

INJURY AND ILLNESS PREVENTION PROGRAM

**For
California Polytechnic State University
San Luis Obispo, California**

**Prepared by
Office of Environmental Health, and Safety**

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1.0 REGULATORY REFERENCE

California Labor Code Section 6401.7 (Chapter 1369, Statutes 1989);
California Code of Regulations, Title 8, Sections 1509 and 3203;

2.0 ADMINISTERING AGENCY

California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA).

3.0 BACKGROUND

Due to increasing public concerns for safety, both the legislature and various regulatory agencies have established strict workplace controls to protect the health and safety of employees, students, and the general public. Non-compliance with increasingly stringent legislation and heavily-enforced regulations has resulted in the issuance of heavy fines and penalties against employers and individuals in both the private and public sectors.

In California, section 3203, Title 8, of the California Code of Regulations describes the requirements for a workplace Injury and Illness Prevention Program. The regulations require every employer to establish, implement and maintain an effective injury prevention program including, but not limited to, a written program for identifying and evaluating hazards; procedures for correcting unsafe conditions; a system for communicating with employees; regularly scheduled safety meetings; employee training programs; compliance strategies; on-going documentation/record keeping; and identification of a person responsible for the program.

4.0 SCOPE AND APPLICABILITY

This Injury and Illness Prevention Program shall apply to all employees of the University. In addition, this program shall apply to all students and visitors at Cal Poly, as well as contractors engaged in work on behalf of the University and its auxiliaries.

5.0 ENVIRONMENTAL HEALTH & SAFETY OFFICE AND RISK MANAGEMENT

The University Environmental Health, and Safety Program is responsible for providing direction to campus programs in the protection of the University and its faculty, staff, students and visitors from fortuitous loss. Following the identification and analysis of loss exposures, the feasibility of risk management techniques for control and financing of losses are examined, evaluated, selected, and implemented by the University.

The University Risk Manager is the University liaison with the California State University Risk Management Authority (CSURMA), the third-party administrator for CSU risk management programs, the CSU Systemwide Director of Risk Management, and the State Office of Risk and Insurance Management (ORIM).

The Office of Environmental Health, and Safety shall be consulted as a liaison for all contact between the campus and regulatory agencies for issues related to environmental compliance and occupational safety.

6.0 OBJECTIVES

The objective of an effective injury and illness prevention program is to assist management in determining what hazards exist in the workplace, how to correct hazards that may occur, and what steps to take to prevent them from recurring. With the establishment of an effective system for providing employee injury and illness prevention, the following objectives can be achieved:

- The University is able to mitigate hazards and prevent injuries from occurring through regular self-inspections.
- Employees and students know to report potentially hazardous conditions and incidents without fear of reprisal, and that their reports will be given prompt and serious attention.
- Workplace equipment is maintained in safe and good working condition.
- Procedures are established to investigate any workplace injuries or illnesses and reported near-miss incidents.
- Hazards are corrected as soon as possible after they are identified.
- Employees and students have received general safety and health rules which are written and apply universally to all campus activities and operations.
- The University has developed written safe and healthful work practices for each specific job or educational activity performed by its employees and students.
- The University has established disciplinary procedures which help ensure that safety rules and work procedures are put into practice and enforced.
- The University has established a written plan for what employees, students, guests, and visitors will do in case of an emergency.

7.0 RESPONSIBILITIES

7.1 University Administration

The ultimate responsibility for establishing and maintaining effective policies regarding environmental health and safety issues specific to campus facilities and operations, rests with the University President. General policies which govern activities and responsibilities under the Injury and Illness Prevention Program are thereby established under the final authority of the President.

Because of the wide diversity of operations within the University and the necessary differences in organizational structure within various departments, it is recognized that certain responsibilities and expressed procedures in this program cannot be equally applied. There are, therefore, some details which might be impossible or impractical for one department chair or department head to implement as directed while another would have no difficulty in applying these procedures to everyone. Departments will, therefore, have some latitude in formulating and implementing alternative methods when necessary, as long as the total Injury and Illness Prevention Program objectives are not compromised. The Office of Environmental Health & Safety will provide assistance to campus departments seeking to implement alternate procedures.

7.2 Environmental Health and Safety - University Participation

Representative members of the University Community will review and make recommendations regarding safety policies and procedures in order to:

- eliminate adverse conditions which may result in injury or illness,
- recommend the establishment of programs to develop safety consciousness in the members of the university community, and
- achieve and maintain a beneficial relationship through continuing communication on issues relating to environmental health and occupational safety.

