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The University's most important resources are the faculty, staff and students who live and work within the University's facilities. Over twenty thousand individuals are involved in research, administrative and educational activities here. Many may work with hazardous materials as part of their job. Others perform work in environments where serious injuries or possible exposures to dangerous substances could occur. Chemicals, radioactive isotopes, biohazardous agents, and energized equipment are routinely used in research and educational endeavors. All personnel working and learning in such environments must be well informed about hazardous materials to which they may be potentially exposed; learn to recognize and correct unsafe physical conditions and to understand correct methods of personal protection to be incorporated into their activities.

The University of Hawaii has a fundamental obligation to safeguard the health, safety and welfare of its students, personnel, and the visiting public whenever they participate in an official University activity. It is the policy of the University to provide and maintain, through implementation of safety and health programs, conditions and practices that provide safe and healthful campus environments. In keeping with this commitment, this Departmental Health and Safety Guide was developed.

The responsibility to implement health and safety programs lies at the departmental level where there exists the greatest control of facilities and personnel. This guide has been developed to provide all Deans, Directors and Department Chairs with an overview of campus resources, regulatory requirements and recommended safe work practices which must be integrated into an effective departmental safety program.

Peter Englert
Chancellor, University of Hawai'i at Manoa
January 2003
INTRODUCTION

Our office is fully committed to providing a healthy and safe environment for everyone and has adopted the theme "Ho'oponopono Laulima" which means "Managing Safety Through Cooperation." It is our hope that the development of this publication will serve as a means of improving communication and cooperation among all members of the University. We believe that departmental support is essential in implementing the University's health and safety policy.

This guide is divided into a number of areas which include policy statements, personnel rights/responsibilities, hazard assessment guidelines and implementation procedures, employee training/education and a reference list of available resources. It is the goal of this publication to integrate health and safety information into a format easily understood and managed by departmental personnel who may have limited knowledge in occupational safety. Any questions concerning this publication should be directed to EHSO for clarification. Any comments or suggestions are encouraged and welcomed by our office.

This manual applies to general work environments and not specific worksites such as laboratories, maintenance shops, animal care facilities, and marine facilities. These specific worksites should have their own safety procedures or manuals, such as the Chemical Hygiene Plan (CHP) for laboratories. Additional departmental procedures may be added to this guide to address specific departmental workplace hazards, e.g. asbestos handling procedures, respiratory protection, hearing conservation, etc.

We hope that this guide will serve as a basis for your departments health and safety program. Please feel free to call us for further information or assistance.

Roy Takekawa, Director
Environmental Health & Safety Office
University of Hawaii at Manoa
POLICY

The University of Hawaii has a fundamental obligation to safeguard the health, safety, and welfare of its students, personnel, and visiting public whenever they participate in an official University activity. It is the policy of the University to provide for and maintain, through implementation of safety and health programs, conditions and practices that will provide safe and healthful campus environments. It is also the responsibility of each individual to comply with established health and safety regulations and procedures and to take every precaution necessary to prevent injury to themselves and to others. This policy is included in the University of Hawaii Systemwide Administrative Procedures Manual, A9.750 University of Hawaii Health and Safety Program.
RESPONSIBILITIES

A. DEANS, DIRECTORS AND DEPARTMENT CHAIRS

All Deans, Directors and Department Chairs are responsible for establishing and maintaining programs in their areas which will provide a safe and healthy work and living environment. The primary responsibility for establishing and maintaining a safe and healthy environment for its employees, students and visitors remains at the department level.

B. DEPARTMENTAL SAFETY COORDINATORS (if applicable)

Appointed by the Department Chair/Director, the Coordinator liaisons with EHSO and other service organizations to assist departmental personnel in developing and maintaining all facets of the program.

C. PRINCIPLE INVESTIGATORS/SUPERVISORS

All Principal Investigators and supervisors are responsible for compliance with this policy as it relates to operations under their control. Specific areas of responsibility include employee safety training, identification and elimination of hazardous conditions and recordkeeping.

