

Palm Beach State College

Florida's First Public Community College



SAFETY PROGRAM MANUAL

2012

**PALM BEACH STATE COLLEGE
SAFETY PROGRAM MANUAL**

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PALM BEACH STATE COLLEGE SAFETY PROGRAM MANUAL

1. INTRODUCTION

The Occupational Safety and Health Act, found in the United States Code at title 29, chapter 15, is the primary federal law governing occupational health and safety in the private sector and federal government in the United States. Enacted by Congress in 1970, its main goal is to ensure that employers provide employees with an environment free from recognized hazards, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. The Act created the Occupational Safety & Health Administration (OSHA) under the Department of Labor to establish and enforce workplace health and safety standards. The standards promulgated by OSHA that are applicable to general industry are found in title 29 of the Code of Federal Regulations (CFR), Part 1910. Pursuant to Florida Executive Order 2000-292, public-sector employers, such as Palm Beach State College, are directed to comply voluntarily with OSHA's CFR 1910 standards as the basis for their safety practices.

Palm Beach State College has established a Safety, Health and Environmental Policy that documents its commitment to the safety and health of its employees and students. A copy of this policy is found at Appendix A.

To ensure that its employees are provided an environment free from recognized hazards, Palm Beach State College has developed this Safety Program Manual. (See link for "Safety Program Manual" found on the Safety & Risk Management web page.) This manual addresses the OSHA requirements applicable to the College and establishes the specific safety programs and procedures that will lead to this desired result. The specific safety programs and procedures are detailed in separate documents referenced in this manual. Organization in this manner allows the programs to be directed to the specifically affected personnel and departments at the College, while also affording ease of administration, i.e., a change in a program's description or requirements to accommodate changes in the regulations would not necessitate an accompanying amendment of the manual.

2. RESPONSIBILITIES

Pursuant to the Occupational Safety and Health Act, Palm Beach State College, as employer, is responsible for (1) providing its employees with employment and a place of employment which is safe and (2) complying with applicable OSHA regulations. Likewise, each employee is responsible for complying with those regulations through their adherence to the safety programs and procedures established by the College.

The Manager of Safety & Risk, reporting to the Executive Director Human Resources, who reports to the Vice President Administration & Business Services, who reports to the College President,

who reports to the District Board of Trustees, is responsible for development of programs that will comply with OSHA requirements and lead to a healthy and safe environment for all members of the College community, which includes faculty, staff, students, vendors and visitors.

Program-specific responsibilities are detailed in each respective program document.

3. WORKPLACE HAZARD ANALYSIS

Identifying and understanding workplace hazards helps to determine the potential for risks to the safety and health of our employees, students, vendors and visitors resulting from activities at any of the College's campuses. OSHA requires such an assessment of the workplace to determine if hazards are present, or are likely to be present. (See 29 CFR 1910.132(d)(1).) Analysis of these hazards allows identification of measures that can eliminate or mitigate their risks. The identification of hazards and their associated controls requires the involvement of safety and health professionals, supervisors and affected employees and can occur through various means.

A. Job Hazard Analysis

One way of determining hazards to personnel is conduct of a job hazard analysis, which examines the steps involved in each task an employee is required to perform to identify any risks that may be present. Consideration is given to the following hazard categories and their sources:

- Impact (e.g., from sources of motion such as movement of tools, machine elements or particles or movement of personnel that could result in collision with stationary objects. Also from falling objects)
- Penetration (e.g., from sharp objects or materials that might pierce, cut or abrade a body part)
- Compression (e.g., from roll-over of vehicles or rolling or pinching objects that could crush a body part)
- Chemical exposure (e.g., from laboratory operations or waste handling)
- Extreme temperature (e.g., high temperatures from ovens or heaters that could result in burns, eye injury or ignition of clothing or cold temperatures from cryogenic materials that could cause freezing of the skin or eye injury)
- Harmful dust, gas, vapor or mist exposure (e.g., from grinding or machining operations, spraying of paints or pesticides)
- Light (optical) radiation (e.g., from lasers, welding, brazing, furnaces, heat treating, high intensity lights, etc.)
- Electrical (e.g., shock hazards from improperly grounded electrical equipment, bare or unprotected electrical wiring, etc.)
- Ionizing/non-ionizing radiation exposure (e.g., from non-destructive test equipment, X-ray equipment)

- Biological exposure (e.g., to bloodborne pathogens or other potentially infectious materials from “needlesticks” or response to an accident involving bodily injury)
- Combustion (e.g., from ignition of automotive fuel, oils and other flammable or combustible materials)
- Harmful noise exposure (e.g., from operation of gasoline- or diesel-powered equipment)
- Repetitive motion/ergonomic stress (e.g., from improper lifting techniques or poorly designed office equipment)

Once hazards have been identified, an estimate of the potential for injuries is made. Each of the identified hazards is reviewed, including the possibility of exposure to several hazards simultaneously, and a determination is made as to the type, level of risk and seriousness of potential injury from each of the hazards found in an area. This information forms the basis for determining the appropriate measures for hazard prevention and control.