Recommendations will be forwarded to the Campus Safety & Risk Management Committee.

7.3 Office of Environmental Health and Safety

It is the responsibility of the Office of Environmental Health and Safety to develop and manage an effective EH&S Program, which includes an Injury and Illness Prevention Program. Further responsibilities are to:

- a. Provide support and consultation to College Deans, Directors, Chairpersons, Faculty, Program Directors, Coordinators, managers, and supervisors regarding program compliance. Consult on issues of hazard identification and evaluation; procedures for correcting unsafe conditions; systems for communicating with employees; regularly scheduled safety meetings; employee training programs; compliance strategies; and record keeping.
- b. Provide centralized monitoring of campus wide activities on a consultative basis in the areas of biological safety, chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification, hazardous materials and hazardous waste management, industrial hygiene, occupational safety, asbestos management, public health and sanitation, radiation safety, safety education and training, and environmental compliance.
- c. Maintain centralized environmental and employee monitoring records, allowing employee access as directed by law.

7.4 Deans, Directors, Department Chairs, Department Heads

It is the responsibility of Deans, Directors, Department Chairs and Department Heads to develop departmental procedures to ensure effective compliance with the Injury and Illness Prevention Program and other applicable university health and safety programs and procedures as they relate to operations under their control. Specific areas include employee and student (both student employees and students in academic programs) education and training, identification and correction of unsafe conditions, and record keeping. It is recognized that a substantial amount of responsibility falls at this level. Colleges and Departments shall designate individuals as the College and department safety coordinator, assigning certain of the following tasks to this person and giving this person the authority to implement the necessary procedures to ensure compliance with the campus program. Deans, Directors, Department Heads or Department Chairs shall work with EH&S to ensure that the following requirements are met:

- a. Develop and maintain written departmental procedures as necessary and ensure that each supervisor adheres to adopted procedures.
- b. Develop and implement an education and training program designed to instruct employees and students in general safe work practices as well as instructions specific to their job duties or educational activities. Such education and training shall take place prior to the employee or student being assigned to potentially hazardous operations.
- c. Instruct employees and students in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine task and emergency operations. Permit only those persons qualified by training to operate potentially hazardous equipment or to use potentially hazardous materials. Ensure that newly hired, newly assigned or reassigned employees, as well as all students, are properly trained in all safety procedures associated with new duties.
- d. Develop a system of record keeping to document all safety related activities. Such records should include, but not be limited to, employee and student training, injury reports, incident reports, and complaints or grievances involving safety issues.
- e. Develop and maintain an inventory of hazardous materials present in all work areas. A copy of this inventory must be forwarded to the Office of Environmental Health and Safety.
- f. When ordering hazardous materials, request a Material Safety Data Sheet (MSDS) on the Requisition Form (unless an MSDS for the material is already available in the work area).
- g. Post appropriate safety notices or procedures in a conspicuous location.

- h. Develop methods, as appropriate, to inform outside contractors' employees who work in areas under department jurisdiction of the hazards to which those employees maybe exposed.
- i. Conduct periodic (at least annually) safety inspections of facilities, equipment, and projects to identify unsafe conditions and practices. Initiate corrective actions regarding identified hazards or deficiencies.

7.5 Faculty

It is the responsibility of faculty to:

- a. Develop procedures to ensure effective compliance with the Injury and Illness Prevention Program as it relates to operations under their control. Specific areas of responsibility include specific safety curriculum development, student education and training, identification and correction of unsafe conditions, and incident reporting.
- b. Develop and maintain written classroom, laboratory, and activity procedures which conform to regulatory, campus and departmental guidelines.
- c. Supervise students in the performance of activities.
- d. Instruct students in the recognition, avoidance, and response to unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- e. Permit only those persons qualified by education and training to operate potentially hazardous equipment or use hazardous materials, unless under close supervision.

7.6 Advisors for Academically Related Activities and Student Clubs

It is the responsibility of advisors for academically related activities and student clubs to:

- a. Develop procedures to ensure effective compliance with the Injury and Illness Prevention Program as it relates to operations under their control. Specific areas of responsibility include student education and training, identification and correction of unsafe conditions, and incident reporting.
- b. Develop and maintain written classroom, laboratory, and activity procedures which conform to regulatory, campus and departmental guidelines.
- c. Supervise students in the performance of activities.
- d. Instruct students in the recognition, avoidance, and response to unsafe conditions, including hazards associated with non-routine tasks and emergency operations.
- e. Permit only those persons qualified by education and training to operate potentially hazardous equipment or use hazardous materials, unless under close supervision.

