



Wildfire Smoke Protection Plan

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**San Bernardino Community College District
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I. Policy Statement

San Bernardino Community College District (SBCCD) is committed to providing a safe work environment for all employees. As part of this commitment, SBCCD has developed the following Wildfire Smoke Protection Plan (WSPP) to comply with California Code of Regulations Title 8 Section 5141.1.

II. Authority

California Code of Regulations Title 8 Sections 5141.1, 5144, and 5155.

III. Scope

This plan applies to all SBCCD employees engaged in outdoor duties and/or assignments in which the Current Air Quality Index for PM2.5 is one hundred fifty-one (151) or greater, and employees anticipated to be exposed to wildfire smoke.

This plan does not apply to employees engaged in duties and/or assignments in:

- Enclosed buildings or structures in which the air is filtered by a mechanical ventilation system and the windows, doors, bays, and other openings are kept closed, except when it is necessary to open doors to enter or exit; or
- Enclosed vehicles in which the air is filtered by a cabin air filter and the employer ensures that windows, doors, and other openings are kept closed, except when it is necessary to open doors to enter or exit the vehicle; or
- Indoor or outdoor locations where the current AQI for PM2.5 is less than one hundred fifty-one (151) or is greater than one hundred fifty-one (151) for a total of one (1) hour or less during a shift.

IV. Definitions

Current Air Quality Index - (Current AQI) - The method used by the U.S. Environmental Protection Agency (U.S. EPA) to report air quality on a real-time basis. Current AQI is also referred to as the “NowCast,” and represents data collected over time periods of varying length in order to reflect present conditions as accurately as possible.

AQI Color	Levels of Concern	Values of Index	Description of Air Quality
Green	Good	0 to 50	Air quality is satisfactory, and air pollution poses little or no risk.
Yellow	Moderate	51 to 100	Air quality is acceptable. However, there may be a risk for some people, particularly those who are unusually sensitive to air pollution.
Orange	Unhealthy for Sensitive Groups	101 to 150	Members of sensitive groups may experience health effects. The general public is less likely to be affected.
Red	Unhealthy	151 to 200	Some members of the general public may experience health effects; members of sensitive groups may experience more serious health effects.
Purple	Very Unhealthy	201 to 300	Health alert: The risk of health effects is increased for everyone.
Maroon	Hazardous	301 and higher	Health warning of emergency conditions: everyone is more likely to be affected.

Emergency - An event or circumstance that poses an immediate risk to health, life, property, or the environment and requires urgent/immediate action.

NIOSH - The National Institute for Occupational Safety and Health of the U.S. Centers for Disease Control and Prevention. NIOSH tests and approves respirators for use in the workplace.

PM_{2.5} – Inhalable airborne particulate matter (PM) is not a single pollutant but rather is a mixture of many chemicals. Particles vary widely in size, shape, and chemical composition, and may contain inorganic ions, metallic compounds, elemental carbon, organic compounds, and compounds from the earth's crust. Particles are defined by their diameter for air quality regulatory purposes. Fine particulate matter is defined as particles that are 2.5 microns or less in diameter (PM_{2.5}).

Wildfire Smoke - Emissions from fires in “wildlands,” (defined as sparsely populated geographical areas covered primarily by grass, brush, trees, crops, or combination thereof), or in adjacent developed areas.

V. Roles and Responsibilities

Campus Leadership

It is the responsibility of the Campus President and the Vice President of Administrative Services (Campus Site Safety Officer) to ensure compliance of the WSPP at their respective campus. This includes:

1. Overall implementation and maintenance of the WSPP.
2. Evaluation of resource needs for the effective implementation of the WSPP, including obtaining and distributing PPE as needed.
3. Ensuring managers are monitoring Current AQI and providing assistance when needed in the determination of alteration or suspension of work activities that may jeopardize employee health and safety regarding wildfire smoke.
4. Directing changes in work practices in order to improve health and safety and audit field work facilities and field activities in order to evaluate the effectiveness and/or compliance with required WSPP safe work procedures.
5. Distribution of the WSPP to the campus community, including administrators, managers, and academic deans.
6. Ensuring that all affected employees are adequately trained.
7. Determining, in conjunction with District leadership and Safety & Risk Management, when the campus should be closed.

Safety & Risk Management Department

It is the responsibility of the Vice Chancellor of Human Resources, Payroll, Police Services, and Health and Safety Administration and the Emergency, Compliance, Risk & Safety Administrator (District worksites Site Safety Officer) to ensure compliance of the WSPP at District worksites. This includes:

1. Conducting or coordinating periodic inspections to ensure compliance in collaboration with the Campus Site Safety Officer and/or appropriate Program Administrator.
2. Initiating hazard mitigation, while coordinating with the appropriate Program Administrator.
3. Conducting accident investigation in collaboration with the Office of Human Resources.
4. Collaborating with the appropriate Program Administrator and managers to ensure employees follow mandated safety and health procedures.
5. Facilitating or coordinating training in collaboration with the appropriate Program Administrator for all SBCCD employees and managers. This training shall cover health and safety hazards to which employees may be exposed, as well as applicable laws, regulations, and SBCCD safety rules and policies.
6. Monitoring compliance with the California Code of Regulations, Title 8 (CCR T8).
7. Determining, in conjunction with District and worksite leadership, when worksite activities should be suspended, or when the worksite should be closed.

