

CAL POLY SPACE SYSTEMS

SAFETY PROTOCOL

Approved			
Authorizing Party	Name	Signature	Date
CPSS Advisor			
EHS			
CPSS President			
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Industry Advisor			
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1 INTRODUCTION

The purpose of this document is to establish a set of safety guidelines that will be utilized by Cal Poly Space Systems (CPSS) to promote a culture of safety and to mitigate injuries and hazards. This document establishes the roles and responsibilities for each position and member of the club. Every CPSS member is responsible for maintaining a safe work environment.

2 SCOPE

This document applies to all members of CPSS and any person participating in CPSS activities.

2.1 Applicable documents

Test Authorization Sheet: Contains a list of people who participated in a test, brief description of the test, the date, and the location the test was performed. The club advisor and appropriate authority will sign and give permission to perform an activity. (APP 8.1)

Readiness review sheet: Contains a list of people who have participated in a reading of the procedure and are trained for the procedure. (APP 8.2)

Initial Risk Assessment Worksheet: Outline procedure to identify and classify risk. (APP 8.3)

Cal Poly Space Systems Inspection checklist: Check-list used to guide inspection walk-throughs of CPSS facilities. (APP 8.4)

Risk Assessment Matrix: A table for determining the level of risk in an activity. (APP 8.5)

List of Acronyms: Defines acronyms used in this document. (APP 8.7)

Activity Plan: All the documentation necessary to perform an activity. (Sec 5)

Procedure: A document that lists all necessary safety callouts and PPE necessary for an activity, as well as every step necessary to perform a Class III activity. (Sec 5)

Safety Info Sheet: A document that lists all necessary safety callouts and PPE necessary for an activity. Step-by-step instructions are not necessary. (Sec 5)

Task List: A document that gives instructions for an activity, but is not necessary to ensure safety. (Sec 5)

2.2 Reference Documents (Available at www.cpspacesystems.com)

These documents are referenced, but not included in the CPSS Safety Guidelines:

Cal Poly Injury and Illness Prevention Plan (IIPP) <https://afd.calpoly.edu/ehs/docs/iipp2.pdf>

IRA Manual

Cal Poly Chemical Hygiene Plan (CHP) <https://afd.calpoly.edu/ehs/docs/chp98.pdf>

Cal Poly Incident/Accident Report: Form for incident reports. Same form Student Machine Shop uses. <https://afd.calpoly.edu/riskmgmt/nonvehicleaccident.asp>

3 RESPONSIBILITIES

3.1 Environmental Health and Safety (EHS)

EHS will be responsible for providing safety consultation to CPSS. This is to include, but not limited to, providing feedback for new processes, reviewing procedures, periodically inspecting CPSS facilities, and answering questions in the area of risk mitigation.

3.2 Student Safety Officer (SSO)

1. The SSO will clearly communicate to club members that safety comes first, and unsafe practices will not be tolerated.
2. The SSO will conduct a safety meeting prior to the implementation of each new or modified procedure. In this meeting, the SSO will:
 1. Review and explain new or modified process(es) to the members of the club who will implement said procedure(s).
 2. Review hazardous materials and processes that will be used in each procedure.
 3. Require that everyone present at the meeting sign a Readiness Review Sheet (APP 8.2).
3. The SSO must be present for and oversee all Class III activities (defined in section 4). During the activity, the SSO will:
 1. Observe the activity and assure that the Test Conductor follows the procedures properly.
 2. Assure that all club members follow the Activity Plan and Test Conductor's instructions.
4. The SSO will coordinate with safety professionals (internal or external to Cal Poly) and meet as necessary. He or she will look to the safety professional(s) for guidance, advice, and training.
5. The SSO will be responsible for maintaining a Safety Log, which will contain Readiness Review Sheets, Procedures, As-Runs, Test Procedure Authorizations (APP 8.1), Activity Plans, and other applicable documentation. These documents are further detailed in Section 5.
6. The SSO will investigate any safety breaches, and will review safety breaches with the offending club member(s) and, when appropriate, with the club advisor and/or other safety professionals.
7. The SSO may appoint deputies as needed. (See 3.3 Student Safety Officer Deputy)
8. The SSO is the representative of the officers and club members in matters of safety.
9. The SSO in conjunction with club advisor will provide safety training and approval for all members of the club.
 1. Annually, the SSO will give a general overview and safety training of CPSS safety protocol to all members who have been previously certified.
10. The SSO is responsible for conducting the safety inspections of CPSS facilities (See Section 8.4).
11. The SSO will be responsible for training his/her successor.

