HAZARDOUS MATERIALS MANAGEMENT

CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 13-47
December 3, 2013

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## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Summary</td>
<td>1</td>
</tr>
<tr>
<td>Introduction</td>
<td>2</td>
</tr>
<tr>
<td>Background</td>
<td>2</td>
</tr>
<tr>
<td>Purpose</td>
<td>4</td>
</tr>
<tr>
<td>Scope and Methodology</td>
<td>5</td>
</tr>
<tr>
<td><strong>OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES</strong></td>
<td></td>
</tr>
<tr>
<td>General Environment</td>
<td>6</td>
</tr>
<tr>
<td>Inspections</td>
<td>6</td>
</tr>
<tr>
<td>Hazard Communication</td>
<td>7</td>
</tr>
<tr>
<td>Laboratory Standard</td>
<td>9</td>
</tr>
<tr>
<td>Training</td>
<td>10</td>
</tr>
</tbody>
</table>
APPENDICES

APPENDIX A: Personnel Contacted
APPENDIX B: Campus Response
APPENDIX C: Chancellor’s Acceptance

ABBREVIATIONS

CalOSHA California Office of Safety and Health Administration
CCR California Code of Regulation
CHO Chemical Hygiene Officer
CHP Chemical Hygiene Plan
CSU California State University
CSUDH California State University, Dominguez Hills
EO Executive Order
EPA Environmental Protection Agency
HAZCOMM Hazard Communication Program
HAZMAT Hazardous Materials
HMM Hazardous Materials Management
IIPP Injury and Illness Prevention Program
MSDS Material Safety Data Sheets
OUA Office of the University Auditor
RCRA Federal Resource Conservation and Recovery Act
RM/EHOS Risk Management/Environmental Health and Occupational Safety
EXECUTIVE SUMMARY

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

We visited the California State University, Dominguez Hills campus from August 5, 2013, through August 30, 2013, and audited the procedures in effect at that time.

In our opinion, except for the effect of the weaknesses described below, the fiscal, operational, and administrative controls for HMM as of August 30, 2013, taken as a whole, were sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of concern include: general environment, laboratory standards, and training.

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.

GENERAL ENVIRONMENT [6]

Safety inspections related to hazardous materials management (HMM) were not always being conducted in accordance with campus and regulatory requirements. In addition, the hazard communication program provisions regarding labeling, HMM inventory lists, and availability of safety information were not always being followed.

LABORATORY STANDARD [9]

The campus chemical hygiene plan did not adequately address safety processes for employees and students working in labs.

TRAINING [10]

The campus did not consistently provide initial and refresher training to all individuals with responsibility for HAZMAT and hazardous waste handling.
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 (EPA) 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 the University Auditor 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, OUA audited HMM in 1992, with a follow-up review in 1996. The OUA 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 August 30, 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.
OBSERVATIONS, RECOMMENDATIONS, 
AND CAMPUS RESPONSES

GENERAL ENVIRONMENT

INSPECTIONS

Safety inspections related to hazardous materials management (HMM) were not always being conducted in accordance with campus and regulatory requirements.

We found that:

- The campus could not provide evidence that periodic safety audits of science labs and art studios had been conducted by accountable managers or supervisors in 2012.

- Inspections in 2013 had not been conducted by the accountable managers and supervisors, but by the manager of risk management/environmental health and occupational safety (RM/EHOS), whose defined role is to augment the primary inspections.

Executive Order (EO) 1039, California State University Occupational Health and Safety Policy, dated January 1, 2009, states that campuses shall develop procedures for identifying and evaluating workplace hazards, including scheduled and unscheduled inspections.

Title 8 §3203(a) states that every employer shall establish, implement, and maintain an effective injury and illness prevention program (IIPP), which shall provide procedures for identifying and evaluating workplace hazards including scheduled periodic inspections to identify unsafe conditions and work practices. It further states that the IIPP will include records of scheduled and periodic inspections to identify unsafe conditions and work practices, including persons conducting the inspection, the unsafe conditions and work practices that have been identified, and action taken to correct the conditions.

California State University, Dominguez Hills (CSUDH) IIPP, dated August 2012, states that all CSUDH managers and supervisors are responsible for conducting periodic safety audits of facilities, equipment and projects to identify unsafe conditions and practices. In addition, it states that the office of the RM/EHOS will conduct periodic inspections and hazard assessments that augment those conducted by managers and supervisors.

The manager of RM/EHOS stated his belief that his participation in the 2012 annual Office of the Fire Marshal inspection, which included projects to remediate findings among various campus entities, was sufficient to meet the requirement for campus inspections in the labs and art studios for that year. He also stated that campus parties did not document their own participation in the inspection process itself due to oversight, but their participation in the remediation was recorded. He further stated that since he started in his position in 2012, he had initiated a work area inspection checklist to demonstrate compliance, and it was in use for 2013.
Inadequate administration of inspections increases the risk that unsafe conditions will not be identified and further increases the potential for accidents and injuries, litigation, and regulatory sanctions.

**Recommendation 1**

We recommend that the campus:

a. Conduct periodic safety audits of science labs and art studios by the accountable managers and supervisors.

b. Reinforce the existing requirement that managers and supervisors are accountable for conducting primary inspections and the RM/EHOS role is to augment these inspections.

**Campus Response**

We concur.

a. The accountable managers and supervisors will conduct periodic safety audits of the science labs and art studios.

b. The campus will reinforce the existing requirement that managers and supervisors are accountable for conducting primary inspections and the RM/EHOS role is to augment these inspections.

Expected completion date: February 2014

**HAZARD COMMUNICATION**

Hazard communication program (HAZCOMM) provisions were not always being followed.

We reviewed nine chemistry and biology rooms containing hazardous materials (HAZMAT), including four research labs, and found that:

- HAZMAT containers were noted to either have missing or incomplete labels in six rooms.
- HAZMAT inventory lists were unavailable for five rooms.
- Material safety data sheets (MSDS) were not readily available in two rooms.

California Code of Regulations (CCR) Title 8 §5194(f)(4) states that the employer shall ensure that each container of hazardous substances in the workplace is labeled, tagged, or marked with the following information: identity of the hazardous substance, and appropriate hazard warnings.

CCR Title 8 §5194(h)(1) requires that employers provide employees with the location and availability of the written HAZCOMM, including the lists of hazardous substances and MSDS.
California Health and Safety Code §25500 states that businesses shall formulate business and area plans relating to the handling and release of HAZMAT, and that these plans shall include an annual inventory of hazardous substances handled by the business.

CCR Title 8 §5194(g)(2)(8) requires employers to maintain copies of MSDS for each hazardous substance in the workplace and ensure that they are readily accessible during each work shift to employees when they are in their work areas.

CSUDH HAZCOMM, dated April 2013, states that every department is responsible and required to have a MSDS for every hazardous chemical product it uses and that the MSDS must be readily available for all employees to review at any time. It further states that hazardous substances may be transferred from their original container into another container, also known as a secondary container, and that the secondary container should be labeled with the identity of the substance and appropriate hazard warnings.

The manager of RM/EHOS stated that the proper labels were not in place for those instances due to oversight, but the bulk of the containers in the rooms did have the required labels. He further stated that the chemistry storeroom did not have a complete inventory list due to oversight, and that it was his belief that the MSDS binder in the biology storeroom was sufficient. In addition, he stated that the campus was in the process of implementing a campuswide MSDS website so staff can access the information from any computer on campus.

Inadequate administration of HAZCOMM programs undermines the safety of employees and students in contact with HAZMAT and increases the risk of litigation and regulatory sanctions.

**Recommendation 2**

We recommend that the campus:

a. Properly label all HAZMAT containers.

b. Maintain a current and complete inventory of hazardous substances in each room containing HAZMAT.

c. Make MSDS documents readily available for each room containing HAZMAT.