D. EMPLOYEES AND STUDENTS

Each individual is responsible for following procedures and guidelines provided by their supervisor/instructor, as well as identifying hazardous conditions in the workplace. Moreover, each employee/student must attend training sessions and understand applicable safety requirements. Individuals are also responsible for asking questions of their supervisors when concerned about unknown or hazardous situations or substances.

E. ENVIRONMENTAL HEALTH AND SAFETY OFFICE (EHSO)

EHSO is responsible for monitoring compliance with this policy. In case of life safety matters or imminent danger to life or health, the Director of EHSO or his/her designee has the authority to order the cessation of the activity until the hazardous condition is abated or adequate measures are taken to minimize exposure to campus personnel from such a condition.
F. WORKPLACE SAFETY COMMITTEE (WSC)

The charge of the committee are as follows:

1. Establish policies that will ensure that the University of Hawai'i is in compliance with all federal, state, and local regulations, statutes, procedures, and principles relating to environmental and occupational safety, including in particular (1) fire code, (2) the electrical code, and (3) the regulations relating to the purchase, storage, use, and disposal of hazardous chemicals. This task includes the review and maintenance of the UH Chemical Hygiene Plan (CHP).

2. Establish close-out procedures for hazardous chemical users that will minimize the hazardous waste burden to UH.

3. Review laboratory safety audit reports. In case where problems have been noted by EHSO, initiate corrective actions if the problems have not been resolved within reasonable amount of time.

4. Evaluate and approve the use of particular hazardous substances such as select carcinogens, reproductive toxins, and highly acute toxins. Prepare a list of such substances to facilitate oversight and control/regulation of their use.

5. The EHSO will evaluate laboratory accidents and chemical spills and will ask the WSC to initiate corrective action if needed to prevent the recurrence of such incidents.

6. In cases where correction of a workplace safety deficiency requires the expenditure of money, authorize, with the approval of the Chancellor, the funds needed to correct the problem.

7. Where necessary, intervene in EHSO inspection and enforcement actions (see Appendix 14).
GENERAL HEALTH AND SAFETY
REQUIREMENTS

Hawaii Occupational Safety and Health Standards require that employers provide safe and healthful work places and practices by elimination or reduction of existing or potential hazards. Departments shall establish and maintain an occupational safety and health program which includes: a training program instructing employees of safe work practices and specific hazards unique to the employee's job; periodic inspections to identify unsafe conditions and work practices; and ways to correct them. All records of training and inspections shall be kept by the department.

A. POSTING OF NOTICE/EMERGENCY TELEPHONE 
NUMBERS/EMERGENCY PROCEDURES

1. Posting of Notice

Each department shall post and keep posted the orange and yellow poster "Safety and Health Protection on the Job" which informs employees of the following:

(a) protections and obligations under the law; and

(b) the availability of assistance and information; including copies of the law and of specific safety and health standards, from the department or EHSO

Posting of notice shall be in accordance with Section 12-51-2, Title 12 of the HIOSH regulations.

2. Emergency Telephone Numbers

A poster shall be fastened and maintained, either on the first-aid kit or cabinet or near telephones giving the phone numbers and addresses of doctors, hospitals and ambulance services to be contacted in case of an emergency or the campus emergency number (X66911) shall be posted.
3. Emergency Procedures

Each University department/office should have a written emergency plan which would address the specific procedures for departmental personnel to follow in the event of various foreseeable emergency situations, i.e. fire, medical problem, bomb threat, etc. This plan should provide for students, staff and members of the public and should be reviewed annually. Campus Security has published a brochure which details the general overall response procedures for the campus entitled, "Emergency Procedures for UH Manoa Campus" and copies are available from them.

