

**HAZARDOUS MATERIALS MANAGEMENT
SAN JOSE STATE UNIVERSITY**

**Report Number 00-15
September 8, 2000**

Members, Committee on Audit

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ABBREVIATIONS

CCR	California Code of Regulations
CSU	California State University
EH&OS	Environmental Health & Occupational Safety
EH&S	Environmental Health & Safety
EO	Executive Order
EPA	Environmental Protection Agency
F&DO	Facilities and Development Operations
HAZMAT	Hazardous Materials
HMCD	Hazardous Materials Compliance Division
HMM	Hazardous Materials Management
HWMG	Hazardous Waste Management Guide
H&SC	Health and Safety Code
MSDS	Material Safety Data Sheets
RCRA	Resource Conservation and Recovery Act
TSD	Transfer, Storage, and Disposal
SAM	State Administrative Manual

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 June 1999 to date. At San Jose State University (SJSU), the Department of Environmental Health and Occupational Safety (EH&OS) 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 several campus units: Biology, Chemistry, Facilities, Development & Operations, Art Foundry, and Moss Landing. 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

INTRODUCTION

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 results 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 San Jose State University campus from April 3, 2000, through May 8, 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 SJSU 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 MANAGEMENT COMPLIANCE CONTROLS [6]

The Environmental Health & Occupational Safety (EH&OS) HAZMAT monitoring practices and safety coordinator compliance inspections were not operating effectively. Employee accidents and exposures to regulatory fines are reduced by conducting IIPP inspections and monitoring compliance with HAZMAT regulations and SJSU policies and procedures.

MATERIAL SAFETY DATA SHEET ADMINISTRATIVE CONTROLS [8]

MSDS administrative controls were in need of strengthening. Pre-notification to Shipping and Receiving of HAZMAT deliveries and employee accessibility to MSDS information improves SJSU's ability to appropriately and expediently respond to an emergency or accident.

ASBESTOS NOTIFICATION AND CONTENT [9]

Employee asbestos notification frequency and content was not in compliance with regulations.

HAZARDOUS MATERIALS COMMUNICATION, REPORTING, AND TRAINING [9]

NEW EMPLOYEE HAZMAT TRAINING [10]

Chemistry, Biology, and F&DO new employee HAZMAT training controls were not adequate. Trained employees are better equipped to appropriately respond in the event of an emergency or release of hazardous substances.

ADMINISTERING AGENCY REPORTING [10]

Documentation was not on file to certify that an updated HAZMAT inventory and business plan was submitted to the administering agency according to the regulatory timetable. Maintaining adequate documentation strengthens internal controls over the business plan and inventory review processes, ensures compliance with state regulations, and reduces the likelihood that fines will be assessed.

HAZARDOUS MATERIALS TRANSPORTATION AND DISPOSAL [11]

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 agreements are supported by signed contracts and hazardous waste transporters maintain adequate liability insurance.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

HAZARDOUS MATERIALS ADMINISTRATION

HAZARDOUS MATERIALS MANAGEMENT COMPLIANCE CONTROLS

The Environmental Health & Occupational Safety (EH&OS) HAZMAT monitoring practices and safety coordinator compliance inspections were not operating effectively.

Discussions with the HAZMAT specialist and walk-throughs of selected departments disclosed the following exceptions:

- ▶ The HAZMAT specialist did not formally monitor the inspections conducted by the safety coordinators. The inspections conducted by the HAZMAT specialist were usually documented on the waste transfer documents.
- ▶ The Biology safety coordinator did not conduct and document HAZMAT inspections.
- ▶ At the request of the Industrial Studies Department, several cylinders of hazardous materials were stored in the Shipping and Receiving area for several months.
- ▶ During our walk-throughs of the Biology Department, Central Plant, Auto/Paint Shops, Art Foundry, and Moss Landing, several instances were noted where hazardous waste container labels were missing or the label accumulation dates were not recorded or incorrect.
- ▶ The Moss Landing Marine Laboratory's waste storage facility did not have a satellite accumulation area identification sign on the door and, in certain instances, the on-site accumulated waste was not stored in a secondary container.
- ▶ Two incompatible hazardous materials (oxygen and acetylene) were stored together in the Aviation Department.

