California Institute of Technology

INJURY AND ILLNESS PREVENTION PROGRAM



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INJURY AND ILLNESS PREVENTION PROGRAM

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INTRODUCTION

The California Institute of Technology (Caltech) is committed to conducting work activities in a manner that promotes the safety and health of faculty, staff, students, and visitors, and complies with all applicable occupational health and safety regulations. Activities at Caltech should be conducted in accordance with the following guiding principles:

- The responsibility for implementing and maintaining a safe work environment rests on all faculty, staff, students, and visitors at Caltech.
- Supervisory personnel are responsible for establishing safe work practices in their respective laboratories or workplaces, and for providing safe equipment and facilities for faculty, staff, students, and visitors.
- All faculty, students, staff, and visitors are expected to follow proper and safe work procedures, and to report accidents, unsafe conditions or practices promptly to their Supervisor.
- Institute activities must comply with all applicable federal, state, and local environmental, health and safety laws and regulations.

Per California Code of Regulations (CCR), Title 8, § 3203 (http://www.dir.ca.gov/title8/3203.html), Caltech has adopted an Injury and Illness Prevention Program (IIPP) which describes specific requirements for program responsibility, compliance, communication, hazard assessment, and accident / exposure investigations. A copy of the IIPP is available online, as well as at the Environment, Health, and Safety Office.

Requirements outlined in this manual are mandated by regulation where the word "shall" is used, and are advisory in nature where the word "should" is used.

RESPONSIBILITIES

PROGRAM ADMINISTRATOR

The ultimate responsibility for Caltech's IIPP rests with the President of the Institute. The Program Administrator is:

Name: Casimir Scislowicz

Title: Director – Environment, Health, and Safety

Address: 1200 E. California Blvd., M/C B125-6, Pasadena, CA 91125

Telephone: (626) 395-6727

Responsibilities include:

- Advising senior management on safety and health issues.
- Working with senior management to develop safety and health guidelines, procedures, and policies.
- Preparing and distributing the Institute's guidelines, procedures, and policies on safety and health issues.
- Maintaining current information on local, state, and federal environmental, safety and health regulations.
- Serving as liaison with environmental, health, and safety governmental regulatory agencies.
- Planning, organizing, and coordinating health and safety training classes.
- Developing safe work practices, and performing safety and health surveys.

- Arranging for safety and health surveys and follow-up to ensure necessary corrective actions are completed.
- Establishing, conducting, and maintaining an injury/illness/accident reporting and investigation procedure.
- Reviewing injury and illness records (e.g., OSHA log 300).
- Reviewing injury and illness trends.
- Establishing a system for maintaining records of surveys, hazard abatement, and training.

ASSOCIATE VICE PRESIDENTS, DIRECTORS, AND DIVISION CHAIRS

Associate Vice-Presidents, Directors, and Division Chairs are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety policies, practices, procedures, and programs.
- Areas under their management have adequate funding for health and safety programs, practices, policies, procedures, and equipment.
- Areas under their management are in compliance with Caltech's health and safety practices, policies, procedures, and programs.

SUPERVISORY PERSONNEL: DIVISION ADMINISTRATORS, FACULTY, MANAGERS, AND SUPERVISORS

Division Administrators, Faculty, Managers, and Supervisors are responsible for implementing Caltech's IIPP. This includes:

- Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external governmental regulatory agency regulations and Caltech's policies, procedures, programs, and practices.
- Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs.
- Enforcing health and safety rules fairly and uniformly as they relate to job performance.
- Acknowledging employees who make a significant contribution to maintenance of a safe workplace, and disciplining employees who fail to follow safe work practices.
- Encouraging employees to report workplace hazards without fear of reprisal.
- Ensuring that periodic, scheduled workplace inspections/surveys are conducted, and that identified health and safety deficiencies are corrected in a reasonable time period.
- Ensuring that workplace incidents (i.e., injuries, exposures, or illnesses) are reported and investigated, and that corrective actions are taken.
- Ensuring that inspections/investigations and employee records are kept for the designated time period(s).

EMPLOYEES

Employees are responsible for following the requirements of this IIPP, which involves:

- Keeping themselves informed of conditions affecting their health and safety.
- Participating in training programs as required.
- Adhering to healthy and safe practices in their workplace.
- Promptly reporting to their Supervisors any potential workplace hazards and incidents (i.e., injuries, exposures, or illnesses).

