



**LOS ANGELES UNIFIED SCHOOL DISTRICT  
POLICY BULLETIN**

**TITLE:** Procedures for Regulatory Agency Inspections and Industrial Hygiene Sampling

**NUMBER:** BUL-5547

**ISSUER:** Enrique G. Boull't, Chief Operating Officer (Interim)  
Office of the Chief Operating Officer

John Sterritt, Director – Environmental Health and Safety  
Office of Environmental Health and Safety

**DATE:** August 8, 2011

**ROUTING**

All Schools and Offices

**POLICY:** The California Code of Regulations and Board Rule 2351 mandate that the District maintain a safe and healthy, learning and working environment. In order to ensure compliance, the Office of Environmental Health and Safety (OEHS) and regulatory agencies conduct on-site inspections. The purpose of this bulletin is to provide staff with procedures to follow when a regulatory agency arrives to conduct an on-site inspection or industrial hygiene sampling. These guidelines also pertain to any non-District entity seeking to conduct industrial hygiene sampling.

**MAJOR CHANGES:** This bulletin replaces Bulletin No. 7, dated March 22, 1996 from the Office of the Superintendent. The material has been updated and includes additional procedures for staff to follow when outside agencies, their representatives or other outside entities request to conduct air sampling or other industrial hygiene activities on-site.

**GUIDELINES:** The following guidelines apply.

**I. PURPOSE**

A. The purpose of this bulletin is to provide staff with procedures to follow when a regulatory agency conducts an on-site inspection. Regulatory agencies include California Occupational Safety and Health Administration [Cal/OSHA], Public Health Department, U.S. Environmental Protection Agency [EPA], Fire Department, South Coast Air Quality Management District [SCAQMD], etc.

**II. POTENTIAL REGULATORY AGENCIES THAT MAY VISIT**

A. Cal/OSHA enforces the California Occupational Safety and Health Act, which imposes on employers the responsibility to provide a safe and healthy workplace. Cal/OSHA inspects sites in response to an employee complaint



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or serious accident.

- B. Los Angeles County Public Health Department ensures sanitation standards for food facilities in food preparation, storage and serving areas and adjoining restroom facilities. Inspections are required by the Federal Child Nutrition and Women, Infants and Children Reauthorization Act and may also be conducted in response to complaints or food-related illness.
- C. The Local Fire Authority (city or county) enforces state regulations pertaining to fire and life safety, and conducts periodic inspections at schools and other District sites.
- D. Schools and other sites may also be inspected by the South Coast Air Quality Management District (outside odors), the U.S. Environmental Protection Agency or Department of Public Works (hazardous waste issues), or any other regulatory agency responsible for monitoring environmental or occupational health and safety. Inspections may be routine or in response to an environmental or occupational health and safety complaint.

### III. PROCEDURES

- A. In general, procedures for all regulatory agency inspections are the same.
  - 1. Upon notification or arrival of a regulatory agency representative on site, site administrators shall contact OEHS at (213) 241-3199 for assistance. When calling OEHS, inform the Duty Officer which agency is on site and the purpose of their visit.
  - 2. Site administrators should request official credentials of the regulatory agency representative, if not offered.
  - 3. If directed by OEHS, request the inspector wait until an OEHS representative can arrive to facilitate the inspection. Should the inspector decide not to wait, allow the inspection to proceed and the OEHS representative will join the inspection in progress.
  - 4. Ensure the inspector has free access to the site without interference.
  - 5. If requested, a representative (i.e., union representative) authorized by a complainant employee shall have the opportunity to accompany the inspector on the inspection, and a representative of the District may also accompany them.
  - 6. The inspector may talk in private with either the District representative or other willing employees during the inspection.
- B. Most regulatory agencies impose deadlines for employers to correct deficiencies found during inspections. Therefore, it is very important that



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the site administrator immediately forward a copy of the report, notice of violation or request for documentation to OEHS at District Headquarters and retain a copy for the site's files. OEHS will then forward the report to the appropriate District office (e.g., Maintenance and Operations Branch, Food Services Division) and follow-up to ensure that corrective action is initiated as soon as possible.

For matters requiring immediate attention, contact OEHS at (213) 241-3199 for specific direction.

- C. In certain cases, the SCAQMD, EPA or other outside agencies may request or attempt to conduct environmental or industrial hygiene sampling on District property. This may be done in response to complaints or to provide evidence of a hazardous condition or lack thereof. Before allowing these activities to take place at a District site, immediately inform OEHS at (213) 241-3199. OEHS will determine if these activities are warranted and provide specific direction on behalf of the District.
- D. In other cases, community groups, news media, LAUSD employees (non-OEHS) or other non-governmental entities may also request or attempt to conduct environmental or industrial hygiene sampling on District property. Regardless of the reason for the sampling, immediately inform OEHS at (213) 241-3199 before allowing any such activities. OEHS will determine if these activities are warranted and provide specific direction on behalf of the District.

**AUTHORITY:** This is a policy of the Office of Environmental Health & Safety.  
Board Rule 2351  
California Code of Regulations, Title 8

**RELATED RESOURCES:** Division of Occupational Health and Safety Policy and Procedure Manual  
OEHS Safety Alert <http://www.lausd-oehs.org/docs/SafetyAlerts/04-14.pdf> 04-02,  
Reporting Safety Hazards

**ASSISTANCE:** For assistance or further information please contact, the Office of Environmental Health and Safety at (213) 241-3199 or visit our website at [www.lausd-oehs.org](http://www.lausd-oehs.org).