HAZARDOUS MATERIALS MANAGEMENT

SYSTEMWIDE

Audit Report 13-44
May 7, 2014

Members, Committee on Audit

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ABBREVIATIONS

CalOSHA California Office of Safety and Health Administration
CCR California Code of Regulation
CHP Chemical Hygiene Plan
CO Chancellor’s Office
CSU California State University
EHS Environmental Health and Safety
EO Executive Order
GC Government Code
HAZCOMM Hazard Communication Program
HAZMAT Hazardous Materials
HMM Hazardous Materials Management
MSDS Material Safety Data Sheets
OAAS Office of Audit and Advisory Services
OHS Occupational Health and Safety
OSRM Office of Systemwide Risk Management
RCRA Federal Resource Conservation and Recovery Act
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of Audit and Advisory Services (OAAS) during the last quarter of 2012, the Board of Trustees, at its January 2013 meeting, directed that Hazardous Materials Management (HMM) be reviewed. The OAAS had previously reviewed HMM in 2000, and Occupational Health and Safety in 2007.

We visited six campuses from April 8, 2013, to September 27, 2013, and audited the procedures in effect at that time. Campus-specific findings and recommendations have been discussed and reported individually.

In our opinion, except for the effect of the weaknesses described below, the fiscal, operational, and administrative controls for HMM as of September 27, 2013, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report. An area of concern is systemwide oversight.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

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

SYSTEMWIDE OVERSIGHT [6]

Systemwide oversight for HMM needed improvement. Although the systemwide Office of Systemwide Risk Management (OSRM) at the chancellor’s office (CO) was responsible for some administrative oversight of HMM at the campuses, there was no effective process in place at the CO to monitor campus compliance with regulatory provisions regarding employee health and safety training and inspections. Likewise, the CO did not have a process for reporting exceptions or problems with campus efforts in these areas to executive management. Specifically, current systemwide HMM policy did not provide sufficient guidance regarding laboratory safety and hazard communication requirement. Our reviews resulted in significant exception trends at most or all of the campuses in these two areas.
INTRODUCTION

BACKGROUND

Regulation over hazardous waste has its roots in the 1976 Federal Resource Conservation and Recovery Act (RCRA), which was enacted to address growing public concern regarding health risks, waste generation, and waste disposal surrounding hazardous materials (HAZMAT). RCRA initiated the “cradle to grave” tracking and management of hazardous waste, and its regulations addressed, but were not limited to, generation of hazardous waste; hazardous waste treatment, transportation, storage, and disposal; federal and state reporting; federal, state, and local permits and registration; and waste minimization.

RCRA states that the federal government can authorize states to develop, implement, and enforce their own HAZMAT and waste management regulations, with the stipulation that the state programs must be as stringent or broader in scope than the federal regulations. In 1992, the Environmental Protection Agency granted California authority to develop its own regulations, most of which are now codified in the Health and Safety Code and in Titles 8 and 22 of the California Code of Regulations (CCR). The California Department of Toxic Substances Control is responsible for enforcing these codes and administrative laws.

All California State University (CSU) campuses purchase HAZMAT for both instructional and research purposes, most prominently in colleges that focus on the sciences, fine arts, and liberal arts. In addition, campus maintenance departments such as custodial services, facilities, and auto shops use materials that are known to have properties that are harmful to humans and the environment and must be monitored to ensure proper and safe utilization. Nearly all of the areas that utilize HAZMAT generate hazardous waste that is subject to strict regulation for safe and proper storage, transport, and disposal.

Sections of Title 8 of the CCR address hazardous materials management (HMM) in several areas, including training, communication, storage, and safety. However, in response to a number of serious accidents in university laboratories in recent years, there has been an increased diligence from the California Occupational Safety and Health Administration (CalOSHA) and other regulatory agencies in enforcing regulations and standards related to laboratory safety. The Occupational Exposure to Hazardous Chemicals in Laboratories standard (8 CCR 5191), commonly referred to as the Laboratory Standard, was created specifically for non-production laboratories and outlines specific requirements for employers to ensure the safety of employees in these labs. The standard requires that the employer designate a chemical hygiene officer and have a written chemical hygiene plan (CHP), which must be routinely verified for effectiveness. The CHP must include provisions for worker training, chemical exposure monitoring where appropriate, medical consultation when exposure occurs, criteria for the use of personal protective equipment and engineering controls, and special precautions for particularly hazardous substances. The CHP must be tailored to reflect the specific chemical hazards present in the laboratory where it is to be used.

Executive Order (EO) 1039, California State University – Occupational Health and Safety Policy, dated January 1, 2009, recognizes that occupational health and safety or environmental health and safety departments are an integral to the CSU system and that injuries and/or illnesses may arise from work-related activities that include exposure to potentially harmful substances. It outlines the responsibilities of the various parties, including the systemwide Office of Risk Management, campus presidents, campus
environmental health and safety departments, and campus departments. It requires campuses to develop, implement, and maintain a campus health and safety program to address all identified campus hazards, including hazardous materials.

EO 1069, Risk Management and Public Safety, dated March 1, 2012, delegates authority and responsibility for systemwide administrative oversight and programmatic responsibility for risk management, environmental health and safety, emergency preparedness, business continuity, and public safety to the assistant vice chancellor for risk management and public safety. This includes responsibility for policies and programs, resource documents, training programs, and production of guidance on the application of risk management techniques and systemwide policies and procedures.

In 2000, the Office of Audit and Advisory Services (OAAS) conducted an audit of HMM at nine campuses and issued a systemwide report. The report noted issues related to contractual arrangements and insurance coverage for waste transporters, material safety data sheets (MSDS), and staff HAZMAT orientation and refresher training. Previous to the 2000 review, OAAS audited HMM in 1992, with a follow-up review in 1996. The OAAS also audited Occupational Health and Safety in 2007 and reviewed activities that also involved HMM.
PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to HMM activities and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the audit objective, specific goals included determining whether:

- Administration of HMM is well-defined and includes clear lines of organizational authority and responsibility.
- Risks related to HMM have been identified and assessed, and the results are applied to appropriate plans and processes.
- Policies and procedures pursuant to HMM are current and comprehensive, and distribution procedures are effective.
- Appropriate due diligence and oversight controls are in place to ensure that contractors conducting HMM services meet both regulatory and CSU contractual obligations.
- The campus has established the required HAZMAT communication documents.
- The campus has obtained the required registrations and permits and complies with key regulatory reporting requirements.
- Hazardous materials inventories are maintained, and purchasing and receipt processing is conducted in a controlled environment.
- HAZMAT in containers are properly labeled to communicate contents and hazards to users.
- The campus has established effective emergency and contingency plans for HAZMAT spills and exposures.
- Campus laboratories are operating and lab activities are conducted in accordance with 8 CCR 5191, The Occupational Exposure to Hazardous Chemicals in Laboratories standard, commonly referred to as the Laboratory Standard.
- Adequate procedures exist to identify hazardous waste.
- Hazardous waste, including biomedical and universal waste, is properly stored and labeled and does not accumulate on-site for longer than the allowable time.
- Hazardous waste transportation and disposal processes are in compliance with regulations.
- Employees and students who handle HAZMAT and/or generate hazardous waste have been adequately trained.
SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment A, Audit Agenda Item 2 of the January 22 and 23, 2013, meeting of the Committee on Audit stated that Hazardous Materials Management would include, but was not limited to, a review of the systems and procedures for controlling the purchase, generation, storage, use, and disposal of HAZMAT and wastes; employee training; emergency response plans; reporting requirements; and compliance with federal and state regulations.

Our study and evaluation were conducted in accordance with the International Standards for the Professional Practice of Internal Auditing, issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining that accounting and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor policies, letters, and directives. The audit focused on procedures in effect from July 1, 2011, through September 27, 2013.

We focused primarily upon the internal administrative, compliance, and operational controls over HMM activities. Specifically, we reviewed and tested:

- Campus administration of HMM, including clear reporting lines and defined responsibilities and current policies and procedures for HAZMAT handling and waste disposal.
- Compliance with permit and registration requirements, as well as with required regulatory and CSU reporting requirements.
- Contents of HAZMAT safety plans, such as the CHP and Hazard Communication plan, as required by the CCR and CalOSHA.
- Hazard communication practices, including the accessibility of MSDS, appropriate hazard signage, and proper labeling of containers stored on site.
- Hazardous waste determination, storage, transportation, and disposal practices.
- Training for employees and students on HAZMAT handling and hazardous waste disposal.

During the course of the audit, we visited six campuses: Bakersfield, Channel Islands, Dominguez Hills, Pomona, San Francisco, and Sonoma. We interviewed campus personnel and audited procedures in effect at the time of the audit.
OBSERVATIONS, RECOMMENDATIONS, 
AND MANAGEMENT RESPONSES

SYSTEMWIDE OVERSIGHT

HEALTH AND SAFETY TRAINING AND INSPECTIONS

Systemwide oversight for hazardous materials management (HMM) needed improvement.

We found that although the systemwide Office of Systemwide Risk Management (OSRM) at the chancellor’s office (CO) was responsible for some administrative oversight of HMM at the campuses, there was no effective process in place at the CO to monitor campus compliance with regulatory provisions regarding employee health and safety training and inspections. Likewise, the CO did not have a process for reporting exceptions or problems with campus efforts in these areas to executive management. Although current policy requires campuses to prepare and submit an annual health and safety report to OSRM, reports were not always remitted and did not always include the status of campus compliance efforts to provide employee health and safety training and perform inspections.

We reviewed six campuses, and we noted that:

 All six had issues related to the provision of employee and student health and safety training. The campuses cited a variety of reasons for these issues; most were related to resource constraints and lack of clear accountability for the performance of training.

 All six had issues related to HMM inspections, including the completion, documentation, and adequate follow-up and remediation of the inspection process. The campuses cited a variety of reasons for these issues; most were related to resource constraints and a lack of clear accountability for performance of inspections.

Previous audits indicate that these issues have been ongoing for years. Campus findings related to employee and student health and safety training and inspections have been consistently reported in each HMM and occupational health and safety (OHS)-related audit performed by our office since 1992. In response to systemwide audit recommendations, CO management issued advisory memoranda reminding the campuses to implement safety training programs and conduct periodic scheduled and unscheduled inspections. Also, in response to the most recent OHS audit in 2007, the CO issued a new systemwide policy for OHS activities. The policy included the annual campus reporting requirements for various programmatic activities.

Executive Order (EO) 1039, California State University OHS Policy, dated January 1, 2009, states that the chancellor has designated the systemwide OSRM administrative oversight responsibility for developing risk management programs, resource documents, and training programs, and that the chief risk officer shall provide guidance on the application of environmental health and safety (EHS) policies and procedures appropriate to the California State University. It further states that the campus EHS program administrators shall provide an annual health and safety program report to the university president with a copy to the systemwide OSRM, and that items to consider for the report include a review of significant events, program trends, status reports for key program areas (e.g.,
training, inspections), and performance data. In addition, it states that it will be the university president or his/her designee’s responsibility to ensure the annual reporting requirement is fulfilled.

Government Code (GC) §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

The associate director of systemwide risk management stated that resources to address training and inspections had been deployed to the campuses from both his office and from the EHS work group, but there was no cohesive or scheduled process to track implementation or results. He further stated that his office sent reminders twice a year to campuses to submit the required EHS annual reports, but the current process did not include additional follow-up on late or missing reports, or on issues of concern raised in the reports.

The lack of effective oversight for HMM activities, including employee and student safety training and required inspections, increases the risk of serious injuries and illnesses and exposes the system to potential litigation and regulatory sanctions.

**Recommendation 1**

We recommend that the CO:

a. Evaluate the current administrative oversight responsibilities for HMM to address the recurring campus issues with employee health and safety training and inspections.

b. Provide general guidance to campuses on their responsibility to implement more effective processes for monitoring compliance with regulatory provisions regarding employee health and safety training and inspections, and for reporting exceptions or problems with campus efforts to the president of the campus.

**Management Response**

We concur. The CO will evaluate current administrative oversight responsibilities for HMM focused on recurring campus employee health and safety training and inspections issues. Necessary and appropriate guidance will be provided by the CO to campuses regarding related regulatory compliance requirements, including monitoring and reporting of campus exceptions or problems to campus presidents.

This recommendation will be completed by October 2014.
SYSTEMWIDE GUIDANCE FOR LABORATORY SAFETY

Systemwide guidance on laboratory safety and hazard communication requirements needed improvement.

We noted that current systemwide HMM policy did not provide sufficient guidance regarding laboratory safety and hazard communication requirements. We reviewed six campuses, and we found significant issues in the following areas:

- **Laboratory safety**: Three campuses had not fully developed a chemical hygiene plan (CHP) specific to hazardous chemicals used in laboratories and the workplace, nor had they designated a chemical hygiene officer with responsibility to ensure implementation of the CHP.

- **Hazard communication**: All six campuses had issues related to the development and implementation of a hazard communication program (HAZCOMM) that identified the health and physical hazards of chemicals used in the workplace and ensured that information about these hazards and associated protective measures was disseminated.

EO 1039, *California State University OHS Policy*, dated January 1, 2009, states that the designated EHS program administrator is responsible for developing and maintaining health and safety programs that meet the California Code of Regulations and California and Federal Occupational Safety and Health requirements. It further states that the campus president will provide the EHS program administrator authority to develop these programs.

GC §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

The associate director of systemwide risk management stated that the language in the campus health and safety program section of the EO was written broadly to capture the universe of safety requirements, including those related to the state requirements for a CHP and HAZCOMM.

Inadequate written policies and procedures for critical health and safety requirements increase the risk of serious injuries and illnesses and expose the system to potential litigation and regulatory sanctions.

**Recommendation 2**

We recommend that the CO provide clear and sufficient guidance to campuses on their responsibilities for laboratory safety and hazard communication requirements.
Management Response

We concur. The CO will evaluate current administrative oversight responsibilities for HMM focused on recurring campus employee health and safety training and inspections issues. Necessary and appropriate guidance will be provided by the CO to campuses on their responsibilities to implement more effective processes for monitoring compliance with regulatory requirements regarding employee health and safety training and inspections, and for reporting of campus exceptions or problems to campus presidents.

This recommendation will be completed by October 2014.
# APPENDIX A: PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Office of the Chancellor</td>
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<tr>
<td>Benjamin F. Quillian</td>
<td>Executive Vice Chancellor and Chief Financial Officer (At time of review)</td>
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<tr>
<td>Steve Relyea</td>
<td>Executive Vice Chancellor and Chief Financial Officer, Business and Finance (Currently)</td>
</tr>
<tr>
<td>Sally Roush</td>
<td>Interim Executive Vice Chancellor and Chief Financial Officer (At time of review)</td>
</tr>
<tr>
<td>Robert Eaton</td>
<td>Acting Deputy Assistant Vice Chancellor, Financing, Treasury and Risk Management</td>
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<tr>
<td>Zachary Gifford</td>
<td>Associate Director, Systemwide Risk Management</td>
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<tr>
<td>David Kervella</td>
<td>Senior Director, Systemwide Professional Development</td>
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<tr>
<td>Melody Kojima</td>
<td>Assistant Director, Purchasing</td>
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<tr>
<td>Robin Innes</td>
<td>Senior Manager, Systemwide Professional Development</td>
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<tr>
<td>Michael Redmond</td>
<td>Acting Assistant Vice Chancellor, Headquarters Building Security and Strategic Initiatives</td>
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<tr>
<td>Tom Roberts</td>
<td>Director, Contract Services and Procurement</td>
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<td>John Swarbrick</td>
<td>Associate Vice Chancellor, Labor and Employee Relations</td>
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**California State University, Bakersfield**

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<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Horace Mitchell</td>
<td>President</td>
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<tr>
<td>Sheila Barela</td>
<td>Environmental Health and Safety Specialist</td>
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<tr>
<td>Laura Ann Bishop</td>
<td>Administrative Analyst/Specialist, Office of the Dean, School of Natural Sciences, Mathematics, and Engineering (NSME)</td>
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<tr>
<td>Michael Chavez</td>
<td>Director of Procurement and Contract Services</td>
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<tr>
<td>Kellie Garcia</td>
<td>Associate Vice President, Human Resources and Administrative Services/Interim Director, Safety and Risk Management</td>
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<tr>
<td>Andreas Gebauer</td>
<td>Chair, Chemistry Department</td>
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<tr>
<td>Summer Gibbons</td>
<td>Instructional Support Technician</td>
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<tr>
<td>Katherine Grube</td>
<td>Instructional Support Technician</td>
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<tr>
<td>Kamel Haddad</td>
<td>Associate Dean, NSME/Professor of Mathematics</td>
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<tr>
<td>Wilfredo Hernandez</td>
<td>Custodial Supervisor</td>
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<tr>
<td>Anne Houtman</td>
<td>Dean, NSME</td>
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<tr>
<td>Michael Neal</td>
<td>Vice President, Business and Administrative Services</td>
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<tr>
<td>Elizabeth Powers</td>
<td>Instructional Support Technician</td>
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<tr>
<td>Jerry Pulkinghorne</td>
<td>Supervisor, Facilities Management</td>
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<tr>
<td>Marcos Rodriguez</td>
<td>Roads and Grounds Supervisor</td>
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<tr>
<td>Christopher Vanni</td>
<td>Instructional Support Technician III</td>
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<tr>
<td>Tom Velasquez</td>
<td>Manager, Facilities Operations</td>
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<tr>
<td>Kathy Villa</td>
<td>Contracts Specialist, Procurement and Contract Services</td>
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<td>Douglas Wade</td>
<td>Assistant Vice President, Fiscal Services</td>
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**California State University, Channel Islands**

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<tr>
<th>Name</th>
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<tr>
<td>Richard R. Rush</td>
<td>President</td>
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<tr>
<td>Sean Anderson</td>
<td>Associate Professor, Environmental Science and Resource Management</td>
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</tbody>
</table>
California State University, Channel Islands (cont.)

Shawn Bochat  Analyst/Programmer, Information Technology
Caroline Doll  Director, Special Projects for Finance and Administration
Scott Duffer  Chemistry Lab Technician
Blake Gillespie  Associate Professor, Chemistry
Philip Hampton  Professor, Chemistry
Catherine Hutchinson  Associate Senior Biology Technician, Biology and Natural Sciences
William Kupfer  Director, Environmental Health and Safety and Risk Management
Michael Mahoney  Senior Biology Technician, Biology and Natural Sciences
Derick Nguyen  Safety Coordinator, Operations, Planning and Construction
Anna Pavin  Associate Vice President, Human Resources
Valerie Patscheck  Director, Procurement and Contract Services
Robert Perez  Shipping and Receiving Assistant, Logistical Services
Manuel Ramos  Manager, Environmental Health and Safety and Risk Management
John Reid  Director, Public Safety and Chief of Police
Margaret Tougas  Emergency Manager, Police
Ysabel Trinidad  Vice President, Finance and Administration
Cindy Ulisse  Mail Services/Receiving Supervisor, Logistical Services

California State University, Dominguez Hills

Willie J. Hagan  President
Arnecia Bryant  Associate Director, Loker Student Union
Anthony Cipriano  Instructional Support Technician, Biology Department
John Epps  Associate Director, Physical Plant
Orson Faynor  Environmental Compliance Specialist, Risk Management/Environmental Health and Occupational Safety (RM/EHOS)
Munashe Furusa  Dean, College of Arts and Humanities
Rodrick Hay  Dean, College of Natural and Behavioral Sciences
David Inafuku  Instructional Support Assistant, Chemistry and Biochemistry Department
Lawrence Kimaara  Manager, Business Process Management
Sandy Lin  Instructional Support Technician, Biology Department
Robert Lovitt  Interim Vice President, Administration and Finance
Greg Mocilnikar  Instructional Aid Technician, Art and Design
Cecilia Ortiz  Director, Loker Student Union
Sheela Pawar  Associate Dean, College of Arts and Humanities
Francisco Quinonez  Director of Procurement, Contracts, Logistical and Support Services
Mary Ann Rodriguez  Vice President, Administration and Finance (At time of review)
Jivin Seward  Instructional Support Technician II, Chemistry and Biochemistry Department
John Tomlinson  Professor and Chair, Biology Department
Karen Wall  Associate Vice President, Administration and Finance (At time of review)
Jeff Wood  Manager, RM/EHOS