ENVIRONMENT, HEALTH, AND SAFETY OFFICE

The Environment, Health, and Safety Office (EHS) is responsible for the development and administration of the IIPP, which involves:

- Providing training and technical assistance to Division Administrators, Faculty, Managers, and Supervisors on implementation of the IIPP.
- Assisting Division Administrators, Faculty, Managers, and Supervisors in conducting workplace hazard assessments to identify, evaluate, and correct hazards.
- Reviewing, updating, and evaluating the overall effectiveness of the IIPP.

DEPARTMENT SAFETY COMMITTEES

Department Safety Committees meet on a regularly scheduled basis to review occupational accidents, incidents, and other safety-related issues. The Department Safety Committees may submit recommendations to assist in the evaluation of employee safety suggestions and to verify action taken by Caltech to abate Cal/OSHA citations.

ADMINISTRATIVE COMMITTEES

Administrative Committees, whose members are qualified by relevant training and experience, provide guidance and oversight on the use of hazardous materials and equipment, and on the development of new procedures or processes that may represent new or unexpected hazards to personnel or property.

Current Administrative Committees at Caltech include:

- Administrative Committee on Biosafety,
- Institutional Animal Care and Use Committee (IACUC),
- · Administrative Committee for the Protection of Human Subjects, and
- Radiation Safety Committee (RSC),

COMPLIANCE

Caltech **shall** ensure that employees comply with safe and healthy work practices. Managers and Supervisors are responsible for establishing and maintaining good health and safety practices. To ensure compliance:

- Employees are recognized for following safe and healthful work practices.
- Employees are trained and retrained, as necessary, or as required.
- Disciplinary actions with employees for failure to follow safe and healthful work practices are taken, when appropriate.

COMMUNICATION

Caltech **shall** communicate with employees in a form readily understandable by all affected employees on matters related to occupational safety and health, including provisions designed to encourage employees to inform their Supervisors about hazards at the worksite without fear of reprisal.

The various communication systems that Caltech uses to relay information to all employees on matters relating to occupational safety and health include:

TRAINING

- A multi-tier training program is an integral component of the communication system.
 - The training program is described in Appendix A and Template A on pages 11 and 12.

HEALTH AND SAFETY MEETINGS

Health and safety meetings at the Division, Department, Shop, or Lab level are conducted to reinforce important concepts including, but not limited to, the following:

- Clearly communicate health and safety programs and procedures to employees and students.
- Encourage employees and students to report workplace hazards to management without fear of reprisal.
- Encourage employees and students to report workplace incidents (i.e., injuries, exposures, and illnesses).

SUPPORTING SAFETY PROGRAMS, POLICIES, and GUIDELINES

As part of the Institute's ongoing safety commitment, supporting safety programs, policies, and guidelines, as listed in <u>Appendix A</u>, have been developed to prevent accidents and injuries.

HEALTH AND SAFETY PUBLICATIONS

Health and safety publications are available from the Environment, Health, and Safety Office.

- Employee's Guide to Caltech: Working Safely at the Institute.

 (https://hr.caltech.edu/documents/64-section 3 working safely at the institute.pdf)
- EHS website: http://www.safety.caltech.edu.
- Department safety manuals and written procedures.
- Department safety posters and bulletins.

REPORTING HAZARDOUS CONDITIONS

Employees are encouraged to report potential health or safety hazards to their Supervisors. Supervisors are responsible for following up on employee suggestions and concerns communicated to them. The EHS Office can assist in this effort.

Employees can also report hazards or share a health and safety concern (anonymously, if desired) by using one of the following methods:

- Directly to the EHS Office by calling x6727
- Caltech Compliance Hotline at x8787 or on-line at http://www.asic.caltech.edu/hotline

No employee will be subject to reprisal for reporting hazards or potential hazards, or for making suggestions related to health and safety.

HAZARD ASSESSMENT

INSPECTION PROGRAM OVERVIEW

The purpose of inspections/surveys is to identify potential hazards so that they can be

corrected before an accident or injury occurs. Supervisors are responsible for ensuring that inspections/surveys are done. To assist the Supervisors, EHS has developed checklist templates that can be adopted for local use to cover potential hazards applicable to specific areas. Records of inspections/surveys shall be maintained for at least one year.

Examples of self-inspection checklist forms available for use in different areas are shown in the Appendices (See <u>Templates A - G: Self-Inspection Forms</u>)

INSPECTIONS

Managers and Supervisors will perform inspections when:

- 1. New substances, processes, procedures, or equipment are introduced.
- 2. New or previously unrecognized hazards are identified.
- 3. Occupational injuries or illnesses occur.
- 4. Workplace conditions warrant an inspection.

The Environment, Health, and Safety Office will assist in these efforts whenever appropriate.

EHS SURVEYS

To assist Supervisors in identifying and correcting potential hazards, EHS conducts periodic surveys, at a minimum, on an annual basis (e.g., baseline occupational health and safety surveys of operating units, surveys of hazardous materials storage/disposal, fire safety, etc.).

HOUSEKEEPING STANDARD

Good housekeeping is basic to fire safety and should be a major priority in every type of occupancy, from the simplest dwelling to the most complex research facility. The following general measures apply.

GENERAL MEASURES

- General work areas such as offices, labs, and shops must be kept orderly and clean.
- Discarded packaging material or scrap should not be accumulated.
- A sufficient number of waste baskets or trash receptacles (non-combustible materials) should be placed in each work area.
- Floors should be swept or vacuumed to prevent accumulation of combustible materials.
- Avoid using flammable cleaning solvents to clean floors, walls, furniture, or equipment.
- Clean up hazardous material spills immediately, and dispose of properly. Call EHS for guidance.
- Do not use low flash point (i.e., flammable) solvents in floor waxes or polishes.
- Place oil or chemical-soaked rags in metal or other suitable containers.

COMPLIANCE

Management at the Institute is committed to ensuring that all policies and procedures involving workplace security are clearly communicated and understood by all employees.

Employees who demonstrate safe work practices may be rewarded. Any employee who demonstrates repeated unsafe or unhealthy work practices will be subject to corrective and/or disciplinary action.

ACCIDENT INVESTIGATION AND REPORTING

Supervisory personnel are responsible for investigating all accidents and incidents (including near misses), even those that do not result in injury or significant damage to equipment or property. Appropriate repairs or procedural changes will be implemented promptly to mitigate the hazard implicated in these events.

Supervisors can consult with EHS when appropriate to help with identifying root causes and corrective actions.

INCIDENT INVETIGATION AND REPORTING PROCESS

EMPLOYEES

- a. Identify incidents and/or hazards.
- b. Obtain first aid/medical attention as appropriate.
- c. Report workplace incidents (i.e., injuries, exposures, or illnesses) to their Supervisors as soon as possible.

SUPERVISORS

- a. The Supervisor reports all emergencies, injuries, or illnesses to the Security Department at extension 5000. Security reports all health and safety-related incidents to EHS, and the Disability and Leave Administration Unit.
- b. The Supervisor investigates work-related incidents, and completes a <u>Supervisor Injury Investigation Report</u> in the case of an injury. The Supervisor should use the following procedure for investigating workplace accidents and hazardous substance exposures:
 - i. Interviewing injured workers and witnesses;
 - ii. Examining the workplace for factors associated with the accident/exposure;
 - iii. Determining the cause of the accident/exposure;
 - iv. Taking corrective action(s) to prevent the accident/exposure from reoccurring; and
 - v. Recording the findings and corrective actions taken.
- c. The Supervisor submits Supervisor Injury Investigation Report to:
 - vi. Disability and Leave Administration Unit. The Supervisor should always report the injury/illness to the Disability and Leave Administration Unit as soon as possible, or at least within 24 hours of knowledge, at extension 4577, for any injury that requires medical treatment beyond first aid. The completed Supervisor Injury Investigation Report should be returned to the Disability and Leave Administration Unit within three (3) working days from the date of knowledge of the injury/illness. Once notified, an "Employee Claim Form for Workers Compensation Benefits" and an "Employee Accident Report Form" will be provided to the Injured Employee for completion.
- d. The Disability and Leave Administration Unit notifies EHS through the Employer's Report of Occupational Injury or Illness, also known as Form 5020.