3.3 Student Safety Officer Deputy

Student Safety Officer Deputy (SSOD) deputies shall be appointed by the SSO at his or her discretion, and can be appointed for any duration during the term of the SSO. SSO may have multiple deputies. The SSO will train the SSOD in areas which include, but are not limited to:

1. Extensive review of CPSS Protocol and Safety Procedures
2. Apprenticeship. The SSOD will follow the SSO and observe his/her actions or duties. This is on a per responsibility/activity basis.

With the approval of the SSO, the SSOD may assume the role of the SSO in these circumstances.

1. Conduct a safety meeting in accordance with 3.2.2, but only for Class I and Class II activities. Activities are defined in Section 4
2. Be present and oversee a Class I or Class II activity in accordance with 3.2.3. Activities are defined in Section 4.

3.4 Team Lead

Team lead(s) are considered the technical experts for an activity. The team lead(s) will be required to conduct a training session with the SSO to train members who are participating in the activity. Team leads will be responsible for developing procedures for an activity and are required to get appropriate approval before the use of the procedures. (See Section 5)

3.5 Conductor

A conductor will be picked and approved by the SSO for each Class III activity, or any other instance that requires a group of people to perform an activity with a procedure. This person will lead the group, will check off each step, and ensure the procedure is followed by others. During the procedure, the conductors shall adhere to the procedure and follow the steps laid out in the procedure. A team lead can be the conductor of an Activity Plan.

3.6 CPSS Members

Members have the responsibility to:

- Read and comply with all safety rules and procedures set in place by CPSS and Cal Poly.
- Inform advisor or SSO of workplace hazards without fear of reprisal.
- Attend established education and training sessions. They are expected to understand and comply with all applicable safety requirements.
- Ask questions when there is concern about an unknown or hazardous situation.
- A member may participate in an activity with which (s)he is unfamiliar, as long (s)he is under close supervision by a certified member and informed of the hazards of the activity. (IIPP 7.5e) (APP 8.3)
- Any member participating in an activity may call an abort at any time, which will halt all activity until the problem is addressed. The activity may continue once the problem has been addressed and verbal approval has been given by the advisor.
 - Certain temporary holds may be predetermined for procedures. For example, during a test fire, range safety may call a hold if someone wanders into the test area. The SSO may call off this type of hold. Every specific instance that might constitute a hold that the SSO can overturn must be recorded in the procedure and approved by the Club Advisor.

3.7 Faculty Advisor

The Advisor must:

- Be aware of club activities
- Be involved with club events

- Provide insight and guidance for activity planning
- Instruct students in the recognition, avoidance, and response to unsafe conditions, including hazards associated with non-routine activities and emergency operations.
- Oversee, approve, and maintain written activity procedures which conform to regulatory, campus, and departmental guidelines.
- Sign off on the Readiness Review Sheet (APP 8.2)
- Ensure that training is performed and documented.
- File Incident Reports
- Ensure procedures are edited and revised properly and students retrained.
- Must be present during all Class III procedures, and give verbal permission for students to operate Class II Procedures.

4 HAZARD ASSESSMENT AND MITIGATION

In order to properly mitigate risk, it is imperative to first assess both the likelihood and severity of the consequences of a failed activity. Then, methods can be designed to control those risks.

4.1 Activity Hazard Assessment and Matrix

The following Risk Assessment Matrix is divided into columns which detail the severity of a possible anomaly, and rows which define the probability that the anomaly will take place.

Risk Assessment Matrix				
	Death	Serious Injury	Minor Injury	Minimum Threat
Expected	IV	IV	IV	III
Probable	IV	IV	III	II
Improbable	IV	III	II	I
Unexpected	III	II	I	I

The rows are defined as follows:

- Expected: It is very likely that the anomaly will occur. Engaging in the activity is expected to yield adverse results.
- Probable: An anomaly is likely to occur with time. While not expected, it is likely to occur with many iterations of the activity.
- Improbable: An anomaly is unlikely, but still reasonably possible to occur with many iterations of the activity.
- Unexpected: It is unexpected that an anomaly will occur with any number of iterations of the activity

The columns are defined as follows:

- Death: Death is one of the possible outcomes of an anomaly.
- Serious Injury: Dismemberment or serious bodily harm that requires professional medical attention is one of the possible outcomes of an anomaly. (i.e. severe cuts which may require stiches or staples, severe burns)

- **Minor Injury:** Small cuts or lacerations that may require first aid, but do not require professional medical attention.
- **Minimum Threat:** An anomaly does not require any form of medical attention.

