



Channel Islands

CALIFORNIA STATE UNIVERSITY

Provost

DATE: August 4, 2020

TO: Dr. Vandana Kohli, Dean for the School of Arts & Sciences  
Dr. Osman Ozturgut, Associate Vice President, Extended University and Dean of International Programs

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RE: Hazard Assessments

CSU Channel Islands is committed to a Culture of Safety in both instructional and research labs. This memo establishes responsibilities and deadlines for Hazard Assessments in the College of Arts and Sciences and Extended University and procedures by which Hazard Assessments shall be implemented and Personal Protective Equipment shall be provided to employees/students.

California Code of Regulations (CCR) Title 8, §3380, Personal Safety Devices and Safeguards, requires employers to assess the workplace to determine whether hazards that necessitate the use of Personal Protective Equipment (PPE) are present and to ensure provision of appropriate PPE if hazards are present.

In its December 13, 2019 Health and Safety audit of CI labs, the CSU Chancellor's Office indicated, *"We recommend that the campus establish and implement a written hazard assessment for all campus workplaces that require the use of PPE, including the academic and research areas, and develop procedures to ensure provision of appropriate PPE if hazards are present."* In its response to the Chancellor's Office audit, the campus indicated, *"By June 13, 2020, we will establish responsibility for completing written hazard assessments for areas that require PPE."*

In addition, the CSU Channel Islands Chemical Hygiene Plan specifies that one of the responsibilities of Laboratory Supervisors is to, *"Conduct hazard assessment, provide hazard mitigation, and document relevant training on these lab-specific hazards for any entity under the supervisor's direction."*

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**Responsibilities:**

For the College of Arts and Sciences and Extended University, the following Responsible Individuals shall have responsibility for completing the Hazard Assessments for academic and research areas according to the procedures outlined in the attached document.

- **Instructional Laboratories/ Courses. Responsible Individual: Chairs.** Chairs shall be responsible for certifying the hazards associated with instructional laboratories/ courses. Chairs shall identify hazards associated with instructional laboratories/ courses, in consultation with appropriate staff and faculty including Instructional Support Technicians (IST), instructors who teach laboratories/courses, and other departmental stakeholders. Separate hazard assessments shall be completed for each activity that involves different types of hazards, e.g. a ceramics class vs. a painting class vs. a woodworking class, or a general education laboratory class with low-hazard chemicals/ procedures, vs. an upper-division laboratory that utilizes hazardous chemicals/ procedures.
- **Principal Investigator (PI) Research. Responsible Individual: Faculty Principal Investigators.** Individual faculty principal investigators who are engaged in research activities shall complete a hazard assessment for their research activities and scholarly activities that involve hazards, e.g. laboratory research, fabrication, welding or woodworking. Hazard assessments shall be completed by each individual faculty member even when two or more faculty share the same physical laboratory or other space, to identify hazards that are unique to the nature of their individual research activities. PI's shall certify the Hazard Assessment for their research group in RSS Assess.

**Deadline:**

Initial hazard assessments shall be conducted before instruction/ research has started. Hazard Assessments shall be conducted using RSS Assess before the beginning of the Fall 2020 semester for any instructional laboratories/ courses that will be meeting with a face-to-face component during the Fall 2020 semester and for any Principal Investigator (PI) Research that will be conducted in research laboratories in Fall 2020. For other instructional laboratories/ courses that will be on-line in Fall 2020 or for Principal Investigator research that will be virtual in the Fall 2020 semester, hazard assessments shall be conducted before the beginning of the semester when the laboratory/course returns to face-to-face instruction or when Principal Investigator research returns to being conducted in research laboratories. Once these initial hazard assessments have been completed, recertifications of the hazard assessments shall be completed annually before the end of the third week of the semester.

## **California State University Channel Islands**

### **Procedure for Hazard Assessment, Provision of Personal Protective Equipment (PPE), and Hazard Communication**

The following procedure outlines how hazard assessments shall be conducted, how appropriate Personal Protective Equipment (PPE) shall be provided to employees and students, and how the hazards identified in the hazard assessment shall be communicated to employees and students.

#### **Hazard Assessment:**

Hazard Assessments shall be conducted using RSS Assess initially before the beginning of the semester when instruction/ research activities will be conducted, and with annual recertifications occurring no later than the end of the third week of the semester.

The below section outlines the Responsible Individuals for completing hazard assessments in RSS Assess for instructional laboratories/ courses and Principal Investigator research.

1. Instructional Laboratories/ Courses. **Responsible Individual: Chairs.** Chairs shall be responsible for completing and certifying a hazard assessment for instructional laboratories/ courses in their program area, in consultation with appropriate staff and faculty, including Instructional Support Technicians (IST), instructors who teach laboratories/courses, and other departmental stakeholders. In consultation with these individuals, Chairs shall:
  - a. Group laboratories/ courses taught in the department into clusters of laboratories/ courses with comparable hazards including work done in prep rooms,
  - b. Complete a Hazard Assessment for each cluster of laboratories/ courses as a separate RSS Assess Group, and
  - c. Identify which faculty, staff members, or student assistants should be associated with each cluster or laboratories/ courses and add them to the RSS Assess Groups.
  - d. Chairs will certify the Hazard Assessment for each RSS group in RSS Assess.
  
2. Principal Investigator (PI) Research. **Responsible Individual: Faculty Principal Investigator.** Individual faculty principal investigators who are engaged in research activities shall be responsible for completing and certifying a hazard assessment for their research activities and scholarly activities that involve hazards, e.g. laboratory research, fabrication, welding or woodworking. Hazard assessments shall be completed by each individual faculty member even when two or more faculty share the same physical laboratory or other space, to identify hazards that are unique to the nature of their individual research activities. PI's shall certify the Hazard Assessment for their research group in RSS Assess.

Chairs and PI's may consult with EH&S while conducting Hazard Assessments to ensure that responses on the Hazard Assessment in RSS Assess accurately reflect the actual hazards involved in the academic or research RSS groups.

When Hazard Assessments have been completed, Environmental Health and Safety (EH&S) will consult with the above individuals to:

- (a) confirm whether the assessment accurately reflects the hazards present in each cluster,
- (b) determine the appropriate Personal Protective Equipment (PPE) and Engineering Controls necessary to ensure that instructors, staff, and students are protected from the identified hazards, and
- (c) confirm that the list of individuals identified for each RSS Assess Group is complete.

If the nature of the work being conducted in a laboratory changes significantly, a new hazard assessment shall be conducted before the work is initiated, so that the hazard assessments accurately reflect the current hazards associated with the work.

The RSS Assess software tracks certification of completed hazard assessments by each responsible individual. The system also tracks each respective faculty and staff's review of each applicable hazard assessment following certification by the responsible individual.

#### **Provision of Personal Protective Equipment**

On completion of a hazard assessment in RSS Assess, required Personal Protective Equipment (PPE) will be identified by RSS Assess for that instructional/ research activity. Responsible Individuals shall ensure any PPE identified by RSS Assess is procured and provided as needed for the instructional/research activities. In accordance with campus procurement policies/procedures, Responsible Individuals will work with department Instructional Support Technicians to place orders for PPE identified as being needed by RSS Inspect. In some cases, the PPE identified may include engineering controls that require the procurement of expensive personal protective equipment and/or modification of physical laboratory spaces. If the cost of acquiring required PPE is outside of the budget available to the department and/or Principal Investigator, a request for financial assistance shall be forwarded to the Dean of the College of Arts and Sciences or the Associate Vice President and Dean of International Programs and Extended University. CSU Channel Islands is responsible for compliance with California Code of Regulations (CCR) Title 8, §3380, Personal Safety Devices and Safeguards, and must ensure its employees are provided appropriate PPE if hazards are present.

#### **Hazard Communication:**

Hazards identified during the hazard assessment in RSS Assess shall be communicated to faculty/ staff members/ student assistants associated with the RSS Assess Group and can be accessed through RSS Assess. Signage indicating required PPE shall be displayed in each laboratory/ room consistent with the Hazard Assessment.