

HAZARDOUS MATERIALS MANAGEMENT

**CALIFORNIA STATE POLYTECHNIC
UNIVERSITY, POMONA**

**Report Number 00-21
January 31, 2001**

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ABBREVIATIONS

CCR	Californian Code of Regulations
CSU	California State University
CSPUP	California State Polytechnic University Pomona
EH&S	Environmental Health & Safety
EPA	Environmental Protection Agency
HAZCOM	Hazard Awareness and Communication Program
HAZMAT	Hazardous Material(s)
HMM	Hazardous Materials Management
HMMD	Hazardous Materials Management Division
H&SC	Health & Safety Code
HWMG	Hazardous Waste Management Guide
IIPP	Injury and Illness Prevention Program
MSDS	Material Safety Data Sheet(s)
RCRA	Resource Conservation and Recovery Act
RMP	Risk Management and Prevention Program
SAM	State Administrative Manual
TSD	Transfer, Storage and Disposal

INTRODUCTION

PURPOSE

Our overall audit objective was to ascertain the effectiveness of policies and procedures concerning Hazardous Materials Management (HMM), determine the adequacy of controls over hazardous materials and waste, and ensure compliance with related governmental regulations.

Within the overall audit objective, specific goals included determining whether:

- ▶ administration and management of the HMM program provide clear lines of organizational authority and responsibility, include maintenance of required registrations and permits, and ensure compliance with the key regulatory reporting requirements;
- ▶ hazardous materials (HAZMAT) and waste management policies and procedures are adequately documented;
- ▶ HAZMAT purchasing and receipt processing are conducted in a controlled environment, and material safety data sheets (MSDS) are obtained and readily accessible to employees;
- ▶ a comprehensive HAZMAT communication program has been established, and effective emergency and contingency plans are in place;
- ▶ inventory records are properly maintained for HAZMAT purchases, and HAZMAT safety and equipment inspections are conducted;
- ▶ HAZMAT maintained in containers and tanks are properly labeled and adequately controlled;
- ▶ hazardous waste transfer, storage, and disposal (TSD) agreements exist between the University and TSD contractors and require the contractors to maintain adequate liability insurance;
- ▶ hazardous waste identification procedures are adequately implemented, and waste transportation and disposal processes are in compliance with governmental regulations;
- ▶ employees who handle HAZMAT or generate waste are adequately trained; and
- ▶ hazardous, biomedical and universal waste is properly labeled and not accumulated on-site for greater than the allowable time.

SCOPE AND METHODOLOGY

This review emphasized but was not limited to compliance with state and federal laws and campus hazardous materials (HAZMAT) policies, letters and directives. The audit review period was July 1, 1999 to August 1, 2000. At California State Polytechnic University, Pomona (CSPUP), the Department of Environmental Health and Safety (EH&S) has overall responsibility for hazardous materials management (HMM).

Our primary focus involved the internal administrative, compliance, and operational controls over the management of the campus HMM function and included visits to three campus units: Biology, Chemistry, and Facilities Management. Specifically, we reviewed and tested:

- ▶ procedures for HAZMAT purchasing, receiving and storage;
- ▶ the use and availability of material safety data sheets (MSDS);
- ▶ HAZMAT communication and training programs, emergency and contingency planning, and related documentation;
- ▶ HAZMAT inventory record keeping practices;
- ▶ procedures for performing HAZMAT safety and equipment inspections;
- ▶ HAZMAT and waste labeling and other forms of required warnings;
- ▶ hazardous waste identification, permit, registration, and manifesting procedures; and
- ▶ the hazardous waste disposal program.

BACKGROUND

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 1999, the Board of Trustees, at its January 2000 meeting, directed that *Hazardous Materials Management* be reviewed.

The proposed scope of such audits as presented in Attachment B, Agenda Item 3 of the January 25-26, 2000 meeting of the Committee on Audit, stated that the review would include the systems and procedures for controlling the purchase, generation, storage, treatment, use and disposal of hazardous materials (HAZMAT) and wastes and responding to hazardous spills. Potential impacts include environmental damage, adverse publicity, excessive costs and legal liabilities, facilities with inordinate health risks, regulatory fines and sanctions, and the inability to identify HAZMAT in

emergency situations. *Hazardous Materials Management* was previously audited in 1992 and a follow-up review was completed in 1996.