California State Polytechnic University, Pomona

J. Michael Ortiz  President
Anita Aguirre  Administrative Analyst/Specialist, Procurement and Support Services
APPENDIX A: PERSONNEL CONTACTED

California State Polytechnic University, Pomona (cont.)

Lisa Alex  Chair, Chemistry and Biochemistry Department
Samir Anz  Professor of Chemistry
Humberto Arias  Manager of Custodial Services
Mark Bailey  Technician III, Electrical and Computer Engineering
Edwin Barnes  Vice President, Administrative Affairs and Chief Financial Officer
(At time of review)
Anthony Beachler  Health and Safety Technician, Biological Sciences Department
Armando Bustamante  Warehouse Staff, Distribution Services
Armando Coronado  Student Assistant, College of Engineering
Tom Delk  Facilities Project Supervisor
Michael DeSalvio  Biosafety Specialist, Environmental Health and Safety
Ulus Ekerman  Technician III, Chemical and Materials Engineering
Sepehr Eskandari  Chair, Biological Sciences Department
Steven N. Garcia  Vice President, Administrative Affairs and Chief Financial Officer
Charles Gefford  Student Assistant, College of Engineering
Peter Graves  Supervisor of Automotive/Equipment Services
Kathy Harper  Secretary of Finance and Administrative Services
Michael Huyter  Environmental Specialist, Environmental Health and Safety
Nancy Kedzierski  Technician, Chemistry and Biochemistry Department
Darwin Labordo  Associate Vice President, Finance and Administrative Services
Helen Lee  Accounts Payable Coordinator
Mark Miller  Director of Facilities Management
Victor Okhuysen  Associate Professor, Industrial and Manufacturing Engineering
Cordelia Ontiveros  Associate Dean, Academic Programs and Student Services
Stephanie Pastor  Technician, Chemistry and Biochemistry Department
David Patterson  Director of Environmental Health and Safety
Eloise Pro  Instructional Technician, Biological Sciences Department
Kathleen Prunty  Director of Procurement and Support Services
Vilupanur Ravi  Chair, Chemical and Materials Engineering
Craig Rich  Associate Dean, College of Science
Lorraine Rodriguez  Buyer, Procurement and Support Services
Pearl Viggers  Instructional Support Technician, Biological Sciences Department
Al Viteri  Director of University Accounting Services
Joice Xiong  Director of Internal Audit

San Francisco State University

Leslie E. Wong  President
Sheldon Axler  Dean, College of Science and Engineering (COSE)
Michel Blagoyevich  Executive Director of Operations, COSE
Libby Chang  Project Manager, Environmental Health and Safety (EHS)
Ronald S. Cortez  Vice President, Administration and Finance/Chief Financial Officer
Maria Fedel  Compliance Officer, EHS
Michael Fong  Operations Manager, Biology Stockroom, COSE
Toby Garfield  Director, Romberg Tiburon Center
Nancy K. Hayes  Vice President, Administration and Finance/Chief Financial Officer
(At time of review)
Chris Johansson  Chemistry Stockroom Manager, COSE
APPENDIX A: PERSONNEL CONTACTED