4. Evacuation and Notification Procedures

WHEN THE BUILDING ALARM IS ACTIVATED, OCCUPANTS WILL:

a. Evacuate the building without delay. Close doors and windows, if possible.

b. Notify Campus Security, via Emergency Call Box or X66911.

c. Do not under any circumstances silence the building fire alarm.

d. When evacuating the building, move away from the building entrance and clear building access for emergency response personnel.

e. Arrange to have a specific location away from the building where people are to meet after evacuation. All department/office personnel, students, and visitors should be accounted for.

f. Information regarding persons with disabilities who need evacuation assistance should be given to the first responding Campus Security officers. Honolulu Fire Department personnel have training and equipment to assist with the evacuation of wheelchair users and other mobility impaired persons. Others who may be ambulatory may be assisted from the building, if it can be done safely.

g. Evacuate disabled persons who are elevator dependent (when the elevator may not be used) i.e. those with wheelchairs, cardiac and/or pulmonary disabilities, crutches, canes, walkers, etc., please use the following procedure (individual departments should evaluate
their situations and may adopt alternate procedures if necessary):

i) Escort the person to the closest stairwell or "area of rescue assistance."

ii) If appropriate, assist the person into the stairwell landing and activate emergency call equipment, if present. If no emergency call equipment is present, assign someone to inform Campus Security that there is a person with a disability needing evacuation assistance and specify the person's access/evacuation needs.

iii) Remain with that person until she/he is rescued by evacuation personnel (Honolulu Fire Department).

B. HAZARD COMMUNICATION

The term "hazardous" refers to any substance or material which could cause personal harm and injury to persons who may become exposed to the substances. Substances such as chemicals, radioactive isotopes, cleaning solvents, paints, inks, etc., are all potentially hazardous materials which are routinely used on campus. Of these various types, chemicals far exceed the others in total number and diversity. Chemicals are not only used by researchers in laboratories, but by our janitorial and trades people as well. Since the safe handling and use of chemicals is of primary concern, the Hazard Communication Program has been developed. This program introduces a set of procedures designed to minimize the risk of chemical exposure and to comply with the State of Hawaii Division of Occupational Safety and Health (HIOSH) Hazard Communication Standard (HazCom).

The major components of our Hazard Communication Program are presented in this guide and the complete written program is provided in Appendix 7.

UH's Hazard Communication (HazCom) Program has two primary goals: (1) to clearly identify hazardous substances being used in the workplace and (2) to inform employees about the hazardous properties of those substances, as well as methods of personal protection that will ensure their well-being while handling the material while on the job.

The Hazard Communication Program includes the following information:

1. Description of how labels, Material Safety Data Sheets (MSDS)
and training are used to inform employees

. Description of the method the University uses to inform employees about the hazards of non-routine tasks and unlabeled pipes

. Description of how the University informs contractors of hazardous substances that they may encounter

. Standardized form for chemical inventories

1. **Hazardous Substance Identification and Inventory**

   Each department is responsible for maintaining an inventory of all chemicals used in its operation. The inventory at a minimum shall include each chemical's name, manufacturer, and quantity. The inventory is to be updated at least annually, with obsolete items removed and new items added as necessary.

2. **Material Safety Data Sheets (MSDS)**

   Manufacturers of chemicals are required by law to develop Material Safety Data Sheets (MSDS) for each of their products. An MSDS is a standardized document which contains sections on safety information including methods of personal protection, flammability, reactivity, special handling instructions, spill cleanup information, waste disposal requirements, etc. The information on each MSDS is standardized, however, there is no standardized MSDS form. Most manufacturers routinely include the MSDS with their product as it is shipped to the campus. Companies must also provide an MSDS for their products upon request.

   Each department is responsible for maintaining copies of all MSDSs for their products. New or updated MSDSs received by the department should replace older documents.

3. **Employee Information and Training**

   Each supervisor must provide training to their employees upon their assignment to a work area where hazardous substances are present. For details on the specific content of the training, refer to the University's HazCom Program. EHSO can also provide assistance to the departments for HazCom training.

4. **Labeling**

   Primary labels affixed to manufacturer's original containers must be in good condition. Labels must state the manufacturer's name, address, identification of the substance, appro-
appropriate health warnings and physical hazards.

All secondary containers into which hazardous substances are transferred must be adequately labeled with information which provides the chemical's name and appropriate hazard warning statement (i.e. "may cause lung damage if inhaled"). Secondary containers with small quantities of hazardous materials intended for use within one day need not have labels.