In 1976, the Federal Resource Conservation and Recovery Act (RCRA) was enacted to address solid waste generated nationwide and the growing public concern regarding HAZMAT health risks; waste generation, and waste disposal. RCRA initiated the “cradle to grave” tracking and management of hazardous waste that is, from the generator to transporter to treatment, storage or disposal. RCRA regulations addressed, but were not limited to, the following management issues: a) generation of hazardous waste, b) hazardous waste treatment, transportation, storage, and disposal, c) federal and state reporting, d) federal, state, or local permits/registration, and e) waste minimization.

RCRA provided the federal government with the authority to authorize states to develop, implement and enforce their own HAZMAT and waste management regulations. However, the state programs must be as stringent or broader in scope than the federal regulations. In 1992, California received such authority from the Environmental Protection Agency (EPA). Most of the California regulations are codified in the Health & Safety Code (H&SC) and the California Code of Regulations (CCR); specifically, Titles eight and twenty-two. The California Department of Toxic Substances Control is responsible for enforcing the enacted codes and administrative laws.

All CSU campuses purchase some amount of HAZMAT that result in the generation of hazardous waste. To limit regulatory compliance risks and control waste processing costs, the campuses enter into contracts with waste transfer, treatment, storage and disposal companies. For the most part, campus Environmental Health and Safety (EH&S) departments are responsible for developing, implementing, and monitoring programs that assure compliance with state and federal hazardous materials and waste regulations. Other services provided by EH&S include, but are not limited to, waste consulting and pick-up; transfer, treatment, storage, and disposal coordination; waste tracking and record keeping; employee and student communication and training; and emergency/contingency planning.

The systemwide report related to the 1992 Office of the University Auditor review identified several HAZMAT and waste management topics that required further attention. Specifically, concerns were expressed over training, inspections, waste manifesting, material safety data sheets (MSDS), inventory record keeping, and the monitoring of contractors for adequate insurance and current registration. As a result, the Chancellor’s Office developed a sample Hazardous Waste Management Guide (HWMG) to assist the campus administrators in understanding and complying with applicable health, safety and environmental laws and regulations. The HWMG covered the basic elements involved in understanding hazardous materials management but was not designed to serve as a policy and procedure manual. The HWMG was intended to be a sample document that could be tailored to, and serve, local campus needs.

OPINION

We visited the California State Polytechnic University, Pomona (CSPUP) campus from August 14, 2000 through September 15, 2000 and audited the procedures in effect at that time.

In our opinion, the administration and management of the Hazardous Materials Management (HMM) program provided reasonable assurance that CSPUP was in compliance with applicable regulations and, for the most part, the HMM function operated effectively. Areas in need of improvement are referenced in the executive summary.

EXECUTIVE SUMMARY

The purpose of this section is to provide management with an overview of conditions requiring their attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [] refer to page numbers in the report.

HAZARDOUS MATERIALS ADMINISTRATION [6]

HAZARDOUS MATERIALS TRANSPORTERS [6]

Hazardous waste removal contractual relationships and waste transport liability coverage maintained by certain contractors did not meet current CSU requirements. The California State University is protected when hazardous waste transporters maintain adequate liability insurance and agreements are supported by signed contracts.

MATERIAL SAFETY DATA SHEET ADMINISTRATIVE CONTROLS [7]

MSDS administrative controls were in need of strengthening. Employee accessibility to MSDS information improves CSPUP's ability to respond appropriately and expeditiously to an emergency or accident.

HAZARDOUS MATERIALS COMPLIANCE INSPECTIONS [8]

The campus hazardous materials inspections were not adequate. This is a repeat from our prior HAZMAT audit. Conducting HAZMAT inspections reduces IIPP and state regulatory compliance risk.

