



# "The Public Interest"

## Health/Safety and Environmental Issues

the PASMA way to shared knowledge

Public Agency Safety Management Association

January 16, 2026

### Front Page:

2026 PASMA President message	Pg. 1
Shout Outs	Pg. 2
2023-25 Recent Standards	Pg. 3
Log300 & Work Relatedness.	Pg. 4
Cal/OSHA Policy & Procedure.	Pg. 5
2026 Membership Form	Pg. 6

**Editor:** Dick Monod de Froideville,  
Cal/OSHA-Retired 310/464/7237  
[Dmonod.pasma@gmail.com](mailto:Dmonod.pasma@gmail.com)

### PASMA NORTH & SOUTH

#### Board Members:

#### President PASMA South:

Don Coccozza, Safety Administrator City of Santa Monica. 310/458/4908  
[Don.Coccozza@santamonica.gov](mailto:Don.Coccozza@santamonica.gov)

#### Vice President:

Chuka Udengwu, Safety Officer II, Los Angeles County Department of Child & Family Svcs 213/910/7208  
[UdengC@dcfs.lacounty.gov](mailto:UdengC@dcfs.lacounty.gov)

#### Secretary:

Lori Chu, City of Pasadena Risk Management 626/744/4340. [lchu@cityofpasadena.net](mailto:lchu@cityofpasadena.net)

**Treasurer:** Mary Ann Pham, Safety Asst. Human Resources Bureau, L.A. County Dept. of Mental Health. 213/972/7000.  
[MHanhPham@dmh.lacounty.gov](mailto:MHanhPham@dmh.lacounty.gov)

#### Member at Large:

Jason Monod de Froideville

**WebMaster:** Antony Garcia, Safety Officer, City of Palmdale Operations and Risk Mgt. 661/267/5494.  
[agarcia@cityofpalmdaleca.gov](mailto:agarcia@cityofpalmdaleca.gov)

#### PASMA Interim Legislative Affairs:

Dick Monod de Froideville

#### PASMA North:

Gina Eicher, City of Walnut Creek, Director Public Wrks. 925/256/3513  
[eicher@walnutcreek.org](mailto:eicher@walnutcreek.org)

#### Vice President: Vacant

#### Treasurer:

Sylvia Elizarraraz, Safety Services Mgr. Contra Costa Health Pers. Safety Svcs 925/655/2443  
[Sylvia.Elizarraraz@cchealth.org](mailto:Sylvia.Elizarraraz@cchealth.org)

#### Secretary & Leg. Affairs: Vacant

### From the New President:

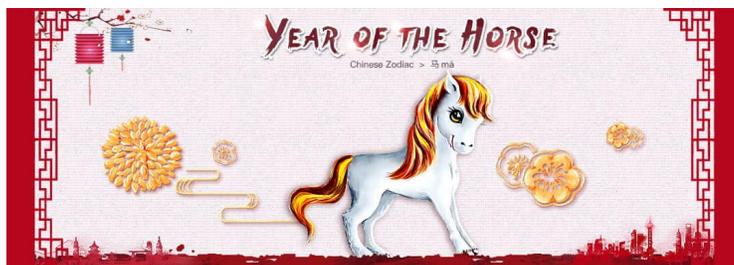
Greetings PASMA members. The Board is grateful for your confidence in us and your continued participation in PASMA. We are excited for a new year and new opportunities to learn, make connections, and tackle safety issues in collaboration with our fellow colleagues. We have hit the ground running and are working on exciting topics and presenters for the upcoming year, as well as some changes to our meetings to improve accessibility:

1. We have moved our in-person meetings to a more centralized location to allow for a more convenient way for members to attend in-person. Going forward, we will be holding PASMA meetings **at the South Whittier Library, 11543 Colima Rd, Whittier, CA 90604**
2. We have made some improvements in our hybrid meeting capabilities and are hoping for a seamless experience for those that need to join us remotely (though we encourage you to attend in person, the networking is the most valuable part!)

We encourage you to let us know topics of interest that you would like to include in our presentation schedule, as well as any issues that you need help with or would like to include in the meeting agenda. Feel free to send suggestions to the Board at any time. Looking forward to seeing you all soon!

Sincerely,  
Don Coccozza  
PASMA South President

**From the Editor:** Welcome Back and let's get to work with honor, integrity and a bit of fun!!





### Cal/OSHA Research and Standards Principal Engineer

A warm welcome and gratitude to **Mr. Kevin Graulich from Cal/OSHA Research and Standards** our January speaker. is a Certified Industrial Hygienist working for Cal/OSHA as a Principal Safety Engineer with the Research and Standards Occupational Health Unit. While in the R&S Health Unit Kevin worked on various rulemaking packages such as workplace violence in healthcare, workplace violence in general industry, revisions to the permissible exposure limits, revisions to the ATD standard to include COVID, and naturally occurring asbestos. Kevin started with Cal/OSHA in 1994 as an Associate Industrial Hygienist and has promoted through Associate Industrial Hygienist, Associate Safety Engineer, District Manager, and Senior Safety Engineer and has been Principal Safety Engineer since February of 2023. Kevin has been Certified Asbestos Consultant since 1993 and maintains Certified Industrial Hygienist and Certified Safety Professional designations as well.

### Another shout out to an Additional Legislative Affairs Volunteer

PASMA South also welcomes back **Mr. Scott Bourdon, Assistant Director California State University System Wide Risk Management**. Mr. Bourdon joined PASMA South last year, assisted the Board Selection Committee and has graciously volunteered to help with our Regulatory Affairs volunteers to help in reviewing and analyzing proposed new Cal/OSHA standards and their implications on all public sector operations.

### Cal/OSHA Resource Library and E-tools

Comparing my tenure with the Division and now, I've been encouraged and happy to see this transformation in outreach publications from Cal/OSHA. ERGO, a **BIG SHOUTOUT** to the [Publications Unit](#) for the updates. Please visit this webpage and increase the working knowledge of all your employees. The page is sorted by category and topics. Has downloadable documents and examples; and more importantly during any inspection, this information would go well in convincing any compliance officer that you are in "substantial compliance" with the required elements of the IIPP.

California workplace postings are available and can be downloaded at [www.dir.ca.gov/wp.asp](http://www.dir.ca.gov/wp.asp).

Electronic tools (eTools) with Action Kits are available and consist of various useful multi-media products, such as videos, compact discs (CDs), electronic publications, and presentation material. These educational materials and resources can be found at <https://www.dir.ca.gov/dosh/etools/etools.htm>.

State Fund's IIPP Builder<sup>SM</sup>: can help you build your IIPP fast, easy, and free. Watch their video to learn more.

State Fund's Be their HERO<sup>SM</sup>: Utilize State Fund's interactive assessment and resources to help prevent falls in the workplace.

### Cal/OSHA Consultation eTools. Electronic Educational Products for Safety and Health

-  Effective Workplace Training
-  Hazards of Silica in Construction
-  Heat Illness Prevention
-  Improving Manual Material Handling
-  Injury and Illness Prevention Program
-  Lockout/Tagout for Employers
-  Portable Ladder Safety
-  Youth in Construction



**Recent Standards worth reviewing:**

Approved Regulation	Effective
Section 1514 Proper Fit of Personal Protective Equipment - HORCHER	Aug. 21, 2025
Section 1532.1, Section 5155 and Section 5198 Lead	Jan. 1, 2025
Section 1635 Cone and Bar Barricades	Oct. 1, 2025
Sections 1671.1, 1716.2, 1730 and 1731 Fall Protection in Residential Construction	Jul. 1, 2025
Sections 1951, 1952, 1953, 1955, 1956, 1960 and 5156 <b>Confined Spaces in Construction</b>	Jan. 1, 2026
New Section 3396 Heat Illness Prevention in Indoor Places of Employment	Jul. 23, 2024
Section 3401, Section 3402, New Sections 3402.1 - 3402.3, Sections 3403 - 3410, New Section 3410.1 and Section 3411 Fire Fighters' Personal Protective Clothing and Equipment – AB 2146	Jan. 1, 2023
Section 5144 Appendix A Fit Testing Procedures (Mandatory) (HORCHER)	Jun. 24, 2024
Section 5204 Occupational Exposures to Respirable Crystalline Silica Non Emergency	Feb. 5, 2025
Sections 6050, 6051, 6052, 6054 and 6056 Diving Operations	Jan. 1, 2026

**A word or two or three...about the term “incorporated by reference”**

When the OSH program **incorporates standards by reference (IBR)**, those industry consensus rules (like ANSI, NFPA) become legally enforceable OSHA regulations, carrying the same weight as direct OSHA rules, meaning violations can lead to direct citations with penalties, bypassing the need to use the General Duty Clause, as they establish mandatory requirements ("shall" provisions) for employers to protect workers, though only the mandatory parts are adopted.