HAZARDOUS WASTE

The generation and disposal of hazardous waste at the University is strictly regulated. The EHSO Hazardous Materials Management Program ensures proper disposal of waste in accordance with federal and state rules and regulations. Hazardous waste includes flammable, explosive, poisonous and toxic chemicals. For radioactive waste, please call EHSO's Radiation Safety Officer; for infectious waste call EHSO's Biological Safety Officer.

NON-HAZARDOUS WASTE

Non-hazardous waste is handled by the Custodial Section of the Buildings and Grounds Management Office (BGM). The custodians will empty waste baskets containing regular trash. Glass is to be segregated from other non-hazardous trash. For disposal of other non-hazardous waste, refer to our waste disposal guidelines at our website (hawaii.edu/ehso/compliance/wast1.htm).

C. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Requirements for personal protective equipment are found in Section 12-64.1-1, Title 12 of the HIOSH regulations. This standard covers protective equipment for eyes, face, head, hands and feet. The standard also includes provisions on electrical equipment.

Under the Personal Protective Equipment standard, there are two major requirements:

1. Hazard Assessment

Each department must assess the workplace to determine if hazards are present, or likely to be present, which necessitate the use
of personal protective equipment (PPE). Please refer to Appendix 8 as a guide for assessing hazards.

If such hazards exist or potentially exist, the departmental supervisor shall select, and have each affected employee use the types of PPE that will protect against the identified hazards. PPE must properly fit each employee and the employee shall verify the assessment in writing.

2. Training Requirements

Each department must provide training to each employee required to use PPE. Training will include when PPE is needed, what PPE is needed, how to wear PPE, the proper care, maintenance, useful life and disposal of the PPE. The departmental supervisor has to certify in writing that the employee has received and understands the training.

D. WORK SITE INSPECTIONS

Section 12-60-1, Title 12 of the HIOSH regulations specifies that periodic inspections to identify unsafe conditions and work practices must be conducted for all departmental areas. The purpose of inspections is to identify and correct potential problems before employees become injured or property is damaged. Conducting inspections serves as one of the elements of a good accident prevention program which helps to maintain a greater safety awareness among all department personnel.

EHSO conducts periodic inspections of labs, shops and administrative areas. However, the number of EHSO staff is not large enough to provide frequent and recurring inspections of all areas on campus. EHSO has conducted inspections upon request and continues to do so. The inspection checklist forms in Appendix 9 were developed primarily for laboratories, but may be revised for offices and other settings.

Departmental inspections should be conducted at least annually. Problems noted in the inspections should be addressed immediately by supervisory personnel. EHSO can be contacted for assistance in resolving problems.

E. WORKERS' COMPENSATION

Supervisors are responsible for informing employees of their rights and responsibilities under the State of Hawaii's workers' compensation law. The designated departmental Workers'
Compensation (WC) Coordinator shall provide advice and guidance to the supervisor, including providing copies of the "Highlights of the Hawaii Workers' Compensation Law" brochure and "What To Do For Work-Related Injury/Illness" information sheet.

Under the worker's compensation law, every work-related injury or illness resulting in the absence of one or more days and requiring medical services other than first-aid treatment must be reported by the Employer within seven days to the Department of Labor and Industrial Relations, Disability Compensation Division. The Employer for reporting purposes is the University's insurance carrier. Employees, supervisors and WC Coordinators have a responsibility to timely report the work-related injury/illness of an employee to the University's insurance carrier. The UH Form 79 (OPHR), "Report of Work-Related Injury/Illness," is available for reporting purposes. Please refer to UH Administrative Procedure A9.720 Workers Compensation for further instructions on this matter.

Copies of completed UH Form 79 are received by EHSO where they are reviewed for injury trends that may occur within a department. If a trend is detected the EHSO conducts an investigation to determine the cause of injury/illness and ways to reduce or prevent the specific injury/illness.

