

OAKLAND UNIVERSITY

ADMINISTRATIVE POLICIES AND PROCEDURES

620 ENVIRONMENTAL HEALTH AND SAFETY

SUBJECT: ENVIRONMENTAL HEALTH AND SAFETY

NUMBER: 620

AUTHORIZING BODY: SENIOR VICE PRESIDENT FOR FINANCE AND ADMINISTRATION

RESPONSIBLE OFFICE: ENVIRONMENTAL HEALTH AND SAFETY

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RATIONALE:

To administer, oversee and enforce regulatory compliance activities related to occupational and environmental health and safety, and fire and life safety.

POLICY:

At Oakland university, safety is a campus community responsibility. All members of the university community should be thoroughly familiar with their safety responsibilities, strive to follow safety practices, act proactively to prevent accidents and injuries, communicate hazards to supervisors or other responsible parties, and be prepared for emergencies that may occur in the workplace. Compliance activities may include: development, implementation and management of programs and procedures that are designed to protect employees, students, contractors and guests from illness and/or injury, protect the environment and public health, including air, water and land, protect persons and property from fire, protect the University from fines and penalties and satisfy applicable compliance requirements.

SCOPE AND APPLICABILITY:

This policy applies to all faculty, staff, students, vendors, contractors and visitors on campus.

DEFINITIONS:

Authority Having Jurisdiction: The governmental agency, subagency or owning authority which regulates processes and compliance.

Biohazardous Materials: Hazardous biological materials which can significantly impact the environment, agriculture, and cause disease to living organisms, including humans, animals and plants. Biohazardous Materials include recombinant DNA, infectious organisms (i.e. bacteria, fungi, parasites, prions, rickettsias, viruses, etc.), tissues containing infectious organisms, and biologically active agents (i.e. toxins, allergens and venoms).

Compliance Program: A program which consists of any/all policies and procedures that must be implemented at the University in order to comply with a specific regulation. The program may include documentation, training programs and other educational material.

Compliance Program Guidance Manual: A manual or guidance document that describes in detail the methods that Oakland University will employ in order to comply with relevant regulatory standards.

Electronic Waste (E-Waste): E-waste refers to obsolete, broken, or irreparable electronic devices including any discarded electrical or electronic equipment that contains a battery or plug.

Environmental Health and Safety (EHS): Office responsible for occupational and environmental health, regulatory compliance and fire and life safety for students, employees and guests of University owned facilities and property, reporting to the Division of Finance and Administration.

Environmental Regulations: Regulations pertaining to the environment, environmental obligations and compliance with state and federal regulations that affect businesses and institutions.

Exit Access: Refers to building corridors and stairwells leading up to “exits”, whereas “exits” are the doors, or other means provided, that open to areas of safety away from fire and smoke.

Fire Prevention Regulations: Regulations that provide for the prevention of fires and the protection of persons and property from exposure to the dangers of fire or explosion.

Hazardous Waste: A waste with properties that make it dangerous or potentially harmful to human health or the environment and/or that exhibits at least one of the following characteristics – ignitability, corrosivity, reactivity, or toxicity. Hazardous Wastes can be liquids, solids, contained gases, or sludges and can be the by-

products of manufacturing processes or simply discarded commercial products, like cleaning fluids or pesticides.

Laboratory Safety and Compliance: Entity responsible for occupational and environmental health, and regulatory compliance of students, employees and guests of University owned laboratory and research facilities and property, reporting to the Research Office, Division of Academic Affairs.

Occupational Safety Regulation: A rule, ordinance, or law by which conduct related to workplace safety is regulated.