Managers

It is the responsibility of all managers to:

1. Understand and comply with the WSSP.
2. Complete Wildfire Smoke training as required and ensure that initial and periodic training is provided to their employees.
3. Be aware of work areas, processes or tasks that present wildfire smoke hazards to their employees.
4. Observe and report wildfire smoke hazards and/or imminent health hazards.
5. Monitor Current AQI when employees may be exposed to wildfire smoke.
6. Check the Current AQI for the PM2.5 level before each shift and periodically during the day when AQI exceeds one hundred fifty-one (151).
7. Inform employees periodically of the current AQI for PM2.5 and which protective measures are available to them.
8. Implement control measures for outdoor workers exposed to wildfire smoke.
9. Provide appropriate PPE to their employees as needed. This includes providing respirators for voluntary use when the Current AQI for PM2.5 is greater than one hundred and fifty-one (151) and ensuring respirators worn when the Current AQI for PM2.5 is greater than five hundred (500).
10. Provide employees with a copy of [Appendix B to Section 5141.1](#) during potential wildfire smoke events.
11. Wear appropriate PPE as needed and/or required.

Employees

It is the responsibility of all employees to:

- I. Understand and comply with the WSSP.
- II. Complete Wildfire Smoke training as required.
- III. Observe and report wildfire smoke hazards and/or imminent health hazards.
- IV. Wear appropriate PPE as needed and/or required.

VI. Identification of Harmful Exposure

The SBCCD Wildfire Smoke Safety Plan takes effect when the Air Quality Index for PM2.5 is one hundred fifty-one (151) or greater, regardless of the AQI for other pollutants. Employee exposure to PM2.5 shall be determined by the appropriate manager or administrator at the start of each shift and periodically thereafter, as needed to protect the health of employees, by any of the following methods:

- Check SBCCD campus specific Current AQI PM2.5 air quality monitors through EPA AirNow; or
- Check AQI forecasts and the Current AQI for PM2.5 from any of the following websites: [U.S. EPA AirNow](#), the [Interagency Wildland Fire Air Quality Response Program](#), the [U.S Forest Service](#), the [California Air Resources Board \(CARB\)](#), the [local air pollution control district \(South Coast AQMD\)](#), or the local air quality management district; or
- Obtain AQI forecasts and the Current AQI for PM2.5 directly from the U.S. EPA, the Interagency Wildland Fire Air Quality Response Program, the U.S Forest Service, the California Air Resources Board, the local air pollution control district, or the local air quality management district by telephone, email, text, or other effective method; or
- Measure PM2.5 levels at the worksite and convert the PM2.5 levels to the corresponding AQI in accordance with [Appendix A of T8 CCR 5141.1](#).

Direct Monitoring

SBCCD may use a direct-reading particulate monitor to determine PM2.5 levels for section 5141.1, so long that the monitor:

- (1) Does not underestimate employee exposures to wildfire smoke; or

(2) May underestimate wildfire smoke exposures, but SBCCD has obtained information on the possible error of the monitor from the manufacturer and has accounted for the error of the monitor when determining exposures to PM2.5 to ensure that employee exposure levels are not underestimated.

The monitor utilized shall be designed and manufactured to measure the concentration of airborne particle sizes ranging from an aerodynamic diameter of 0.3 micrometers or less, and up to and including 2.5 micrometers ($\leq 0.3\mu\text{m}$ to $2.5\mu\text{m}$).

SBCCD shall ensure that the monitor and all necessary monitor accessories are calibrated, maintained, and used, in accordance with the manufacturer's instructions for accurately measuring particles with an aerodynamic diameter of 0.3 micrometers or less, and up to and including 2.5 micrometers ($\leq 0.3\mu\text{m}$ to $2.5\mu\text{m}$). SBCCD may use an air monitor that measures particles less than 0.3 micrometers to greater than 2.5 micrometers ($\leq 0.3\mu\text{m}$ to $\geq 2.5\mu\text{m}$) if the result is treated as the PM2.5 level.

SBCCD shall use the following table to convert the PM2.5 concentration to the AQI for PM2.5.

PM2.5 in Micrograms per Cubic Meter ($\mu\text{g}/\text{m}^3$)	Air Quality Index (AQI) Categories for PM2.5
0 to 12.0	0 to 50
12.1 to 35.4	51 to 100
35.5 to 55.4	101 to 150
55.5 to 150.4	151 to 200
150.5 to 250.4	201 to 300
250.5 to 500.4	301 to 500

The person supervising, directing, or evaluating workplace monitoring for PM2.5 shall have the training or experience necessary to apply this section and to ensure the correct use of the monitor and the interpretation of the results, so that exposures are not underestimated.

VII. Training, Control of Harmful Exposures, and Respiratory Protective Equipment

Training will be provided to all employees and managers who are reasonably expected to be covered under the Cal/OSHA Wildfire Smoke Emergency Standard. This may include "just-in-time" training for employees unexpectedly exposed to wildfire smoke. Training shall also include [Title 8 Appendix B to Section 5141.1](#).

The following controls will be utilized to reduce harmful exposure to employees:

- **Engineering controls** will be utilized to reduce employee exposure to PM2.5 to less than a current AQI of one hundred and fifty-one (151). This will be achieved by providing enclosed buildings, structures, or vehicles where the air is filtered.
- **Administrative controls** will be utilized whenever engineering controls are not feasible or do not reduce employee exposures to PM2.5 to less than a Current AQI of one hundred and fifty-one (151). These controls include relocating work to a location where AQI for PM2.5 is lower, changing work schedules, reducing work intensity, and/or providing additional rest periods in enclosed buildings, structures, or vehicles where the air is filtered.
- **Respiratory protective equipment** will be used as follows:
 - Respirators will be encouraged and provided to employees for **voluntary*** use when the Current AQI for PM2.5 is equal to or greater than one hundred and fifty-one (151) but does not exceed five hundred (500).
 - Respirators will be used in accordance with T8 CCR 5144 and will be:
 - NIOSH-approved and effectively protect the wearers from inhalation of PM2.5, such as N95 filtering facepiece respirators, and
 - Maintained as per manufacturer's instructions including storage, and maintenance, and replacement so that they do not present a health hazard to users.
 - Respirator use will be **required**** when the Current AQI for PM2.5 exceeds 500. Respirators shall be used in accordance with Title 8 section 5144, and the respirators will have an assigned protection factor so that

the PM2.5 levels inside the respirator correspond to an AQI less than 151.

* Fit testing and medical evaluations are not required of employees whose only use of respirators involves the voluntary use of filtering facepieces, such as N95 respirators.

** Fit testing and medical evaluations are required of employees whose use of respirators is required to safely engage in assigned duties and tasks.

Recommended Emergency Controls and Thresholds

AQI Color	Levels of Concern	Values of Index	Description of Air Quality	Recommended Emergency Control
Green	Good	0 to 50	Air quality is satisfactory, and air pollution poses little or no risk.	Monitor Air Quality
Yellow	Moderate	51 to 100	Air quality is acceptable. However, there may be a risk for some people, particularly those who are unusually sensitive to air pollution.	Monitor Air Quality
Orange	Unhealthy for Sensitive Groups	101 to 150	Members of sensitive groups may experience health effects. The general public is less likely to be affected.	Monitor Air Quality
Red	Unhealthy	151 to 200	Some members of the general public may experience health effects; members of sensitive groups may experience more serious health effects.	Begin voluntary use of respirators. Consider suspension of outdoor activities.
Purple	Very Unhealthy	201 to 300	Health alert: The risk of health effects is increased for everyone.	Continue voluntary use of respirators. Consider suspension of outdoor activities.
Maroon	Hazardous	301 and higher	Health warning of emergency conditions: everyone is more likely to be affected.	Discuss campus/worksite closure. Respirators are required at AQIs of 500 or higher.

VIII. Communication

Wildfire smoke hazards shall be communicated to employees by their manager or appropriate administrator in a way that is easily understandable. Employees shall be informed of the Current AQI for PM2.5 and protective measures that are available to, and/or required of them, to reduce exposure to wildfire smoke. Employees shall also be encouraged to inform their supervisor of worsening air quality and adverse health symptoms that may be the result of wildfire smoke exposure.

SBCCD will primarily utilize standard communication methods (e.g., phone calls, emails, radio, and/or text messages) to communicate to employees when the Current AQI for PM2.5 is equal to or greater than one hundred and fifty-one (151) but does not exceed five hundred (500). SBCCD will utilize its emergency notification system, RAVE Alert, when necessary to communicate to employees if the AQI for PM2.5 reaches five hundred (500) or higher, or as needed to effectively communicate wildfire smoke hazards to employees.

IX. Health Effects, Medical Treatment, and Record Keeping

The Health Effects of Wildfire Smoke

Although there are many hazardous chemicals in wildfire smoke, the main harmful pollutant for employees who are not close to the fire is “particulate matter,” the tiny particles suspended in the air. Particulate matter can cause problems such as asthma, difficulty breathing, and chest pain.

The smallest -and usually the most harmful particulate matter is called PM2.5 because it has a diameter of 2.5 micrometers or smaller.

More information can be found in [Title 8 Appendix B to Section 5141.1](#).

The Right to Obtain Medical Treatment Without Fear of Reprisal

Employees who show signs of injury or illness due to wildfire smoke exposure and seek medical treatment shall not be punished for seeking such treatment. Effective provisions are in place to provide prompt medical treatment of employees in the event of serious injury or illness caused by wildfire smoke exposure.

Record Keeping

All medical assessments and records, verbal and written, concerning the voluntary use or required use of respiratory protection for an employee will not be disclosed or released to anyone without the employee’s written consent except as required by law. These records will be kept by the Office of Human Resources.