HAZARDOUS MATERIALS COMMUNICATION, REPORTING AND TRAINING [9]

HAZARDOUS MATERIALS TRAINING [9]

Controls over employee hazardous materials (HAZMAT) orientation and refresher training were not adequate. This is a repeat from our prior HAZMAT audit. Properly trained employees reduce job related injuries and ensure an appropriate response in the event of an emergency.

BIENNIAL REPORTING [11]

The campus did not prepare and submit the 1999 Biennial Report to the California Department of Toxic Substances Control. Compliance with biennial reporting requirements reduces the likelihood that fines will be assessed.

EMERGENCY EYEWASH AND SAFETY SHOWER EQUIPMENT [11]

Emergency eyewash and shower equipment were not installed and inspected in compliance with state regulations. Compliance with eyewash and shower regulations increases the likelihood that emergency facilities will operate effectively in the event of an accident.

HAZARDOUS WASTE DETERMINATION, STORAGE, TRANSPORTATION AND DISPOSAL [12]

Controls over hazardous waste accumulation facilities and waste storage practices needed improvement. Adequate waste accumulation space and appropriate hazardous waste storage reduces the possibility of employee accidents and/or resultant injuries.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

HAZARDOUS MATERIALS ADMINISTRATION

HAZARDOUS MATERIALS TRANSPORTERS

Hazardous waste removal contractual relationships and transporter liability coverage maintained by certain contractors did not meet current CSU requirements.

We found that:

- ▶ the relationships between the campus and three of the four hazardous waste transporters were established via purchase order as opposed to the CSU HAZMAT model contract; and
- ▶ insurance liability coverage was not sufficient for two of the contractors.

The CSU Policy Manual for Contract Services and Procurement (412.07 - Contracts Involving Hazardous Materials) states that contracts involving the handling, removal or disposal of hazardous materials shall be developed in accordance with the CSU model contract for hazardous material removal, and comply with all State and Federal requirements.

CSU model contract states that a contractor shall provide the CSU with the following insurance documents on or before the effective date of the agreement: a) certificates of insurance for all required coverages, and b) full copies of all liability policies, which are to include additional insured endorsements and 30 days notice cancellation clause endorsements.

The EH&S director indicated that the campus used a purchase order rather than the CSU hazardous materials model contract due to the low dollar value of the services provided.

HAZMAT agreements that are not governed by model contracts and transporter liability insurance that is below the required minimum increase CSU liability exposure and insurance risk.

Recommendation 1

We recommend that the campus:

- a. utilize the model agreement specified in the CSU policy rather than a purchase order for removal of all hazardous materials; and
- b. ensure that all HAZMAT contractors maintain the minimum insurance coverage or conduct and document a complete risk identification and evaluation if campus management believes that a contractor's current insurance liability coverage is adequate.

Campus Response

We concur with the recommendation. The University has completed all necessary actions related to this recommendation.

MATERIAL SAFETY DATA SHEET ADMINISTRATIVE CONTROL

MSDS administrative controls were in need of strengthening. This is a repeat from our prior HAZMAT audit.

During the course of testing and evaluating MSDS controls, we found that:

- ▶ Purchase orders for all areas were not consistently annotated with a request for a MSDS. Consequently, the shipping and receiving department did not consistently receive advance notification of hazardous materials.
- ▶ MSDSs were not located for 30 of the 57 campus and foundation purchased hazardous materials reviewed.
- ▶ MSDSs for the purchases made outside of the warehouse at facilities management were not maintained in the various shops.
- ▶ Certain research labs did not maintain MSDSs in the labs. In other instances, MSDSs were centralized in a stockroom, and the employees using hazardous materials were located on different floors or in other buildings.

CSU Policy Manual for Contract Services and Procurement §303.03 states that the Hazardous Substances Information and Training Act in the California Labor Code specifies that purchase orders for chemicals, solvents, or other products that may contain any kind of hazardous material include a vendor requirement to furnish a Material Safety Data Sheet for the commodity being purchased.