Title 8 §3203 states that the IIPP shall include procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Further, records of scheduled and periodic inspections should include persons(s) conducting the inspection, the unsafe condition and work practices that have been identified and actions taken to correct the identified unsafe conditions and work practices. These records shall be maintained for one year.

SJSU's IIPP states that the department manager is responsible for implementation of the IIPP and that the IIPP program coordinator is responsible for helping to maintain overall control of the required activities. To that end, a system should be in place for evaluating workplace hazards through scheduled, periodic self-inspections. The self-inspection should be a continuous, uninterrupted activity designed for the sole purpose of identifying unsafe work conditions and practices.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Title 8 §5164(a) requires that substances that react violently shall be stored separately from each other by distance. Additionally, containers of hazardous substances shall not be stored in such locations or manner as to result in damage to the container.

Title 22 §66262.34 (e)(1)(d) allows a generator to accumulate hazardous waste if the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste.

Title 22 §66262.31 requires that before transporting hazardous waste or offering hazardous waste for transportation off-site, a generator shall label each package in accordance with the applicable Department of Transportation regulations.

The HAZMAT specialist stated that EH&OS inspections were typically completed in conjunction with waste pick-up or while accompanying the county inspector during their HAZMAT examinations. The HAZMAT specialist further stated that he provides safety coordinator HAZMAT training that includes labeling and storage requirements and remedies for violations noted by the regulatory inspectors. The manager of distribution services indicated that the Industrial Studies Department requested that he store the cylinders containing hazardous materials because there was not enough room within the department. The technician in the Aviation Department stated that the hazardous waste cylinders were stored together in the past, and he was not aware that there was a problem.

Failure to conduct IIPP inspections and monitor compliance with HAZMAT regulations and SJSU policies and procedures increases the potential for employee accidents and exposes the campus to regulatory fines.

Recommendation 1

We recommend that the campus:

- a. establish procedures to monitor compliance with IIPP HAZMAT inspection policies and procedures; and
- b. tailor and use the IIPP Hazardous Materials Users Guidelines for Self-Inspection as a tool to conduct and record HAZMAT inspections.

Campus Response

We concur.

- a. A memo will be issued to all university department heads, reminding them of the requirement by December 31, 2000.
- b. The university's Hazardous Materials Specialist will inspect sites quarterly, beginning in December 2000, for the presence and timeliness of inspection log. The Inspection Form used on campus will be forwarded by December 31, 2000.

MATERIAL SAFETY DATA SHEET ADMINISTRATIVE CONTROLS

MSDS administrative controls were in need of strengthening.

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

- ▶ The Shipping and Receiving Department did not consistently receive advance notification of hazardous materials. The MSDS request was not annotated on twenty-five of the twenty-seven purchase orders tested.
- ▶ MSDS were not readily accessible to the College of Science employees who worked in the laboratories.

SJSU's Hazard Communication (HAZCOMM) Program states that purchase orders should include a statement requesting that an MSDS accompany shipments of hazardous materials. 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.

Title 8 §5194 (g) (2) and (8) requires employers to obtain an MSDS for each hazardous substance that they use and to 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 lead buyer, Procurement Services, indicated that purchase orders were not annotated in part because of modification to the new purchasing system. The assistant safety coordinator in the College of Science stated that he was in the process of transferring the centralized MSDS maintained in his office to the respective labs.

Failure to alert the Shipping & Receiving Department of impending HAZMAT deliveries and MSDSs not 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 SJSU a MSDS;
- b. provide Shipping and Receiving a copy of all HAZMAT purchase orders; and
- c. make MSDSs readily accessible to all employees at their work locations.

Campus Response

We concur.

- a. A memo will be issued to SJSU Procurement restating this requirement by December 31, 2000.
- b. A memo requesting Purchasing to provide Receiving a copy of all HAZMAT purchase orders will be issued by December 31, 2000.
- c. A memo stating that MSDSs must be readily accessible to all employees will be issued to Department Heads by December 31, 2000.

ASBESTOS NOTIFICATION AND CONTENT

Employee asbestos notification frequency and content was not in compliance with regulations.

The Safety and Risk Management Office did not notify employees during January 1999 or 2000 of the presence of asbestos in campus buildings. In addition, SJSU's asbestos notification letter did not contain information on the specific locations where asbestos was present.

SAM §2591, Asbestos Notification to Employees, requires state agencies that occupy buildings constructed prior to 1980 to provide a written notification to employees each January of the presence and location of asbestos containing materials.

The associate director of Safety and Risk Management stated that employees were not notified due in part to staff turnover. She also stated that it was not practical to attach a list of all asbestos containing locations to the notification letter. It was more practical to refer the employee to his/her department office where he/she could find a list of all known asbestos containing material in SJSU buildings.

Failure to promptly and properly notify employees of the presence of asbestos materials in campus buildings increases employee health risks and could subject SJSU to regulatory penalties.

Recommendation 3

We recommend that the campus establish procedures to ensure that employees are notified each January of the presence and location of asbestos in SJSU buildings.

Campus Response

We concur. The annual 'Notice Regarding Asbestos in Campus Buildings' will be issued to ALL SJSU EMPLOYEES on January 2, 2001; a copy of the letter is also included in the university's new employee handbook.

HAZARDOUS MATERIALS COMMUNICATION, REPORTING, AND TRAINING

NEW EMPLOYEE HAZMAT TRAINING

Chemistry, Biology, and F&DO new employee HAZMAT training controls were not adequate.

We found that none of the 19 employees selected for audit received HAZMAT new employee training within their first week of employment.

Title 8 §5194(h)(1) requires employers to provide employees with information and training on hazardous substances in their work area at the time of their initial assignment.

SJSU Hazards Communication Program states that each supervisor shall provide training to their employees upon initial assignment to a work area where hazardous substances are present and whenever a new hazard is introduced.

The Special Project & Safety Manager stated that he usually conducted his orientation training approximately four months after new employees started working at F&DO. The micro/physician stated that the practice of using an outside consultant to conduct orientation training was discontinued because she thought that EH&OS conducted orientation training.

Employees who do not receive required orientation training are less equipped to appropriately respond in the event of an emergency or release of hazardous substances in the work place.

Recommendation 4

We recommend that the campus develop procedures and controls that ensure that new employees receive the required HAZMAT orientation training prior to handling hazardous materials.

Campus Response

We concur. Human Resources is developing a new employee orientation which includes the distribution of a Safety Handbook. The Safety Handbook includes an employee checklist to identify users of HAZMAT for follow-up training. The Safety Handbook will be distributed as part of the new employee orientation by February 1, 2001.

ADMINISTERING AGENCY REPORTING

Documentation was not on file to certify that an updated HAZMAT inventory and business plan was submitted to the administering agency according to the regulatory timetable.

Health & Safety Code §25505(c), *Review of business plan; modification of operation and plan; periodic review*, specifies that the handler shall at least once every three years determine if a revision is needed and shall certify to the administering agency that the review was made and that any necessary changes were made to the plan. A copy of these changes shall be submitted to the administering agency as a part of this certification.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Health & Safety Code §25505(d) specifies that any business that handles a hazardous material shall annually submit a completed inventory form to the administering agency of the county or city in which the business is located.

The hazardous materials specialist indicated that the current practice was informal and the administering agency did not require him to provide documentation to certify a tri-annual review of the business plan and annual inventory updates.

Inadequate documentation weakens internal controls over the business plan and inventory review processes, increases the risk of non-compliance with state regulations, and could result in the assessment of fines.

Recommendation 5

We recommend that the campus obtain an acknowledgement from the local administering agency when a business plan certification/update or HAZMAT inventory has been submitted, or, at a minimum, maintain internal documentation to evidence compliance with the H&SC.

Campus Response

We concur. The Hazardous Materials Specialist requested and received acknowledgement in June 2000 from the Santa Clara County – Hazardous Materials Compliance Division. Future submittals will be sent by Certified Mail.

HAZARDOUS MATERIALS TRANSPORTATION AND DISPOSAL

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

We found that:

- ▶ the relationship between the campus and certain transporters was established via purchase order and was not governed by the CSU hazardous materials removal model contract;
- ▶ evidence of insurance liability coverage could not be located for four of the eight hazardous waste transporters sampled; and
- ▶ the campus hazardous materials specialist transported hazardous materials to off-campus satellite locations without the required insurance liability coverage.

The CSU Policy Manual for Contracting & 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 CSU's model contract for hazardous material removal and comply with all State and Federal requirements.

CSU systemwide memo entitled Hazardous Waste Removal, dated June 2, 1992, requires the minimum amount of liability insurance for hazardous waste removal contractors to be \$1,000,000.

SUAM §2520.03.01. states that "Contractor shall furnish the...University a certificate of insurance with a combined single limit of not less than \$500,000 per occurrence."

The lead buyer, procurement services, stated that the missing insurance certifications were probably misplaced during the department relocation. The director, safety and risk management, stated that the campus liability insurance policy automatically covers the activities of the hazardous materials specialist related to transporting hazardous materials off-campus to satellite locations.

Failure to contractually protect the university and require the proper level of insurance coverage could result in the CSU sharing responsibility for failures or oversights of hazardous waste contractors.

Recommendation 6

We recommend that the campus:

- a. implement written contracts with transporters for the removal of hazardous materials;
- b. maintain evidence on file of insurance liability coverage for hazardous waste transporters; and
- c. seek clarification of insurance requirements regarding the transporting of hazardous materials by campus employees to off-campus satellite locations.

Campus Response

We concur.

- a. An example of a written contract will be forwarded by February 1, 2001.
- b. Procurement keeps a certificate of insurance on file for each waste transporter.
- c. The university's Hazardous Materials Specialist is a properly licensed (Department of Transportation) Hazardous Materials Handler. Only very small quantities of materials are transported from satellite locations to the main campus. Confirmation from the Risk Pool will be sought by February 1, 2001.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Dr. Robert Caret	President
Ray Balaoro	Special Project & Safety Manager, Facilities Development & Operations
Maria Blake	Manager, Sponsored Programs
Kenneth Coate	Acting Director, Moss Landing Marine Laboratories
Barbara Coats	Director, Safety and Risk Management
Gustavo De La Torre	Associate Vice President, Human Resources
Jocelyn Douglas	Chemical Safety Officer
Lyle Fifield	Manager, Distribution Services
Linda Goff	Micro/Physician Manager, Biological Sciences
John Gorvad	Lead Auto Mechanic
Chandra Gowda	Hazardous Materials Specialist
John Hawk	Assistant Safety Coordinator, College of Science
Don W. Kassing	Vice President for Administration
Robert Lamp	Technician, Art Foundry
Christine Little	Industrial Hygienist
Carl Panther	Technician, Aviation Department
William Petchauer	Director, Business and Finance, SJSU Foundation
Richard Staley	Manager, Emergency Preparedness
Dennis Suit	Manager of Grounds and Transportation
Dian Tollinger	Associate Director, Safety and Risk Management
Janice Uyeda	Student Health Center
Jamie Van Brocklin	Administrative Coordinator, Safety and Risk Management
Paul Wood	Safety Coordinator/Chemical Safety Manager, College of Science



San José State
UNIVERSITY

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December 19, 2000

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University Auditor

DEC 28 2000

The California State
University

Larry Mandel
University Auditor
Office of the University Auditor
The California State University
401 Golden Shore
Long Beach, CA 90802

HAZARDOUS MATERIALS MANAGEMENT Audit No. 00-15

Please find enclosed San José State University's response to the Hazardous Materials Management Audit No. 00-15. The campus is committed to addressing the issues identified in the audit report.

If you have any questions please contact Sue Lantow at 408-924-1500.

DON W. KASSING
Vice President for Administration and Finance

Attachment

C: Robert L. Caret, President
Nate Clark, University Auditor

San José State University
HAZARDOUS MATERIALS MANAGEMENT AUDIT
Audit No. 00-15

RECOMMENDATION 1

We recommend that the campus:

- a. establish procedures to monitor compliance with IIPP HAZMAT inspection policies and procedures.
- b. tailor and use the IIPP Hazardous Materials User Guidelines for Self-Inspection as a tool to conduct and record HAZMAT inspections.

CAMPUS RESPONSE

We concur.

- a. A memo will be issued to all university department heads, reminding them of the requirement by December 31, 2000.
- b. The university's Hazardous Materials Specialist will inspect sites quarterly, beginning in December 2000, for the presence and timeliness of inspection log. The Inspection Form used on campus will be forwarded by December 31, 2000.

RECOMMENDATION 2

We recommend that the campus:

- a. annotate all hazardous material purchase orders with a request that the vendor provide SJSU an MSDS,
- b. provide Shipping & Receiving a copy of all HAZMAT purchase orders, and
- c. make MSDSs readily accessible to all employees at their work locations.

CAMPUS RESPONSE

We concur.

- a. A memo will be issued to SJSU Procurement restating this requirement by December 31, 2000.
- b. A memo requesting Purchasing to provide Receiving a copy of all HAZMAT purchase orders will be issued by December 31, 2000.
- c. A memo stating that MSDSs must be readily accessible to all employees will be issued to Department Heads by December 31, 2000.

RECOMMENDATION 3

We recommend that the campus establish procedures to ensure that employees are notified each January of the presence and location of asbestos in SJSU buildings.

CAMPUS RESPONSE

We concur. The annual 'Notice Regarding Asbestos in Campus Buildings' will be issued to ALL SJSU EMPLOYEES on January 2, 2001; a copy of the letter is also included in the university's new employee handbook.

RECOMMENDATION 4

We recommend that the campus develop procedures and controls that ensure that new employees receive the required HAZMAT orientation training prior to handling of hazardous materials.

CAMPUS RESPONSE

We concur. Human Resources is developing a new employee orientation which includes the distribution of a Safety Handbook. The Safety Handbook includes an employee checklist to identify users of HAZMAT for follow-up training. The Safety Handbook will be distributed as part of the new employee orientation by February 1, 2001.

RECOMMENDATION 5

We recommend that the campus obtain an acknowledgement from the local administering agency when a business plan certification / update or HAZMAT inventory has been submitted, or, at a minimum, maintain internal documentation to evidence compliance with the H&SC.

CAMPUS RESPONSE

We concur. The Hazardous Materials Specialist requested and received acknowledgement in June 2000 from the Santa Clara County – Hazardous Materials Compliance Division. Future submittals will be sent by Certified Mail.

RECOMMENDATION 6

We recommend that the campus:

- a. implement written contracts with transporters for the removal of hazardous materials,
- b. maintain evidence on file of insurance liability coverage for hazardous waste transporters, and
- c. seek verification of insurance requirements regarding the transporting of hazardous materials by campus employees to off-campus satellite locations.

CAMPUS RESPONSE

We concur.

- a. An example of a written contract will be forwarded by February 1, 2001.
- b. Procurement keeps a certificate of insurance on file for each waste transporter.
- c. The university's Hazardous Materials Specialist is a properly licensed (Department of Transportation) Hazardous Materials Handler. Only very small quantities of materials are transported from satellite locations to the main campus. Confirmation from the Risk Pool will be sought by February 1, 2001.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR

BAKERSFIELD

CHANNEL ISLANDS

January 8, 2001

CHICO

MEMORANDUM

DOMINGUEZ HILLS

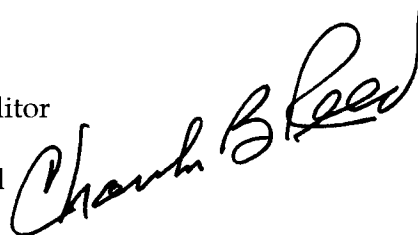
FRESNO

TO: Larry Mandel
University Auditor

FULLERTON

HAYWARD

FROM: Charles B. Reed
Chancellor



HUMBOLDT

SUBJECT: Draft Final Report Number 00-15 on *Hazardous Materials Management*,
San Jose State University

LONG BEACH

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of January 8, 2001, I accept the
response as submitted with the draft final report on Hazardous Materials
Management, San Francisco State University.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/nk

SACRAMENTO

Enclosure

SAN BERNARDINO

cc: Dr. Robert Caret, President

SAN DIEGO

SAN FRANCISCO

SAN JOSE

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS