



Ohio Administrative Code

Rule 3352-7-03 Environmental health and safety.

Effective: July 1, 2009

(A) Purpose. Wright state university strongly believes the position that it is the university's legal and moral obligation to provide employees, students, and visitors an environment to work, study, visit and conduct research that will be conducive to their health, safety, and well-being. Consistent with the university's mission Wright state is also committed to excellence in environmental stewardship on campus as well as within surrounding communities and globally. The university holds this responsibility at a level commensurate with other goals and values of the university.

The high priority assigned to this issue is reflected in the university's strategic plan, which includes sustainability as one of its core values and the encouragement and support of professional development and wellness of faculty and staff as an objective.

This policy establishes an environmental health and safety management system that will allow the university to meet these commitments.

(B) Scope.

The university president maintains ultimate responsibility for environmental health and safety on campus. The university, through the office of the president, has designated the department of environmental health and safety (EHS) as the departmental unit responsible for reviewing environmental health and safety rules and best management practices applicable to university operations. All levels of management, from the president to the individuals who directly supervise our faculty, staff and student employees as well as faculty who teach and conduct research and the staff who provide everyday services for the university are expected to be knowledgeable to their responsibilities as they relate to workplace safety and environmental protection. The scope of this policy is to:

- (1) Prevent occupational and non-occupational injuries and illnesses;



(2) Provide facilities that are operated, designed, constructed, and/or renovated with consideration to applicable environmental health and safety rules and best management practices;

(3) Ensure compliance with applicable federal, state, and local environmental health and safety rules and regulations by promoting awareness throughout campus through education and training.

(4) Establish environmental health and safety goals for university employees.

(5) Ensure continual campus improvement in environmental health and safety performance.

(C) Responsibilities.

(1) President and provost. Maintain the university's commitment to environmental health and safety. Promote a philosophy that environmental health and safety on campus is everyone's responsibility and provide the authority and resources by which delegated departments and individuals can accomplish the environmental health and safety considerations of their activities.

(2) Vice presidents and deans. Define responsibilities and extent of authority for environmental health and safety throughout their organizations. Endorse the establishment of environmental health and safety related goals for their respective units. Endorse the establishment of environmental health and safety committees when warranted to provide a forum for campus involvement in the development of programs.

(3) Directors and chairs. Implement the authority provided to them by the vice president or dean throughout their unit. Work with the department of environmental health and safety to operate programs within their unit that meet or exceed established rules and regulations. Establish a program within their unit whereby environmental health and safety goals are given to employees and evaluate these goals annually. Ensure all employees under their supervision attend required environmental health and safety training.

(4) Managers, supervisors, and principal investigators. Attend environmental health and safety training as directed. Ensure employees are properly trained in occupational safety and health and environmental protection. Ensure work facilities, equipment, and tools are maintained in a clean and



usable condition including, but not limited to, areas, equipment, and tools which, because of an employee's proximity to, or use of, places employees at an increased risk for injury or illness. Ensure work facilities, equipment, and tools designed for protection of the environment by limiting pollutant discharge are used and maintained in a clean and usable condition. Ensure proper corrective action is taken on any of their employees found not upholding their responsibility of this policy. The department of human resources shall be used as a resource for proper disciplinary procedures.

(5) Non-supervisory employees. Conduct their work activities in a safe manner and with regard to limiting the effect of their work on the surrounding environment including the discharge of pollutants to the air, water, or land. Utilize tools and equipment provided to them for the safe and environmentally protective accomplishment of all tasks. Such tools and equipment shall include, but not be limited to, personal protective equipment and pollution control devices. Attend environmental health and safety training as instructed by their manager or supervisor. Never work in a condition they feel is unsafe or creates an unnecessary negative impact on the environment and report such conditions immediately to their supervisor.