SAM §2590.2 states that all vendors are required to supply MSDS to departments ordering hazardous substances, and receiving clerks should be advised to follow internal departmental procedures in making the appropriate filing and distribution of the MSDS.

CCR Title 8 §5194(g)(1) and (8), respectively, state that employers shall have a MSDS for each hazardous substance, which they use. Further, the employer shall maintain copies of the required MSDS for each hazardous substance in the workplace, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s).

The EH&S director indicated that there are some problems in the process of maintaining MSDSs, especially those ordered through the foundation for research laboratories. He further stated that the system in place to ensure receipt of MSDS was adequately operating but could be enhanced by incorporating foundation HAZMAT purchase processing.

Failure to make MSDSs readily accessible to employees could negatively impact the university's ability to appropriately and expeditiously respond to an emergency or an accident.

Recommendation 2

We recommend that the campus:

- a. annotate all hazardous material purchase orders with a request that the vendor provide CSPUP a MSDS;
- b. provide shipping and receiving a copy of all HAZMAT purchase orders;
- c. ensure that all copies of MSDSs are forwarded to EH&S with the department location noted; and
- d. ensure that MSDSs are readily accessible to all employees at their work locations.

Campus Response

We concur with the recommendation. The University has completed all necessary action related to this recommendation.

HAZARDOUS MATERIALS COMPLIANCE INSPECTIONS

The campus hazardous materials inspections were not adequate. This is a repeat from our prior HAZMAT audit.

We noted:

- ▶ there were no documented inspections for biology and facilities management;
- ▶ only one chemistry department IIPP inspection was conducted during 1999; and
- ▶ EH&S annual HAZMAT inspection was last conducted during 1998. We found no evidence that a follow-up of the identified problems took place.

The CSPUP Injury and Illness Prevention Program (IIPP) requires that EH&S conducts inspections of all buildings and grounds at least annually. The inspections should include, but are not limited to, quarterly fume hood certifications, eyewash and safety showers, and hazardous waste accumulation sites. The IIPP also requires that each department ensure that a regular and systematic inspection program be scheduled. It is recommended that department safety coordinators be assigned to conduct these inspections.

CCR Title 8 §3203 states that the IIPP shall, at a minimum, include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards.

The EH&S director indicated that they were understaffed, and therefore could not complete the required number of inspections.

Failure to conduct HAZMAT inspections increases the risk of non-compliance with the campus IIPP policies and applicable state regulations.

Recommendation 3

We recommend that the campus conduct the 2000 EH&S IIPP inspections and ensure that all department inspections are conducted. Copies of the department inspection reports should be provided to EH&S for review.

Campus Response

We concur with the recommendation. The Chemistry, Biological Sciences and Facilities Management Department will complete and document periodic IIPP inspections. These inspections occur on a semiannual basis. The Environmental Health & Safety Department will complete the annual inspections of public areas on campus. The annual EH&S IIPP Inspections are included in the Campus Safety Audits conducted by Environmental Health & Safety. However, the frequency of the Campus Safety Audits of each Department conducted by the Environmental Health & Safety Department has been changed from annual to triennial. A reminder system will be implemented to verify that Departments conduct inspections in compliance with the frequency specified in the Campus Injury & Illness Prevention Program (IIPP).

The expected completion date for this recommendation is August 31, 2001.

HAZARDOUS MATERIALS COMMUNICATION, REPORTING AND TRAINING

HAZARDOUS MATERIALS TRAINING

Controls over employee hazardous materials (HAZMAT) orientation and refresher training were not adequate. This is a repeat finding from our prior HAZMAT audit.

We noted that:

- ▶ A review of the HAZMAT training records of 23 biology, chemistry, and facilities employees hired between 1998 and 2000 disclosed that orientation training had not been conducted and/or documented for 22 employees. Based upon our review of the HAZMAT training process, we concluded that HAZMAT orientation primarily consisted of Human Resources' issuance of an EH&S handout to new employees.
- ▶ Of the 54 chemistry, biology, and facilities management employee training records reviewed, 52 employees had not completed HAZMAT refresher training. Furthermore, 33 of the 54 employee records indicated that they had not undergone HAZMAT orientation training.
- ▶ Documentation was not on file to evidence that the 8 selected chemistry, biology, and facilities management student assistants underwent any HAZMAT training.