B. Accident/Incident Reports and Investigation

All College employees and students have been instructed to immediately report any accident or incident to the Palm Beach State College Security Department. In an emergency situation, they have been directed to call 911 first and then notify Security. The responding Security Officer prepares an Accident/Incident Report detailing the occurrence, including statements from witnesses, photographs, etc. These reports can provide information that allows the identification of hazards, as well as serve as the basis for an investigation into cause(s) that determines corrective and preventive measures. Copies of Accident/Incident Reports involving potential liability to the College for loss, damage or injury may be forwarded to the Florida College System Risk Management Consortium in the event of a future claim.

C. Employee Reports

Employees and students are encouraged to note and report unsafe or potentially hazardous conditions to their supervisor or faculty member, Security, Facilities, campus Safety Committee or the Safety & Risk Management Department. These reports become the basis for corrective measures to eliminate or mitigate the hazardous condition.

D. Ergonomic Assessments

Musculoskeletal injury can occur from improper equipment, equipment set-up or equipment use. Employees may request an ergonomic assessment through their supervisor, which will identify potential risks, as well as the need for any replacement equipment, and advise employees of proper techniques for using their equipment in a manner that will minimize the risk of injury. Employees may access the “Ergonomic Assessment Process” via a link found on the Safety & Risk Management web page to learn how to obtain an ergonomic assessment.

E. Annual Inspections/Self-Inspection Program

The College's Chief Fire Official conducts annual fire safety inspections at each campus in accordance with State Requirements for Educational Facilities and Florida Administrative Code (FAC) Chapter 69A-58. In addition, the State Requirements for Educational Facilities requires an annual fire safety inspection to be performed by the local fire official and annual casualty safety and sanitation inspections to be performed by persons who are proficient with applicable rules and standards. The College's Chief Fire Official performs the annual casualty safety and sanitation inspections at the time of his annual fire safety inspection. Fire safety deficiencies and other safety hazards identified during the course of these inspections, as well as a corrective action plan, must be detailed in a report to the College's Board of Trustees. The corrective action plan would involve the Manager of Safety & Risk and/or other appropriate personnel as necessary.

Periodic safety inspections of College facilities by College safety and health professionals are conducted, which may identify existing or potential hazards in the workplace. The Manager of Safety & Risk would work with appropriate departments and personnel to correct any deficiencies or safety hazards identified.

The College has also established an employee safety self-inspection program to be undertaken in the employee's work area on a monthly basis. (See link for "Safety Self-Inspection Program" found on the Safety & Risk Management web page.) If not correctable by the employee (e.g., through submittal of a Facility Work Order), issues or concerns identified by the inspection would be directed to their supervisor for resolution. The supervisor would bring the matter to the attention of the Manager of Safety & Risk and/or other appropriate personnel as necessary.

F. Capital Planning and Planned Changes to Equipment and Facilities

The College's capital planning process, as administered by Facilities Planning & Construction, ensures that all facility additions or modifications that are classified as a capital or fixed asset, including purchases of capital equipment, are reviewed by the Safety & Risk Management Department in order to:

- Determine potential environmental impacts and safety or health hazards;
- Identify permit requirements and obtain necessary regulatory approvals;
- Recommend appropriate design modifications or engineering and/or administrative controls necessary to eliminate or mitigate the impacts or hazards identified;
- Determine operating procedures necessary to comply with environmental, safety or health requirements and to protect employees;
- Determine appropriate personal protective equipment and employee environmental, safety and health training requirements.

Issues identified by the review are brought to the attention of Facilities Planning & Construction for resolution.

4. OSHA REGULATORY REQUIREMENTS

Based on an analysis of workplace hazards, which includes the elements described above, a number of OSHA regulations that are applicable to the College's activities have been identified. (See link for "Occupational Safety & Health Administration Requirements Applicable to Palm Beach State College" found on the Safety & Risk Management web page.) These regulations require employers to undertake various actions to protect employees and promote their safety, including the following which have been undertaken by the College:

- Provide appropriate employee training. See link for "Annual Safety Training Plan" found on the Safety & Risk Management web page.
- Establish written programs and plans and make them available to employees. See links found on the Safety & Risk Management web page for the following programs and plans:
 - Chemical Hygiene Plan per 29 CFR 1910.1450(e)(1)
 - Emergency Action Plan (Emergency Operations Plan) per 29 CFR 1910.38(b). The Emergency Operations Plan also includes the Chemical Hygiene Plan and the Hurricane Preparedness Plan.
 - Energy Control Program (Lockout/Tagout) per 29 CFR 1910.147(c)(1)
 - Exposure Control Plan per 29 CFR 1910.1030(c)(1)(i)
 - Fire Prevention Plan per 29 CFR 1910.39(b)
 - Hazard Communication Program per 29 CFR 1910.1200(e)(1). This program also addresses the requirement to have Material Safety Data Sheets for hazardous chemicals in the workplace available to employees during their work shift. The link for "Material Safety Data Sheets (MSDS)" found on the Safety & Risk Management web page ensures their immediate accessibility for employees at any time.
 - Respiratory Protection Program per 29 CFR 1910.134(c)(1)

5. HAZARD PREVENTION AND CONTROL

Workplace hazards are identified through the Workplace Hazard Analysis described in section 3 above. Hazard prevention and control are achieved by one or more of the measures described below.

A. Engineering Controls

Engineering controls involve some structural change to the work environment or work process to place a barrier to, or interrupt the transmission path between, the worker and the hazard. This may include isolation or enclosure of hazards or use of machine guards and manual handling devices. At Palm Beach State College, the use of engineering controls is the preferred method of preventing

exposure to chemical, physical and ergonomic hazards. Listed below are a few examples of engineering controls implemented within the College.

Examples of Palm Beach State College Engineering Controls

Hazard	Engineering Control
<i>Chemical or Biological Exposure, Combustion</i>	<ul style="list-style-type: none"> • Laboratory fume hoods • Laboratory biosafety cabinets • Storage of chemical containers in secondary containment or in flammable cabinets
<i>Penetration</i>	<ul style="list-style-type: none"> • Machine guards for drill presses
<i>Ergonomic Stress</i>	<ul style="list-style-type: none"> • Ergonomically correct workstations and furniture

B. Administrative Controls

Administrative (procedural) controls reduce or eliminate exposure of individuals to a hazard by adherence to a specific process or set of instructions. Documentation should emphasize all the steps to be taken and the controls to be used in carrying out the task safely. Listed below are a few examples of administrative controls utilized by the College.

Examples of Palm Beach State College Administrative Controls

Hazard	Administrative Control
<i>Impact</i>	Certification of forklift operators
<i>Compression</i>	“No wearing of personal jewelry” policy
<i>Ergonomic Stress</i>	“Ergonomic Assessment Process”

C. Safe Work Practices

Work practice controls ensuring the safety of College employees are documented in the programs listed in section 4 above.

D. Personal Protective Equipment

Personal protective equipment (PPE) is worn by employees as a barrier between themselves and the hazard. The success of this control is dependent on the protective equipment being chosen correctly (i.e., it must ensure a level of protection greater than the minimum required to protect an individual from the hazard), as well as its being fitted, worn and maintained correctly and worn at all times of

exposure to the specific hazard. All PPE is College-provided and selected to meet the requirements of recognized regulatory standards. The selection of proper PPE is determined from the job hazard analysis and, in the case of handling chemicals, from the chemical-specific Material Safety Data Sheet. The table below summarizes some of the PPE utilized by our employees.

Examples of Personal Protective Equipment Used By Palm Beach State College Employees

Task Description	Hazard	PPE Required
Handling/pouring chemicals	<i>Chemical exposure</i>	Goggles, face shield, gloves, laboratory coat
Grinding/sanding/machining operations	<i>Impact, penetration, compression</i>	Safety glasses with side shields, gloves
Operation of gasoline-powered grounds-keeping equipment	<i>Harmful noise/dust/fume exposure</i>	Hearing protection, N95 disposable respirator (dust mask)

E. Preventive Maintenance

When equipment fails to operate properly or breaks down, the result can lead to accidents, injury and/or unsafe conditions (e.g., poor indoor air quality) for members of the College community. The Facilities Department at Palm Beach State College has an extensive, detailed preventive maintenance (PM) program covering every major piece of equipment to ensure that it continues to operate properly. Examples of the type of equipment covered include the following:

- Heating, ventilating and air conditioning (HVAC) systems
- Generators
- Hoist and lifting devices
- Materials handling equipment (e.g., forklifts)
- Motors and motor bearings
- Blowers
- Laboratory fume hoods
- Alarm systems
- Fire suppression systems
- Utility carts
- Automobiles and trucks

Each major piece of equipment at the site has a detailed, written procedure for performing PM, which is conducted in accordance with an established regular schedule. By conducting regular PM and corrective maintenance as necessary, the Facilities Department ensures that the potential for equipment failure is minimized, thereby preventing equipment breakdowns that may cause hazards.

F. Safety and Health Training and Awareness

Providing training to the College community on safety requirements and procedures and promoting awareness of safety hazards and measures to avoid them are essential to ensuring the prevention and control of hazards. The College provides this training and awareness through a number of activities.