EHS

- a. Investigate further into the immediate and underlying causes where necessary.
- b. Initiate further corrective action(s) as needed.
- c. Complete an investigation report and monitor corrective action(s).

INCIDENT EXTERNAL REPORTING PROCEDURES

SERIOUS INJURIES, ILLNESSES, OR FATALITIES

• Supervisors must report work-related death, serious injury, or illness to the EHS office, (626) 395-6727, no later than 8 hours of knowledge.

Cal/OSHA defines an injury or illness as "serious" if it:

- Requires in-patient hospitalization for a period in excess of 24 hours for other than medical observation; or
- · An employee suffers a loss of any member of the body; or
- An employee suffers any serious degree of permanent disfigurement.
- EHS immediately reports any serious injury, illness, or fatality to Cal/OSHA. Other incidents may be reported to Cal/OSHA on a case-by-case basis.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices, or procedures **shall** be corrected in a timely manner based on the severity of the hazards. Hazards **shall** be corrected according to the following procedures:

- When observed or discovered:
- When an <u>imminent</u> hazard exists which cannot be immediately abated without endangering employee(s) and/or property. All exposed personnel will be removed from the area, except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition **shall** be provided with necessary safeguards.

RECORDKEEPING

As corrective actions are implemented, Supervisors shall document the effort and maintain these records.

TRAINING

The objective of the Institute's safety training program is to protect the health and safety of faculty, employees, students, and visitors. Safety training is a method to teach new skills, provide information to enable employees to perform designated tasks in a safe and efficient manner, and create an awareness of safe and healthful work habits. Training is provided to each employee, including Managers and Supervisors, on general safety procedures and any hazards specific to an employee's job.

Training **shall** be provided to all employees/students:

- When new employees are hired.
- When employees are given new job assignments for which training has not previously been received.
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard.
- Whenever the employer is made aware of a new or previously unrecognized hazard.

- When employees become Supervisors, so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.
- When employees are presented with hazards specific to their job assignment.

MULTI-TIER TRAINING PROGRAM

Caltech has organized its training system into a multi-tier program which is described below:

Tier 1: General Safety Training

 General New Employee Safety Orientation is provided by Human Resources to all new employees. This includes information on Caltech's health and safety policies and practices, employee health and safety rights and responsibilities, health and safety services, and what the employee should expect in terms of further training.

Tier 2: Hazard-Specific Training

 Provided by the Division, Department, or EHS to employees and students in labs, shops, or other workplaces where special hazards may be encountered. Training topics include, but are not limited to, ergonomics, hazard communication, departmental emergency response/evacuation procedures, bloodborne pathogens, lab safety training, radiation safety, and laser safety.

Tier 3: Workplace Training

 Provided by the Supervisor for laboratory researchers and assistants, lab class students, shop and dining workers, or other employees and students as appropriate. Training consists of information specific to the hazards encountered by these individuals. Training is communicated by one or more of the following methods: oneon-one, safety meetings (formal or informal), safety data sheets, videos, on-line resources, pamphlets, booklets, and postings.

TRAINING RESOURCES FROM EHS

- EHS assists Divisions and Departments in providing health and safety training to employees on a variety of topics. These include laboratory safety training, radiation safety, and many others. Training information can be accessed on-line through: http://www.safety.caltech.edu/training
- EHS has a safety video library, a collection of safety publications, and technical staff to assist Supervisors and departments in implementing training programs.

TRAINING RECORDKEEPING

Documentation of health and safety training for each employee shall include:

- Employee name
- Training dates
- Training times
- Training topic
- Training provider

Departments maintain records of health and safety trainings for their employees. EHS maintains records of trainings conducted by EHS staff. EHS training records shall be maintained in accordance with the Institute's Records Retention Schedule (until after termination of employee plus 5 years).

RECORDKEEPING

Caltech keeps records of scheduled and periodic inspections/surveys meeting the full recordkeeping requirements of Cal/OSHA IIPP, T8CCR 3203(7)(b)(1).

