



# Oregon

Theodore R. Kulongoski, Governor

Department of Consumer and Business Services  
Oregon Occupational Safety & Health Division (OR-OSHA)  
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PORTLAND STATE UNIVERSITY  
PRESIDENTS OFFICE

SEP 06 2005

Portland State University  
PO Box 751  
Portland OR 97207


**Inspection Number:** 308752104  
**Optional Report Number:** Z7575-037-05  
**Employer Number:** 5677737-000  
**Inspection Date:** 07/20/2005

The Oregon Occupational Safety and Health Division (OR-OSHA) conducted an inspection of your workplace located at SW 6th & Hall (Ondine Hall), Portland, Oregon. The inspection was to determine if safety or health hazards were present which could cause injury or illness to your employees. Violations of safety and/or health rules were found during this inspection and the citation is enclosed.

In addition, the OR-OSHA representative noted certain conditions which may potentially cause injuries and/or illnesses. These conditions are listed in the Notice on the following page. At this time it is not mandatory that you take any action to correct them. Nonetheless in the interest of reducing the high cost and human suffering associated with work-related injuries and illnesses OR-OSHA encourages you to initiate corrective measures with respect to the conditions listed in the Notice.

There may be other hazards present which were not apparent at the time of the inspection. If you need assistance in identifying and/or eliminating health or safety hazards consultative and training services are available to you at no cost through OR-OSHA by calling (503) 378-3272.

Your continuing effort to identify and eliminate work-related hazards is appreciated.

  
Penny Wolf-McCormick  
Health Enforcement Manager  
OR-OSHA Portland Field Office  
1750 NW Naito Parkway Suite 112  
Portland OR 97209-2533  
(503) 229-5910

308752104-plt

cc: Portland State University, Facilities Planning Attn Chuck Cooper, PO Box 751, Portland  
OR 97207

## NOTICE

**Employer Name:** Portland State University  
**Employer Number:** 5677737-000  
**Inspection Number:** 308752104  
**Optional Report Number:** Z7575-037-05

THE FOLLOWING IS A LIST OF CONDITIONS WHICH COULD CAUSE WORK-RELATED INJURIES OR ILLNESSES TO EMPLOYEES. ALTHOUGH NOT MANDATORY AT THIS TIME THE OREGON OCCUPATIONAL SAFETY AND HEALTH DIVISION ENCOURAGES YOU TO INITIATE CORRECTIVE MEASURES FOR THESE PROBLEM AREAS IN THE INTEREST OF REDUCING THE HIGH COST AND HUMAN SUFFERING ASSOCIATED WITH WORK-RELATED INJURIES AND ILLNESSES.

Item 1-02

Rule: 1910.146 and 437-002-0378

The Oregon Occupational Safety and Health Division (OR-OSHA) recently conducted an inspection at Portland State University (PSU) located at 1912 SW 6th Ave in Portland, Oregon. Portions of the inspection pertained to confined spaces and chemical safety. The following issues are areas of concern and should be evaluated by the management of PSU.

1910.146 is the regulation that outlines the employer's responsibilities pertaining to confined spaces. Through employee interviews it was determined that PSU has not properly identified all the confined spaces and permit required confined spaces throughout the university. A brief summary of the basic responsibilities of an employer under 1910.146 are as follows:

- 7 Identify and inventory all the permit required confined spaces throughout the university
- 7 Mark these spaces with a warning sign to inform employees of the danger
- 7 Determine if PSU employees or contractors will be entering into these spaces
- 7 If anyone will be entering the space a hazard assessment of the space must be completed
- 7 PSU needs to ensure that its employees are trained on the university's policies and procedures pertaining to permit required confined spaces

If PSU employees will not be entering into permit required confined spaces, the aforementioned list is all that would be triggered. However, in the event that PSU employees will be entering into Permit Required Confined Spaces than the 1910.146 regulation in its entirety will need to be implemented.