(1) Recurring Training

Employee training in order to promote hazard awareness and safe work practices is an OSHA requirement under various programs. Students may receive similar training as part of their academic coursework. Some of the OSHA-required training must be provided annually, while other training is one-time and recurs only under the conditions indicated in the specific regulation. The Manager of Safety & Risk is responsible for developing and coordinating presentation of pertinent training courses for College employees. An “Annual Training Plan” for the College has been prepared and may be viewed via the link on the Safety & risk Management web page.

(2) New Employee Orientation

New employees receive an orientation on the College, its administrative policies and procedures and benefits, including the functions of various departments, on the first work day of the month following their hire date, or as soon as possible thereafter. The orientation also includes a presentation from Safety & Risk Management covering the Emergency Action Plan, Hazard Communication, Slip-Trip-Fall Awareness, Access to Medical and Exposure Records and the individual’s role in safety.

(3) College Publications

Information regarding safe practices or to promote safety awareness is communicated to the College community through various publications, including the HR Newsletter and “Perspectives”.

(4) E2 Alert System

College employees and students can receive emergency notifications and updates via the College’s e2 Alert system. Immediate safety alerts, emergency closings, cancellations, re-openings and updates will be sent directly to each individual through any of the devices registered. The service will send text or instant messages to registered mobile phones, wireless PDAs, e-mail addresses, Facebook and/or Twitter. Access to the e2 Alert system is offered through the Security web site at <http://www.palmbeachstate.edu/alert.xml>.

(5) Campus Safety and Security Committees

Each campus has formed a campus Safety and Security Committee to communicate safety and security information and coordinate responses to safety and security issues and concerns. Each committee meets routinely to review trends, issues and concerns pertinent to each campus, establish priorities for educating the campus community regarding them, and develop plans and assign responsibilities for addressing them, including working with the Facilities Department to correct physical hazards. A link to the meeting minutes for each committee is shown on Safety & Risk Management web page, as well as the name of each committee's chair and co-chair. If any member of the College community has a safety or security issue or concern, it may be addressed either to one of the Safety Committee members for their campus or to either the Manager of Safety & Risk or the Director of Security.

G. Emergency Preparedness and Response

Various internal and external events having impacts to safety and security may occur, which result in an emergency situation for the College. Examples include fire, hurricane, tornado, hazardous material spill, active shooter, etc. Being prepared for emergencies and undertaking an effective response will limit the impact of the emergency on the College community, provide for the safety of personnel and property and promote the College's continued operation. OSHA requires that employers, such as Palm Beach State College, have a written emergency action plan, kept in the workplace and available for employees to review (29 CFR 1910.38(b)). The Palm Beach State College's Emergency Operations Plan has been prepared jointly by the Security and Safety & Risk Management Departments to fulfill this requirement. It establishes an emergency response organization and specifies the planning and procedures necessary for proper response to various emergency scenarios. It is accessible via the "Emergency Action Plan (Emergency Operations Plan)" link shown on the Safety & Risk Management web page, as well as the "Emergency Operations Plan" link on the Security web page.

APPENDIX A

Palm Beach State College

Board Policy

TITLE	Safety, Health and Environmental Policy	NUMBER 6Hx-18-1.3X
LEGAL AUTHORITY	1001.61 FS, 1001.64 FS, 1004.65 FS, Div. 62 FAC, Florida Executive Order 2000-292, Federal law: 29 U.S.C. 651 et seq.	PAGE 1 of 1
DATE ADOPTED/AMENDED	Adopted XX/XX/XXXX	

Policy:

1. As a responsible steward of our people and facilities and the environment, it is the duty of Palm Beach State College to provide a workplace for its faculty and staff and a learning environment for its students that are free from recognized hazards to their safety and health. In addition to protecting the people who work and learn on our campuses, the College has an obligation to ensure that its operations do not harm the environment.

2. In recognition of these responsibilities, Palm Beach State College hereby adopts a safety, health and environmental policy that commits it to do the following:
 - A. Comply with all applicable safety, health and environmental laws and regulations and establish programs and procedures to assure compliance.
 - B. Provide College personnel with appropriate safety and emergency equipment and ensure that they are properly trained in the procedures that will protect themselves and the environment.
 - C. Take appropriate action to correct hazards or conditions that pose a risk to safety, health or the environment.
 - D. Consider safety and environmental factors in all operating decisions.

3. The safety and health of the College community must be a part of everyone's daily concern, and safety and environmental protection must be an integral part of every job.

4. All faculty and supervisory personnel are accountable for the actions of the individuals they supervise in that regard.

5. All College employees and students are responsible for complying with all safety rules, for their individual safety performance, for the safety of those around them and for working in such a manner as to prevent harm to themselves, to others and to the environment.