**Campus Response**

We concur.

a. The campus will properly label all containers containing hazardous substances.

b. The campus will maintain a current and complete inventory of hazardous substances in each room containing hazardous substances.
c. The campus will ensure MSDS documents will be readily available in each room containing hazardous materials.

Expected completion date: March 2014

LABORATORY STANDARD

The campus chemical hygiene plan (CHP) did not adequately address safety processes for employees and students working in labs.

We found that the campus had not required each academic division to appoint a qualified individual to provide technical guidance to the chemical hygiene officer (CHO). In addition, the CHP did not address:

- A description of the circumstances under which a particular laboratory operation, procedure, or activity required prior approval from the employee or employer’s designee.

- The faculty and student relationship regarding safety training, and how training should be implemented in the labs.

CCR Title 8 §5191(e)(3)(E) states that the provisions of a CHP should include, among others, the circumstances under which a particular laboratory operation, procedure, or activity shall require prior approval from the employer or the employer's designee before implementation.

CSUDH CHP, dated June 2010, states that each academic division appoints at least one qualified person to provide technical guidance to the CHO on matters relating to safety considerations and procedures for the use of hazardous materials.

EO 1039, California State University Occupational Health and Safety Policy, dated January 1, 2009, states that the campus presidents will ensure that the responsibility for providing student health and safety training is defined and documented and that campus presidents should ensure that the campus environmental health and safety program administrator encourages and supports departments in providing and emphasizing student safety training.

The manager of RM/EHOS stated that due to time constraints, some in-progress revisions and updates to the CHP had not been completed, including the requirement to assign a qualified person from each academic area to consult with the CHO.

The lack of a current and comprehensive CHP increases the risk of accidents and injuries and the potential for regulatory sanctions.
Recommendation 3

We recommend that the campus:

a. Require each academic division to appoint at least one qualified person to provide technical guidance to the CHO on safety matters.

b. Update the CHP to include the circumstances under which a particular laboratory operation, procedure or activity requires prior approval from the employer or the employer’s designee.

c. Update the CHP to address the faculty and student relationship regarding safety training, and how training should be implemented in the labs.

Campus Response

We concur.

a. The campus will require each academic division to appoint at least one qualified person to provide technical guidance to the CHO on safety matters.

b. The campus will update the CHP to include the circumstances under which a particular laboratory operation, procedure, or activity requires prior approval from the employer or the employer’s designee.

c. The campus will update the CHP to address the faculty and student relationship regarding safety training, and how training should be implemented in the labs.

Expected completion date: March 2014

TRAINING

The campus did not consistently provide initial and refresher training to all individuals with responsibility for HAZMAT and hazardous waste handling.

We reviewed the training records for employees who worked with HAZMAT in the biology and chemistry departments, and we found that:

- The campus was unable to provide evidence of initial training on HAZCOMM requirements, the IIPP, HMM, and the Laboratory Standard for two of the five employees hired in the past two years.

- The campus was unable to provide evidence of refresher training on hazardous waste handling for any of the 14 employees we reviewed who had been employed for more than two years.
The campus was unable to provide evidence of student safety training for two of the three science lab sections handling HAZMAT and hazardous waste that we reviewed.

CCR Title 8 §5194(h) states that employers shall provide employees with effective 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. It further states that the training shall include information on the applicable regulations; the operations in the employee’s work area where hazardous substances are present; the location and availability of the HAZCOMM, including the list of substances and the MSDS; methods and observations used to detect the presence or release of hazardous substances in the work area; the health hazards of the substances in the work area and measures they can take to protect themselves from the hazards; and an explanation of the labeling system and the MSDS and how employees can use this information.

CCR Title 8 §5191(e)(3) states that lab employees shall be trained on the hazards of chemicals present in their work areas at the time of the initial assignment to the work area and prior to assignments involving new exposure situations. It further states that the training should include methods and observations used to detect the presence or release of a hazardous chemical; the physical and health hazards of chemicals in the work area; and the measures employees can take to protect themselves from these hazards, such as appropriate work practices, emergency procedures, and personal protective equipment usage.

CCR Title 8 §3203(a)(7) states that the IIPP will provide for training and instruction to all new employees and to all employees given new job assignments for which training has not previously been received. It further states in §3203(b)(2) that documentation of training shall include the employee name, training dates, type(s) of training, and training providers, and that these records will be maintained for at least one year.

Title 22 §66264.16 states that new employees shall receive introductory training in hazardous waste management procedures relevant to the positions in which they are employed, and that it should occur before they are left unsupervised and annually thereafter. It further states that the facility will maintain records of every employee involved in hazardous waste management, a description of the training provided to these individuals, and records that the training occurred.

EO 1039, California State University Occupational Health and Safety Policy, dated January 1, 2009, states that campuses shall develop, implement, and maintain a health and safety program that includes a training program that ensures employees receive adequate safety training for the tasks they are performing and/or that is included in the job description or scope of work. In addition, it states that for educational activities, where there is a potential for exposure to biological, chemical and/or physical hazards, campuses shall evaluate the need for student health and safety training. It further states that in cases where student training is determined to be necessary, the campus should develop and implement student training programs that inform of the potential hazards and the safe educational practices that must be utilized to avoid injury or illness, and should maintain documentation of the training.

The manager of RM/EHOS stated that the lack of documentation to support whether initial and/or refresher training was provided to the employees was due to oversight and staff turnover.
Inadequate administration of required safety training related to HAZMAT and hazardous waste increases the risk of accidents, injuries, and lawsuits.

**Recommendation 4**

We recommend that the campus:

a. Provide required initial and refresher training to employees with responsibility for HAZMAT and hazardous waste handling.

b. Provide appropriate safety training in instructional settings where students are exposed to HAZMAT and hazardous waste.

**Campus Response**

We concur.

a. The campus will provide the required initial and refresher training to employees with responsibility for HAZMAT and hazardous waste handling.

b. The campus will provide the appropriate safety training in instructional settings where students are exposed to HAZMAT and hazardous waste.

Expected completion date: April 2014
## APPENDIX A:
### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td>Willie J. Hagan</td>
<td>President</td>
</tr>
<tr>
<td>Arnecia Bryant</td>
<td>Associate Director, Loker Student Union</td>
</tr>
<tr>
<td>Anthony Cipriano</td>
<td>Instructional Support Technician, Biology Department</td>
</tr>
<tr>
<td>John Epps</td>
<td>Associate Director, Physical Plant</td>
</tr>
<tr>
<td>Orson Faynor</td>
<td>Environmental Compliance Specialist, Risk Management/Environmental Health and Occupational Safety (RM/EHOS)</td>
</tr>
<tr>
<td>Munashe Furusa</td>
<td>Dean, College of Arts and Humanities</td>
</tr>
<tr>
<td>Rodrick Hay</td>
<td>Dean, College of Natural and Behavioral Sciences</td>
</tr>
<tr>
<td>David Inafuku</td>
<td>Instructional Support Assistant, Chemistry and Biochemistry Department</td>
</tr>
<tr>
<td>Lawrence Kimaara</td>
<td>Manager, Business Process Management</td>
</tr>
<tr>
<td>Sandy Lin</td>
<td>Instructional Support Technician, Biology Department</td>
</tr>
<tr>
<td>Robert Lovitt</td>
<td>Interim Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Greg Mocilnikar</td>
<td>Instructional Aid Technician, Art and Design</td>
</tr>
<tr>
<td>Cecilia Ortiz</td>
<td>Director, Loker Student Union</td>
</tr>
<tr>
<td>Sheela Pawar</td>
<td>Associate Dean, College of Arts and Humanities</td>
</tr>
<tr>
<td>Francisco Quinonez</td>
<td>Director of Procurement, Contracts, Logistical and Support Services</td>
</tr>
<tr>
<td>Mary Ann Rodriguez</td>
<td>Vice President, Administration and Finance (At time of review)</td>
</tr>
<tr>
<td>Jivin Seward</td>
<td>Instructional Support Technician II, Chemistry and Biochemistry Department</td>
</tr>
<tr>
<td>John Tomlinson</td>
<td>Professor and Chair, Biology Department</td>
</tr>
<tr>
<td>Karen Wall</td>
<td>Associate Vice President, Administration and Finance</td>
</tr>
<tr>
<td>Jeff Wood</td>
<td>Manager, RM/EHOS</td>
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December 17, 2013