F. ACCIDENT AND NEAR-MISS REPORTING/INVESTIGATION

An accident can be defined as "an undesirable event that results in harm to people, damage to property, or loss to process." This includes injuries, occupational disease, damage to University equipment, damage to property, environmental pollution, release of hazardous material or disruption to services. Anytime an accident occurs, that does not result in a workers' compensation claim, an Accident Injury and Illness Report should be completed and forwarded to EHSO for follow-up. A copy of the form is provided as Appendix 11.

Similarly, a near-miss is defined as "a situation where the sequence of events could have caused an accident if it had not been interrupted". In order to be proactive in preventing accidents, supervisors are responsible for reporting near-misses to EHSO.

A near-miss report form is provided in Appendix 11. Depending on the potential severity and the probability of a near-miss becoming an accident, EHSO staff will conduct investigations in order to identify the problem and implement corrective actions. It is important to understand that "employees being more careful" is not an acceptable corrective action to prevent recurrence of these incidents. When an accident of near-miss is experienced, a
failure in a system or procedure has occurred. Identifying the failure is the objective of the investigation that EHSO conducts.

**G. RECORDKEEPING**

All matters pertaining to employee/student health and safety concerns must be fully documented. Written records of activities, such as development of special departmental safety policies and procedures, training sessions for managers and employees, and minutes of safety meetings and so on, must be maintained at the appropriate level as specified in the following:

1. **EHSO is responsible for:**
   
   Documenting all training programs provided to departments by EHSO staff, including a participant list, date of presentation and topic discussed.

2. **Department is responsible for:**

   Maintaining records concerning employee injuries, incident reports, grievances involving safety matters, personnel exposure records, training, etc.

3. **Supervisor is responsible for:**

   Documenting any exchange of safety information with employees occurring through formal presentation and/or one-to-one meetings at the work site.

   Records of all safety matters are subject to periodic review by EHSO, HIOSH and other applicable agencies conducting workplace inspections. They should be maintained in a clearly identified, central file within the department for ease of access.
Effective dissemination of safety information is essential in the success of a health and safety training program. Section 12-60-2, Title 12 requires the department to provide safety training for its employees in the following: "general safe work practices and specific instructions with respect to hazards unique to the employee's job assignment."

The purpose of providing safety training to employees is to help them clearly understand the risks of hazards they face on the job and to provide information concerning methods of personal protection which will safeguard them while performing those tasks.

EHSO provides training programs in many different areas, see Appendix 6. Most training program material is general in nature so as to be applicable to a great number of departments. Sessions can be scheduled through EHSO for presentation to departmental employees/students as needed.

Specialized training sessions dealing with an employee's unique job assignment must be developed by his/her supervisor. It is the supervisor's responsibility to understand his/her employee's job tasks and its related hazards. HIOSH regulations are quite specific about responsibilities of supervisory personnel with respect to informing their employees about hazards they face on the job.

A long-range departmental training plan should be developed which sets priorities for training sessions, including a schedule of presentations. Consideration should also be given to frequency required for retraining purposes. These refresher programs should be incorporated into the long-range plan.

Complete documentation of all training activities must be maintained at the department. The record should show the participants printed name and signature, date of presentation, topic discussed, as well as an outline of the material presented. These records must be made available to HIOSH and other agencies during worksite inspections.
RESOURCES

The following resources are available to departments for assistance in the implementation of their health and safety program.

A. ON-CAMPUS

1. Environmental Health and Safety Office

The following presents an overview of the services available from EHSO:

Radiation Safety - The Radiation Safety Officer and health physics staff monitor the proper use of all radioactive materials used in research and instructional applications on campus.

Education & Training - A broad array of safety programs have been developed by EHSO's staff to assist supervisor's in meeting their training obligations. Topics range from subjects on fire, laboratory and radiation safety to specialized sessions on asbestos, lead, noise, etc.

Workplace Safety - The Industrial Hygienist provides personal monitoring and environmental testing in work areas where toxic or hazardous substances are routinely used.

Fire Safety - The Fire Safety Officer ensures that all campus facilities conform to the applicable fire codes and that the campus is prepared for fires, explosions and other emergency situations in an informed manner.

