

 <p>UNIVERSITY OF DENVER</p>	<b>UNIVERSITY OF DENVER POLICY MANUAL ENVIRONMENTAL HEALTH AND SAFETY POLICY</b>		
<p><b><u>Responsible Department:</u></b> Environmental Health and Safety  <b><u>Recommended By:</u></b> Craig Woody, Chris Short  <b><u>Approved By:</u></b> Chancellor Coombe, Board of Trustees</p>	<p><b>Policy Number</b> 2.50.050</p>	<p><b>Effective Date:</b> February 16, 2011</p>	

### A. Purpose

It is the goal of the University of Denver to provide a healthy and safe working environment, and to support environmentally sound practices in the conduct of University activities. The University's goal is to prevent workplace injuries and illnesses, environmental incidents, and property losses or damage.

This policy outlines responsibilities that ensure individual and institutional compliance with relevant environmental health and safety laws, regulations, policies, and guidelines.

### B. Policy Statement

This policy requires that faculty, staff, and students comply with environmental health and safety laws and regulations issued by federal, state, and local agencies including: the Occupational Safety and Health Administration, the Environmental Protection Agency, the Colorado Department of Public Health and Environment, the Denver Fire Protection Bureau, and others. Faculty, staff, and students must also comply with related University policies, procedures, and instructions.

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. All University activities are to be conducted in a manner that ensures the safety and protection of students, faculty, staff, visitors, the public, property, and the environment.

Achieving this goal is the responsibility of every member of the University community. Supervisors have particular responsibility for the activities of those people who report to them.

### C. Entities Affected by the Policy

All individuals, departments, and units under the direct supervision of the University of Denver

### D. Authority

- 1) The Environmental Health and Safety (EHS) department is authorized to survey and evaluate all areas of the campus to assess environmental risks and exposures and safety.
- 2) Any employee or student employee familiar with the situation, or credentialing government representative, who feels that there is an unsafe situation has the authority to suspend or restrict the operation and contact their immediate supervisor at time of incident, EHS, and/or Campus Safety at (303)871-3000. These situations include:
  - a) Presents a serious hazard associated with health, life, safety, or welfare of the university community or public, or
  - b) Violates a law, regulation, standard or university policy, or
  - c) Presents a serious hazard to the environment
- 3) EHS may consult with external agencies or regulatory bodies as necessary on behalf of the university.
- 4) The EHS Director and representatives of affected units may negotiate the terms of citation settlement agreements and associated penalties but may not authorize payment or accept final settlements on behalf of the university.
- 5) The Chancellor, Provost, Vice Chancellor for Business and Financial Affairs, and University Counsel may 1) agree to the final terms and conditions set forth in settlement agreements associated with citations of environmental health and workplace safety laws and regulations, 2) authorize payment of associated fines. Fines will be paid through affected departments' budgets.

## **E. Responsibilities**

- 1) The Chancellor has overall responsibility for the implementation of the university's environmental health and safety policy at all facilities under university control.
- 2) General
  - a) Each person who manages a project, activity or area is responsible for ensuring the safety and regulatory compliance (safety and environmental) of such activity or project.
  - b) Employees that direct the activities of other individuals are responsible for protecting faculty, staff, students, visitors, the public and environment, and for adhering to this policy. Accountability should be addressed in job descriptions, performance evaluations, compensation, and job contracts.
  - c) An activity or project is not considered safe unless it is in compliance with all applicable safety regulations and university policies and procedures.
  - d) Persons who manage a project, activity or area, and those responsible for approving the budget for the project, activity or area are responsible for ensuring that budget requests include adequate funding to meet environmental health and safety requirements.

- e) Each individual is expected to follow all applicable environmental health and safety requirements, and no person is expected to carry out any activity that does not meet all applicable environmental health and safety requirements. If there is any doubt, it is the individual's responsibility to bring his or her concerns to the attention of his or her supervisor, EHS, and/or the department responsible for correcting the condition. It is incumbent upon the individual and his or her supervisor to ensure that the DU employee or department responsible for correcting an unsafe or noncompliant condition is notified timely.
- f) Employees should attend required environmental health and safety training.

### 3) Environmental Health and Safety

- a) Advise the university community of its responsibilities regarding the Environmental Health and Safety Policy
- b) Prepare documents and guidelines for programs to ensure individual and university compliance with relevant environmental, health, and safety laws, regulations, policies, and guidelines
- c) Establish generic EH&S standard operating procedures
- d) Recommend programs and actions for compliance
- e) Communicate with regulators and other external entities on behalf of the university
- f) Anticipate, track and communicate new regulations applicable to the university
- g) Provide guidance and technical assistance to supervisors and managers in departments and units in identifying, evaluating, and correcting safety and health hazards
- h) Provide required training
- i) Conduct investigations and analyses of occupational accidents and injuries
- j) Monitor compliance with health and safety statutes and regulations and university health and safety policies, programs, and guidelines
- k) Identify noncompliant situations and recommend improvements as necessary; submit these to deans, directors, department heads, supervisors and principal investigators who are responsible for departments, laboratories, units, and work areas
- l) Ensure that hazardous materials are disposed of properly
- m) Execute responsibilities involving inspection and enforcement delegated by any standing university safety committee
- n) Order the cessation of hazardous activities or those that violate a law, regulation, standard or university policy, are detrimental to the environment
- o) Appraise the administration of compliance status
- p) Provide assistance to groups planning renovations or new construction of buildings or spaces that may contain hazards related to art, science, theater or facilities management operations
- q) Inspect new or renovated art, science, theater, or facilities management buildings or spaces prior to occupancy to ensure proper location and function of building features engineered to control hazards

### 4) Departments/Units

- a) Implement the Environmental Health and Safety Policy and communicate its requirements to faculty, students, and staff

- b) Designate and empower safety representative(s) for departments, units, or sections to ensure compliance with the Environmental Health and Safety Policy and program requirements
- c) Representatives will work with EHS staff to develop and maintain safety programs
- d) Take all reasonable steps to respond to and correct any noncompliance incidents and prevent reoccurrences
- e) Develop unit specific environmental health and safety standard operating procedures
- f) Direct individuals, including but not limited to principal investigators, supervisors, regular and temporary employees, visiting professors, and students, to obtain any required safety training before they work with hazardous chemicals, biohazards, radiation, or physical/mechanical hazards in their working or learning environments
- g) Report all accidents, job-related illnesses, and work site injuries to Risk Management
- h) Conduct a review and investigation of all job-related illnesses, accidents, and work site injuries as needed to complete the Supervisors Accident Report and to identify if there are workplace hazards that need to be corrected
- i) Incorporate workplace safety requirements and responsibilities into each appropriate job description and ensure that workplace safety expectations are communicated to each employee
- j) Ensure that periodic safety self-audits of laboratories are conducted
- k) Ensure that emergency action preparedness plans and business continuity plans are developed and communicated to all personnel in order to ensure familiarity and coordination between facility personnel and emergency responders. Information can be found through the Office of Emergency Preparedness at <http://www.du.edu/emergency/index.html>.
- l) Assure that hazards are proactively identified and corrected by implementing engineering or administrative controls, or by assuring use of necessary personal protective equipment
- m) Dispose of waste properly and in accordance with university, state and federal requirements.

## **F. Third Party Inspections**

This section sets forth the provisions for responding to an individual(s) representing a federal, state or local government regulatory agency that visits or otherwise contacts a department for the purpose of conducting an inspection or other data collection procedure.

- 1) Record the person's name, government affiliation, stated purpose of the visit (if provided) and arrival time. As a general rule, officials are required to identify themselves and their affiliation and state the purpose of their visit
- 2) Inform the regulatory official that under University policy you lack authority to consent to inspection and are obligated to notify the Environmental Health and Safety Director and obtain management authorization before allowing the inspection to proceed
- 3) Immediately notify the EHS Director and provide your name, department, location and phone number; and the visiting official's name, affiliation, stated purpose of the visit and time of arrival. In the event EHS Director is unavailable contact Campus Safety at 1-3000 or Risk Management at 1-2327.

- 4) While waiting for the authorized University representative, courteously request that he/she defer asking questions relating to his/her inquiry until the authorized University representative arrives. If the University allows the inspection to proceed, coordinate with the designated University representative on how to address the inspector's questions to ensure accuracy and completeness
- 5) If contacted by telephone, record the caller's name, affiliation, and nature of the request, if provided. Ask for the request to be presented in writing, including the reason for the request and the deadline for response. Courteously inform the caller that this is University policy for tracking its responses to regulatory agencies. After the call, contact the EHS Director and provide your name, department, location and phone number; and the official's name, affiliation, time of the call, and stated request and reason for the request if provided in the call.

Third party contractors are not authorized to grant consent for access to University-owned/operated areas without the University's prior written approval. They must immediately inform the University unit supervising their work if they receive such requests for access, or for information related to their work at the University.

## **G. Enforcement**

The University is committed to investigating and appropriately reporting and as necessary remediating all environmental, safety and health incidents. It is the responsibility of all employees of the University to disclose fully any activity that may be or may result in a violation of any environmental health or safety regulation, and to participate cooperatively in the investigation and remediation of any incidents. Any incident or questions regarding compliance should normally be reported to supervisors, department administration, and/or the Environmental Health and Safety Department.

Employees and students who report incidents in accordance with law and university procedures, or who raise questions or concerns about the University's environmental, safety and health procedures, will not be penalized and such action will not reflect adversely on the employee's or student's record.

The University views compliance with all applicable laws and regulations as a condition of employment, and violation of such requirements shall be considered grounds for disciplinary action, including termination of employment.