

May 6, 2014

MOLLY THEODOSSY, POLICY COORDINATOR

Campus Compliance

RE: Revised Policy and Procedure Manual (PPM) section 290-50 – Protective Clothing and Equipment

The revised PPM section 290-50, regarding protective clothing and equipment, was forwarded to all Davis Division of the Academic Senate standing committees and Faculty Executive Committees from the Schools and Colleges. Responses were received from the Committees on Faculty Welfare and Research, as well as from the Faculty Executive Committee from the College of Letters and Science.

Committees acknowledge the value of policies regarding protective clothing and equipment. However, committees are concerned about the increasing burden of compliance regulations that are often overlapping and inconsistent. Additional regulations, such as this revised policy, should replace or update existing regulations rather than add to them. The Faculty Welfare Committee urges a review of safety policies to (1) look for and eliminate redundancies and (2) streamline compliance procedures to avoid unnecessary and time-consuming busywork.

Other committees found the policy unworkable for technical, practical, and financial reasons. The FEC from the College of Letters and Science noted that a huge expenditure would be required every year to purchase unnecessary equipment and materials.

Specific concerns and suggestions included:

- 1) In item IV.B.3, the policy states that protective clothing must not be removed from the University for cleaning, even when the clothing is personally owned by the employee. Employees should be able to remove personally-owned PPE off-campus for cleaning. If there is a concern about spreading hazardous substances off-campus, there should be a requirement to provide the necessary cleaning on-campus. There doesn't appear to be such a requirement in the document.
- 2) It is unclear who will enforce the proposed safety requirements and what the legal consequences are if the policy is not followed. This should be made clear in the policy.

I reviewed the policy and tried to determine the implications of items III.C and IV.B.1, which state that the University provides "certain protective clothing and PPE" to employees, while the Departments must "maintain and replace all necessary protective clothing and PPE." The distinction between the respective roles of the University and the Departments and the difference in scope of their responsibilities need to be clarified. Policies of this kind should not be submitted without clear motivation and should be accompanied by an analysis of the budgetary implications.

The Davis Division of the Academic Senate urges the Environmental Health and Safety Department to consider these concerns before implementing the revised policy section and will appreciate further clarification on the specific suggestions listed above.

Sincerely,



Bruno Nachtergaele, Chair
Davis Division of the Academic Senate
Professor: Mathematics

c: John Meyer, Vice Chancellor for Administrative and Resource Management