The contents of the cells define the class of activity each combination of probability and severity will require. They are defined as follows:

- **Class IV:** This activity has a very high level of risk. CPSS will never, under any circumstances, engage in an activity that is a Class IV activity.
- **Class III:** This activity has a high level of risk.
- **Class II:** This activity has a moderate level of risk.
- **Class I:** This activity has a low level of risk.

In order to determine the risk level of an activity, the Risk Assessment Matrix will be used in conjunction with the Initial Risk Assessment Worksheet (IRAW) (APP 8.3). In the IRAW, an activity will be identified, and broken down into basic tasks. Each task will be given a risk classification using the Risk Assessment Matrix. Then, methods for risk control will be identified, and a final risk classification will be given to each task. The activity as a whole will have the same risk classification as the task with the highest final level of risk.

4.2 Risk Mitigation

Each level of classification has different requirements to ensure safety. The higher the classification, the more work that is required to ensure the safety of the individuals involved. The *Activity Plan* required will be determined by the activity's classification level, where Class III requires the most rigorous *Activity Plan*.

	Class III	Class II	Class I
Required Steps	Activity Plan must be approved by the advisor, and other appropriate resources (such as EHS), and notification will be given to the advisor and EHS as appropriate 48 hours prior to carrying out the procedure.	Activity Plan must be approved by the advisor. To run this activity, notification will be given 24 hours in advance to the advisor.	Activity Plan must be approved by the SSO.

All manufacturing and testing activities will comply with the rules of the Student Machine Shop which specify the following requirements:

- More than one person must be present
- Participants must wear long pants, close-toed shoes, and applicable PPE
- Participants do not manufacture or test between the hours of 12 am and 7 am.

A procedure must be performed with all required positions assigned. All non-essential persons must clear the area if their presence constitutes an increased safety risk.

CPSS will comply with Chemical Hygiene Plan. All chemical mixing will be performed with, but not limited to, proper ventilation, PPE, and MSDS's for chemicals and materials nearby. Any new or modified chemical procedure will be approved by The Advisor and/or EHS.

4.3 Facility Hazard Assessment and Mitigation

CPSS shall ask EHS to conduct a review of CPSS facilities at beginning of every year. In this review, CPSS may either submit an Inspection Check-List (APP 8.4) for approval by EHS or a staff member of EHS will walk through the CPSS facilities with the SSO and identify any possible hazards/risks. The SSO will rectify these hazards within the time period specified by EHS during the walk through.

The SSO or SSOD will conduct a quarterly walkthrough of facilities using the Inspection Check-List and bring up any observations or actions needed with club officers, advisor, and/or EHS as appropriate. Each successive walkthrough after a hazard is identified will indicate if the hazard/risk was addressed and mitigated.

Walkthroughs and corrective action will be documented on the Inspection Check-List and logged in the SSO folder.

5 PROCEDURES AND ACTIVITY PLANS

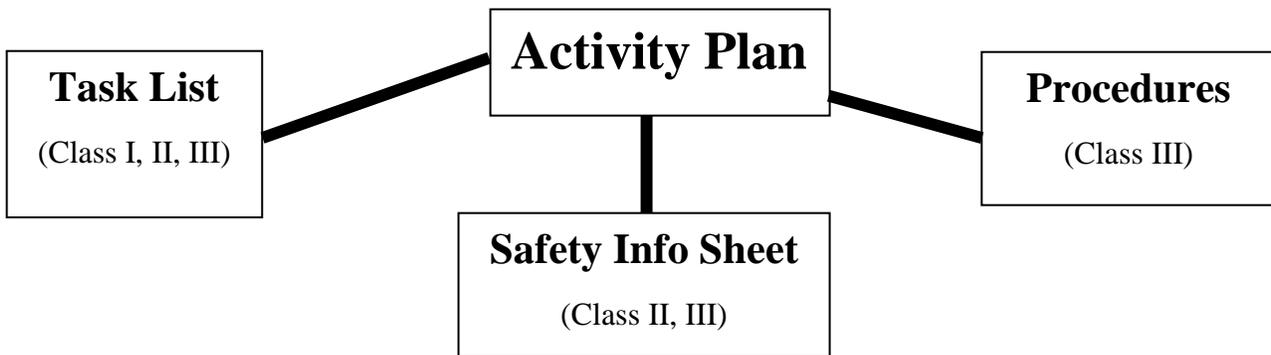
Procedures outline each step that will be undertaken during the activity, and the proper safety measures that must be adhered to. Procedures will also highlight each identified hazard using an Initial Risk Assessment Worksheet (APP 8.3). Proper PPE, exposure mitigation methods, and accident

Task Lists will be used to ensure quality and repeatability in club activities which pose a minimum health risks to members. A task list will list general PPE required as well as potential risks defined in the Initial Risk Assessment Worksheet. A general overview of the activity may be included.

Safety Info Sheets lists required PPE, excerpts from the MSDS's of materials used, and general safety callouts. They do not require step by step instructions to ensure safety. For example, a Class II activity will require a section that details all hazards, as well as methods for mitigating those hazards, such as special PPE, or techniques to be used throughout the Task List. Safety Info Sheets are designed to mitigate the risk of an activity, while allowing the Task List to change with minimal hurdles for review.

Activity Plans depend on the safety classification of the activity. Class I activities only require *Task Lists*. Class II activities require both *Task Lists* and *Safety Info Sheets*. Class III activities require *Procedures*, and may contain *Task Lists* and *Safety Info Sheets*.

All current procedures and activity plans will be posted on the CPSS website.



Required documents for each activity:

- Class I: Task list
- Class II: Task List and Safety info sheet
- Class III: Task List, Safety Info sheet and Procedures

All activities may benefit from more than the required documentation. The decision lies with the club advisor and student leadership, who may decide a Procedure and/or Safety Info Sheet are also necessary. Initial Risk Assessment Worksheet will help determine if this is the case.

5.1 Procedure and Activity Plan Development

Procedures and activity plans will undergo peer review and approval. The extent of peer review and approval required will depend on the risk classification level. Every procedure will contain a Test Authorization Page (APP 8.1), and a list of members certified to participate in the test.

Procedures and activity plans are living documents. After the initial creation, any edits or changes to the procedure must be approved by the SSO and/or advisor. Class II and Class III procedure edits or changes require Advisor approval. Class I procedure edits or changes require approval of SSO only.

5.2 Procedure Record Keeping

The most recently approved “Original” procedures, with required signatures, will be stored in the SSO’s Safety Log. “Originals” are the printed procedures that have been signed by the appropriate parties. Superseded procedures will be noted “expired” and placed in a file with old procedures. Both the date a procedure was last modified and the date it was printed shall be clearly displayed on each page of the procedure. Once a procedure is modified, the old version will be kept in a separate folder from the most recently approved procedures.

CPSS shall keep a record of all “As-Run” procedures for Class III activities. “As-Runs” are the physical procedures used to perform an activity, and should contain notes and documentation that each step was followed properly (check marks). Each As-Run will also include a Test Authorization sheet, and a list of the participants.

All “As-Runs” and “Originals” will be scanned and archived in CPSS’s Google Drive (or equivalent); physical copies will be kept for 3 years in the CPSS office.

6 TRAINING

Every activity requires some degree of training and is dependent on Class level. Class III has more training than Class I.

6.1 Test Procedure Training and Review

The SSO, with the advisor’s knowledge, will conduct a Readiness Review at least 24 hours before performing Class III procedures. The Readiness Review is a group read through of the procedure. The review and the names of those present will be documented on Test Authorization Sheet (See APP 8.1).

For a brand new procedure, a dry run will be conducted a week before the scheduled use of the procedure. In a dry run, the conductor will run through the procedure, and each participant will indicate how he or she would carry out each step. For example, if a procedure called for valve B to be turned, the participant would point to valve B without actually turning it. Dry runs will not include the use of oxidizer, fuel, or chemical mixing. If an activity is being performed off-campus, the equipment will be set up as close to the real set-up as possible and the dry run will be performed on campus. The dry run will be performed before the scheduled test and will be part of the test readiness review (APP 8.2) and test authorization (APP 8.1).

6.2 Tool Use

All members will be required to have a red tag in the Student Machine Shops in order to use any hand tools owned by CPSS. CPSS will keep a list of members who have a red tag in the member database.

6.3 Trainers and Certifying

A Trainer is someone who is proficient in a specialized activity. The Advisor and the SSO decide together who is qualified to be a Trainer.

A member may become certified to perform an activity after demonstrating his/her comprehension of the activity, and the trainer has given his or her approval that the member is trained. The SSO and advisor may veto the decision that the member is certified in an activity.

An up-to-date list of certified members will be kept for each activity. APP 8.1 will be used for procedures otherwise APP 8.6 will be used. Certification will need to be renewed annually at the aforementioned general safety overview.

7 ACCIDENT INVESTIGATION AND CORRECTION

All injuries and exposures shall be reported to the club advisor as soon as possible. The advisor shall ensure that the appropriate injury report forms are filed with the University Risk Management Office. CPSS will be responsible for reporting incidents that occur during club activities.

In the event of equipment damage, a notice preventing use of the equipment will be posted on the equipment and members will be notified.

The CPSS Incident Classification Chart defines exposures and incidents and outlines the required action.

CPSS Incident Type Chart			
	Type C - Breach of "10 Fingers, 10 Toes"	Type B-Incident	Type A-Minor Injury
Definition	"10 fingers, 10 toes" means any injury or illness which requires inpatient hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any degree of permanent disfigurement. (IIPP 11.2)	Professional medical care is required for a period less than 24 hours. (outpatient procedures, stitches, minor burns, broken bones)	Minor injuries include, but not limited to small cuts, scrapes, and splinters. A minor injury can be addressed with basic first-aid.
Action taken	911 will be called, EHS, and Advisor will be notified immediately (As appropriate). Cal Poly Incident/Accident report will be completed within 48 hours.	Advisor will be notified and Cal Poly Incident/Accident report will be completed within 48 hours. 911 called as appropriate	"Band-Aid" (use of first aid kit for minor injuries) reports will be logged on a form in the first aid box within 24 hours. Incident Accident Report as appropriate

8 APPENDIX

The following pages contain applicable documents.

8.1 Test Authorization Sheet

Name of Test			
Date		Activity Class:	I II III
Location			
Description of Test			
SSO Present		Test Conductor	
Test Participants	Name	Signature	

Advisor Signature: _____ Date: _____

Student Safety Officer or Deputy: _____ Date: _____

Test Conductor Signature: _____ Date: _____

8.2 Readiness Review Sheet

Topic:

Meeting Facilitator:

Summary:

This section will contain a summary of the contents of the safety meeting for the corresponding procedure. The Readiness Review Sheet will be referenced when filling out the Test Authorization Sheet (Safety Protocol APP 8.1) prior to the implementation of every Class II or III activity, and only those whose names appear on the list will be allowed to participate. Readiness Review Sheets will be kept in a three ring binder and a copy will be issued to the lead in charge of implementing a procedure.

Attendees:

Name	Signature	Name	Signature
SSO:		Conductor:	

Advisor Signature: _____ Date: _____

Student Safety Officer: _____ Date: _____

8.3 Initial Risk Assessment Worksheet

Initial Risk Assessment Worksheet					
Activity Name		Activity Description			
Task	Identified Hazard	Preliminary Risk Level	Steps to be Taken	Projected Final Risk Level	
Overall Activity Risk Classification	I		II	III	IV
SSO Name		SSO Signature		Date	
Advisor Name		Advisor Signature		Date	
EHS Rep Name		EHS Rep Signature		Date	

8.4 Cal Poly Space Systems Inspection Check List

General	Yes	No	Comments	Recommended Corrective Action	Corrective Action Taken (with Date)	Initials
Are work and storage areas clean and orderly?						
Are emergency contacts and phone numbers posted?						
Is a first aid kit readily accessible and adequately stocked?						
Is red safety wire in place on the Filament Winder?						
Is electrical equipment grounded or double insulated?						
Is the CPSS safety documentation laid out in sections 7.1 and 7.2 properly organized and filed?						

General	Yes	No	Comments	Recommended Corrective Action	Corrective Action Taken (with Date)	Initials
Is a fire extinguisher readily accessible with a current service tag?(a year)						
Are all containers clearly labeled, including hazard identification?						
Are chemicals segregated by hazard class and chemical compatibility?						
Are MSDS readily available for all substances?						
Are flammable liquids stored in safety cans or flammable cabinets?						
Are appropriate chemical spill and clean up materials? <ul style="list-style-type: none"> • Absorbent • Rubber gloves • Heavy duty trash or compactor bags • Sharpie for labeling 						

General	Yes	No	Comments	Recommended Corrective Action	Corrective Action Taken (with Date)	Initials
Do members receive training on : <ul style="list-style-type: none"> • Specific hazards associated with the materials and equipment they use and how to protect themselves? • The use of personal protective equipment (PPE), if applicable? • Emergency procedure? • Is written document of safety training available, complete, and current? 						
Have trip hazards been eliminated?						
Is personal protective equipment provided, used, and maintained when required?						

Machine Tools (Filament Winder)	Yes	No				
Are all machinery and equipment kept clean and properly maintained?						
Are emergency stop buttons colored red?						
Compressed Gas Cylinders	Yes	No				
Are all compressed gas cylinders anchored in place by at least two chains?						
Are cylinders legibly marked to clearly identify the gas contained?						
Are compressed gas cylinders stored in areas which are protected from external heat sources such as flame impingement, intense radiant heat, electric arcs or						

high temperature lines?						
Are cylinders located or stored in areas where they will not be damaged by passing or falling objects or subject to tampering by unauthorized persons?						
Are cylinders stored according to compatibility standards, such that fuels and oxidizers are at least 20 feet away from each other?						
Are cylinders stored or transported in a manner to prevent them from tipping, falling or rolling?						
Are caps placed always placed on cylinders when the cylinders are not in use or connected for use?						
Are all valves closed before the cylinder is moved, when the cylinder is empty and at the completion of each job?						

Flammable and combustible materials	Yes	No				
Are all fire extinguishers and fire alarm pull stations free from obstructions?						
Are all fire extinguishers properly date-tagged and pressurized?						
Hazardous Chemical Use	Yes	No				
Are members trained in the safe handling practices of hazardous chemicals such as acids, caustics, solvents, etc.?						
Are members aware of the potential hazards involving various chemicals stored or used in the workplace such as acids, bases, caustics, epoxies, phenols, etc.?						

Are all containers of hazardous materials clearly labeled with their contents and their hazard?						
Are flammable or toxic chemicals kept in closed containers when not in use and stored according to compatibility?						
Are members prohibited from eating in areas where hazardous chemicals are present?						
Is there a member training program for hazardous substances?						

Performed by: _____

SSO Signature: _____ Date: _____

8.5 Risk Assessment Matrix

In order to properly mitigate risk, it is imperative to first assess both the likelihood and severity of the consequences of a failed activity. The Risk Assessment Matrix is divided into columns which detail the severity of a possible anomaly, and rows which define the probability that the anomaly will take place.

Risk Assessment Matrix				
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Improbable	IV	III	II	I
Unexpected	III	II	I	I

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- Unexpected: It is unexpected that an anomaly will occur with any number of iterations of the activity

The columns are defined as follows:

- Death: Death is one of the possible outcomes of an anomaly.
- Serious Injury: Dismemberment or serious bodily harm that requires professional medical attention is one of the possible outcomes of an anomaly.
- Minor Injury: Small cuts or lacerations that may require first aid, but do not require professional medical attention.
- Minimum Threat: An anomaly does not require any form of medical attention.

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- Class IV: This activity has a very high level of risk. CPSS will never, under any circumstances, engage in an activity that is a Class IV level of activity.
- Class III: This activity has a high level of risk.
- Class II: This activity has a moderate level of risk.
- Class I: This activity has a low level of risk.

8.6 Training Program Attendance Log

Program: _____ Duration: _____

Trainer: _____ Date: _____ Location: _____

Trainer Signature: _____ Adviser Signature: _____

Short Description of Training Content: _____

NAME (Print)	NAME (Signature)	email
1.		
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8.7 List of Acronyms

CHP: Chemical Hygiene Plan

CPSS: Cal Poly Space Systems

EHS: Environmental Health and Safety

HTPB: Hydroxyl Terminated Polybutadiene

IIPP: Injury and Illness Prevention Program

IRAW: Initial Risk Assessment Worksheet

MSDS: Material Safety Data Sheet

PPE: Personal Protection Equipment

SSO: Student Safety Officer

SSOD: Student Safety Officer Deputy

References

Environmental Health and Safety Cal Poly SLO, Laboratory Safety,
<https://www.afd.calpoly.edu/ehs/laboratorysafety.asp>