- ▶ The campus did not adhere to the established frequency (annual) for HAZMAT refresher training.
- ▶ Three of the 5 individuals on the emergency response team had not completed the annual refresher training required.

CCR Title 8 §5194(h)(1), *Hazard Communication*, and CSPUP's HAZCOM require that employers provide employees with information and training on hazardous substances in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area. Information and training may relate to general classes of hazardous substances to the extent appropriate and reasonably foreseeable exposures on the job.

CCR Title 8 §5191(f)(2), *Occupational Exposure to Hazardous Chemicals in Laboratories*, states that the employer shall determine the frequency of refresher information and training.

CCR Title 8 §5192(e) requires that emergency response team members shall receive eight hours of refresher training annually.

The EH&S director indicated that the training deficiencies were due in part to not having enough resources to maintain the HAZMAT training program.

Failure to ensure that all employees attend required HAZMAT training increases the risk of job related injuries and inappropriate responses in the event of an emergency.

Recommendation 4

We recommend that the campus:

- a. enhance the tracking and monitoring process for employee orientation and refresher training to ensure compliance with training requirements; and
- b. re-emphasize the importance to the department safety coordinators the need to conduct the appropriate training as outlined in the IIPP and HAZCOM manuals.

Campus Response

We concur with the recommendation. The University will engage a Safety Trainer to address these training issues. The Safety Trainer will implement a system for tracking employee environmental and safety training, as recommended in item a. The system will include periodic reports to Department Managers and individual employees.

In response to item b, both of the reports mentioned above will emphasize the importance of attending training. The periodic reports to Department Managers will indicate the level of training compliance in their Department, the training required for each of their employees and the schedule of any upcoming training offered by Environmental Health & Safety. A copy of the Manager's report will be provided to the corresponding Department Safety Coordinators. The reports to employees will indicate the training they are required to attend and the schedule of any upcoming training offered by Environmental Health & Safety.

The expected completion date for this recommendation is August 31, 2001.

BIENNIAL REPORTING

The campus did not prepare and submit the 1999 Biennial Report to the California Department of Toxic Substances Control.

Title 22 §66262.41, *Biennial Report*, specifies that a generator who ships any hazardous waste offsite to a transfer, treatment, storage or disposal facility within the U.S. shall prepare and submit a single copy of a Biennial Report. The Biennial Report shall be submitted on forms provided by the department and shall cover generator activities during the previous calendar year.

The EH&S director indicated that the administering agency had not sent the documentation to complete the report and that there had been no follow-up on EH&S's behalf.

Failure to satisfy biennial reporting requirements increases the risk of non-compliance with regulations and the likelihood that fines will be assessed.

Recommendation 5

We recommend that the campus obtain the appropriate documentation to complete the 1999 biennial report (due April 1, 2000). Documentation should be maintained on file to support compliance with the biennial reporting requirements.

Campus Response

We concur with the recommendation. The University has completed this recommendation.

The Department of Toxic Substances Control has finally provided the University with all the appropriate documentation to complete the 1999 biennial report. This report will be completed and submitted to Department of Toxic Substances Control by March 30, 2001.

EMERGENCY EYEWASH AND SAFETY SHOWER EQUIPMENT

Emergency eyewash and shower equipment were not installed and inspected in compliance with state regulations.

We noted that:

- ▶ emergency eyewash and/or safety shower equipment were not inspected on a monthly basis;
- ▶ shipping and receiving and the tractor shop were not equipped with emergency eyewash and showers, and the auto shop emergency equipment could not be reached within 10 seconds of an accident;
- ▶ a number of locations within science buildings #3 and #8 were not equipped with a drainage system to capture water during testing and chemicals resulting from accidental spills; and
- ▶ the eyewash/shower drains in science building #4 were elevated in a manner that presented a safety hazard.

