

Section 114-526 of the city code states that the city's policy is to use progressive discipline methods when employees violate any rules or standards, although it also allows for immediate dismissal in certain cases. Disciplinary action should be progressive in nature, beginning with oral admonishment, written reprimand, and adverse action such as suspension without pay, demotion, and possible dismissal.

We recommend that management develop procedures that outline what actions the Department of Public Works will take to discipline employees who violate safety procedures. These procedures should also align with the city's progressive discipline policy. Public works

should keep documentation of corrective actions taken in a location that is easily accessible.

Employees Indicated Safety Is Not Top Priority

The Office of Solid Waste appears to have fostered an environment that fails to deter unsafe practices. Employees we spoke with were aware of safety procedures; however, likely due to lack of monitoring and enforcement, they engage in unsafe waste collection practices. Employees told us they do not feel safety is a management priority and supervisors are primarily concerned with completing garbage routes.

The National Transportation Safety Board (NTSB) states that a safety culture starts with upper management and spreads through the entire organization.¹ The safety behaviors and attitudes of individuals are influenced by their perceptions and expectations about safety in their work environment. Employees pattern their safety behaviors to meet demonstrated priorities of organizational leaders, regardless of stated policies. Industry experts state that an over-emphasis on production could result in rewarding employees who cut corners to boost output and recommends that safety be included in performance standards and accountability.

The City of Phoenix's Department of Public Works uses a six part approach to reduce accidents and injuries. It begins with (1) hiring qualified staff, (2) providing structured classroom training, (3) supplementing with field training, and (4) holding weekly refresher training. The department also (5) provides post-accident training. Last, waste collectors are (6) evaluated on their adherence to safety standards as part of their annual performance evaluations.

We recommend that the executive director of safety develop a safety training program that includes clear hiring criteria, contains a structured training program, provides for ongoing training, and includes post-accident training. The department should include incorporate employees' compliance with safety procedures in annual performance appraisals.

¹ National Transportation Safety Board, Flight Safety Foundation 66th Annual International Air Safety Summit, October 2013.

Human Resources Conducts Random Drug Testing Annually

Human resources conducted random drug testing of all solid waste employees at least annually during 2012 and 2013. The department also randomly tested workers after a recent accident. Human resources conducted an alcohol test of 117 employees in November 2013, in which four failed, immediately after a fatal garbage truck accident the same month. Regular random testing can deter illegal drug and alcohol use and help to prevent drug and alcohol-related injuries. Industry best practices state that testing should be conducted at least quarterly.

Human resources conducted random drug and alcohol testing during 2012 and 2013; one or more employees tested positive for alcohol or drugs in each of both years. After a fatal accident involving a solid waste garbage truck in November 2013, the city immediately ordered alcohol tests for 117 employees, in which four failed. Human resources did not test for any other substances. The pool of employees tested included commercial drivers' license holders and other employees. Prior to the accident, the department randomly tested CDL holders for drugs and alcohol, which is required by federal law.² The department also conducted random drug and alcohol tests of other employees during 2012 and in 2013 prior to the accident.

Section 114-571 of the city code states that sworn employees of Police, Fire & Rescue, Corrections, or any other department with employees designated by the commissioner of the Department of Human Resources as "safety-sensitive" are subject to random drug and/or alcohol tests. Other city employees may also be tested if their supervisor or department official has "reasonable suspicion" that the employee is under the influence. The code provides that random drug testing is subject to available funding in the budget.

Human resources' drug testing practices are consistent with federal guidelines as well as the city code. The human resources commissioner told us that she verbally designated all public works employees as safety sensitive, providing a basis for random drug testing.

Of the four employees who failed the November alcohol test, two held commercial drivers' licenses and two did not. Public works

² Code of Federal Regulations, 49 FR 382 et seq.

staff told us that testing the 117 employees for alcohol cost the department \$4,680, at a cost of about \$40 per person. Drug testing would cost the department \$40 per person.

The United States Department of Transportation Office of Drug and Alcohol Policy and Compliance state that random drug testing saves lives and prevents injuries, and suggests that selection and testing be performed at least quarterly or as frequently as the organization deems necessary. Everyone in the pool of candidates must have an equal chance of being selected and tested in each selection period.

We recommend that human resources conduct quarterly random drug and alcohol testing of all employees, consistent with best practices. To facilitate accurate information and ongoing implementation of the random drug testing efforts, we also recommend that the human resources commissioner document the designation of safety-sensitive positions through written communications.

Recommendations

To improve the safety culture in solid waste, create a more structured safety and training program, and help to reduce injuries, the commissioner of public works should:

1. Draft legislation for city council consideration to discontinue allowing customers to use non city-issued cans.
2. Revise the job descriptions to include the physical requirements for laborers and operators to indicate the weight that candidates should be able to lift repetitively.
3. Develop procedures that outline what actions the Department of Public Works will take to discipline employees who violate safety procedures. These procedures should also align with the city's progressive discipline policy. Public works should keep documentation of corrective actions taken in a location that is easily accessible.
4. Incorporate employees' compliance with safety procedures in annual performance appraisals.

To support the safety program within solid waste and citywide, the commissioner of human resources should:

5. Conduct random drug and alcohol testing of all solid waste employees on a quarterly basis, consistent with best practices.
6. Document the designation of safety-sensitive positions through written communications to facilitate accurate information and ongoing implementation of drug testing efforts.

To help public works create a more structured safety and training program, the city's executive director of safety should:

7. Determine the safety training courses, including any refreshers, that employees should receive and

incorporate it into a written policy. The executive director should work with the public works department to ensure that all employees receive required training.

8. Develop a structured safety training program that includes clear hiring criteria, is developed and delivered in compliance with the city's safety related training policy where applicable, provides for ongoing training, and includes post-accident training.

Appendices

Appendix A Management Review and Response to Audit Recommendations

| Report # 13.07 | Report Title: Department of Public Works - Solid Waste Safety Practices | Date: 3/6/14 |
|---|--|--|
| Recommendation Responses - Public Works Commissioner | | |
| Rec. #1 | The commissioner of public works should draft legislation for city council consideration to discontinue allowing customers to use non city-issued cans. | Partially Agree |
| <p><u>Proposed Action:</u></p> <p><u>Implementation Timeframe:</u></p> <p><u>Responsible Person:</u></p> | | <p>We believe that sufficient code is already written to ensure safe and proper operations. Code 130-36-(d) already states, "for the disposal of yard trimmings may not exceed a volume of 32 gallons". Also, Code 130-37-6-d "extra garbage shall not be placed for collection in amounts exceeding five properly marked bags or containers" and we believe we could add "32 gallon container".</p> <p>May of 2014 based on legislative time frame</p> <p>Chris Fetterman, Solid Waste Director</p> |
| Rec. #2 | The commissioner of public works should revise the job descriptions to include the physical requirements for laborers and operators to indicate the weight that candidates should be able to lift at least repetitively. | Agree |
| <p><u>Proposed Action:</u></p> <p><u>Implementation Timeframe:</u></p> <p><u>Responsible Person:</u></p> | | <p>Coordinate with HR recruitment to have added to all SWS positions the ability to lift a minimum of 35 pounds and add a test requirement on the pre-employment physical.</p> <p>April 1, 2014</p> <p>Chris Fetterman, Solid Waste Director/HR</p> |

| | | | | | | |
|--|--|-----------------|--------------------------------|--|---|-----------------------------------|
| Rec. #3 | The commissioner of public works should develop procedures that outline what actions the Department of Public works will take to discipline employees who violate safety procedures. These procedures should also align with the city's progressive discipline policy. Public works should keep documentation of corrective actions taken in a location that is easily accessible. | Partially Agree | | | | |
| <table><tr><td><u>Proposed Action:</u></td><td rowspan="3">Use the current department PPB on PPE and incident policy and City Vehicle Use policy as well as any other newly implemented safety procedures to enforce safety practices. All supervisors and managers need to enforce these safety practices and procedures through department's disciplinary action guidelines. All written violations will be kept at the person's sub-station. April 1, 2014 Chris Fetterman, Solid Waste Director/Safety</td></tr><tr><td><u>Implementation Timeframe:</u></td></tr><tr><td><u>Responsible Person:</u></td></tr></table> | | | <u>Proposed Action:</u> | Use the current department PPB on PPE and incident policy and City Vehicle Use policy as well as any other newly implemented safety procedures to enforce safety practices. All supervisors and managers need to enforce these safety practices and procedures through department's disciplinary action guidelines. All written violations will be kept at the person's sub-station. April 1, 2014 Chris Fetterman, Solid Waste Director/Safety | <u>Implementation Timeframe:</u> | <u>Responsible Person:</u> |
| <u>Proposed Action:</u> | Use the current department PPB on PPE and incident policy and City Vehicle Use policy as well as any other newly implemented safety procedures to enforce safety practices. All supervisors and managers need to enforce these safety practices and procedures through department's disciplinary action guidelines. All written violations will be kept at the person's sub-station. April 1, 2014 Chris Fetterman, Solid Waste Director/Safety | | | | | |
| <u>Implementation Timeframe:</u> | | | | | | |
| <u>Responsible Person:</u> | | | | | | |
| Rec. #4 | The commissioner of public works should incorporate employees' compliance with safety procedures in annual performance appraisals. | Agree | | | | |
| <table><tr><td><u>Proposed Action:</u></td><td rowspan="3">Add a Critical Job Element to job performance with ratings of: outstanding = 0 occurrences, highly effective = 1 occurrence, effective = 3 occurrences, needs improvement = 4 occurrences, unacceptable = 4 or more occurrences. We will need to update the job performance form. To facilitate evaluation of this during performance review, any violations will be kept at the person's sub-station. July 1, 2014 Chris Fetterman, Solid Waste Director/HR</td></tr><tr><td><u>Implementation Timeframe:</u></td></tr><tr><td><u>Responsible Person:</u></td></tr></table> | | | <u>Proposed Action:</u> | Add a Critical Job Element to job performance with ratings of: outstanding = 0 occurrences, highly effective = 1 occurrence, effective = 3 occurrences, needs improvement = 4 occurrences, unacceptable = 4 or more occurrences. We will need to update the job performance form. To facilitate evaluation of this during performance review, any violations will be kept at the person's sub-station. July 1, 2014 Chris Fetterman, Solid Waste Director/HR | <u>Implementation Timeframe:</u> | <u>Responsible Person:</u> |
| <u>Proposed Action:</u> | Add a Critical Job Element to job performance with ratings of: outstanding = 0 occurrences, highly effective = 1 occurrence, effective = 3 occurrences, needs improvement = 4 occurrences, unacceptable = 4 or more occurrences. We will need to update the job performance form. To facilitate evaluation of this during performance review, any violations will be kept at the person's sub-station. July 1, 2014 Chris Fetterman, Solid Waste Director/HR | | | | | |
| <u>Implementation Timeframe:</u> | | | | | | |
| <u>Responsible Person:</u> | | | | | | |

Report # 13.07

Report Title: Department of Public Works - Solid Waste Safety Practices

Date: 3/10/14

Recommendation Responses - Commissioner of Human Resources

| | | |
|----------------|---|-------|
| Rec. #5 | The commissioner of human resources should conduct random drug and alcohol testing of all solid waste employees on a quarterly basis, consistent with best practices. | Agree |
|----------------|---|-------|

Proposed Action:

The commissioner of human resources agrees with this recommendation; however it is important to note that since 2012 quarterly tests have taken place within the Department of Public Works and other key departments such as Watershed Management. Per the report's recommendation, testing will be implemented quarterly within Solid Waste-Public Works specifically in addition to the ongoing testing across other City departments.

