Arkansas State University - Jonesboro

Effective Date: 05/01/2006
Number: 05-32
Section: Finance and Administration
Subject: Environmental Health and Safety

Procedure Statement:
Arkansas State University is committed to maintaining a safe and compliant campus. As such, the University expects all employees, students and other members of the campus community to comply with all applicable environmental, health and safety laws and regulations. Environmental Health and Safety (EHS) develops and maintains programs and procedures that allow Arkansas State University to promote excellence in environmental, health and safety administration.

Why the Operating Procedure Is Necessary:
The university wishes to maintain a safe and healthy environment for all members of the campus community including students, faculty, staff and visitors. Furthermore, the University seeks continuous improvement to safety culture and environmental stewardship initiatives. Finally, the University, through the vehicle of EHS, develops and implements standards that comply with federal, state and local regulations pertaining to environmental, health and safety that reduce institutional liability and that exhibit financial responsibility.

Applicability:
This operating procedure applies to the Arkansas State University Jonesboro campus.

Responsibilities:
All students, faculty and staff share a role in abiding by this operating procedure. The roles and responsibilities outlined below apply generally to this operating procedure. Roles and responsibilities within each safety program are defined within the appropriate safety program document.
All Arkansas State University Students, Faculty and Staff

- Abide by this operating procedure and all applicable university environmental health and safety programs and procedures.
- Comply with all federal, state and local regulations and codes.
- Notify EHS, an immediate supervisor or a faculty member if a safety or compliance issue or concern is observed.
- Attend applicable EHS training.
- Notify EHS of any regulatory agency visit related to environmental health and safety so that EHS may accompany the regulator.
- Support voluntary EHS initiatives.
- Report (or ensure reporting of) all work-related injuries, illnesses and/or exposures as well as environmental spills and/or releases to EHS.

Director of Environmental Health and Safety

- Manage operations and services of EHS.
- Where there is an immediate danger to life, health or the environment, order the suspension of hazardous activities until the appropriate measures have been taken to remove the imminent danger.
- Serve as a voting or a non-voting member on university-led safety committees or designate EHS personnel to do so.
- Set priorities for university resources in support of EHS programs in line with the University’s mission and this operating procedure.

Department Environmental Health and Safety

- Develop, implement and revise written programs to comply with applicable environmental health and safety laws, regulations and codes.
- Obtain stakeholder input before implementation or revision of programs that will affect said stakeholders.
- Provide service and support to facilitate safety and compliance.
- Provide resources for training and auditing.
- Provide environmental, health and safety oversite for all university operations.
- Manage relationships with the regulatory community in environmental, health and safety issues.
- Provide support for emergency planning and services in environmental health and safety issues.
- Conduct hazard analyses including exposure monitoring to identify control measures required to provide a safe work and study environment.
- Conduct periodic reviews of university operations and facilities to identify areas of high-risk and/or non-compliance.
- Present corrective actions or other risk mitigation strategies to appropriate personnel to implement.
Management (including academic, research, clinical and administrative positions)

- Implement this operating procedure as well as other applicable EHS program and procedures.
- Provide feedback for applicable EHS programs and procedures.
- Designate a department safety liaison to assist in compliance with the operating procedure and applicable EHS programs and procedures.
- Require students, faculty and staff to complete required applicable safety training, to report accidents and other incidents as appropriate.
- Encourage the development of an internal safety committee to address EHS concerns and coordinate environmental, health and safety initiatives within the department. The committee should work with EHS and the department safety liaison to accomplish this goal.
- In coordination with the safety officer, develop an evacuation plan for facilities under the manager’s control or delegate said responsibility to a competent individual.

Department Safety Liaison (this can be but does not have to be the same person as the Building Liaison)

- Support the implementation of EHS programs and procedures for the department to meet their environmental health and safety goals and obligations.
- Serve as the liaison between the department and EHS for information exchange and promote EHS training initiatives within the department.
- Aid in routine EHS inspections and assessments of work areas.
- Ensure maintenance of department safety equipment including (but not limited to): chemical fume hoods, safety showers, eyewashes and fire extinguishers.
- Support coordination between EHS and project managers to ensure safety and compliance issues are addressed in new construction and renovation of assigned spaces.

Building Liaison

- Monitor designated facility(s) for environmental, health and safety violations.
- Notify EHS immediately of regulatory inspections within the designated facility(s) and escort inspection agency personnel in concert with EHS.
- Coordinate correction of facility-based violations of environmental, health and safety regulations within required timeframes.
- Notify EHS when aforementioned violations cannot be corrected within required timeframes.

Human Resources

- Administer a process that informs individuals of their role related to environmental, health and safety.
- Refer outstanding safety and compliance issues to EHS for review and resolution.
Facilities Management

- Coordinate with the building liaison for correction of facility-based environmental, health and safety issues.
- Monitor contractor activities in cooperation with EHS for environmental, health and safety issues and determine course of action if issues are not resolved.

Safety Officer

- Collaborate with EHS in development and implementation of procedures to respond to spills, injuries, illnesses and other emergencies.
- Develop a template for managers to use for facility evacuation plans and review developed evacuation plans for each facility.

NOTE: The safety officer develops emergency and response plans for the University; those plans require Executive Council approval. Approval of this operating procedure does not relax that requirement.

Research Compliance

- Monitor research conducted at the University to inform EHS when research activities are being proposed that require EHS involvement.

Procedures:
What follows are general procedures. Specific procedures related to environmental, health and safety are described in specific written programs developed by EHS. These are available on the EHS website.

Affected parties referred to below is defined as anyone in the University community affected by environmental, health and safety regulations and includes all faculty, staff and students to which the requirements apply.

Determination of Applicable Requirements

- EHS shall identify, interpret and communicate to affected parties within the University both existing and proposed regulations.
- Affected parties shall consult with EHS for interpretation of regulations that apply to them.

Safety Program and Procedure Development

- EHS shall develop and revise safety programs that communicate specific compliance requirements of affected parties by interpretation of applicable laws, regulations, standards and codes with feedback from affected parties.
- Affected parties shall comply with all applicable safety programs and provide feedback in program development and revision, as appropriate.

Assessment of Compliance with Regulations

- EHS shall assess compliance with applicable regulations that pertain to environmental, health and safety through onsite inspections and reviews, assessments and audits and
other means necessary to determine level of compliance. EHS shall provide tools to allow affected parties to perform self-audits, as appropriate.

- Affected parties shall coordinate with EHS to assess all operations for compliance and provide necessary resources for EHS to complete assessments.

**Corrective Actions for Non-Compliance**

- EHS shall assist affected parties in determining and taking the appropriate corrective actions for observed non-compliance issues. EHS shall monitor correction on non-compliance issues by onsite review, interviews and other means.
- Affected parties shall correct identified non-compliance issues and communicate the corrective action taken to EHS.

**Hazard Assessment**

- EHS shall assist in identifying and assessing workplace hazards and in the development and monitoring of protection strategies.
- Affected parties shall work with EHS to address workplace hazards in a manner that meets safety and regulatory requirements.

**Regulatory Report Submission**

- EHS shall collect and maintain data for the purposes of providing reports to appropriate regulatory agencies. EHS shall submit or aid in submission of regulatory reports, as appropriate.
- Affected parties shall assist EHS in data collection where necessary and submit or aid in the submission of regulatory reports, as appropriate.

**Emergency Planning**

- EHS shall be a resource in identifying potential emergency scenarios and suggest appropriate responses to such scenarios to the safety and emergency planning manager.
- Affected parties shall inform EHS of hazardous situations that may require emergency planning and provide practical input into applicable emergency plans.

**Determination of Training Requirements**

- EHS shall determine based on duties and location the required environmental, health and safety training that is required. EHS shall either provide the training or review available training on applicable to the situation for suitability.
- Affected parties shall take the required training and ensure those for whom they are responsible have also taken the required training.

**Liaison with Regulatory Community**

- EHS shall interact with regulatory entities on behalf of the University on environmental, health and safety issues. EHS shall communicate said interaction to affected parties.
- Affected parties shall immediately notify EHS of a regulatory agency inquiry, visit or enforcement action on environmental, health and safety issues. Affected parties shall collaborate with EHS regarding interaction with regulatory entities.
Reporting of Work or Research-Related Injury, Illness or Exposure
- EHS shall perform an incident investigation for every work or research-related injury, illness or exposure. EHS shall manage all worker’s compensation claims and work with the Public Employee Claims Division and related medical community to ensure that all employees who sustain a work related injury, illness or exposure are provided proper medical treatment.
- Affected parties shall report all work or research-related injuries, illnesses or exposures to EHS in a timely manner. Affected parties shall cooperate with EHS to ensure that any employee that sustains a work related injury, illness or exposure is provided timely and proper medical treatment.

Reporting of Incidents Not Involving Injury, Illness or Exposure
- EHS shall perform or assist in an incident investigation for major incidents including (but not limited to) hazardous material spill, fire and highly hazardous material loss or theft. EHS shall provide recommendations to address the incident to minimize the potential for recurrence.
- Affected parties shall report incidents to EHS in a timely manner and assist EHS in implementation of recommendations to address the incident to minimize the potential for recurrence.

Approved 12/07/15