CCR Title 8 §5162(a)(c)(d) states that emergency eyewash and shower equipment shall be provided at all work areas where, during routine operations or foreseeable emergencies, the eyes of an employee may come into contact with a substance which can cause corrosion, severe irritation or permanent tissue damage or which is toxic by absorption. Further, eyewash and showers shall be in accessible locations that require no more than 10 seconds for the injured person to reach. CCR Title 8 §5162(e) states that eyewash and shower equipment shall be activated at least monthly to flush the line and to verify proper operation.

The EH&S director indicated that the inspections were to be conducted by the department on a monthly basis.

Non-compliance with eyewash and shower equipment regulations and failure to perform monthly inspections increase the risk that emergency equipment will not operate effectively in the event of an accident.

Recommendation 6

We recommend that the campus:

- a. conduct and document monthly emergency eyewash and shower equipment inspections; and
- b. access all work areas and take appropriate actions to ensure that emergency eyewash and shower equipment are installed as required by CCR Title 8 §5162.

Campus Response

We concur with the recommendation.

The expected completion date for item a is August 31, 2001.

In response to item b, the University will ensure that emergency eyewash and shower equipment are installed as required by CCR Title 8 §5162 by individual Departmental Safety Audits, conducted by the departments, and the Triennial Safety Audits conducted by Environmental Health & Safety.

The expected completion date for item b is August 31, 2001.

HAZARDOUS WASTE DETERMINATION, STORAGE, TRANSPORTATION AND DISPOSAL

Controls over hazardous waste accumulation facilities and waste storage practices needed improvement.

During our review of the facilities, we noted the following:

- ▶ due to waste accumulation station (WAS) size and space limitation, some waste was maintained outside the WAS storage facility;

- ▶ the radiation waste accumulation facility was overcrowded, which left very little room for movement or the storage of additional waste;
- ▶ the waste located in three of the labs reviewed was not properly stored and segregated; and
- ▶ food was stored in two refrigerators (one in a lab and the other in the shipping and receiving area) reserved for hazardous materials.

CCR 8 §5164(a) states that substances which, when mixed, react violently, or evolve toxic vapors or gases, or which in combination become hazardous by reason of toxicity, oxidizing power, flammability, explosibility, or other properties, shall be separated from each other in storage by distance, by partitions, or otherwise, so as to preclude accidental contact between them.

The EH&S director indicated that the improper storage was probably a result of the chemistry and biology departments moving into a new facility. The EH&S director also indicated that he was aware of the space issues concerning the waste accumulation sites and has submitted a fund proposal to expand the hazardous waste storage facilities. He further indicated that occasionally the biology department will use food in their experiments. The director of procurement services indicated that the food stored in the refrigerator resulted from the malfunctioning of the refrigerator in the break room.

Failure to provide adequate space and appropriate storage for accumulated hazardous waste could result in employee accidents and/or injuries.

Recommendation 7

We recommend that the campus re-emphasize the importance of compliance with hazardous waste labeling and storage policy and regulations, and include specific checks for compliance during semi-annual IIPP inspections conducted by safety coordinators. Further, we encourage the campus in their plans to expand the existing waste accumulation facilities.

Campus Response

We concur with the recommendation. The University has completed all necessary action related to this recommendation.

Departments were reminded of the importance of required hazardous substance labeling, storage, and inspections in the October 17, 2000 Memorandum concerning Required Hazardous Materials Audit Improvements. Additionally, the University will continue to increase the amount of training provided to employees emphasizing the importance of required hazardous substance labeling, storage, and inspections. The current inspection check lists in the Chemical Safety Plan for Laboratories specifically address problems with labeling and storage in campus work areas.