**Key Impacts on Citations:**

- ✚ Direct Enforceability: Standards incorporated by reference (IBR) have the same legal force as other OSHA standards, allowing direct citations for violations of mandatory provisions (those using "shall").
- ✚ Clearer Violations: Instead of relying on the broader General Duty Clause (Section 5(a)(1)), OSHA can cite a specific, detailed IBR standard, simplifying the violation description and abatement requirements.
- ✚ Industry Expertise: IBR integrates expert-developed, up-to-date industry guidelines (like for aerial lifts or eye protection) directly into federal law, ensuring employers meet current best practices.
- ✚ Hazard Recognition: Even if not IBR'd, consensus standards can be used as evidence to prove an employer violated the General Duty Clause or in California the IIPP by recognizing a hazard or failing to provide a feasible means of abatement, say [the American Bar Association](#) and [OSHA](#).
- ✚ Reduced CFR Size: IBR helps keep the Code of Federal Regulations (CFR) manageable by incorporating lengthy technical documents by reference rather than printing them in full.

**How it Works in Practice: When researching any code PAY ATTENTION TO ANSI, NIOSH, OR ANY OTHER CONSENSUS STANDARD LISTED IN THAT SAFETY ORDER....IT MEANS YOU ARE OBLIGATED TO COMPLY WITH THE APPLICABLE SECTION(s) OF THAT STANDARD!!!**

[General Industry Topic List Incorporated by Reference](#)

[Construction Industry Topic List Incorporated by Reference](#)



## Log 300 Reminder

### Reminder to post 2025 annual summary of work-related injuries and illnesses by February 1

The annual summary must be placed in a visible and easily accessible area at each worksite. This helps ensure workers are aware of work-related injuries and illnesses that occurred the previous year. Employers are required to complete and post Form 300A even if no workplace injuries or illnesses occurred.

Instructions and form templates are available for download from Cal/OSHA's [Record Keeping Overview](#). The overview gives instructions on completing both the log (Form 300) and annual summary (Form 300A) of work-related injuries and illnesses.

Current and former employees and their representatives are entitled to a copy of the summary or the log upon request.

Many employers in California must also comply with [electronic submission of workplace injury and illness records](#) requirements by March 2 each year. Cal/OSHA has posted details on which employers are required to submit the electronic reports as well as other information online.

To be recordable, an illness must be work-related and result in one of the following:

- Death
- Days away from work
- Restricted work or transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- A significant injury or illness diagnosed by a physician or other licensed health care professional.

The definitions and requirements for recordable work-related fatalities, injuries and illnesses are outlined in the [California Code of Regulations, Title 8, sections 14300 through 14300.48](#).

### **§14300.5(b)(2) Determination of Work-Relatedness...a reminder WC and Cal/OSHA are not the same!**

(2) Are there situations where an injury or illness occurs in the work environment and is not considered work-related?

Yes. An injury or illness occurring in the work environment that falls under one of the following exceptions is not work-related, and therefore is not recordable:

**(A)** At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.

**(B)** The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.

**(C)** The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.

**(D)** The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related. Note : If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.

**(E)** The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.

**(F)** The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.

**(G)** The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.

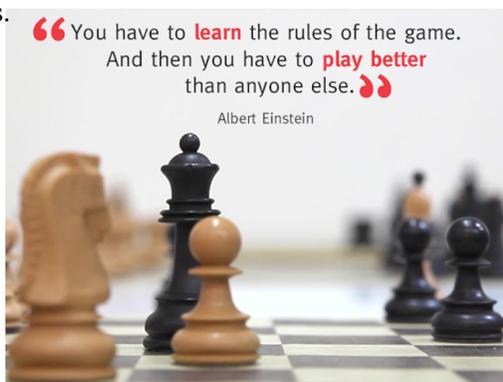
**(H)** The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

**(I)** The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

Cal/OSHA is allegedly updating the Policy and Procedures Page – **Rule 1: Know The Rules of Engagement**

P&P no.	Title	Last Revised
C-1A	<a href="#">Inspection Procedures</a>	5/31/2022
C-1B1	<a href="#">Documenting the Existence of a Violation</a>	7/22/2019
C-1B2	<a href="#">Documenting the Classification of a Violation</a>	7/22/2019
C-1B3	<a href="#">Documenting the Penalty Adjustment Factors of a Violation</a>	5/24/2017
C-1C	<a href="#">Multi-Employer Worksite Inspections</a>	12/8/2000
C-1D	<a href="#">Dual-Employer Inspections</a>	12/12/2017
C-2	<a href="#">Citation, Notification of Penalty and Verification of Abatement (Cal/OSHA 2, 2X, 160, 161 and 161A)</a>	6/2/2008
C-3	<a href="#">Special Order (Cal/OSHA 3 and 3X)</a>	3/18/2021
C-4	<a href="#">Notice (Cal/OSHA 4 and 4X)</a>	2/1/1995
C-5	<a href="#">Information Memorandum (Cal/OSHA 5 and 5X)</a>	2/1/1995
C-6	<a href="#">Order to Take Special Action (Cal/OSHA 6 and 6X)</a>	6/21/2012
C-7	<a href="#">Complaint Evaluation and Documentation (Cal/OSHA 7) Form Completion and IMIS Data Entry for Cal/OSHA 7</a>	6/29/2017
		2/20/2002
C-7A	<a href="#">Non Formal Complaint Evaluation and Investigation</a>	10/04/2023
C-10	<a href="#">Completion of Proposed Penalty Worksheet (Cal/OSHA 10)</a>	7/6/2004
C-12	<a href="#">Professional Development and Training</a> <a href="#">Back to Contents</a>	3/29/2024
C-20	<a href="#">Informal Conference (Cal/OSHA 20)</a>	1/16/2024
C-23	<a href="#">Appeals and Hearings</a>	9/15/2021
C-42	<a href="#">Corporate Criminal Liability Act</a>	8/1/1994
C-43	<a href="#">Hazard Communication</a>	8/24/2016
C-45A	<a href="#">Enforcement of 8 CCR Section 3203: Injury and Illness Prevention Program</a>	4/1/2003
C-200	<a href="#">Severe Violator Enforcement Program (SVEP)</a>	11/29/2023

Much like the Fed/OSHA Field Operations Manual – These Rules establish standardized controls on the Operation and Conduct of **ALL Compliance Officers**. The more you know, the better prepared you’ll be. Know Your Rights as well as your responsibilities.



# 2026 Membership Information

PASMA, the Public Agency Safety Management Association is a not-for-profit organization. Its members include Safety, Health, and Risk Management Professionals from public agencies throughout California. Member agencies include Cities, Counties, Port Authorities, Transit Districts, School Districts and other Academic Agencies, Utilities, Joint Powers Authorities, Flood Control Districts, and other Special Districts.

## Chapters

PASMA currently has two chapters, North and South. Each meets on a BI-monthly basis. Meetings are conducted at locations convenient to a majority of the membership.

Regular meetings are broken up into two segments, a roundtable and a speaker presentation. The roundtable is an opportunity for all members to discuss their victories, needs and frustrations; this will help members to keep up-to-date on current events and topics, and reduce wasted research time. Speakers include Health Care Professionals, Emergency Planners, Specialists in Safety, Hazardous Waste, Driver Training, Industrial Hygiene, etc.

## Membership Forms

Please send in your 2026 PASMA Registration by February 28, 2026.

### PASMA Membership Rates:

- **Regular Membership** \$100
- **Group Rate\*** \$400  
\*for five (5) regular memberships from the same public agency. Additional members are \$50 each.
- **Affiliate Membership** \$315
- **Guest Attendee** \$30

PASMA South Chapter - [2026 Membership Form](#)

PASMA North Chapter - [Membership Form](#)

## For Additional Information Contact:

**South:** Lori Chu or Mary Ann Pham

**North:** Gina Eicher or (925) 256-3513

Federal Identification Number: 68-0309592

*Since 1996*