San Francisco State University (cont.)
Steve Lahey          Director, Creative Arts Technical Services, College of Liberal and Creative Arts (LCA)
Brita Larsson        Lab Coordinator, Romberg Tiburon Center
Yvonne Le            Instructional Support Technician, COSE
Franz Lozano         Budget Officer
Michael Martin       Interim Associate Vice President, Human Resources, Safety and Risk Management
Charles Meyer        Senior Director, Facilities and Service Enterprises
Aaron Nevatt         Director, EHS
Gayle Orr-Smith      Emergency Coordinator
Peter Palmer         Professor, Chemistry and Biochemistry Department, COSE
Todd Roehrman        Associate Dean, LCA
Stephen Smith        Director, Procurement and Support Services
Linda Vadura         Health and Safety Specialist, COSE

Sonoma State University
Ruben Armiñana       President
Letitia Coate        Associate Vice President, Administration and Finance
(Jenifer Crist
Purchasing Manager, Financial Services
Craig Dawson         Director of Energy and Environmental, Health, and Safety (EHS)
Christopher Dinno    Associate Vice President, Facilities Operations and Planning
Jon Fukuto           Professor of Chemistry and Chemical Hygiene Officer
Christy Gorman       Instructional Support Technician III and Associate Chemical Hygiene Officer
Tyson Hill           Senior Director of Risk Management
Kurt Koehle          Director, Internal Operations, Analysis and Review
Scott Lance          Information Technology Consultant
Steve Nank           Mail and Receiving Coordinator
Brian Orr            Director, Tax and Compliance
Shawn Potts          Building Service Engineer Supervisor
Thomas Sargent       EHS Specialist
Laurence Furukawa-Schlereth Vice President, Administration and Finance/Chief Financial Officer
DATE: June 30, 2014

TO: Larry Mandel
    Vice Chancellor and Chief Audit Officer

FROM: Steve Relyea, Executive Vice Chancellor and
      Chief Financial Officer


In response to the "Incomplete Draft" report dated May 7, 2014, we are providing the enclosed management response.

Should you have any questions, please feel free to contact us.

SR:mpr

Attachment

cc: Robert Eaton, Acting Deputy Assistant Vice Chancellor, Financing, Treasury and Risk Management
    Zachary Gifford, Associate Director, Systemwide Risk Management
    Michael P. Redmond, Acting Assist. Vice Chancellor, HQ Budget, Security and Strategic Initiatives
HAZARDOUS MATERIALS MANAGEMENT
SYSTEMWIDE
Audit Report 13-44

SYSTEMWIDE OVERSIGHT

HEALTH AND SAFETY TRAINING AND INSPECTIONS

Recommendation 1

We recommend that the CO:

a. Evaluate the current administrative oversight responsibilities for HMM to address the recurring campus issues with employee health and safety training and inspections.

b. Provide general guidance to campuses on their responsibility to implement more effective processes for monitoring compliance with regulatory provisions regarding employee health and safety training and inspections, and for reporting exceptions or problems with campus efforts to the president of the campus.

Management Response

We concur. The CO will evaluate current administrative oversight responsibilities for hazardous materials management focused on recurring campus employee health and safety training and inspections issues. Necessary and appropriate guidance will be provided by the CO to campuses regarding related regulatory compliance requirements, including monitoring and reporting of campus exceptions or problems to campus presidents.

This recommendation will be completed by October 2014.

SYSTEMWIDE GUIDANCE FOR LABORATORY SAFETY

Recommendation 2

We recommend that the CO provide clear and sufficient guidance to campuses on their responsibilities for laboratory safety and hazard communication requirements.

Management Response

We concur. The CO will evaluate current administrative oversight responsibilities for hazardous materials management focused on recurring campus employee health and safety training and inspections issues. Necessary and appropriate guidance will be provided by the CO to campuses on their responsibilities to implement more effective processes for monitoring compliance with
regulatory requirements regarding employee health and safety training and inspections, and for reporting of campus exceptions or problems to campus presidents.

This recommendation will be completed by October 2014.
July 23, 2014

MEMORANDUM

TO: Mr. Larry Mandel
Vice Chancellor and Chief Audit Officer

FROM: Timothy P. White
Chancellor

SUBJECT: Draft Final Report 13-44 on

*Hazardous Materials Management, Systemwide*

In response to your memorandum of July 23, 2014, I accept the response as submitted with the draft final report on *Hazardous Materials Management, Systemwide.*

TPW/amd