Implementation Timeframe:

April 2014

Responsible Person:

Yvonne Cowser Yancy, Commissioner Human Resources

| | | |
|----------------|---|-------|
| Rec. #6 | The commissioner of human resources should document the designation of safety-sensitive positions through written communications to facilitate accurate information and ongoing implementation of drug testing efforts. | Agree |
|----------------|---|-------|

Proposed Action:

The commissioner of human resources will provide written notice to respective departments concerning the designation of safety-sensitive positions that have been identified for testing per the authority provided in the code to the commissioner of human resources. It is important to note the positions designated as safety sensitive may change as roles are added and job duties change.

Implementation Timeframe:

April 2014

Responsible Person:

Yvonne Cowser Yancy, Commissioner Human Resources

Report # 13.07**Report Title: Department of Public Works - Solid Waste Safety Practices****Date: 3/4/14****Recommendation Responses - Executive Director of Safety**

| | | | | | | | | |
|---|--|-------|--------------------------------|--|---|-------------|-----------------------------------|--|
| Rec. #7 | The executive director of safety should determine the safety training courses, including any refreshers, that employees should receive and incorporate it into a written policy. The executive director should work with the public works department to ensure that all employees receive required training. | Agree | | | | | | |
| <table><tr><td><u>Proposed Action:</u></td><td>Develop "Safety Related Training Profiles" for all job descriptions in Solid Waste (provided by Human Resources) in the Solid Waste Division of the Department of Public Works as well as an accompanying policy in coordination with the Citywide Workplace Safety Committee.</td></tr><tr><td><u>Implementation Timeframe:</u></td><td>July, 2014</td></tr><tr><td><u>Responsible Person:</u></td><td>I. David Daniels, Executive Director of Workforce Safety</td></tr></table> | | | <u>Proposed Action:</u> | Develop "Safety Related Training Profiles" for all job descriptions in Solid Waste (provided by Human Resources) in the Solid Waste Division of the Department of Public Works as well as an accompanying policy in coordination with the Citywide Workplace Safety Committee. | <u>Implementation Timeframe:</u> | July, 2014 | <u>Responsible Person:</u> | I. David Daniels, Executive Director of Workforce Safety |
| <u>Proposed Action:</u> | Develop "Safety Related Training Profiles" for all job descriptions in Solid Waste (provided by Human Resources) in the Solid Waste Division of the Department of Public Works as well as an accompanying policy in coordination with the Citywide Workplace Safety Committee. | | | | | | | |
| <u>Implementation Timeframe:</u> | July, 2014 | | | | | | | |
| <u>Responsible Person:</u> | I. David Daniels, Executive Director of Workforce Safety | | | | | | | |
| Rec. #8 | The executive director of safety should develop a structured safety training program that includes clear hiring criteria, is developed and delivered in compliance with the city's safety related training policy where applicable, provides for ongoing training, and includes post-accident training. | Agree | | | | | | |
| <table><tr><td><u>Proposed Action:</u></td><td>Develop a training calendar for FY15 utilizing the SRTPs for DPW Solid Waste Division with the necessary safety related training. The number of specific offerings of each topic will be based on FTE counts and composition as well as projected hiring based on estimates provided by DPW.</td></tr><tr><td><u>Implementation Timeframe:</u></td><td>July , 2014</td></tr><tr><td><u>Responsible Person:</u></td><td>I. David Daniels, Executive Director of Workforce Safety</td></tr></table> | | | <u>Proposed Action:</u> | Develop a training calendar for FY15 utilizing the SRTPs for DPW Solid Waste Division with the necessary safety related training. The number of specific offerings of each topic will be based on FTE counts and composition as well as projected hiring based on estimates provided by DPW. | <u>Implementation Timeframe:</u> | July , 2014 | <u>Responsible Person:</u> | I. David Daniels, Executive Director of Workforce Safety |
| <u>Proposed Action:</u> | Develop a training calendar for FY15 utilizing the SRTPs for DPW Solid Waste Division with the necessary safety related training. The number of specific offerings of each topic will be based on FTE counts and composition as well as projected hiring based on estimates provided by DPW. | | | | | | | |
| <u>Implementation Timeframe:</u> | July , 2014 | | | | | | | |
| <u>Responsible Person:</u> | I. David Daniels, Executive Director of Workforce Safety | | | | | | | |

Appendix B Department of Public Works Safety Policy and Procedures Bulletins



DEPARTMENT OF PUBLIC WORKS SAFETY POLICY AND PROCEDURES BULLETIN

PPB# 313

Page 1 of 2

SUBJECT: Incidents

TO: All Employees

PURPOSE: To establish uniform investigative review and disposition procedures for incidents that are not covered by citywide or departmental policies.

EFFECTIVE DATE: Upon the Commissioner's signature

SUPERSEDES: N/A

DEFINITION: Incident - An unforeseen occurrence or event that results in property, vehicle or equipment damage, but does not occur as a result of a motorized vehicle or equipment in motion.

I. Reporting Procedures for Employees

Any employee involved in an incident shall comply with the following procedures:

1. Contact the immediate supervisor, identify the location of the incident and give all pertinent information.
2. Call 911 for police and medical assistance if needed, and make a report to the supervisor, even if the incident occurs on private property.
3. Provide a detailed written statement of the occurrence using the *Employee Report of Injury, Accident or Incident* form.

II. Reporting Procedures for Supervisors and Safety Personnel

1. Upon being notified of an incident, the supervisor shall immediately inform the Occupational Safety Manager or other designated Safety Officer and provide the exact location of the incident.
2. Supervisor shall request employee to complete the *Employee Report of Injury, Accident or Incident* form. Supervisor shall sign and submit form to the Safety Officer.
3. The Safety Officer will conduct a thorough investigation which shall include securing original photographs (no copies); *Employee Report of*

Injury, Accident or Incident form; Police Report (if necessary); damage estimates and all witness statements.

4. The Occupational Safety Manager is responsible for ensuring distribution of the incident package to the following:
 - a. Department of Law, Claims Division – original copy
 - b. Motor Transport Services (vehicle incident only)
 - c. Office of Transportation (if applicable)
 - d. Bureau of Solid Waste Services (if applicable)
 - e. Risk Management
 - f. Departmental Safety Unit file
5. A Final Incident Report shall be prepared by the safety unit and submitted to the appropriate deputy commissioner, director and installation chief. Upon receipt of the Final Incident Report, the Public Works Manager or designee shall prepare and forward to the Office of the Commissioner, Human Resources Division, any proposed disciplinary action and supporting documentation.

III. Preventable Incidents: Occurrences within a two-year period

1. 1st Preventable Incident - Employee shall participate in a group safety session held at their work location with the installation chief, supervisor and safety unit staff, to discuss how to prevent similar future occurrences.
2. 2nd Minor Preventable Incident - Employee shall attend a safety incident prevention course.
3. 3rd Minor Preventable Incident - Employee shall attend 24 hours of mandatory incident prevention courses within a two month period.

APPROVED:


David E. Scott, P.E., Commissioner

DATE:

6/28/06



DEPARTMENT OF PUBLIC WORKS SAFETY POLICY AND PROCEDURES BULLETIN

PPB# 304.5

Page 1 of 3

SUBJECT: Accidents – Motorized Equipment

TO: All Employees

PURPOSE: To establish uniform investigative review and disposition procedures covering accidents involving moving vehicles.

EFFECTIVE DATE: January 2006

SUPERSEDES: PPB#304, distributed January 30, 2004
PPB #44 distributed December 17, 1990

I. Policy

Civil Service Code, Sec. 2-1712 – Use of city owned vehicles by city employees.

- (a) No employee shall drive a city vehicle without a valid state driver's license.
- (b) An employee in charge of a vehicle owned by the city shall exercise care in the operation of that vehicle and avoid accidents. Disregard of this obligation shall be grounds for dismissal.
- (c) Employees riding in city vehicles for which seat belts are provided must wear seatbelts at all times.

Civil Service Code, Sec. 2-1717 – Duty to take names of witnesses to accidents. Employees engaged in work where an accident occurs shall immediately obtain the names of persons witnessing such accident or persons who have knowledge relating thereto and shall at once transmit a copy of those names to the heads of their departments, who shall in turn transmit them immediately to the Department of Law. Any failure to comply shall be a breach of duty.

II. Reporting Procedures for Employees

Any employee involved in a motor vehicle accident while operating a city owned vehicle shall comply with the following procedures:

- 1. Call 911 for police and medical assistance if needed, and make a report, even if the accident occurs on private property.
- 2. Contact the immediate supervisor, identify the location of the accident and give all pertinent information.
- 3. Provide a detailed written statement of the occurrence.
- 4. Submit to an alcohol and/or drug test if cited.

III. Reporting Procedures for Supervisors and Safety Personnel

1. Upon being notified of a motor vehicle accident, the supervisor, prior to reporting to the site, shall immediately inform the Occupational Safety Manager at (404) 330-6240, of the exact location.
2. Upon arrival at the accident site, the supervisor shall fill out the Operator's Report of Motor Vehicle Accident (Form 11-M-188) and submit it to the Safety Officer upon his/her arrival.
3. The Safety Officer will conduct a thorough investigation. The investigation must include original photographs (no copies); *Employee Report of Injury, Accident or Incident* form; Police Report; and damage estimates. All witness statements shall be included.
4. If the employee involved in the accident is issued a traffic citation, the employee shall be directed to submit to a drug and/or alcohol analysis (Civil Service Code, Section 114-571 [4]).
5. Form 11-M-188 (Operator's Report of Motor Vehicle Accident) shall be completed and sent to the Office of the Commissioner, Occupational Safety Manager within five (5) days. Employee as outlined in Atlanta code Sec. 114-571, may be required to submit to a drug/alcohol analysis.
6. The Occupational Safety Manager shall distribute the accident package to:
 - a. Department of Law, Claims Division – original copy
 - b. Motor Transport Services
 - c. Office of Transportation (if applicable)
 - d. Bureau of Solid Waste Services (if applicable)
 - e. Departmental Safety Unit file
7. A Final Accident Report shall be prepared and submitted to the appropriate deputy commissioner, director and installation chief by the safety unit. Upon receipt of the Final Accident Report, the Public Works Manager shall prepare and forward to the Office of the Commissioner, Human Resources Division, any proposed disciplinary action with supporting documentation.

IV. Types of Accidents:

- A. **Minor** – A "minor" accident is generally one in which:
 1. Total property damages are less than \$5,000.00.
 2. There are no injuries that require hospitalization. Injuries may require an examination, treatment and release within the same day of admittance.
- B. **Major** – A "major" accident is generally one in which:
 1. Total damages are \$5,000.00 to \$15,000.00. Total damage is defined as "All associated damages, including related estimates or actual cost such as city property, citizen property and/or personal injury.

- C. **Catastrophic** – A catastrophic accident is generally one in which:
1. Total damages exceed \$15,000.00.
 2. There is partial or permanent disability of any party to the accident (includes loss of member, i.e., arm, leg, sight, hearing, etc.)
 3. There is a fatality as a result of the accident.
- D. **Disciplinary Actions for chargeable accidents**
1. Minor Chargeable Accident:
 - a. First Minor Chargeable Accident: - Employee receives written counseling and recommendation is made by the Commissioner for employee to successfully complete a defensive driving course as scheduled by the department's Occupational Safety Manager.
 - b. Second Minor Chargeable Accident: Five (5) day suspension.
 - c. Third Minor Chargeable Accident: Ten (10) day suspension.
 - d. Fourth Minor Chargeable Accident: (Within three (3) years of the First Minor Chargeable Accident): Employee shall be dismissed.
 2. Major Chargeable Accidents:
 - a. First Major Chargeable Accident: Ten (10) day suspension.
 - b. Second Major Chargeable Accident: Twenty (20) day suspension.
 - c. Third Major Chargeable Accident: Employee shall be dismissed.
 3. Catastrophic Chargeable Accident: The Disciplinary action for an employee charged in an accident determined to be a catastrophic loss shall be dismissal.

