

UNIVERSITY of



DAYTON

## Environmental Health & Safety Policy

Effective Date: January 25, 2016

Approval: January 25, 2016

Maintenance of Policy: Facilities and Campus Operations, Department of Environmental Health & Safety/Risk Management

**PURPOSE:** The purpose of the Environmental Health & Safety policy is to formalize the University of Dayton's commitment to provide a safe and healthy environment for all students, faculty, staff and visitors of our campus community and to define a strategy for achieving and maintaining university-wide compliance with all environmental, health, and safety laws and regulations.

**SCOPE:** The University of Dayton (University) is committed to providing a safe and healthy working environment for all members of the campus community. All University activities are to be conducted in a manner that ensures the protection of students, faculty, staff, visitors, property, and the environment.

### APPLICABLE REGULATIONS:

1. Occupational Health and Safety (OSHA)
2. Environmental Protection Agency (EPA)
3. National Fire Protection Agency (NFPA)
4. Nuclear Regulatory Commission (NRC)
5. Ohio Department of Health (ODH)
6. Regional Air Pollution Control Agency (RAPCA)
7. Dayton Fire Department (DFD)
8. Ohio Building Code (OBC)
9. Department of Homeland Security (DHS)
10. Department of Transportation (DOT)
11. Comprehensive Environmental Response
12. Compensation and Liability Act (CERCLA)
13. Superfund Amendments and Reauthorization Act (SARA)
14. Higher Education Opportunity Act (HEOA)
15. Spill Prevention
16. Control and Countermeasure (SPCC)
17. Department of Labor (DOL)

### REFERENCE DOCUMENTS:

1. Appendix A: Health and Safety Programs
2. Asbestos Policy
3. Hazardous Materials Handling
4. Fire Safety and Evacuation Policy
5. Laboratory and Technical Area Safety Policy
6. Safety Training Policy
7. Open Flame Policy
8. Vehicle Use and Driver Certification

### POLICY HISTORY:

Approved in Original Form:

January 25, 2016

**POLICY:**

It is University policy to comply with all applicable health, safety and environmental protection laws, regulations and requirements. To meet this standard of excellence, the University implements management initiatives and best practices to systematically integrate health, safety, and environmental considerations and sustainable use of natural resources into all activities. This policy provides a framework of compliance with applicable Federal, State and local regulations and University policies, programs and procedures.

**I. ROLES AND RESPONSIBILITY****1. President, Provost, Vice Presidents**

The University President has the ultimate responsibility for environmental, health and safety programs for the University.

Under the authority delegated by the President, the Executive Administration provides appropriate financial and organizational support to assure operations are conducted safely and in compliance with applicable environmental, health and safety laws and regulations. Executive Administration approves and authorizes the implementation of policies and programs for safety and compliance including the establishment of consequences for non-compliance as well as unsafe acts or creating unsafe working conditions.

**2. Executive Administration: Provost, Vice Presidents, Associate, Assistant Provosts and Vice Presidents, Deans, Chairs, Department Heads, Directors, Division Heads and Group Leaders are responsible for:**

- Providing a safe and healthful environment in those areas and for those employees, students and others for whom they have supervisory or administrative responsibility, incorporating safety and health as an integral part of their activities.
- Ensuring compliance with EHS/RM programs, policies, procedures and guidelines in their work units or areas.
- Ensuring corrective action is taken to remedy any health and safety deficiencies identified in their areas of responsibility.
- Appointing sufficient safety coordinators to perform the responsibilities to cover all of their areas of responsibility.
- Stopping, and/or complying with EHS/RM requests to cease, any University-related activity which presents an unreasonable health or safety risk to University employees, students or visitors.

**3. Environmental Health & Safety/Risk Management (EHS/RM) are responsible for:**

- Providing leadership to develop and implement EHS/RM policies, programs and procedures.
- Providing technical resources, staff support, advice, and consultation to University leadership, Safety Coordinators, managers and supervisors concerning EHS/RM issues.
- Formulating and drafting for review, policies, procedures and guidelines necessary to implement the environmental health and safety programs under its jurisdiction.
- Monitoring University compliance and the effectiveness of EHS/RM programs.

- Ensuring centralized EHS/RM records, including training logs, inspection reports, compliance reports, and information requiring employee access are maintained.
- Investigating identified hazards and recommending actions to correct deficiencies.
- Ensuring that EHS/RM policies, written programs and guidelines are communicated, implemented and evaluated to all working units.
- Acting as the University liaison with governmental and regulatory agencies regarding environmental health and safety matters.
- Stopping any University-related activity which presents an unreasonable health or safety risk to University employees, students or visitors.

#### **4. Safety Coordinators and Safety Committees**

Safety Coordinators and Safety Committees are appointed by Deans, Directors, or Department Heads and are critical to the effective implementation of the EHS/RM program and ensuring University compliance.

Safety Coordinators and Safety Committees are responsible for:

- Coordinating with EHS/RM.
- Assisting the Dean, Director or Department Head in the communication, development and implementation of required EHS/RM Programs.
- Assisting the Dean, Director or Department Head in the identification and implementation of required training programs for employees.
- Reviewing environmental health and safety activities.
- Coordinating appropriate training for staff, faculty, students, visitors and volunteers in their areas.
- Assisting EHS/RM in conducting periodic inventories and inspections.
- Preparing written reports, recordkeeping and recommendations as needed to assist in compliance with EHS/RM programs.
- Assisting with incident or near-miss incident follow-up investigations.
- Providing assistance to correct identified deficiencies.

**5. Managers, Supervisors, Faculty and Principal Investigators are responsible for:**

- Ensuring effective implementation of and compliance with EHS/RM policies, programs, procedures and guidelines as they relate to their operations.
- Ensuring that all of their employees and students receive the appropriate training as well as instruction regarding general safe work practices and instructions specific to their job duties. Such education and training shall take place prior to assignment to potentially hazardous activities. See the University of Dayton Safety Training Policy.
- Ensuring documentation of all EHS/RM training of employees and students in their areas of responsibility is maintained.
- Developing and maintaining an inventory of hazardous materials present in all work areas within the department.
- Posting appropriate safety notices and/or procedures in noticeable locations.
- Developing methods, as appropriate, to inform outside contractors and/or University maintenance personnel working in areas under their supervision of the hazards to which those employees may be exposed.
- Reviewing accident and injury reports for their area(s).
- Promptly notifying EHS/RM when they become aware of a violation of any University, State or Federal environmental health or occupational safety rule or regulation.
- Seek assistance from EHS/RM for safety or environmental issues identified in their areas.
- Stopping, and/or complying with EHS/RM requests to cease, any University-related activity which presents an unreasonable health or safety risk to University employees, students or visitors.

**6. Employees**

- Read, understand and comply with EHS/RM policies, procedures and guidelines governing their activities.
- Promptly report unsafe conditions, environmental hazards as well as injuries and illnesses to the responsible supervisor or program director.
- Complete all required EHS/RM training.
- Ask questions of their supervisors when there is a concern about an unknown or potentially hazardous situation.
- Conduct themselves in a manner which promotes safety and avoids unsafe or unhealthful conditions.
- Use common sense and good judgment at all times to avoid potential hazards that may exist or be created in the work environment.

**7. Students**

- Students shall follow all safety instructions in the use of facilities, equipment and hazardous materials.
- All injuries, safety incidents, hazardous work conditions and “close calls” shall be recorded on the UD Incident and Hazard Report Form and provided to the student supervisor or appropriate faculty member.

**II. ENFORCEMENT AND RESPONSE TO NON-COMPLIANCE**

The primary responsibility for the environmental health and safety of the workplace belongs to each University employee. However, employees functioning in a supervisory role have a heightened responsibility to ensure that safe conditions, practices and training are provided and followed within their areas of control. Members of the campus community shall cooperate fully with all aspects of the EHS/RM policies and programs. Failure to comply with established EHS/RM policies, programs and procedures can lead to University disciplinary action under the general rules of conduct of all University employees, applicable collective bargaining agreements and the University student Conduct Code.

**Appendix A:**

This Environmental, Health and Safety policy is implemented through a series of policies, programs, and procedures. The items listed below are mandatory in nature and must be followed to ensure compliance. Programs can be found on the EHS/RM website at: <https://www.udayton.edu/facilities/ehsrp/index.php>. For programs not found, please contact EHS/RM at 937-229-4503.

- Contractor Management Program
- EPA Compliance Programs
- Fire Safety Compliance Program/Fire Protection System Management
  - Hot Work
  - Red Tag
  - Building Inspection
  - Equipment Maintenance and Testing
- Department of Transportation (DOT)
- Elevator Entrapment
- Emergency Evacuation Program
- Emergency Shower Installation, Inspection and Maintenance
- Emergency Response Program
- Flood Emergency Response Plan
- Insurance Coordination for Coverage and Claims
- Institutional Animal Care Occupational Health & Safety (IACUC)
- Incident & Hazard Reporting
- Injury & Illness Reduction Program
- Mold and Indoor Air Quality
- Nano Material Safety
- OSHA Compliance Programs
  - Aerial Lifts
  - Asbestos Management
  - Biosafety
  - Bloodborne Pathogens
  - Confined Space
  - Electrical Safety (Lockout/Tagout & NFPA 70E)
  - Ergonomics
  - Fall Protection
  - Hazard Communication
  - Hazardous Material Spill Response (SPCC)
  - Hazardous Materials and Waste Management
  - Hearing Conservation
  - Integrated Lab Safety (Chemical Hygiene)
  - Laboratory and Technical Area Safety Policy
  - Laser Safety
  - Machine Guarding & Power Tool
  - Occupational Safety & Health Training
  - Overhead Cranes
  - Personal Protective Equipment
  - Power Industrial Trucks
  - Voluntary Protection Program (VPP)
  - Welding, Brazing, Cutting

**Appendix A (continued):**

Radiation Safety  
Risk Management  
Safety Inspections  
Vehicle Usage & Driver Certification

