

Moving on After the Settlement

The Approach of a Small University of California Campus

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Background

- University of California, Merced
 - Newest of 10 campuses, est. 2005
 - 7300 students
 - Located in the Central Valley ~150 miles from San Francisco
- UC system is committed to safety first, and compliance second.
- Increased risk management

Background

- Accident at UCLA 2008
- UC - Cal/OSHA settlement agreement
 - Settlement requirements already law (Lab Standard).
 - 4 year term
 - 8 labs at UCM
- Post settlement applies to all 80 labs (soon to be 110 labs)

Settlement Requirments

- Training
- Personal Protective Equipment (PPE)
- Standard Operating Procedures (SOPs)

Training



Settlement required 95% of workers trained on Lab Safety Fundamentals.

- OSHA 1910.1450(f)
- Lab Roster
- Establish Learning Management System
- Offer online training
- Run training reports

Training - moving forward

- Current % compliance? Campus has some work to do.
 - Know who is in lab.
 - Notify on lab audits
 - Escalate
 - Lock out lab
- What about other training courses?
 - Biosafety, Fire Safety

Challenges

- Short term visiting researchers don't get into system.
- Manual, labor intensive process to track training.
- Rely on PI to update lab roster.

Training Questions?

Personal Protective Equipment (PPE)



Employer must provide PPE free of charge.

- OSHA 1910.1450(a)(2)(ii)
- No PPE without hazard assessment
 - 70 assessments certified, 7 drafts, 3 not certified

Personal Protective Equipment (PPE)

- Initial UC Office of President help
 - Funding
 - Hazard Assessment software
- Line item in budget
 - Purchased \$16,000 of PPE in 2016
 - About \$73,000 of PPE on campus
 - Current coats issued: 1,128
 - 235 coats issued this academic year



One Size Does Not Fit All

- Offer 24 different styles of safety glasses
- 8 styles goggles
- 12 sizes lab coats in male and female
 - Bimodal distribution with S preferred female, M male.
- Three types of lab coats
 - Cotton, barrier, and fire/chemical resistant coats based on hazard assessment
- Each worker gets two coats minimum.



Tracking the PPE

- Name of student/PI
- Barcode coat
- Scan when vendor picks up/ drops off
- Coats returned direct to lab like chemical package.
- Charge students for unreturned coats
 - Cotton/barrier coats \$30
 - FR coat \$100
 - FR-CR coat \$200



Challenges

- Random PPE checks.
 - Are they working with hazardous materials?
- Labs keeping PPE after students move on.
- Space for storage of lab coats.

PPE Questions?

Standard Operating Procedures (SOPs)



Settlement required 95% of SOPs to be written for Exhibit 1 chemicals.

- Exhibit 1 - strong corrosives, carcinogens, mutagens, potential explosives, highly toxics, etc.
- OSHA's lab standard 1910.1450 (e)(3)(i) requires SOPs for Particularly Hazardous Substances (H314, H318, H300, H310, H330, H340, H341, H350, H360, H361)

SOPs - How Accomplished

- Order Approval
- Central Receiving
- Chemical Inventory
- UCOP provided software
 - Radical and Chemical Inventory
 - Reports
- Prioritized Exhibit 1 list, then PHSs

SOPs - Moving Forward

- Current % compliance? Campus has some work to do.
 - Track on audits
 - Escalate
 - Prevent chemical orders
 - EHS approval needed
 - EHS store items received until SOPs written

Challenges

- PIs don't want to write SOPs.
- Very labor intensive to review SOPs and inventory to determine compliance.

SOP Questions?

Summary

- Settlement contained nothing that wasn't already in the law.
- Tracking is difficult, but results in better risk management.
- How is your campus doing?