V. Processing Procedures for Disciplinary Actions

1. A Turn-Around Document (TAD) must be completed for any disciplinary action, including suspensions and dismissals. The TAD should be forwarded to the Office of Commissioner, Human Resources Division along with any other appropriate documentation.
2. The TAD must have all appropriate signatures, or in instances of an employee's refusal to provide a signature, a notation must be indicated on the TAD.

APPROVED:


David E. Scott, P.E., Commissioner

DATE: 6/28/06



DEPARTMENT OF PUBLIC WORKS SAFETY POLICY AND PROCEDURES BULLETIN

PPB# 312

Page 1 of 3

SUBJECT: Personal Protection Equipment (PPE)

TO: All Employees

PURPOSE: To enhance workforce safety by requiring employees be issued, wear and use Personal Protective Equipment (PPE) appropriate to the task being performed.

EFFECTIVE DATE: Upon the Commissioner's signature

SUPERSEDES: PPB #43, distributed August 4, 1987

I. Policy

Supervisors/Managers:

To reduce injuries and illness in the workplace, supervisors and managers shall be accountable for ensuring that employees under their supervision be issued, wear and use **Personal Protective Equipment (PPE)** while performing routine work or in conditions considered to be hazardous and unsafe.

Supervisors shall immediately assemble employees under their supervision when hazardous or unsafe conditions occur at worksites or along routes and explain proper and safe work procedures. This includes mandatory use of **PPE**, equipment and other devices needed to ensure the work team understands the hazards and complies with requirements for safely completing the work.

Employees:

Employees shall be trained regarding the safety requirements of his/her job. Training shall include **PPE** required to perform the job and the proper use of the equipment.

Employees issued **Personal Protective Equipment (PPE)** and who have been instructed in its use, are required to wear the **PPE** while working.

If an employee is unable to wear the required **PPE** (i.e., safety boots, safety glasses, ear plugs, etc.) for a medical reason(s), a medical certificate from the city's workers' compensation medical provider shall be submitted by the employee to the Office of the Commissioner, Human Resources Division, Safety Occupational Administrator for review and response. The employee will be assigned alternate duties until completion of the review.

II. Disciplinary Actions:

Supervisors:

To ensure the safety of employees at all times, supervisors are expected to provide Personal Protective Equipment that is appropriate to the task being performed. Failure or refusal of a supervisor to require employees under their supervision to wear and use **PPE**, and observe safety rules as a requirement of conditions of work, shall result in the following disciplinary actions up to and including dismissal:

1. 1st Incident/Violation – Supervisor shall be given an oral admonishment.
2. 2nd Incident/Violation – Supervisor shall be issued a written reprimand.
3. 3rd Incident/Violation – Supervisor shall be suspended for three (3) days without pay, within one (1) rolling year of the written reprimand.
4. 4th Incident/Violation – Supervisor shall be dismissed. Incident must occur within one (1) rolling year of the written reprimand.

Employees:

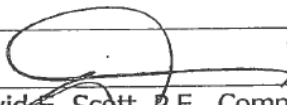
For their own personal safety, all employees are required to wear and use the safety equipment provided to them. This includes, but is not limited to, safety shoes, safety glasses; and use of seat belts and shoulder restraints (if available) when operating a city vehicle.

Employee shall be charged for loss or destruction of **PPE** when such loss or destruction occurs as a result of negligence.

Failure or refusal of an employee to wear and use **Personal Protective Equipment (PPE)** shall result in the following disciplinary actions up to and including dismissal:

1. 1st Incident/Violation – Employee shall be given an oral admonishment.
2. 2nd Incident/Violation – Employee shall be issued a written reprimand.

3. 3rd Incident/Violation – An Incident report shall be completed and submitted to the Installation Chief or Fleet Manager recommending three (3) days suspension without pay, within one (1) rolling year of the written reprimand.
4. 4th Incident/Violation – Employee shall be dismissed. Incident must occur within one (1) rolling year of written reprimand.

| | |
|---|---------------|
| APPROVED:  | DATE: 6/28/06 |
|---|---------------|

David E. Scott, P.E., Commissioner