Biological Safety - The Biological Safety Officer oversees the use of potentially hazardous biological organisms and recombinant DNA activities at all University facilities.

Hazardous Materials Management - Manages the campus waste minimization program. Chemical wastes are picked up by request, taken to a special waste handling facility and packaged for shipment to mainland disposal sites.

Chemical Safety/Toxicology - The Chemical Hygiene Officer provides information on safe handling and storage of reactive and toxic substances; and makes recommendations regarding proper personal protection.
Laboratory Safety - EHSO personnel conduct periodic inspections of eyewash stations, safety showers and laboratory hoods. Problems connected with chemical storage, fire safety, electrical hazards, and personal protection are focused upon.

Office Safety - EHSO on request, may conduct inspections in offices to address common concerns such as poorly designed work areas, use of unsafe electrical devices, improper storage of office chemicals, inadequate ventilation and lighting, etc.

Respiratory Protection - The Industrial Hygienist coordinates the campus-wide program which provides proper fit-testing of approved respirators for all persons working in areas where exposures to harmful levels of dusts, mists, fumes or vapors occur.

EHSO Publications - Copies of the following reference publications are available from EHSO:

* UH Diving Safety Manual
* UH Radiation Safety Manual
* UH Hazard Communication Program
* UH Hearing Conservation Program
* UH Respiratory Protection Program
* UH Asbestos Management Plan
* UH Chemical Hygiene Plan
* UH Hazardous Materials Management Program

All EHSO services are available to department personnel by contacting EHSO during regular working hours.

2. Office of Human Resources - the Worker's Compensation (WC) Program for the University is administered by this office. A work related injury or illness of an employee must be timely reported by his/her departmental WC Coordinator to the University's insurance carrier with a copy to the UH Office of Human Resources. See UH Administrative Procedure A9.720 Workers' Compensation for further instructions on this matter.

3. University Health Services - physicians and nurses provide primary medical care for illness and injury for students. Student Health Services assists the student in obtaining other specialized medical services in the community. Health education and counseling are also provided.

4. Wellness Council - the primary functions of the council are: (1) permit exchange of information among a widely re-
representative body of individuals whose interests in wellness issues reflect the diversity of the Manoa campus; (2) develop and implement plans for action for a campus wellness program; (3) coordinate appropriate and relevant activities; (4) recommend appointment and length of service of new and continuing members; and (5) provide timely and informative reports to the Manoa Executive Council.

B. OFF CAMPUS

1. Hawaii Division of Occupational Safety and Health - This agency is divided into several branches, each of which provides different services:

   a) Consultation Branch - provides free workplace inspections and written materials to businesses in an effort to help them understand and comply with the occupational safety codes for Hawaii. This division cannot, by law, issue any citation unless there is an immediately, life-threatening situation occurring. They are strictly an advisory group which can provide a wealth of information upon request.

   b) Compliance Branch - acts as the enforcement arm of the agency. This group conducts unannounced inspections of work areas with the task of ensuring that workplaces are operating in conformance to applicable occupational safety and health standards. Problem areas found during a compliance inspection result in citations and fines being issued to the department with orders to have the problems corrected within a fixed time frame. Compliance investigations are conducted after serious accidents occur or in response to employee complaints.

   c) Library/Video Catalog - The reference library makes available, free of charge to the public, 16mm films, slide/tape presentations and 1/2" VHS videocassettes.

2. Human Resources Department - provide assistance in safety, training and worker's compensation for other state agencies. The Training Branch coordinates health and safety training for state employees. The Safety Branch responds to other state agencies' requests for assistance on safety related problems.

3. National Safety Council - a nonprofit organization dedicated to providing safety related information for work and home. Both members and nonmembers of the
Council may purchase training materials, posters, films, tapes, etc., which can be used to augment departmental efforts. Catalogs of materials are available upon request from the EHSO.

4. **National Institute for Occupational Safety and Health (NIOSH)** - a branch of the US Department of Health and Human Services which provides a diversity of educational materials concerning occupational safety topics. Catalog materials are available at a nominal cost.