7.7 Principal Investigators and Supervisors

It is the responsibility of Principal Investigators and Supervisors to:

- a. Develop local area procedures to ensure effective compliance with the Injury and Illness Prevention Program as it relates to operations under their control. Specific areas of responsibility include

employee education and training, identification and correction of unsafe conditions, and record keeping.

- b. Develop and maintain written workplace procedures which conform to regulatory, campus and departmental guidelines.
- c. Ensure that each employee or student adheres to adopted procedures.
- d. Instruct employees, visitors, and guests in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations. Permit only those persons qualified by training to operate potentially hazardous equipment or use hazardous materials. Ensure that newly hired, newly assigned or reassigned employees are properly trained in all safety procedures associated with new duties.

7.8 Employees (Including Student and Volunteer Employees)

It is the responsibility of all employees to:

- a. Read and comply with procedures and guidelines provided by their supervisors.
- b. Inform their supervisors of workplace hazards without fear of reprisal.
- c. Attend established education and training sessions. They are expected to understand and comply with all applicable safety requirements. Failure to comply with established safety rules may be reflected in performance evaluations and may lead to disciplinary action consistent with procedures described in respective collective bargaining contracts, where applicable.
- d. Ask questions of their supervisors when there is concern about an unknown or hazardous situation.

7.9 Students

Students are expected to always adhere to safety practices presented by faculty, technical staff, student assistants, graduate assistants or other authorized individuals. They must also report potentially hazardous conditions that become known to them. These reports should be made to their supervisors, faculty advisers, Office of Health and Environmental Safety, or other responsible parties.

8.0 COMPLIANCE GUIDELINES & RECOGNITION

All employees shall adhere to safe and healthy work practices defined by law and by established campus and departmental safety and health guidelines. Failure to do so may result in the initiation of disciplinary measures defined in the campus Employee Handbook or by collective bargaining agreements, as appropriate.

The University recognizes the importance of recognition for employees who exemplify good safety practices. The University participates in the annual Governor's Safety Award Program through the C.S.U. systemwide Risk Management Office.

9.0 SAFETY COMMUNICATIONS

Several methods of communicating with employees on matters relating to health and safety have been established. Managers and supervisors will encourage employees to report any unsafe or unhealthful conditions they discover without fear of reprisal.

9.1 Campus Wide Environmental Health and Safety Committee

The campus wide Environmental Health and Safety Committee has been established to achieve and maintain effective campus communications on environmental health and safety issues and to resolve related problems (see Section 7.3).

9.2 Department / Program Safety Meetings

Departments and/or programs will schedule regular safety meetings at which safety and health issues are freely and openly discussed by employees of the department. Meetings should be scheduled at a time when most employees can attend and minutes should be kept to document who was in attendance and what topics were discussed.

9.3 Employee Safety Training

The University provides general training programs for employees on an on-going basis (see Section 12.0). Departments shall ensure the provision of job-specific training programs for employees on a periodic basis, prior to assignment on a new job, and when work assignments change.

9.4 Posters

The Office of Environmental Health & Safety can provide departments with a variety of posters to be used in promoting a safe and healthful workplace and work practices. Posters should be displayed in high visibility areas within each applicable workplace.

9.5 Campus Safety Bulletins

The Environmental Health & Safety Office publishes Campus Safety Bulletins as necessary to keep the campus community informed of changes in regulations or topics of interest related to campus operations.

10.0 HEALTH AND SAFETY INSPECTIONS

A health and safety inspection program is essential in order to reduce unsafe campus conditions which may expose faculty, staff, students and visitors to incidents that could result in injury to individuals or damage to property.

10.1 Scheduled Work Place Inspections

- a. Department Chairs/Heads shall ensure all work areas under their management are inspected at least annually for:
 - Hazardous Materials
 - Hazardous Waste
 - Hazardous Equipment
 - Hazardous Processes

- c. The Site Manager (Principal Investigator, lab/space owner, cognizant individual, etc) or qualified designee (not the Safety Coordinator) is responsible to conduct the inspections using the appropriate form available at:

<https://afd.calpoly.edu/ehs/inspectiondocs.asp>

- d. The Site Manager shall send the completed annual self-inspection report to the department safety coordinator and the department chair/head.
- e. The following Self-Inspection Checklists and instructions are available on the EH&S Webpage
- i. Self-Inspection Checklist for Hazardous Materials
 - ii. Laboratory Safety Checklist
 - iii. Shop Safety Checklist
 - iv. Storage Checklist
 - v. Office Checklist
- f. Departments shall conduct an inspection whenever new substances, processes, procedures or equipment, which represent a new occupational safety and health hazard, are introduced.
- g. The Office of Environmental Health & Safety shall conduct random annual inspections of department workspaces to ensure departments are completing the annual inspection and implementing appropriate corrective actions.
- h. The Office of Environmental Health & Safety, in conjunction with departmental representatives, will conduct a health and safety inspection in the event of an occupational injury, occupational illness, or exposure to hazardous substances as defined by Cal/OSHA.

11.0 INJURY AND ILLNESS INVESTIGATION

11.1 Reporting

All injuries received on the job will be reported to the immediate supervisor of the injured employee. Supervisors shall ensure that the appropriate injury report forms are filed with the Office of Environmental, Health & Safety. Campus employees who become aware of an injury to a non-employee student, visitor, guest or contractor shall ensure that a report is made to Risk Management on a form provided by that office.

11.2 Serious Incident Reporting

Serious occupational injuries, illness or exposures to hazardous substances, as defined by Cal/OSHA, must be reported to the Office of Environmental Health & Safety no later than 48 hours after they become known. The Office of Environmental Health & Safety will contact Cal/OSHA as required by law. The Office of Environmental Health & Safety, or a Worker's Compensation representative, will investigate the circumstances of the incident to determine the cause. A copy of this report may be forwarded to the University Legal Counsel upon request.

For the purposes of the above reporting requirement, "serious injury or illness" is any injury or illness which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement.

12.0 HAZARD CONTROL PROCEDURES

Upon completion of scheduled or unscheduled inspections, all findings will be prepared in writing and submitted to Department Chairs/Heads, Directors, Deans, and/or other appropriate responsible persons. Corrective actions, or a suitable timetable for elimination of a hazard (where appropriate) is the responsibility of the department. The Office of Environmental Health & Safety will, however, assist in obtaining expert corrective assistance and university-wide funding where appropriate and necessary.

Once identified, hazards will be ranked according to both consequence (the severity) and probability (the frequency) as defined in Table 1. Prioritization of abatement actions will be based on the ranking scheme. Serious violations and hazards should always be given top priority and be corrected immediately or consideration should be given to stopping operations affected by the violations or hazards.

12.1 Imminent Hazard Situations

Individuals, whether conducting a safety inspection or in the normal course of their duties, shall immediately notify the Department Chair/Head and the Office of Environmental Health & Safety, as appropriate, if a condition exists that presents an imminent hazard to health or safety. The Department Chair/Head shall inform all employees of any such imminent hazard(s) that cannot be immediately corrected and ensure that all necessary precautions are taken to prevent injuries and illnesses.

An imminent hazard is any condition or practice where there is reasonable certainty that a hazard exists that can be expected to cause death or serious physical harm immediately or before the hazard can be eliminated through normal corrective measures (e.g. an employee is working on an electrical line without shutting off the power). A conspicuous written notice will be attached to the equipment or facility presenting the hazardous condition, prohibiting use by employees or students. The written notice may not be removed until the hazardous condition no longer exists, and the required safeguards and safety devices are implemented. This written notice may only be removed, and the equipment or area released for use, by a representative from the Office of Environmental Health and Safety or a supervisor responsible for the process or area which was "tagged." Personnel who continue to use an item that has been so tagged, or who willfully remove a tag before the unsafe condition is corrected, are subject to severe disciplinary action, up to and including, dismissal as allowed by campus policy and respective collective bargaining contracts. Entry or use may be allowed with the written permission of a staff member of the Office of Environmental Health & Safety, for the sole purpose of eliminating the hazardous condition.

**Table 1
 Hazard Classification**

Order of Priority	Consequence (Severity)	Probability of Injury Occurrence
1	Imminent danger exists. Capable of causing death, possible multiple deaths, widespread occupational illness and loss of facilities	Probable
2	Severe injury, serious illness, property and equipment damage	Reasonably Probable
3	Minor injury, illness or equipment damage may result	Remote
4	First aid care.	Extremely Remote

13.0 EMPLOYEE SAFETY TRAINING

Effective dissemination of safety information lies at the very heart of a successful Injury and Illness Prevention Program. It is essential to provide training for employees concerning general safe work practices as well as specific instruction with respect to hazards unique to each employee's job assignment

13.1 General Safe Work Practices

Human Resources and the Office of Environmental Health & Safety have developed training programs designed to meet general safe work practice requirements. These programs are elements of larger programs which service broad campus needs. These programs include:

- Back Injury Prevention
- Ergonomic Injury Prevention
- Infectious Waste Management
- Chemical Hygiene
- Hazard Communication
- Occupational Safety
- Environmental Health
- Blood Borne Diseases
- Safety Education and Training

13.2 Specific Safe Work Practices

Specialized training sessions dealing with an employee's unique job assignment must be developed by each supervisor. It is the responsibility of each supervisor to understand his/her employee's job tasks and related hazards.

13.3 Scheduled Training

- a. Each supervisor will ensure that all new employees receive general and specific training prior to assignment on a new job.
- b. Supervisors will ensure that employees are trained whenever new substances, processes, procedures or equipment are introduced to the workplace which represent a new hazard or whenever the supervisor receives notification of a new or previously unrecognized hazard.
- c. All training will be documented in writing. Topics, participants and dates will all be recorded and kept on file within each department and a copy will be provided to the Office of Environmental Health and Safety annually. Standard forms for maintaining this information can be obtained from the Office of Environmental Health and Safety.

14.0 RECORD KEEPING

Many standards and regulations of Cal/OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections, and other activities and incidents relevant to environmental health and occupational safety.

14.1 Campus Accidents, Injuries and Illnesses

It is essential that all accidents, injuries and illnesses occurring either on University property or at off-campus University sponsored events are reported. Injuries or illnesses suffered by employees

(including student employees) should be reported to Office of Environmental Health and Safety. Injuries or illnesses suffered by students, visitors, guests, or contractors should be reported to Risk Management.

Statistics and other information from these records are available to departments for use in accident prevention efforts. In addition, departments should also maintain and analyze records of accidents occurring in their own area of operations.

14.2 Occupational Injuries and Illnesses

- a. The University will record and report within five (5) days every employee injury or illness unless disability resulting from such injury or illness does not last through the day or does not require medical service other than minor first-aid treatment.
- b. The University will maintain a master log and summary of occupational injuries and illnesses (OSHA forms 300 & 300A). This log and summary will be maintained in Office of Environmental Health and Safety.
- c. Records of occupational injuries and illnesses (form 3067, appendix A) will be kept on file in the Office of Environmental Health & Safety and will be made available for review by Cal/OSHA at any time, for a period of five (5) years.
- d. The Cal/OSHA summary for the previous year will be posted in Human Resources for review by employees.

14.3 Material Safety Data Sheets (MSDS)

Each MSDS received by the campus must be maintained for at least thirty (30) years unless some record of the identity (chemical name if known) of the substance or agent, where it was used, and when it was used is retained for at least thirty (30) years. Environmental Health & Safety subscribes to the MSDS Online service. Physical MSDS can be replaced by employee access to a computer which can use this service during an employee's shift. If MSDS Online is used in place of paper MSDS, a working computer must be available to employees with a MSDS Online link on the desktop. MSDS Online can be accessed at: <http://hq.msdsonline.com/csuedus/Search/Default.aspx>.

14.4 Employee Exposure Records

Each employee exposure record will be preserved and maintained by either Human Resources or the Office of Environmental Health and Safety for at least thirty (30) years except for certain background data related to workplace monitoring and certain biological monitoring results. Such records include workplace monitoring or measuring of a toxic substance or harmful physical agent; biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems; material safety data sheets; and in the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity of a toxic substance or harmful physical agent.

Departments using any regulated carcinogens have additional reporting and record keeping requirements specified by Cal/OSHA. These departments shall provide a list of all carcinogens used to the Office of Environmental Health & Safety.

14.5 Medical Records

The medical record for each employee will be preserved and maintained for at least the duration of employment plus thirty (30) years except for certain health insurance claims records, first aid records, or the medical records of employees who have worked for less than one (1) year if they are provided to the employee upon termination of employment. Such records include medical and employment questionnaires

or histories; the results of medical exams and lab tests; medical opinions, diagnoses, progress notes, and recommendations; first aid records; descriptions of treatments and prescriptions; and employee medical complaints.

14.6 Employee Exposure and Medical Record Analyses

Each analysis using exposure or medical records will be preserved and maintained for at least thirty (30) years.