APPENDIX A: SUPPORTING SAFETY PROGRAMS

- Asbestos Awareness Program
- Bloodborne Pathogens Program
- Chemical Hygiene Plan
- Confined Spaces Program
- Emergency Action Plan
- Fire Prevention Plan
- Contractor Safety Guide
- Hazard Communication Program
- Hearing Conservation Program
- Heat Illness Prevention Program
- Industrial Truck Policy
- Fall Protection Guide
- Lockout / Tagout Program
- Radiation Safety Program
- Respiratory Protection Program
- Laser Safety

* * *

TEMPLATE A: Workplace-Specific Safety Training

EMPLOYEE NAME	
Supervisors are required to provide new employees checklist must be signed, dated, and retained by your E	<u> </u>
 The California Institute of Technology (Caltech) California Health and Safety Code. Federal and California Occupational Safety and Other federal, state, and local laws, regulations, 	Health Act (OSHA) regulations.
Explain the use of the emergency telephone and other safety emergencies.	number for fire, police, paramedics,
Explain that the treatment of minor injury or arising out of the course of employment, is handled by the Supervisor. The Supervisor will then call Worke Compensation will then direct the employee to an off treatment, if necessary. Medical costs and insurance painjury are covered under Workers' Compensation.	by first reporting the injury or illness to rs' Compensation at x4577. Workers' -campus occupational health clinic for
Explain how special personal protective equip and dust masks, hearing protection, etc.) is obtained.	ment (e.g., safety glasses, respirators
Explain the safety organization at Caltech, included Supervisors and the Environment, Health and Safet report safety hazards without fear of reprisal.	•
Show the employee the location of fire extinguand alternate emergency evacuation exits. If instruction extinguishers, arrange for this instruction through the S	n is needed on the use of portable fire
Explain to the employee the use of equipment at that may be encountered, and the safety precautions must be followed and used. (You may use the se explanation.)	and equipment that are available and
Instruct the employee to report to the Supervised Safety Office any unsafe conditions or unsafe acts to Caltech equipment or facilities.	
EMPLOYEE NAME (signature)	Date
SUPERVISOR/INSTRUCTOR (signature)	Date

TEMPLATE B: Shipping and Receiving Self-Inspection Checklist Inspected by: Location: Date: Hazardous materials are transported in the proper manner. Two or more persons carry heavy loads. Employees use proper lifting techniques. Hand trucks or carts are used when moving heavy loads. Loads to be lifted are divided into smaller/lighter loads when possible, and several trips are made. Objects are stacked properly; heavy objects are stored on bottom shelves. Proper shoes are worn in work area. Gloves are worn when handling sharp objects. Nails are removed from open boxes. __ All stacked materials have a firm foundation. Round objects are blocked or bracketed so that they cannot roll. Materials are not piled so high that they cause unsafe lifting and/or handling. Flammable materials are stored in a separate area away from heat/ignition sources. Employees are aware of hazardous conditions such as splinters, slivers, and rough or slippery surfaces. Greasy, wet, slippery, or dirty objects are cleaned/wiped off before they are handled. Safety equipment appropriate for the work to be performed is available and used. Corrective actions:

TEMPLATE C: Dining Services Self-Inspection Checklist

	All machinery is properly grounded.
	All walkway surfaces are maintained in a non-slip condition.
	Signs are posted warning about travel direction inside kitchen.
	Fire extinguishers are available, and properly inspected and maintained.
	Goggles and/or face shields are provided to prevent injuries from hot great splashes.
	Sprockets, chains, and V-belt drives on slicers are completely enclosed.
	All slicing machines are provided with a mechanical device to push the load through the slicer blades.
	Structural parts of ovens are protected against corrosion or deterioration.
	Fat, oil, and grease bins are properly dumped for recycling.
	All knives and cutlery are in good condition.
	Aerosol containers are stored away from cooking equipment.
	Sufficient ventilation is maintained at all times.
	The counters are kept clean when not in use.
	No knives or cutlery are left out when not in use.
	Aisles are kept clear at all times.
	Adequate lighting is present in all areas where employees work.
	Circuit breakers are clearly marked as to what they control.
	Garbage is kept in closed containers and removed daily.
	Suction/exhaust ventilation ducts over ranges are cleaned as necessary.
	Sanitary requirements (e.g., handwashing) are followed and enforced.
ective action	ns:
	15.

TEMPLATE D: Shop Self-Inspection Checklist

Exits and aisles are clear and free of obstructions.
Fire extinguishers are mounted in readily accessible locations.
Sufficient clearance is provided around and between equipment to allow for sa operation.
Work areas are clean, orderly, and properly illuminated.
Appropriate safety supplies and personal protective equipment is available ar used for hazardous work.
Machinery and equipment are kept clean and properly maintained.
Equipment and tools are in good condition.
Rotating moving parts of equipment are guarded to prevent physical contact.
Safety guards are provided and in place over belts, pulleys, chains, ar sprockets.
Portable equipment is stored in a dry, clean area when not in use.
"No Smoking" signs are posted where required.
Electrical cords and power lines are grounded and in good condition.
Flammable liquids are kept in flammable liquid storage cabinets.
Push sticks are available for use with table saws.
Floors are clean and free of dust, wood chips, and liquids.
Broken or temporarily out of service equipment is labeled "Do Not Use."
Compressed gas cylinders are separated by class and properly secured.
SDS's and other HazCom information is readily available.

TEMPLATE E: Vehicle Self-Inspection Checklist

Lights and warning signals are in working condition. Brakes are in good condition. Tires are not worn or cracked. Engine is clean and working properly. Oil and gas levels are adequate. Seatbelts are accessible for driver and passengers. Nothing is blocking driver's view out of any windows or from No objects are obstructing brake and gas pedals. Vehicle is idling smoothly.	
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Vehicle is idling smoothly.	m mirrors.
ctive actions:	

TEMPLATE F: Office Self-Inspection Checklist

	Work areas are maintained in a clean and orderly manner, and free of debris.
	Aisles and exits are clear and free of obstructions.
	Exits are marked and well lit.
	Storage of heavy materials is kept close to the floor.
	Equipment, cabinets, and book shelves are bolted into place.
	Book shelves have earthquake restraints to prevent books from falling.
	Electrical equipment is maintained properly, and outlets are not overloaded.
	Liquids are not stored near electrical equipment.
	Cords across the floor are covered to protect the cords, as well as office workers from tripping.
	Proper ventilation is maintained for a constant, comfortable office temperature.
	Desks and chairs are positioned at proper heights and locations for each office worker.
	Copy holders are used to hold typing materials.
	Noise is at an acceptable level.
	Emergency phone numbers are posted on each telephone.
	Trash cans are emptied, and boxes are disposed of regularly.
	Chemicals (e.g., duplicating fluids, paints, solvents) are stored in a designated location, and only authorized workers can handle and use them.
ive act	

TEMPLATE G: Laboratory Self-Inspection Checklist

Location:	Date:

	afety procedures (SOPs) are accessible to lab personnel.
	S safety training and lab-specific safety training is completed and documented.
Incon	npatible chemicals are segregated.
Exam	oples of chemical groups that must be segregated include: Oxidizers from Flammables and Combustibles Acids from Bases Organic Acids from Oxidizing Acids Flammables from Acids
	Acids from Cyanides Acids from Sulfides
•	
•	Elemental metals from Acids
	Organic peroxides from Anything Azides from Anything
	Air and/or Water Reactive from Anything
Ether	s and other peroxide forming materials are dated and properly disposed of.
	nize quantity of flammable liquids outside of a flammable cabinet. No more than 10 ns can be outside of a flammables cabinet at any time.
Perso	onal protective equipment (PPE) worn as assigned per laboratory hazard assessment
Conta	ainers are labeled with contents (full name, hazard warning, and date).
Seco	ndary containment is provided for hazardous material and hazardous waste.
Haza	rdous waste is tagged, closed, and is disposed of when full or within 9 months.
	ders, excluding lecture bottles, are stored in an upright position with chains on top m. Gas cylinder valve protection cap is in place when not in use.
Shou	nsion cords: not running through walls, doors, ceilings. Should not cause a trip haze all not be used as a permanent source of electrical supply. No overloaded outlets, chained power strips.
as a	hoods are certified within one year and sash is at or below marked level. Not use chemical storage area.
Stora	ge clearance from ceiling: 18" with sprinklers, 24" without sprinklers.
	ance around safety showers/eyewashes, fire extinguishers, and electrical panel
	y objects or unrestrained glass bottles are not stored on top shelves.
Work	areas, aisles, and exits are clear of obstructions and clutter.
OTHI	ER: