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<th>TITLE: HAZARD IDENTIFICATION AND CORRECTION (RED TAG) PROCESS</th>
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<td>INITIATOR: David Mori</td>
<td>REVISION DATE: 10/12/14</td>
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1. Program Description

The purpose of this program is to specify procedures and establish criteria to safely shut down activities or processes that present a risk of imminent danger or other safety hazards to the health and safety of employees, students, or visitors.

2. Scope

This program is applicable to any locations on campus where operations, processes, or machinery present risks of imminent danger or other high risk safety hazards to employees, students, or visitors.

3. Definitions

**Imminent Danger** - Any condition or practice at any campus location in which a recognized danger exists which “may cause death, loss of a facility, severe injury, severe occupational illness, or major property loss, and is likely to occur immediately or in a short period of time”.

The following conditions must be met before a hazard becomes an imminent danger:

- There must be a threat of death or serious physical harm. "Serious Physical Harm" means that a part of the body is damaged so severely that it cannot be used or cannot be used very well
- For a health hazard there must be a reasonable expectation that toxic substances or other health hazards are present and exposure to them will shorten life or cause substantial reduction in physical or mental efficiency. The harm caused by the health hazard does not have to happen immediately
- The threat must be immediate or imminent. There must be a reasonable belief that death or serious physical harm could occur within a short time

4. Responsibilities

**Principal Investigator/Supervisor/faculty**

- Does not allow any operations to continue that present risks of imminent danger to students or staff
- Responsible for working with EH&S to eliminate or reduce imminent dangers that have been identified through the Red Tag Process
- Does not allow the use of any equipment or operations that have been red tagged without first consulting with EH&S
- Ensures that University safety policies are enforced and safe work practices are followed

**UC Irvine Employees and Students**

- Reports safety concerns to supervisors or to EH&S
- Does not perform any operations or use any equipment that have been red tagged
- Performs all work in accordance with UC Irvine safety programs and prudent safe work practices
Environmental Health & Safety (EH&S)

- Takes appropriate action when an imminent danger is discovered by communicating the dangers to responsible parties, immediately stopping the activity, red-tagging the process, and informing appropriate EH&S management
- For identified hazards that may not meet the definition of “Imminent Danger” but still present safety risks to staff or students, EH&S Specialists will determine the level of risk and recommend appropriate actions to reduce or eliminate the hazard in a timely manner. See Appendix A.
- Makes recommendations for correction or elimination of hazards to Departments
- Conducts follow-up on identified hazards to verify that corrective actions have been taken in timely manner and have reduced or eliminated imminent dangers
- Authorizes the removal of the "Red Tag" allowing the activity to resume when imminent dangers are eliminated and when hazards are properly controlled
- Ensures that University policies are enforced and safe work practices are used

5. Program Components

Hazards that are identified as part of a programmed inspection or discovered as part of a site visit should be corrected as quickly as possible. Upon discovery of a danger or hazard that could cause serious injury or illness, immediate correction by the department is required, or the operation or machine must be taken out of service. The following steps outlined below must be followed if all of the aforementioned criteria are met:

A. Any imminently dangerous locations, machinery, or processes shall be red-tagged as “DO NOT OPERATE”. Only an EH&S Representative may remove the red tag after documenting that the imminent danger has been abated and the activity is safe to proceed.

B. Immediate corrective action should be taken by the employee if they are able and qualified. If the employee is unable to take corrective action, then any hazard concerns are to be reported to the employee's direct supervisor.

C. If a serious or imminent danger exists that could cause an employee injury, the Supervisor, Department, EH&S School Coordinator, and EH&S Manager and Senior Manager must be immediately notified. Once notified, the Supervisor or Department is responsible for abatement or mitigation of the situation to eliminate or reduce the imminent danger.

D. The EH&S School Coordinator will communicate with affected staff and Departments documenting safety concerns, information as to nature and progress of corrective actions, and resolution of safety issue.

E. If the hazard cannot be immediately abated or mitigated to correct the
imminent danger to protect employees or students from exposure, additional actions may be required. These may include providing written notification to all affected employees or evacuating the affected area. Hazard correction and controls may include:

- Applying engineering controls to eliminate imminent danger and properly control the hazard;
- Implementing administrative changes so that personnel are no longer exposed to the hazard, or
- Ensuring that staff and students are wearing Personal Protective Equipment (PPE) to prevent injury from hazards if engineering and administrative controls are not available.

6. Reporting Requirements

Information on the imminent danger or other identified hazard is communicated to the areas immediate Supervisor, Department, EH&S School Coordinator, and appropriate EH&S Manager.

7. Information and External References

Title 8, §3203. Injury and Illness Prevention Program
OSHA Act of 1970, Section 5 - Duties
### Appendix A
Hazard Risk Rating and Control Strategies Table

<table>
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<tr>
<th>RISK RATING</th>
<th>CONTROL STRATEGIES (to mitigate risk from the identified hazard)</th>
<th>TIME FOR CORRECTION</th>
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| **VERY HIGH**        | • Immediate action required  
• Shut down activity, evacuate area if necessary, and apply red tag to equipment or process until hazard reduction measures have been implemented  
• Notify Supervisor, EH&S Senior Manager, and Department  
• Arrange continuous review and monitoring                                                                                     | ACTIVITY SHUT DOWN UNTIL CORRECTIVE ACTIONS IMPLEMENTED |
| **HIGH**             | • Consider shutting down task/activity until control measures have been implemented as soon as practicable  
• Notify Supervisor and EH&S Senior Manager  
• Implement immediate action plan to reduce risk  
• If the activity is not shut down, monitor subsequent exposures to the identified hazard until control measures are in place | 7 DAYS                                     |
| **MEDIUM**           | • Implement action to minimize potential for injuries  
• Notify Supervisor to organize remedial action before continuing activity                                                   | 30 DAYS                                    |
| **LOW**              | • Required action to be agreed upon with Supervisor  
• Remedial action to be taken as soon as practicable                                                                           | 1- 6 MONTHS                                |

### Appendix B
Sample Red Tag

![Sample Red Tag Image]
Appendix C
Red Tag Procedures Flow Chart

HAZARD ELEVATION PROCESS

Hazard identified by EH&S representative or reported to EH&S

Identify and document the existence of workplace hazards that violate a Cal/OSHA safety standard or the OSHA General Duty Clause

Is safety violation an Imminent Danger?

Yes

Activity halted and hazardous locations, machinery, or processes are "Red Tagged"

No

Hazard information communicated to immediate Supervisor, School Coordinator, EH&S Senior Manager, and Department contact

EH&S SME consulted as necessary

Provide written notification to all employees in affected area

Engineering Controls

Administrative Controls

Personal Protective Equipment

Hazard correction and control recommendations are made to Department

Corrective actions taken by Department

EH&S notified when corrective actions completed

Facilities Management Work Order

Verification that corrective actions have reduced or eliminated hazard

If activity was halted due to imminent danger, "Red Tag" may be removed by EH&S and activity allowed to proceed

Follow up communication from School Coordinator to affected staff and Departments documenting corrective actions and resolution of safety issue