(6) Department of environmental health and safety (EHS). Responsible for the overall environmental health and safety program. Will work with other operating units on campus to determine program applicability, develop processes, identify training needs, train and/or assist in the development of departmental training, perform audits and inspections, perform sampling and analysis, ensure maintenance of records and submission of reports as required by applicable environmental health and safety rules, and track environmental health and safety metrics as a means of trending and university performance evaluation in environmental health and safety matters. Work with operating units to identify environmental health and safety goals for their employees. EHS is authorized to stop any work or operation it deems to be immediately dangerous to life and/or health or that is discharging pollutants to the environment in a manner inconsistent with applicable permits or environmental protection rules.

(D) Procedures.

The commitments of this policy will be met through university compliance with established programs developed under the guidance of EHS. All employees will be held accountable for their responsibilities as described in paragraph (C) of this rule. A key element for the successful



implementation of this policy is the execution of the responsibility each employee has in ensuring proper training is given to applicable employees. The procedures for implementation of an EHS training program is listed in paragraph (E) of this rule.

Programs implemented by EHS as required under this policy are listed in this rule. All programs will be accessible by contacting the EHS or electronically by visiting the EHS website (www.wright.edu/admin.ehs).

(1) Occupational safety and health. As a public employer Wright state university must maintain compliance with the state of Ohio's public employment risk reduction program. The purpose of this program is to ensure that public employees in the state of Ohio are provided with a safe and healthful working environment. Public employers are to furnish employees a place of employment free of recognized hazards that may cause death or serious physical harm. Ohio House Bill 308 (as amplified in rules under agency 4167 of the Administrative Code) incorporated by reference all of the Federal occupational safety and health administration standards found in the Code of Federal Regulations 20 CFR parts 1910, 1926 and 1928 as Ohio Employment Risk Reduction Standards. Environmental health and safety shall ensure compliance with applicable rules by developing, maintaining, and implementing the programs listed:

- (a) Hazard communication
- (b) Asbestos operations and maintenance
- (c) Confined space
- (d) Fall protection
- (e) Materials handling and storage
- (f) Lockout/tagout
- (g) Electrical safety



(h) Noise and hearing

(i) Personal protective equipment

(j) Respiratory protection

(k) Toxic and hazardous substances

(l) Laboratory safety

(m) Contractor safety and health

(n) Bloodborne pathogens

(o) Occupational health and medical surveillance

(2) Radiation safety. Wright state university is authorized to use radioactive materials and radiation-producing devices under specific licenses and registrations issued by the Ohio department of health contingent upon the appointment of a radiation safety committee (RSC) and a radiation safety officer (RSO). Together the RSC and RSO shall develop, maintain, and implement a radiation safety manual consistent with applicable rules to provide a university wide radiation safety program. The radiation safety manual shall contain policies and procedures established by the RSC for the comprehensive implementation of standards, procedures, and regulations set by federal and state agencies for the safe use of radioactive material and radiation producing devices. The strict observance by all users of radioactive material or radiation producing devices to the provisions of the radiation safety manual is required.

(a) Radiation safety committee. The RSC is established by and responsible to the vice president for research and graduate studies and consists of a chair, a representative of university administration, the RSO, and minimum of five authorized users of radioactive materials or radiation producing devices. The role of the RSC is to:

(i) Have responsibility and authority for radiation safety policy in all areas of the university and for



all activities under the jurisdiction of the university.

(ii) Shall institute and periodically review university procedures for compliance with state and federal regulations and shall exercise the responsibility of the university for minimizing radiation exposure to students, employees, the public, and the environment; maintaining off-site radiation releases as low as reasonable achievable; and maintaining proper licensing and registration of radioactive materials and radiation producing devices.

(iii) Establish criteria for the qualification of users and for evaluation of proposed uses of radioactive materials and radiation producing devices.

(iv) Periodically review all aspects of the radiation safety program, including records, and shall have approval authority for radiation safety and control procedures implemented by the RSO.

(v) Shall act, subject to review by the vice president for research, in all matters of disputed policy or procedure.

(vi) Assure any person using radioactive materials or radiation producing devices is qualified by training and experience, has adequate facilities for safe use, and proposes safe use with adequate radiation safety precautions.