PROCEDURES:

I. Ensuring Regulatory Compliance

- a. Establish Compliance Program(s). When an Occupational Safety Regulation is deemed applicable to the University's activities and/or conditions, Environmental Health and Safety (EHS) and/or Laboratory Safety and Compliance (LSC) shall examine the regulatory text, and generate a Compliance Program which consists of any/all documents, policies and procedures that must be established at the University in order to comply with the regulation, and thereby protect University employees, visitors and property. [Note: Occupational Safety Regulations provide the minimum requirements toward this goal; EHS and LSC have the right and responsibility to add any reasonable requirements to the Compliance Program as deemed necessary.
- b. EHS and LSC shall train and test staff, faculty and students in topics and at intervals explicitly required by the Compliance Program, in addition to those deemed necessary by EHS and LSC.
- c. Materials, supplies, equipment. Provide specifications and or recommendations for the purchase of items required by the Compliance Program(s) and in compliance with AP&P #1000 and #1020.
- d. Record-keeping. Maintain compliance related documents and training records required by the Compliance Program(s).
- e. Audits/Inspections. Conduct audits/inspections and manage implementation of corrective actions as required by the Compliance Program(s).
- f. Reporting Hazards. All members of the campus community may and should notify EHS, in a timely manner, of any problems, concerns, or questions related to regulatory compliance or safety in general.

II. Emergency Procedures – Fire

- a. Fire Alarms. When an emergency evacuation alarm is sounded in any University building, all persons will immediately leave the building in an orderly manner by means of the nearest exit.
- b. Use of Elevators. For their own protection, faculty, staff, visitors, students and vendors will refrain from using elevators during an emergency evacuation.

- c. Safe Distance. Emergency responders require all persons to remain at least 100 feet away from evacuated buildings to enable rescue/responding vehicles and personnel to enter and exit the buildings quickly and safely.
- d. 'All Clear' – The Oakland University Police Department (OUPD) or the responding Authority Having Jurisdiction will issue an "ALL CLEAR" when re-entry of an evacuated building is permissible.
- e. Report violations. Any violation of these Emergency Procedures should be reported to the OUPD or responding Authority Having Jurisdiction.

III. Fire Prevention

- a. Exit-access (building corridors and stairwells leading up to exits) OR exits(doors) must be maintained free of obstruction (i.e., with furniture, storage, displays, vending machines, etc.). Report violations to EHS.
- b. Fire doors, including stairwells and other are to remain closed at all times (unless designed, constructed and installed to close automatically in the event of a fire).
- c. Exit signs must be visible at all times and may not be obstructed or blocked from view.
- d. Exits or exit-access modifications, including electronic access controls are subject to the requirements of AP&P #310 Building Alterations, Renovations and/or Modifications. Report violations to EHS.

IV. Fire Protection Equipment

- a. Tampering with, obstructing or in any way interfering with fire protection equipment, including but not limited to: smoke detectors, pull stations, fire extinguishers, sprinklers, horns and/or strobes is prohibited per University Ordinance, AP&P #640, Ordinance 4.11b.
- b. All fire protection equipment shall be installed in compliance with applicable codes and standards under the supervision of Facilities Management (FM) and/or EHS (or their designee), and must be approved prior to being placed in service.
- c. Housekeeping - Clear access to fire protection equipment including fire extinguishers, fire alarm pull-stations, and other emergency fire equipment must be maintained at all times.

V. Fire Prevention – Codes and Standards

- a. University buildings must be constructed in accordance with OU AP&P #310 and all applicable federal, state and local regulations, codes, standards and policies.
- b. University building repairs, alterations, renovations and/or modifications must be made in accordance with OU AP&P #310 and all applicable federal, state and local regulations, codes, standards and policies.
- c. All projects will require a final inspection in accordance with OU AP&P #310 and approval from EHS and/or the State or Local Fire Marshall, prior to occupancy.
- d. Projects that involve the concealment of any work will be required to be inspected by the appropriate office or agency prior to any concealment.

VI. Unauthorized Activities and Equipment

- a. Cooking, grilling and the use of unapproved cooking appliances are prohibited except in areas designated for such use or with the written approval of the Authority Having Jurisdiction.
- b. Use of any unauthorized electrical equipment (i.e., space heaters, hot plates, grills) is prohibited.
- c. In accordance with University Ordinance 4.11a (OU AP&P #640) open burning including, flames and burning of candles or combustibles are prohibited. Limited exceptions include authorized burning in approved, designated areas and in accordance with applicable University procedures.

VII. Laboratory Safety

- a. The Research Office is the responsible body for Laboratory Safety and Compliance policy and procedures.

VIII. Regulated Waste Management

- a. Hazardous and biohazardous waste.
 - i. The University manages the collection and disposal of university-generated hazardous, universal and biohazardous waste in accordance with applicable laws and regulations. University-generated hazardous and biohazardous waste must be reported in accordance with the University's Hazardous Waste Management Guidance Manual, the University Medical Waste Management Plan and the University Exposure Control Plan, so that compliant on-site storage and disposal can be arranged.
 - ii. Hazardous and biohazardous waste may not be transported, disposed of, or stored without prior approval from EHS and/or LSC.
 - iii. Generally, the University will collect and dispose of these wastes at no charge to the generating department, with the exception of the following:
 - 1. Laboratory and/or research operations – disposal fees are managed in accordance with guidelines established by LSC.
 - 2. Auxiliary unit's disposal fees are managed in accordance with guidelines established by EHS.
- b. Electronic waste (E-waste)
 - i. E-waste and contaminated equipment must be disposed of in accordance with OU AP&P #310 and University Property Management Procedures for Disposal and Recycling of Computers, Electronic Waste and Contaminated Equipment.
 - ii. E-waste must be delivered to the University property office (Property Office) for recycling unless it is determined that the electrical equipment cannot be decontaminated.
 - iii. An equipment release certificate of decontamination must be affixed to any lab equipment delivered to the Property Office.
 - iv. Arrangement must be made for contaminated equipment to be transferred to EHS/LSC or picked-up for disposal as a hazardous waste.
- c. Other wastes

- i. Liquid industrial waste.
 - 1. Disposal arrangements and disposal fees for waste classified as liquid industrial waste (includes some off-specification commercial chemical products, industrial wastewater, used oil that is being recycled, storm sewer and sanitary sewer clean-out residue, grease trap clean-out residue, and other liquid industrial waste) will be the responsibility of the generating departments.
 - 2. EHS must be notified prior to disposal.
- ii. Asbestos waste.
 - 1. Disposal arrangements and disposal fees for waste classified as asbestos waste, including asbestos that is abated, remediated, and/or removed by a licensed third-party vendor will be the responsibility of the generating department(s), the Project and/or FM.
 - 2. An Asbestos Waste Shipping Manifest must be provided to EHS.
- iii. Universal waste.
 - 1. Disposal and recycling of university-generated universal wastes, including batteries and lamps, is managed in accordance with applicable laws and regulations and University guidelines.
- iv. Vendor/Project generated waste
 - 1. Oakland University and its approved vendors may provide oversight and management recommendations for waste generated by contractors for any remodeling, alterations or repairs to university owned facilities (University-generated waste) or new construction.
 - 2. Fees for these wastes are the responsibility of the generating department(s) and/or the OU Project.
- v. Recordkeeping
 - 1. The University (EHS/LSC) will maintain a copy of any associated waste manifests in accordance with local, state and federal regulations.

IX. Authority

- a. EHS shall be notified immediately of the arrival of representatives and/or inspectors representing local, state or federal regulatory agencies for the purposes of compliance related audits or inspections.
- b. LSC shall also be notified immediately when there is overlap with the visiting agencies.
- c. EHS or their designees may enter premises and other areas owned, rented or leased by the University for the purposes of conducting inspections (announced or unannounced), addressing safety hazards, testing, maintenance or repair of safety equipment, investigation of fires or occupational injuries/illnesses, and/or investigation of health or fire safety concerns, questions, complaints or violations (actual or potential).

- d. Upon observing a condition or activity out of compliance with one or more University Compliance Programs, and/or one that is otherwise dangerous to persons or property, the EHS Staff or their designees may take any/all necessary steps, to include issuance of an immediate “STOP WORK” order, in order to:
 - i. have the hazardous condition/activity abated/terminated.
 - ii. protect campus persons and property.
- e. This authority applies to ANY/ALL outside contractors’ employees or outside contractors performing work on the University campus.

RELATED POLICIES AND FORMS:

- OU AP&P #310 Building Alterations, Renovations and/or Modifications
- OU AP&P #360 Property Management
- OU AP&P #640 University Ordinances

APPENDIX: