



Environmental, Health & Safety Policy

Responsible Officer:	Chief Risk Officer
Responsible Office:	RK - Risk / EH&S
Issuance Date:	TBD
Effective Date:	TBD
Last Review Date:	New Policy
Scope:	[All University Locations]

Contact:	Ken Smith
Title:	EH&S Executive Director
Email:	Ken.Smith@ucop.edu
Phone #:	(510) 987-0170

I. POLICY SUMMARY

This Environmental, Health and Safety Policy (Policy) establishes minimum standards required for all University of California (University) Locations, in order to maintain a safe and healthy environment for its faculty, staff, students, visitors, and surrounding community members and to preserve resources and protect the environment from adverse impacts.

TABLE OF CONTENTS

I. POLICY SUMMARY	1
II. DEFINITIONS	2
III. POLICY STATEMENT	2
IV. COMPLIANCE / RESPONSIBILITIES	3
V. REQUIRED PROCEDURES	4
VI. RELATED INFORMATION	8
VII. FREQUENTLY ASKED QUESTIONS	8
VIII. REVISION HISTORY	8

II. DEFINITIONS

Environmental, Health and Safety (EH&S) Department – The administrative unit that manages the University Location’s Environmental, Health and Safety programs.

Local EH&S Director – The person who manages an EH&S Department at a Campus, National Laboratory, or Medical Center. In addition to Director of EH&S, titles for this position may also be identified as, among other titles, Medical Center Safety Officer, Associate Vice Chancellor, Risk Manager, or Deputy Directors of EH&S.

University Location – Any property or building that is owned or leased by the University where University business or activities take place.

III. POLICY STATEMENT

The University is committed to providing a safe and healthy environment for its students, academic appointees, staff, visitors, and members of the general public in the conduct of University activities and to preserving resources and protecting the environment. It is the policy of the University to conduct its operations in conformance with applicable laws and regulations. Where required by contract, it is the policy of the University to conduct its operations in conformance with Department of Energy (DOE) requirements. In addition, relevant published EH&S standards and best practices for the protection of health, safety and the environment shall be used as guidance when no applicable regulation exists.

This Policy establishes the minimum requirements for Environmental, Health and Safety Programs (EH&S Program) at all University Locations and provides guidance to aid in EH&S Program implementation. University Locations may develop and tailor their own policies and procedures for effectively implementing the requirements of this Policy. Each University Location’s EH&S Programs and detailed written plans and procedures must fulfill the requirements of this Policy as well as all environmental, health and safety laws and regulations, as they apply to that University Location.

Each University Location must also implement a process of continuous improvement through which environmental, health and safety protection goals and objectives are established and evaluated periodically.

University Locations shall implement a process of systematically integrating health, safety, environmental considerations into all activities.

IV. COMPLIANCE / RESPONSIBILITIES

Goals of the University are to:

- Prevent workplace injuries and illnesses,
- Avoid property losses or damage,
- Protect the environment by reducing adverse impacts, and
- Maintain compliance with health, safety and environmental protection laws and regulations.

While pursuing these goals is the responsibility of every member of the University community, the following University officials have particular responsibility for implementing the principles and practices of this Policy.

A. UCOP EH&S Executive Director is responsible for:

- Creating, maintaining and interpreting University systemwide EH&S policies.
- Providing systemwide EH&S support to the various University Locations.
- Supporting systemwide tools that are developed and made available to the University Locations.

B. The Chancellor, Vice President – Agriculture and Natural Resources, Vice Chancellors, Deans and Medical Center Executive Officers are responsible for:

- Providing sufficient funding to permit appropriate implementation and enforcement of this Policy at their University Location.
- Designating authority and areas of responsibility to the Local EH&S Director.

C. Local EH&S Director is responsible for:

- Facilitating and monitoring local implementation of this Policy.
- Providing technical assistance and oversight for the development and implementation of the University Location's programs and written procedures for the protection of health and safety and the environment.
- If a University Location assigns an EH&S program element to a department other than EH&S it shall designate and communicate the identity of the responsible party for implementing that program element to the UCOP EH&S Executive Director. Appendix A has a form that can be used as a suggested format.

- Appropriately communicating safety hazards or issues of potential non-compliance with recommendations for required resources to address identified deficiencies.
- Providing technical assistance to campus departments with responsibility for capital projects in preparation of documentation required under the California Environmental Quality Act (CEQA).

V. REQUIRED PROCEDURES

PROGRAM ELEMENTS

The University Location is responsible for establishing written programs and procedures to ensure compliance with all applicable health and safety and environmental protection regulations. The University Location EH&S Programs must include, but not be restricted to, the following program elements and activities. Each University Location must have written EH&S Programs in the following areas as applicable.

Air Quality Management

Each location is required to implement an air quality program to ensure compliance with air quality laws and regulations. Required programs may include, but are not limited to, stationary source criteria, hazardous, and toxics emissions management (including AB 2588 program compliance), Greenhouse gas (GHG) regulatory compliance, ozone-depleting substances, on-road and off-road vehicle fleet emissions management, and portable equipment management.

Biological Safety

Programs shall be developed and maintained to identify, monitor, control potentially harmful biological agents, and provide for their safe use within each University Location. As required by the National Institutes of Health (NIH) contracts, Cal/OSHA Bloodborne Protection, Aerosolized Transmissible Disease and Zoonotic standards, University Locations shall comply with applicable regulations and accepted standards governing the acquisition, use, storage, and disposal of biological substances and agents, including blood borne pathogens. If applicable, the University Location shall maintain an Institutional Biosafety Committee (IBC) in accordance with NIH Guidelines for Research Involving Recombinant or Synthetic DNA Molecules (NIH Guidelines). Practices and procedures involving biological agents shall be in conformance with the latest edition of the CDC *Biosafety in Microbiological and Biomedical Laboratories* publication.

Chemical Safety

Programs shall be developed and maintained to identify, monitor, control potentially harmful chemicals, and provide for their safe use within each University Location. Programs may include the assignment of a Chemical Hygiene Officer and, if appropriate, establishment of a Chemical Safety Committee. Programs shall be developed to train personnel in the safe use, storage, handling, and potential hazards of chemical materials.

Driving and Pedestrian Safety

Each University Location shall implement defensive driving and traffic and pedestrian safety programs to increase awareness and safety.

Diving and Boat Safety

University Locations which conduct authorized University diving and boating activities are required to implement diving and boating safety programs and procedures. Programs shall include basic underwater diving safety procedures including certifications and training for scientific divers and requirements for maintenance of boats and motors. University Location diving and boating safety programs shall meet OSHA and the American Academy of Underwater Sciences (AAUS) requirements.

Emergency Management

Emergency Management programs shall facilitate an appropriate technical response to disasters and provide for the coordination of diverse response organizations and activities through the implementation of the University Locations emergency response plan. Appropriate emergency response plans shall be maintained for each University Location and steps shall be taken to ensure adequate familiarity with the plan on the part of campus personnel.

Hazardous Materials Management

Each University Location is required to implement a hazardous materials management program to ensure compliance with regulations that apply to the University's use and storage of hazardous materials above and below ground. Required programs may include, but are not limited to, a Spill Prevention Control and Countermeasure Plan (SPCC), Aboveground Storage Tank (AST) and Underground Storage Tank (UST) management, California Accidental Release Prevention (CalARP) and Risk Management Plan (RMP) programs, management of PCB containing equipment, asbestos containing materials and lead containing materials, Department of Transportation (DOT) hazardous materials shipping compliance, dangerous goods shipping program, management of pesticide use, soil import/export management, Chemical Facilities Anti-Terrorism Act (CFAT) compliance, and emergency planning and training for spill response.

Environmental Health (Public Health)

University Locations shall be maintained in compliance with applicable regulations and accepted standards of environmental health (public health) and sanitation. Activities shall include, but not be limited to, the maintenance of good housekeeping practices, safe food preparation at University Location food facilities, potable water quality, insect and rodent control, sewage treatment and disposal.

Ergonomics

A broad range of University job tasks and work environments, including office and computer, laboratory, dining, custodial, and carrying and transporting heavy materials, contain risk factors that may contribute to injuries related to ergonomic risk factors. University Locations shall establish, implement and maintain ergonomics programs to prevent ergonomic injuries.

Program elements include ergonomic assessments, training, and development of engineering, administrative and work practice controls to reduce or eliminate ergonomic risk factors.

Fire Protection

Each University Location must develop, implement, and maintain programs in compliance with regulations and accepted standards to protect life and minimize the risk of injury and property damage from fire. Facilities and equipment shall be inspected, maintained, occupied, and operated in compliance with applicable regulations and accepted standards for fire protection and life safety. The design and construction of new University buildings or alterations to existing University facilities shall, at a minimum, comply with the regulations of the State Fire Marshal. Program activities must include monitoring and enforcement of safe occupant capacity at special events and classroom activities.

Industrial Hygiene

Program elements must include the identification, assessment, monitoring, and control of potentially harmful substances and physical agents at University Location worksites. The scope of this program shall include but not be limited to toxic materials, air quality in controlled environments, and elements of physical exposure such as lighting, noise, and temperature and hazard communication training.

Laboratory Safety (Research Safety)

University Locations shall develop comprehensive laboratory safety programs for all laboratory research and teaching involving, biological, chemical, physical, radiation, and other hazards. Programs must ensure activities are conducted in a safe and responsible manner in compliance with health and safety regulations applicable to laboratories. The program shall include policies and procedures for laboratory safety, training, minors in labs, personal protective equipment, chemical hygiene, eye wash and safety shower operations and testing, fume hood use, carcinogenic chemical safety, controlled substances, food and drink in lab, ventilation, indoor air quality, ergonomics and respiratory protection. Site-specific programs may also include policies and procedures for gas safety, pressure safety and cryogenics, toxic gas, and lab animal occupational safety and laser safety.

Field Safety

University Locations shall have a written field safety program to ensure the health and safety of researchers in the field. The field safety program should include a requirement for a site specific health and safety plan for all field research activity. The site specific health and safety plan should include pre-planning requirements, hazard identification and supporting information, a communication plan, and emergency response procedures.

Laser Safety

University Locations using lasers shall implement and maintain a Laser Safety Program guided by nationally-recognized standards such as the American National Standard (ANSI Standard series) for Safe Use of Lasers (medical, research, outdoor as

appropriate), for the safe use of lasers by all personnel who may be exposed to hazards of lasers at University Locations. In the absence of clear regulatory oversight, publications from the International Commission on Non-Ionizing Radiation Protection (ICNIRP) shall be used as a guide in determining safe work requirements for other forms of Non-Ionizing Radiation (NIR) (strong magnets, radio frequency, and microwave).

Occupational Health and Safety

Each University Location shall maintain a safe and healthy workplace by implementing and maintaining occupational safety policies, programs and procedures. In addition to the EH&S Program elements identified in this Policy, program elements may include lead hazards and controls, confined spaces, construction health and safety, cranes/hoists/rigging safety, shop safety, electrical safety, elevated work safety, fall protection, heat illness prevention, forklift and industrial truck safety, welding safety, hazard communication plan, hearing conservation, respiratory program, and other programs/elements as appropriate for each University Location. University Locations shall be maintained in compliance with applicable regulations of energy isolation (lockout/tagout).

Radiation Safety

University Locations shall observe applicable regulations and appropriate standards in the use of radioactive materials and radiation producing machines. Appropriate guidelines and procedures must be developed and maintained relating to the proper use, storage, transportation, and disposal of radioactive materials. In the absence of clear regulatory requirements, publications from the American National Standards Institute (ANSI) and the National Council on Radiation Protection and Measurements (NCRP) shall be used as a guide in determining safe work requirements.

Waste Management

Each University Location must have a program for managing waste that is generated onsite and is inappropriate for drain or trash disposal. Waste shall include Hazardous Waste, Universal Waste, Medical Waste, Biotechnology Waste, Radiological Waste, Mixed Waste, Nano-particle Waste, and Exempt Recyclable Waste (Latex Paint and Scrap Metal). Program elements may include, but are not limited to the type of waste, the handling, storage and disposal requirements of the waste, and training requirements for personnel managing the waste.

Water Quality Management

Each University Location is required to implement a water quality management program. Required programs may include, but are not limited to Small Municipal Separate Storm Sewer Systems (MS4), Construction Activity, Industrial Activity, or Composting General Storm Water Permit or the Sanitary Sewer Overflow requirements, wastewater discharge management, seawater discharge management, and drinking water programs.

VI. RELATED INFORMATION

UC's Sustainable Practices Policy addresses UCOP's commitment to sustainability and the preservation of resources and can be found at the following location:

<http://policy.ucop.edu/doc/3100155/SustainablePractices>

The University's Sustainability program has numerous aspects for which coordination with EH&S is desirable. Each campus has a Climate Action Plan that deals with greenhouse gas (GHG) emission reduction, a Water Action Plan that deals with water conservation, and a Waste Diversion Plan that deals with waste reduction. Electronic waste recycling is reported as part of annual waste diversion data collection, though not counted toward municipal solid waste diversion goals.

Long Range Development Plans (LRDPs) and LRDP Environmental Impact Reports (EIR) <http://www.ucop.edu/construction-services/facilities-manual/volume-2/vol-2-chapter-3.html>

Campus LRDPs are land use plans that guide physical development of the campus and project future enrollment and space needs. Each LRDP is evaluated in an EIR which evaluates potential impacts in relation to multiple environmental topics. Mitigation measures are required for significant environmental impacts. The LRDP EIR mitigation measures are applied to all campus construction, and forms the basis for subsequent individual project environmental evaluation.

VII. FREQUENTLY ASKED QUESTIONS

Not applicable.

VIII. REVISION HISTORY

This is a new policy.



Appendix A: Environmental, Health & Safety Policy

Program Applicability and Oversight Form

Programs	Is Program applicable to University Location? Y/N	Is Program Oversight under Local EH&S Director? Y/N	If not under EH&S, Name of University Department with Oversight	Lead Contact	Title	Email	Phone
Air Quality Management	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Biological Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Chemical Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Driving and Pedestrian Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Diving and Boat Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Emergency Management	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Hazardous Materials Management	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Environmental Health (Public Health)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Ergonomics	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Fire Protection	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Industrial Hygiene	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Laboratory Safety (Research Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Field Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Laser Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Occupational Health and Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Radiation Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Waste Management	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					
Water Quality Management	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No					

Form completed by:

Name

Title

Location

Date