Mr. Larry Mandel  
University Auditor  
The California State University  
401 Golden Shore, 4th Floor  
Long Beach, CA 90802-4210

Dear Mr. Mandel:

Enclosed, please find California State University, Dominguez Hills’ responses to the Hazardous Materials Management Audit Report 13-47, dated December 3, 2013. The campus is committed to addressing and resolving the issues identified in the audit report.

If you have any questions or would like additional information, please contact me.

Sincerely,

[Signature]

Robert L. Lovitt  
Interim Vice President  
Administration and Finance

Enclosure (1)

c: Willie J. Hagan, President  
Karen Wall, Associate Vice President, Administration and Finance
HAZARDOUS MATERIALS MANAGEMENT

CALIFORNIA STATE UNIVERSITY,
DOMINGUEZ HILLS

Audit Report 13-47

GENERAL ENVIRONMENT

INSPECTIONS

Recommendation 1

We recommend that the campus:

a. Conduct periodic safety audits of science labs and art studios by the accountable managers and supervisors.

b. Reinforce the existing requirement that managers and supervisors are accountable for conducting primary inspections and the RM/EHOS role is to augment these inspections.

Campus Response

We concur.

a. The accountable managers and supervisors will conduct periodic safety audits of the science labs and art studios.

b. The campus will reinforce the existing requirement that managers and supervisors are accountable for conducting primary inspections and the RM/EHOS role is to augment these inspections.

Expected completion date: February 2014

HAZARD COMMUNICATION

Recommendation 2

We recommend that the campus:

a. Properly label all HAZMAT containers.

b. Maintain a current and complete inventory of hazardous substances in each room containing HAZMAT.

c. Make MSDS documents readily available for each room containing HAZMAT.
Campus Response

We concur.

a. The campus will properly label all containers containing hazardous substances.

b. The campus will maintain a current and complete inventory of hazardous substances in each room containing hazardous substances.

c. The campus will ensure MSDS documents will be readily available in each room containing hazardous materials.

Expected completion date: March 2014

LABORATORY STANDARD

Recommendation 3

We recommend that the campus:

a. Require each academic division to appoint at least one qualified person to provide technical guidance to the CHO on safety matters.

b. Update the CHP to include the circumstances under which a particular laboratory operation, procedure or activity requires prior approval from the employer or the employer’s designee.

c. Update the CHP to address the faculty and student relationship regarding safety training, and how training should be implemented in the labs.

Campus Response

We concur.

a. The campus will require each academic division appoint at least one qualified person to provide technical guidance to the CHO on safety matters.

b. The campus will update the CHP to include the circumstances under which a particular laboratory operation, procedure or activity requires prior approval from the employer or the employer’s designee.

c. The campus will update the CHP to address the faculty and student relationship regarding safety training, and how training should be implemented in the labs.

Expected completion date: March 2014
TRAINING

Recommendation 4

We recommend that the campus:

a. Provide required initial and refresher training to employees with responsibility for HAZMAT and hazardous waste handling.

b. Provide appropriate safety training in instructional settings where students are exposed to HAZMAT and hazardous waste.

Campus Response

We concur.

a. The campus will provide the required initial and refresher training to employees with responsibility for HAZMAT and hazardous waste handling.

b. The campus will provide the appropriate safety training in instructional settings where students are exposed to HAZMAT and hazardous waste.

Expected completion date: April 2014
January 23, 2014

MEMORANDUM

TO: Mr. Larry Mandel
   University Auditor

FROM: Timothy P. White
       Chancellor

         California State University, Dominguez Hills

In response to your memorandum of January 23, 2014, I accept the response as
submitted with the draft final report on *Hazardous Materials Management*,
California State University, Dominguez Hills.

TPW/amd