



## OFFICE OF THE CHANCELLOR

### **Chancellor's Environmental Health and Safety Policy**

**Purpose:** This document identifies the safety roles and responsibilities of University of South Carolina Aiken employees and their role in reducing and controlling workplace hazards and hazards to the environment.

**Scope:** This document serves as the University of South Carolina Aiken Chancellor's vision and direction regarding the area of environmental health and safety policies. Compliance with this document is mandatory.

**Applicability:** This document applies to all full-time, part-time, temporary and student employees on or off-campus while conducting official business on behalf of the University of South Carolina Aiken.

### **I. Management Leadership and Employee Involvement**

The University of South Carolina Aiken (*USCA*) management and chancellery is committed to providing the necessary resources to ensure that all faculty, staff, students, and visitors are protected from injury and illness hazards. Our mission is to reduce injuries, accidents and environmental impact and ensure regulatory compliance. Management visibly leads in the design, implementation, and continuous improvement of the campus environment, health, and safety (EHS) activities. Management ensures that all visitors including contract and temporary labor, vendors, and salespeople have knowledge of campus hazards applicable to them, and how to protect themselves against those hazards, including knowledge of emergency alarms and applicable policies and procedures. Management ensures that these visitors do not introduce hazards to the campus that can be prevented or that are not properly controlled. Management will accept no unnecessary risks to the USCA workforce, students, or the environment.

### **Responsibility for Safety**

University Deans, Department chairs, heads of offices, directors of programs, laboratory managers, principal investigators, and supervisors are responsible for the health and safety of individuals engaged in activities under their direction or supervision. They must ensure compliance with all relevant regulations and accepted standards ensuring that work activities are performed in a safe and considerate manner. Managers shall correct emergency drill, audit, and inspection deficiencies in a timely manner. Each employee is responsible for complying with the applicable provisions of EHS standards and regulations. They also must adhere to all University and departmental safety policies and procedures and comply with safety directives issued by their individual supervisors.

## **Supervisors**

Supervisors at all levels are responsible for providing a safe work environment for all employees free of preventable hazards. Supervisors shall complete an initial Workplace Orientation with all new subordinates discussing job scope, hazards, emergency procedures, and workplace injuries. Existing employees shall receive a Workplace Orientation when the information is updated or there is a change to the work environment or conditions. Supervisors will provide job and task specific safety training to workers as required. Safety training and Workplace Orientation documentation must be maintained by the employee's respective supervisor for the duration of employment and three years after. It is the responsibility of supervisors to assess their areas, tasks and environment for hazards and apply hazard reduction/elimination techniques utilizing job hazard analysis (JHA). Supervisors must provide necessary personal protective equipment (PPE) to workers as needed and PPE procurement should be budgeted by each respective department requiring PPE for their workers and students. Provided PPE must be clean, serviceable, provide good fitment and appropriate for the hazard or task. Supervisors must assist with reporting workplace injuries for subordinate employees to human resources (HR), the Environmental Health and Safety (EHS) Manager and CompEndium (877-709-2667).

## **Workers**

The USCA workforce is comprised of full and part-time employees, temporary employees, and student employees. Workers must comply with all USCA safety procedures, training, policy, and PPE requirements. Workers shall report hazards, dangerous conditions, injuries, and unsafe acts to supervisors and management. Workers have the authority to call a "time out" to stop an unsafe act or prevent an unsafe condition. The condition concerning the time out must be communicated to supervision or management immediately and once a safe path forward has been identified by supervision or management work may resume. Worker failure to adhere to USCA safety procedures, training, policy, and PPE requirements may result in disciplinary actions including termination.

## **USCA Safety Manager**

The USCA EHS Manager is the principal contact for faculty and staff to address all university safety issues and concerns. The EHS manager works with faculty, management, and supervisory personnel to identify potential hazards associated with their operations and activities. The EHS manager reports to the Senior University Facilities Executive who has the responsibility for oversight of health and safety within the USCA campus. The EHS Manager will provide Supervisor Safety Training to USCA supervisors and management in addition to assisting supervisors in the development and implementation of workplace specific safety training. The EHS Manager will develop and maintain campus wide safety training and the USCA Emergency Action Plan (EAP). The EHS Manager shall evaluate emergency drills and perform safety audits and inspections on all campus facilities. Drill, audit, and inspection results will be provided to the Senior University Facilities Executive for distribution to department managers. The EHS Manager will coordinate with outside agencies, vendors and contractors as necessary to ensure the safety needs of the campus are met.

## **Senior University Facilities Executive**

The Senior University Facilities Executive is responsible for providing safe facilities and grounds for all employees and students. The Senior University Facilities Executive oversees the management of the EHS program including the areas of occupational safety, laboratory safety, chemical safety, biological safety, hazardous waste, biohazardous waste, universal waste, and environmental programs. The Senior University Facilities Executive ensures regulatory compliance with all programs by identifying and correcting hazards and deficiencies within their respective area of responsibility. The Senior University Facility Executive shall ensure contractors and vendors are aware of USCA safety and emergency procedures and are responsible for the safety of their employees while working on the USCA campus.

## **II. University Campus Hazard Analysis**

All hazards found are eliminated whenever possible or managed using OSHA specified hierarchy of controls. Hazard analysis is followed by risk assessment. All employees who encounter the controlled hazards are trained to protect themselves from these hazards (administrative and engineering controls) and when necessary, use the appropriate PPE provided by USCA. Employees and their supervisor will complete individual Workplace Orientation and JHA to determine the appropriate PPE for each task.

### **Hazard Prevention and Control**

Specifics of hazards and associated risks are determined before hazard solutions are put in place. University management ensures that a hierarchy of safeguarding controls are used to establish the control actions to be considered in the following order of effectiveness: (1) Hazards will be eliminated or substituted when economically feasible, with design or replacement e.g., a hazardous chemical is replaced with a less hazardous “green” product (2) Use of engineering controls and safeguarding technology e.g., laboratory air flow control, use and testing of fume hoods, and machine guards (3) Use of warning and alerting techniques e.g., lockout/tagout and “caution” or “warning” signage (4) Use of administrative controls e.g., safe work policies and procedures i.e., training and qualification for powered industrial trucks, confined space, fall protection, hot work, lead and asbestos awareness controls (5) Personal protective equipment (PPE) e.g., SDS listings for all chemical hazards and the required PPE. A lower step control is not chosen until practical applications of the preceding higher levels are exhausted.

All employees and supervisors are held accountable for integrating safety and health procedures and best practices requirements into their work process. *A job is not done right unless it is done safely.* Safety is integrated into the work process/procedure. Appropriate steps will be taken by management to ensure that the university remains a safe and healthy campus within a strong, continuously improving safety culture. Any “near misses” or accidents will be reported to EHS to allow for an investigation to determine the contributing factors and possible root cause. Corrective actions will then be immediately implemented to eliminate or remediate the causes.

USCA is classified as a Very Small-Quantity Generator (VSQG) of hazardous waste, generating 100kg or less per month of hazardous waste under the RCRA regulations. As a VSQG, any

hazardous, or otherwise controlled waste, must be properly transported for disposal by the hazardous waste disposal contractor. Shipments typically occur annually. Any personnel that may generate hazardous waste must receive annual hazardous waste training. Biological waste and sharps are collected placed in a red bag and biohazard box and transported for disposal by waste contractors.

### **III. Training**

At USC Aiken training is a priority. Annual OSHA refresher training, just-in-time safety training and monthly safety meetings provide opportunities for continuous improvement and integration of safety into job training and performance requirements. USCA housing employees participate in this program. Specific USCA Police integrated safety training is scheduled and maintained by their training officer. Performing any job to standard includes performing safely. Beginning with Orientation training, each employee, working with the EHS manager and supervisor, complete their own Job Hazard Analysis and risk assessment. This leads to individual prescriptive training for hazards, emergency action, safety and health, hazard communication, and applicable job-related PPE. OSHA 'just-in-time' standards training is offered, as requested by supervisors, just prior to beginning work e.g., Hazard Communication (specific chemicals being used) Lockout/Tagout, Powered Industrial Truck plus performance evaluation, Confined Space and permit, PPE usage, Fire Safety, Fleet User Safety/defensive driving, and Bloodborne Pathogens. Attendance records, completion certificates, certification records, course lesson plans and handouts are kept by the USCA EHS manager or the respective supervisor. Police training records are kept by the USCA Police training officer.

#### **Areas Identified that Require Training**

Supervisors and the ESH Manager will ensure safety training is developed to appropriately address the below topics and areas. Workers shall not be exposed to hazards or operate equipment until properly trained on the specific hazard or safe operation of equipment.

##### **General Work Environment**

- Hazard Communication and Right to Know
- Emergency Action Plan and Fire Prevention plan
- Back Care Program
- Fleet User Safety / Defensive Driving
- Office and Classroom Safety
- Ergonomics
- Personal Protective Equipment
- Accident and Near-Miss Investigations
- Injury/Work Related Illness Reporting

##### **Safety for Support and Maintenance Activities**

- Noise and Hearing Conservation
- Electrical Safety / Arc Flash Safety

- Lockout/Tagout
- Machine Guarding
- Fall Protection
- Portable Ladder Safety
- Cutting and Welding
- Powered materials handling equipment
- Confined Spaces
- Asbestos Containing Materials
- Lead in Construction
- Scaffold Safety
- Excavations
- Hand Tools
- Walking and Working Surfaces
- Flammable and Combustible Liquids
- University Vehicles

**Chemical Safety**

- Chemical Inventory and Homeland Security Hazardous Chemical Inventory
- Chemical very Small Quantity Generator Requirements
- Laboratory Standard and Chemical Hygiene Plan
- Emergency Eyewash and Safety Showers
- Lab Emergency Procedure Poster

**Biological Safety**

- Bloodborne Pathogens and Infectious Waste
- Biological Safety Program

A handwritten signature in blue ink, appearing to read 'D. Heimmermann', with a long horizontal stroke extending to the right.

Daniel Heimmermann, PhD  
Chancellor