As to overcrowding at the University's main hazardous waste accumulation facility, the University has placed the construction of a new hazardous waste accumulation area as the second item on the Minor Capital Outlay List for 2001/2002. Additionally, the University is moving forward with the construction of a temporary waste accumulation facility scheduled for completion this fiscal year.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Dr. Bob Suzuki	President
Janet Almassy	Biology Stock Room
Genie Apodaca	Director of Human Resources, Foundation
Thomas Barber	Senior Safety Coordinator
Bill Benaquista	Chemistry Stock Room
Armando Bustamonte	Shipping and Receiving
Joe Casalnuovo	Professor, Chemistry
Lynne Cywan	Employment Coordinator, Human Resources
Patricia Farris	Vice President for Administrative Affairs
Carolyn Forrester	Chemistry Stock Room
Monica Fry	Industrial Hygienist
Don Green	Director Procurement
Donna Griffith	Customer Service Coordinator, Human Resources
Michael Huyter	Environmental Specialist
Tye Kitasato	Manager of Landscape Services, Facilities Management
Darwin Labordo	Associate Vice President for Finance and Administrative Services
Richard Marvin	Hazardous Materials Specialist
Patrick Mobley	Professor, Biology
David Patterson	Director, Environmental Health and Safety
Frank Pegram	Plumbing Supervisor, Facilities Management
David Prenovost	Chief Financial Officer, Foundation
Eloise Pro	Biology Stock Room
Debra Schneck	Contracts Administrator
Andrea Vestey	Biology Stock Room
Marilyn Wilkerson	Manager of Custodial Services, Facilities Management



March 5, 2001

Mr. Larry Mandel
University Auditor
California State University
401 Golden Shore, 4th Floor
Long Beach, California 90802

RECEIVED
UNIVERSITY AUDITOR

MAR 16 2001

The California State
University

Dear Mr. Mandel:

Subject: Hazardous Materials Management Audit
Audit report Number 00-21

Attached please find our response to the recommendations in Audit Report Number 00-21, Hazardous Materials Management. We believe the University has completed recommendations one, two, five and seven. Further action and completion dates have been identified for the remaining recommendations. The status of each recommendation is summarized in the attached table.

We appreciate your efforts and those of your staff. If you require additional information or clarification, please feel free to contact David L. Patterson at (909) 869-3695 or via e-mail at Dlpatterson@csupomona.edu.

Sincerely,

Mr. Darwin Labordo
Associate Vice President, Finance and Administrative Services

Copy: Dr. Bob H. Suzuki, President
Ms. Patricia Farris, Vice President for Administrative Affairs
Mr. David L. Patterson, Director, Environmental Health & Safety

California State Polytechnic University Pomona
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Recommendation 1

We recommend that the campus:

- a. utilize the model agreement specified in the CSU policy rather than a purchase order for removal of all hazardous materials; and
- b. ensure that all HAZMAT contractors maintain the minimum insurance coverage or conduct and document a complete risk identification and evaluation if campus management believes that a contractor's current insurance liability coverage is adequate.

Campus Response

We concur with the recommendation. The University has completed all necessary actions related to this recommendation.

Recommendation 2

We recommend that the campus:

- a. annotate all hazardous material purchase orders with a request that the vendor provide CPSUP a MSDS;
- b. provide Shipping and Receiving a copy of all HAZMAT purchase orders;
- c. ensure that all copies of MSDSs are forwarded to EH&S with the department location noted; and,
- d. ensure that MSDSs are readily accessible to all employees at their work locations.

Campus Response

We concur with the recommendation. The University has completed all necessary action related to this recommendation.

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Recommendation 3

We recommend that the campus conduct the 2000 EH&S IIPP inspections and ensure that all department inspections are conducted. Copies of the department inspection reports should be provided to EH&S for review.

Campus Response

We concur with the recommendation. The Chemistry, Biological Sciences and Facilities Management Department will complete and document periodic IIPP inspections. These inspections occur on a semiannual basis. The Environmental Health & Safety Department will complete the annual inspections of public areas on campus. The annual EH&S IIPP Inspections are included in the Campus Safety Audits conducted by Environmental Health & Safety. However, the frequency of the Campus Safety Audits of each Department conducted by the Environmental Health & Safety Department has been changed from annual to triennial. A reminder system will be implemented to verify that Departments conduct inspections in compliance with the frequency specified in the Campus Injury & Illness Prevention Program (IIPP).