14.7 Documentation of Activities

Essential records, including those legally required for Workers' Compensation, insurance audits and government inspections will be maintained for as long as required. Individual Departments and/or Colleges will also keep records of steps taken to establish and maintain the Injury and Illness Prevention Program. They must include:

- a. Records of scheduled and periodic inspections to identify unsafe conditions and work practices. The documentation includes the name of the person(s) conducting the inspection, the unsafe conditions and work practices identified, and the corrective action(s) taken. These records will be maintained for at least three years.
- b. Documentation of health and safety training for each employee. Specifically, employee name or other identifier, training dates, type(s) of training and the name of the training provider will be included. Records will be retained for at least three years. Standard forms for maintaining this information can be obtained from the Office of Environmental Health and Safety.
- c. Training records will be kept in each department and copies will be forwarded to the Office of Environmental Health and Safety.

15.0 EMPLOYEE ACCESS TO EXPOSURE AND MEDICAL RECORDS

The University recognizes that employees and their designated representatives and authorized representatives of the Chief of the Division of Occupational Safety and Health (Cal/OSHA) have a right of access to relevant exposure and medical records. Such access is necessary to yield both direct and indirect improvements in the detection, treatment and prevention of occupational disease. Whenever an employee or designated representative requests access to a record, the University shall assure that access is provided in a reasonable time, place and manner.

16.0 RESOURCES

The Office of Environmental Health and Safety oversees specific safety programs which are incorporated into the overall campus Injury and Illness Prevention Program. This helps ensure that adequate environmental health and safety measures are taken when carrying out campus operations. Existing programs are outlined below. Written copies of programs and procedures may be obtained from the Office of Environmental Health & Safety.

16.1 Chemical Hygiene

The written Chemical Hygiene Plan provides that the Office of Environmental Health and Safety will consult with individuals who work in laboratories with hazardous materials and/or hazardous processes.

Assistance provided includes information on methods of safe handling and storage of reactive and toxic substances, as well as personal protection. Available toxicological information includes permissible exposure limits to certain chemicals, as well as effects of overexposure to various target organs.

Office of Environmental Health and Safety staff members will, upon request, conduct walk-through surveys of lab spaces for the purpose of advising the research staff about physical and chemical hazards routinely found in research lab settings. Problems connected with chemical storage, waste management, earthquake preparedness, electrical hazards, personal protection, etc., are focused upon.

16.2 Emergency Preparedness

The campus Emergency Management Plan provides for a consistent and adequate means of handling a variety of emergencies. University personnel, students and the public are informed of and included in the preparedness and response strategy. The campus Emergency Management Plan outlines the actions to be taken by the University in response to emergency situations. The goals of this Plan are the preservation of life, the protection of our environment and property, and the continuity of campus operations.

16.3 Hazard Communication

The written Hazard Communication Program provides for an inventory of hazardous substances used in each workplace; a system of labeling containers; material safety data sheets for each hazardous substance used; and a comprehensive training program for employees who use hazardous materials.

16.4 Hazard Identification and Correction

Office of Environmental Health and Safety staff conduct periodic worksite inspections for the purpose of identifying potentially hazardous situations before injuries occur. Inspections are performed to help supervisors realize where unsafe conditions exist and how to provide effective protection for all staff. Efforts focus on such concerns as engineering and design, maintenance of facilities and equipment, and ergonomics.

16.5 Occupational Safety

The campus Occupational Safety program provides for safe working/walking surfaces, adequate illumination, proper maintenance of tools and other equipment, proper guarding of machinery, an electrical safety program, a lockout/tagout procedure for all energized systems, safe use and storage of compressed gas, a confined space entry procedure, equipment and procedures for the safe handling of materials, and a heavy equipment operator safety program.

16.6 Radiation Safety

The Radiation Safety program provides for the safety of personnel, students and the public during operations involving ionizing, ultra-violet, laser and microwave radiation sources. Working in conjunction with the Radiation Safety Committee and guidelines approved in the University's broad scope license with the State, the Office of Environmental Health & Safety administers the radiation safety program to ensure that all exposures to radioactive sources are kept to a level as low as reasonably achievable.

16.7 Safety Education and Training

A broad array of safety education programs have been developed by the Office of Environmental Health and Safety staff to assist supervisors in meeting their training obligations. Topics range from general interest subjects on fire and earthquake safety to specialized sessions on food handling, confined space operations, lab safety, etc.