437-002-0378 is the regulation that outlines the requirements for transporting chemicals (including steam and compressed air) through pipes. During the progression of the inspection, an employee mentioned that they had concerns about the pipe labeling throughout the university. The specific verbiage of this regulation is located below. PSU management should evaluate if they have the pipe system properly labeled as stated below.

**Oregon Department of Consumer and Business Services**

Oregon Occupational Safety and Health Division (OR-OSHA)  
1750 NW Naito Parkway Suite 112  
Portland, OR 97209-2533  
Phone: (503)229-5910

**PORTLAND STATE UNIVERSITY**  
PRESIDENTS OFFICE

SEP 06 2005



**Citation and Notification of Penalty**

**To:**  
Dan Bernstine President  
Portland State University  
PO Box 751  
Portland, OR 97207

**Inspection Number:** 308752104(91)  
**Inspection Date(s):** 07/20/2005-08/04/2005  
**Issuance Date:** 09/02/2005  
**Optional Rpt Num:** Z7575-037-05  
**Employer ID No:** 5677737-000

**Inspection Site:**  
Ondine Hall 1912 SW 6th Ave  
Portland, OR 97201

*The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated.*

In the interest of assuring a safe and healthy workplace, the Oregon Occupational Safety and Health Division (OR-OSHA) conducted an inspection at a workplace under your control. During this inspection, violations of the Oregon Safe Employment Act and occupational health and/or safety rules were found.

This citation lists the violations and a date by which they must be corrected. If you are not able to correct the violations by the correction date, you must apply for an extension of the correction date by following the instructions outlined later in this citation. Oregon laws require that under certain conditions violations of occupational safety and health rules carry a civil penalty. If penalties have been assessed on this citation, they have been computed in conformity with Oregon Administrative Rules, Chapter 437, Division 1. If you want to appeal this citation, file your request for hearing within 20 calendar days as outlined on the reverse side of this page. If you choose not to appeal this citation, it becomes a final order 20 calendar days after receiving it. You must abate the violations referred to in this Citation by the dates listed, and pay the proposed penalties.

An effective Safety and Health program not only assures the correction of cited violations, it also requires actions to prevent violations from recurring. Through continued cooperation of employers, employees and OR-OSHA, a safe and healthful workplace for all Oregon employees can be achieved.

Michael D. Wood, Administrator  
Oregon OSHA

**PLEASE SEE REVERSE SIDE OF PAGE FOR IMPORTANT INFORMATION**

437-002-0378 - Pipe Labeling

(4) Labeling.

(a) Pipes and piping systems which contain hazardous substances or transport substances in a hazardous state shall be labeled in accordance with subsections (A), (B), (C) and (D) or otherwise identified in accordance with subsection (c) of this rule:

(A) Positive identification of the hazardous contents of a piping system shall be by lettered labels. The label shall give the name of the contents in full or abbreviated form.

(B) Contents shall be identified by labeling with sufficient detail to identify the hazard.

(C) Label wording shall be brief, informative and simple.

(D) Labeling shall be accomplished by stenciling, the use of tape, adhesives, markers or approved alternative means.

(b) Pipes or piping systems which use asbestos as a pipe insulation material shall be labeled in accordance with subsection (b)(A), or otherwise identified in accordance with subsection (c) below:

(A) The label for pipe insulation containing asbestos shall include the following:

DANGER

CONTAINS ASBESTOS FIBER

AVOID CREATING DUST

CANCER AND LUNG DISEASE HAZARD

(c) The employer may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual pipes, as long as the alternative method identifies the pipe(s) to which it is applicable and conveys the information required by this rule. The written materials shall be readily accessible to the employees in their work areas during each shift. (OAR 437, Division 2/Z, Hazard Communication, 1910.1200.)

(5) Location of Labeling.

(a) Labeling shall be applied where confusion may occur, such as close to valves or

flanges and adjacent to changes in direction, branches and where pipes pass through walls, floors or ceilings.

(b) Labeling shall be applied, at a minimum, at the beginning and end of continuous pipe runs.

(c) For asbestos insulation, labeling shall be at a minimum, on unobstructed continuous pipe runs, every 75 feet.

PSU was not issued citations for the aforementioned issues due to a lack of documented employee exposure, however, these items may result in citations during future inspections if they are not addressed properly. In the event that PSU is in need of any assistance evaluating these topics you can contact OR-OSHA consultative services or your workers compensation carrier.

**Oregon OSHA**

Oregon Department of Consumer & Business Services

**Inspection Number:** 308752104

**Inspection Dates:** 07/20/2005 - 08/04/2005

**Issuance Date:** 09/02/2005



**Citation and Notification of Penalty**

**Optional Rpt Num:** Z7575-037-05

**Company Name:** Portland State University

**Inspection Site:** Ondine Hall 1912 SW 6th Ave, Portland, OR 97201

**Citation 1 Item 1 Type of Violation: **Serious****

29 CFR 1910.147(c)(4)(ii): The energy control procedures did not clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, including, but not limited to Items A-D of this section:

a) At the time of the inspection, the employer did not ensure that there were written equipment specific lockout/tagout procedures that clearly and specifically outline the scope, purpose, rules and techniques, and the procedural steps for shutting down, isolating, blocking and securing machines or equipment.

Date By Which Violation Must be Abated:	10/03/2005
Proposed Penalty:	\$ 195.00

See pages 1 through 3 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



**Citation and Notification of Penalty**

Optional Rpt Num: Z7575-037-05

Company Name: Portland State University  
Inspection Site: Ondine Hall 1912 SW 6th Ave, Portland, OR 97201

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**Citation 2 Item 2** Type of Violation: **Other**

29 CFR 1910.132(d)(2): The employer did not verify that the required workplace hazard assessment had been performed through written certification that identified the workplace evaluated; the person certifying that the evaluation had been performed; the date(s) of the hazard assessment; and, identified the document as a certification of the hazard assessment:

a) At the time of the inspection, the employer did not ensure that there was written certification of workplace hazard assessments to determine the need for personal protective equipment.

Date By Which Violation Must be Abated:	10/03/2005
Proposed Penalty:	\$ 0.00

**Citation 2 Item 3** Type of Violation: **Other**

29 CFR 1910.1200(h)(2)(iii): The employer did not provide information to the employees as to the location and availability of the written hazard communication program, and material safety data sheets required by this section:

a) At the time of the inspection, the employer did not ensure that effective hazard communication training pertaining to accessing material safety data sheets. As evidence through employee interviews.

Date By Which Violation Must be Abated:	10/03/2005
Proposed Penalty:	\$ 0.00

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**Oregon OSHA**

Oregon Department of Consumer & Business Services

**Inspection Number:** 308752104

**Inspection Dates:** 07/20/2005 - 08/04/2005

**Issuance Date:** 09/02/2005



**Citation and Notification of Penalty**

**Optional Rpt Num:** Z7575-037-05

**Company Name:** Portland State University

**Inspection Site:** Ondine Hall 1912 SW 6th Ave, Portland, OR 97201

**Citation 2 Item 4 Type of Violation: Other**

29 CFR 1910.1030(f)(2)(i): Hepatitis B vaccination was not made available after the employee had received the training required in 29 CFR 1910.1030(g)(2)(vii)(I) or within 10 working days of initial assignment to employees who had occupational exposure to blood or other potentially infectious materials:

a) At the time of the inspection, the employer did not ensure that employees who had occupational exposure to blood or other potentially infectious materials were offered the Hepatitis B vaccination within 10 days of initial assignment.

Date By Which Violation Must be Abated:		10/03/2005
Proposed Penalty:	\$	0.00

<b>TOTAL PROPOSED PENALTIES</b>	<b>\$</b>	<b>195.00</b>
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