The expected completion date for this recommendation is August 31, 2001.

Recommendation 4

We recommend that the campus:

- a. enhance the tracking and monitoring process for employee orientation and refresher training to ensure compliance with training; and,
- b. re-emphasize the importance to the department safety coordinators the need to conduct the appropriate training as outlined in the IIPP and HAZCOM manuals.

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Campus Response

We concur with the recommendation. The University will engage a Safety Trainer to address these training issues. The Safety Trainer will implement a system for tracking employee environmental and safety training, as recommended in item a. The system will include periodic reports to Department Managers and individual employees.

In response to item b, both of the reports mentioned above will emphasize the importance of attending training. The periodic reports to Department Managers will indicate the level of training compliance in their Department, the training required for each of their employees and the schedule of any upcoming training offered by Environmental Health & Safety. A copy of the Manager's report will be provided to the corresponding Department Safety Coordinators. The reports to employees will indicate the training they are required to attend and the schedule of any upcoming training offered by Environmental Health & Safety.

The expected completion date for this recommendation is August 31, 2001.

Recommendation 5

We recommend that the campus obtain the appropriate documentation to complete the 1999 biennial report (due April 1, 2000). Documentation should be maintained on file to support compliance with the biennial reporting requirements.

Campus Response

We concur with the recommendation. The University has completed this recommendation.

The Department of Toxic Substances Control has finally provided the University with all the appropriate documentation to complete the 1999 biennial report. This report will be completed and submitted to Department of Toxic Substances Control by March 30, 2001.

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Recommendation 6

We recommend that the campus:

- a. conduct and document monthly emergency eyewash and shower equipment inspections; and
- b. access all work areas and take appropriate actions to ensure that emergency eyewash and shower equipment are installed as required by CCR Title 8 §5162.

Campus Response

We concur with the recommendation.

The expected completion date for item a is August 31, 2001.

In response to item b, the University will ensure that emergency eyewash and shower equipment are installed as required by CCR Title 8 §5162 by individual Departmental Safety Audits, conducted by the departments, and the Triennial Safety Audits conducted by Environmental Health & Safety.

The expected completion date for item b is August 31, 2001.

Recommendation 7

We recommend that the campus re-emphasize the importance of compliance with hazardous waste labeling and storage policy and regulations, and include specific checks for compliance during semi-annual IIPP inspections conducted by safety coordinators. Further, we encourage the campus in their plans to expand the existing waste accumulation facilities.

Campus Response

We concur with the recommendation. The University has completed all necessary action related to this recommendation.

Departments were reminded of the importance of required hazardous substance labeling, storage, and inspections in the October 17, 2000 Memorandum concerning Required Hazardous Materials Audit Improvements. Additionally, the University will continue to increase the amount of training provided to employees emphasizing the importance of required hazardous substance labeling, storage, and inspections. The current inspection check lists in the Chemical Safety Plan for Laboratories specifically address problems with labeling and storage in campus work areas.

California State Polytechnic University Pomona
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As to overcrowding at the University's main hazardous waste accumulation facility, the University has placed the construction of a new hazardous waste accumulation area as the second item on the Minor Capital Outlay List for 2001/2002. Additionally, the University is moving forward with the construction of a temporary waste accumulation facility scheduled for completion this fiscal year.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

March 28, 2001

CHANNEL ISLANDS

CHICO

MEMORANDUM

DOMINGUEZ HILLS

FRESNO

TO: Larry Mandel
University Auditor

FULLERTON

FROM: Charles B. Reed 

HAYWARD

SUBJECT: Draft Final Report Number 00-21 on *Hazardous Materials Management*,
California State Polytechnic University, Pomona

HUMBOLDT

LONG BEACH

LOS ANGELES

In response to your memorandum of March 28, 2001, I accept the response as submitted with the draft final report on Hazardous Materials Management, California State Polytechnic University, Pomona.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/ac

POMONA

Enclosure

SACRAMENTO

cc: Dr. Bob H. Suzuki, President

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS