



# "The Public Interest"

## Health/Safety and Environmental Issues

the PASMA way to shared knowledge

Public Agency Safety Management Association

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## PASMA Survey

The results of our 2025 PASMA member survey were analyzed, and the following topics were identified as either future articles or meeting topics and ranged between 5-7 points.

Asbestos, Lead, Silica	6
Conducting Inspections	6
Electrical Safety	6
Fall Prevention	6
Incident Notification & Investigation	7
Job Safety Analysis	6
Risk Management/Loss Control	5

This analysis further suggests that our members may have a "topical" rather than a "systems or process" perspective of their practice, and in my experiences, is not uncommon at all. Furthermore, note that 4 of the 7 listed survey topics are in fact functional elements of an effective "Safety Systems Management" program such as ANSI Z-10 or more familiarly, the California IIPP. Effectively, then, we as practitioners need to re-orient ourselves away from the topical (program related) to the functional or "applied critical skills" involved with process identification and observation. To help guide those that may need a bit of a "refresher", may I suggest you follow this link [Incident Notification & Investigation](#). To be sure, this is a Fed/OSHA link, however, since there are few conceptual differences between Fed and Cal/OSHA the information may provide some additional insight. Also remember that where the site refers to any Federal Regulations substitute a Cal/OSHA Regulation. Finally, since all of the PASMA survey topics are a part of a "systems" approach and related to each other, I refer you to ANSI Z10. ANSI and the ASSP have created a [FREE ANSI Z10 Implementation Guide](#), and should be downloaded as a primary road map to updating individual site programs. It takes registering and downloading. What are you waiting for????





**A quick update from our Northern Colleagues** - In mid-April, Ms. Gina Eicher, PASMA North "forever" President reached out with some good news. 1. Congratulations on your promotion, 2. PASMA North now has a new Treasurer and we welcome Ms. Sylvia Elizarraraz. We in the South thank you both for your support and dedication to maintaining and advancing Public Sector employee safety and health. As always we will support your efforts in any way we can.

Let's now talk about **Asbestos, Lead, and Silica**, the most notorious of the highly regulated chemistries. All three of these have separate safety orders governing specific "industries" (General Industry and Construction), more importantly knowing which order will take citation precedence depends on "what the activity" was at the time of the potential exposure. Additionally, two (Lead and Silica) have recently been updated, so it is imperative that the Safety Office be fully aware of what employees are likely to be "engaged in activity", when and for how long; remember that the "dose makes the poison".

First, every Compliance Officer is expected to issue the "most appropriate" safety code that best applies to the hazard. For that reason, a careful examination of the "Applications" section in both [General Industry](#) as well as [Construction](#) safety orders will provide a clue as to which activities take precedence over the other. For example, it is very common for General Industry to mistake the "activities" of their "maintenance personnel" as General Industry activities. Yet anytime their maintenance staff engages in any access to "structures" that activity typically gets evaluated to the Construction Safety Orders. Conversely, Construction Departments/Companies, typically do not view their yard as General Industry, yet because of the fixed address, will get evaluated to General Industry Standards.

Second, in deciding the degree of mandatory compliance to any of the Asbestos, Lead and Silica Safety Orders, Safety Offices are well advised to review the "scope, applications and definitions" sections of either of the industries (example [GIS05208](#); [CS01529](#)). Reviewing these subsections will provide a more accurate understanding not only of the compliance requirements, but in many cases provide options that may have been overlooked.

Finally, all three of these topics will have a "registration and notification" requirement to the Cal/OSHA Carcinogen Control Unit. Failing to have done so in the past, typically will result in a citation. More importantly, since many public sector employers "contract" services out to vendors, it is imperative that whatever department lets out contracts that they vet and insist any contractor to be registered as well. Remember that the public sector may still be held accountable as the "controlling" employer if this does not get the scrutiny required.

**Additional resources:**

[Asbestos and Carcinogen Control Unit](#) [Lead Information](#) Page. [Silica Information](#) Page...AND [HAZMAP](#)

The screenshot shows the Haz-Map website. The header includes the title "Haz-Map" and the subtitle "Information on Hazardous Chemicals and Occupational Diseases". A search bar is located on the right side of the header. Below the header, there are eight icons arranged in a 2x4 grid, each with a corresponding label: Hazardous Agents, Occupational Diseases, High Risk Jobs, Non-Occupational Activities, Industries, Job Tasks, Processes, and Symptoms/Findings.

What does it mean to be Safe + Sound? Safe workplaces are sound businesses.

Every workplace should have a safety and health program that includes management leadership, worker participation, and a systematic approach to finding and fixing hazards. Whether you have a well-developed program or are just getting started, look for ways to be #SafeAndSoundAtWork.

Origin of "OSHA's Safe & Sound" See OSHA 2017 News Release

OSHA ANNOUNCES INAUGURAL 'SAFE + SOUND WEEK'

WASHINGTON – The U.S. Department of Labor's Occupational Safety and Health Administration announced today it has designated June 12-18, 2017, as "Safe + Sound Week," a new nationwide effort that calls on organizations of all sizes in a wide range of industries to raise awareness of the value and importance of workplace safety and health programs.

Joining OSHA to sponsor the effort are the National Safety Council, American Industrial Hygiene Association, American Society of Safety Engineers and the National Institute for Occupational Safety and Health. In addition, 85 trade associations, industry and professional groups are partnering with the Safe + Sound Week initiative.

"Our nation has made great strides in raising awareness about the importance of workplace safety, yet more than four million workers suffer serious job-related injuries or illnesses annually. We can do better," said U.S. Secretary of Labor Alexander Acosta.

Participating in Safe + Sound Week can help organizations get their safety and health program started or energize an existing one. While approaches vary, effective programs have three core elements:

- Management leadership that commits to establishing, maintaining and continually improving the program. Managers must also provide needed resources to support the program.
- Workers who help identify solutions for improvements. A workforce engaged in safety and health programs result in higher productivity, increased job satisfaction and strong worker retention, which combine to increase revenues and lower turnover and recruitment costs.
- A systematic "find and fix" approach that calls upon employers and workers alike to examine their workplaces – proactively and routinely – to identify and address hazards before an injury or illness occurs.

Information on how to participate in Safe + Sound Week, ideas for events and resources, and details of planned events around the country are available at [this link](#).

Date June 1, 2017....And the tradition continues. **Safe and Sound Week August 11-17, 2025.**

See and participate organization wide with this home page: [Safe and Sound Home Page](#)

The screenshot shows the OSHA Safe and Sound website interface. At the top, there's a navigation bar with the URL 'osha.gov/safeandsound/'. Below that, there are several tabs for different resources. The main content area is divided into sections:

- Get Involved:** This section contains two primary actions:
  - Join our mailing list:** A call to action to subscribe to a monthly newsletter, with a 'Sign up' button.
  - Take a Challenge:** A call to action to challenge colleagues and partners, with a 'Take a Challenge' button.
- Develop Your Program:** This section features three key pillars, each with an image and a brief description:
  - Management Leadership:** An image of three workers in safety gear reviewing documents. Description: 'Commit to implementing a program and using it to drive continuous improvement in safety and health.'
  - Worker Participation:** An image of a group of workers in a large industrial setting. Description: 'Tap into workers' collective experiences, knowledge, and insights in order to find solutions to workplace safety and health challenges.'
  - Find & Fix Hazards:** An image of two workers inspecting a floor. Description: 'Develop a systematic process for identifying and controlling (i.e., finding and fixing) workplace hazards.'

At the bottom of the page, there is a row of logos for partner organizations: AIHA, SafetyShot, American Society of Safety Professionals, OSHA, nsc (National Safety Council), CPWR (The Center for Construction Research and Training), and NIOSH.

**"The interrelatedness of safety orders and how they are enforced"  
Applicable Safety Orders – Regardless of Hazard Category, i.e. chemical/physical etc.**

**The following is an example of how easily it is to receive multiple citations from different safety order regarding ONE complaint or accident issue. Compliance knows how they are related to that one issue. The question should occur to the reader, how prepared is my IIPP to deal with this process related exposure. FYI, this example would all be classified as "Serious". Caveat Emptor. The allegation is plumbed Carbon Dioxide delivery from daisy chained gas tanks.**

<https://www.dir.ca.gov/title8/3203.html>

See subsections (a)(4) and (a)(6) ---- think global definitions. CSHO's will look to inspection records and Log 300 to determine if any exposures and/or incidences involving this material have an historical data points.

[https://www.osha.gov/pls/imis/AccidentSearch.search?acc\\_keyword=%22Carbon%20Dioxide%22&keyword\\_list=on](https://www.osha.gov/pls/imis/AccidentSearch.search?acc_keyword=%22Carbon%20Dioxide%22&keyword_list=on)

Mandatory CSHO searchable data base to determine if ANY incidences have been recorded relative to the inspection topic/subject whether it is a compressed gas cylinder repair or an overexposure.

<https://www.dir.ca.gov/title8/5155.html>

See subsection (e)(1) ---- which states in part; "whenever it is reasonable to suspect...." CSHO's will look to the conditions of use from the material's SDS. I.E. the PEL, and the manufacturers suggestion in terms of placement, use, and any controls. CSHO will ID lowest PEL, if the material has a Ceiling ("C"); a Short-Term Exposure Limit ("STEL"); an Action Level ("AL"); or a Skin notation ("S"); or any "subjective" evidence such as employee complaints, and/or symptomologies.

<https://www.dir.ca.gov/title8/5194.html>

(e) Written Hazard Communication Program.

(1) Employers shall develop, implement, and maintain at the workplace a written hazard communication program for their employees which at least describes how the criteria specified in sections 5194(f), (g), and (h) for labels and other forms of warning, safety data sheets, and employee information and training will be met, and which also includes the following...

<https://www.dir.ca.gov/title8/5141.html>

In indoor applications of ANY contaminant, CSHO's will look to determine compliance with this order. Take note of subsection (c)(3). In fact, this will relate back to 3203(a)(4) which requires a formal assessment.

<https://www.dir.ca.gov/title8/5143.html>

This order is used to compare the SDS recommendations to the placement and use of ANY material with a PEL.

<https://www.dir.ca.gov/title8/3328.html>

This code is used to again ensure compliance to MANUFACTURERS SPECIFICATIONS regarding placement, care, use etc. of any MACHINERY/EQUIPMENT relative to the industrial process, i.e. temperature, pressure, quantity, ventilation and/or any "use" variable that might impact a potential "release" either as an "airborne and/or contact" hazard to any employee.

### Other interrelated safety orders

<https://www.dir.ca.gov/title8/5194.html>

(g) Safety Data Sheets.

(1) Manufacturers and importers shall obtain or develop a safety data sheet for each hazardous chemical they produce or import. Employers shall have a safety data sheet for each hazardous chemical which they use.

**Note** to (g)(1): Employers should also refer to section 3204 concerning information to be retained after a particular chemical is no longer in use.

(2) The manufacturer or importer preparing the safety data sheet shall ensure that it is in English (although the employer may maintain copies in other languages as well) and includes at least the following section numbers and headings, and associated information under each heading, in the order listed (See Appendix D to section 5194—Safety Data Sheets, for the specific content of each section of the safety data sheet):

(B) Section 2, Hazard(s) identification;

(D) Section 4, First-aid measures;

(E) Section 5, Fire-fighting measures;

(F) Section 6, Accidental release measures;

(G) Section 7, Handling and storage;

(H) Section 8, Exposure controls/personal protection;

**These sections are the basis for PPE assessments described in T83380**

<https://www.dir.ca.gov/title8/3380.html>

(f) Hazard assessment and equipment selection.

(1) The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the employer shall:

(A) ....

(B) Communicate selection decisions to each affected employee; and,

(C) ....

(2) The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

<https://www.dir.ca.gov/title8/5097.html>

(b) Monitoring.

(1) When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, the employer shall obtain measurements for employees who may be exposed at or above that level. Such determinations shall be made by December 1, 1982.

This code is applicable at all "fixed locations", even if that location is associated with an industry other than "General Industry".