(b) Radiation safety officer. The RSO acts upon the guidance of the RSC and is appointed (with input from the vice president for research and graduate studies) by and reports to the director of environmental health and safety. The RSO has the authority to discuss and/or report any organizational, procedural, or safety issue with the vice president for research and graduate studies while carrying out their duties. The role of the RSO is to:

(i) Implement radiation safety control procedures in accordance with RSC approved policies and radiation safety standards established by the Ohio department of health and the radioactive material license and radiation producing device registrations.

(ii) Identify radiation safety problems, stop unsafe operations, and/or initiate, recommend, or provide corrective actions and verify the implementation of corrective actions.



(iii) Maintain records of the receipt, storage, use, transfer, and ultimate disposal of all licensed and registered radioactive material and radiation producing devices.

(iv) Provide initial and refresher safety training to users of radioactive material and radiation producing devices.

(v) Maintain records of personnel and use areas.

(vi) Serve as university representative during Ohio department of health inspections of university facilities, records, and use areas.

(vii) Review and update, with guidance from the RSC, the radiation safety manual and distribute to all users of radioactive material and radiation producing devices.

(viii) Provide advice and assistance to the RSC and principal investigators concerning containment procedures and practices, laboratory security, recommended laboratory containment equipment, rules, regulations, and other matters as may be necessary.

(3) Biological safety. Wright state university faculty, staff, and students use various biological materials during certain research and teaching activities. The university shall establish an Institutional biosafety committee (IBS) and employ an institutional biological safety officer (IBSO) who together shall develop, maintain, and implement a biological material safety program consistent with approved guidelines of the centers for disease control (CDC) and the national institute of health (NIH). The IBC shall establish committee guidelines and policies and develop, maintain, and implement an institutional biological safety manual consistent with applicable guidelines of the CDC and NIH to provide a university wide biological material safety program. The strict observance by all users of biological material to the provisions of the institutional biological safety manual is required.

(a) Institutional biosafety committee. The IBC is established by and responsible to the vice president for research and graduate studies and consists of a chair, a vice chair, the IBSO, faculty researchers, two non-affiliated members, and other members as needed or required. The role of the IBC is to:



- (i) Advise the president, provost, associate provosts, vice presidents, deans, and department chairs on matters related to biohazards and biosafety with their respective areas of responsibility.
 - (ii) Develop, recommend, and implement policies and procedures for biological risk assessment and biological risk reduction throughout the university.
 - (iii) Develop emergency plans for the containment and resolution of accidental spills and other related emergencies with an emphasis on risk reduction, personnel protection, and environmental protection.
 - (iv) Oversee all research and teaching activities involving biohazardous agents including review and approval prior to initiation, annual reviews and updates, reviews of laboratory safety equipment and procedures, and certification of compliance with all applicable rules and regulations governing the use of biohazardous materials.
 - (v) As an agent of the institution, ensure that all principal investigators are sufficiently trained in appropriate containment practices, secondary containment procedures, accidental spill containment, and their responsibilities as principal investigators.
 - (vi) Advise and provide technical expertise, whenever possible, to the IBSO on matters regarding biosafety.
 - (vii) Conduct investigation of serious violations or problems and to make recommendations to the vice president for research and graduate studies for the resolution of continued non-compliance or serious infractions.
- (b) Institutional biological safety officer. The IBSO acts upon the guidance of the IBC and is appointed (with input from the vice president for research and graduate studies) by and reports to the director of environmental health and safety. The IBSO has the authority to discuss and/or report any organizational, procedural, or safety issue with the vice president for research and graduate studies while carrying out their duties. The role of the IBSO is to:
- (i) Conduct periodic inspections of laboratories to ensure compliance with established containment



procedures.

(ii) Identify biological safety problems, stop unsafe operations, and/or initiate, recommend, or provide corrective actions and verify the implementation of corrective actions.

(iii) Investigate laboratory accidents and report problems, violations and injuries or illnesses associated with biohazardous research activities, to the institutional biosafety committee.

(iv) Develop and implement emergency plans for handling accidental spills and personnel contamination.

(v) Provide advice and assistance to the institutional biosafety committee and principal investigators concerning containment procedures and practices, laboratory security, recommended laboratory containment equipment, rules, regulations, and other matters as may be necessary.

(vi) Provide oversight and assurance that laboratory safety containment equipment is functioning properly including field testing and certification, where appropriate, of all biosafety cabinets.

(vii) Serve as a member of the institutional biosafety committee.

(4) Fire and life safety. EHS shall work together with physical plant casualty prevention and risk management and insurance to develop fire and life safety programs to protect the students, employees, visitors, and contractors of Wright state university. EHS's main role is to ensure programs meet or exceed the fire and/or life safety aspects of 20 CFR 1910 subpart E, subpart K, and subpart L.

(5) Laser safety. EHS shall develop, maintain, and implement a laser safety program designed to protect campus laser users from the damaging effects of laser radiation. The program shall be consistent with the American National Standard for Safe Use of Lasers, ANSI Z136.1-2007 and in compliance with applicable sections of 29 CFR 1910.

(6) Accident/incident/illness investigation. EHS shall develop, maintain, and implement an accident, incident, and illness investigation program designed to determine causes for accident, incident, or



illness (or any near miss thereof) occurrence and develop and implement preventive measures. This program shall include a reporting method for accidents, incidents, and illnesses. EHS shall coordinate efforts with the office of general counsel to utilize workers compensation information to investigate trends and target prevention areas and reduce accidents, injuries, and illnesses occurring on campus while attempting to reduce overall workers compensation expenditures.

(7) Waste management. EHS shall develop, maintain, and implement chemical, universal, and infectious waste management programs in compliance with applicable Ohio environmental protection agency rules and a radioactive waste management program in compliance with applicable Ohio department of health rules. These programs will provide for the legal, efficient, and effective management of unwanted material generated by various university operations while protecting human health and the environment. These programs will not directly cover the disposal of ordinary refuse or the disposal of unwanted equipment. Separate programs operated by physical plant and excess and surplus property management include the recycling or disposal of this material.

(8) Environmental protection. Due to the varied nature of activities at Wright state university compliance with several environmental protection rules is necessary. These include, but are not limited to, programs covered by the Clean Water Act, Clean Air Act, Safe Drinking Water Act, and the Toxic Substance and Control Act. EHS shall work with affected departments to develop, maintain, and implement the various programs mandated under these acts which are applicable to the university.

(a) Drinking water management

(b) Storm water management

(c) Oil pollution prevention (spill prevention control and countermeasure plan)

(d) PCB management

(9) Public health and sanitation. EHS shall work with physical plant, dining services, student union operations, and the Greene county combined health district to assist in the maintenance of facilities that provide adequate public health and sanitation. This shall include the swimming pool and dining



establishments on campus as well as general public health and sanitation issues that may arise.

(10) Hazardous material transportation. EHS shall develop, maintain, and implement a hazardous materials transportation program in compliance with applicable department of transportation rules. The purpose of this program is to ensure any individual or department on campus whose operation affects the safe receipt or transportation of hazardous material to or from campus is trained as required and that hazardous material is properly packaged and labeled. Depending on the nature or the hazardous material requiring transportation individuals may receive training directly from EHS or may be required to obtain proper training from another qualified trainer or training program.

(11) Hazardous material emergency response. EHS shall maintain a hazardous material response team to provide initial response to hazardous material releases on campus. Depending on the quantity, hazard type, and time of the release EHS is equipped to completely cleanup and mitigate most hazardous material spills. EHS shall maintain a trained staff to adequately access hazardous material releases and to determine if the release is within the capabilities of EHS to manage. Hazardous material releases not able to be managed by EHS shall be turned over to the jurisdiction of the Fairborn fire department who can utilize the local hazardous material response team as needed.

(E) Training and recordkeeping.

(1) EHS shall develop and provide training programs as required by applicable rules and regulations as well as training on industry accepted best management practices. Training programs will be provided by EHS tailored to groups of employees based on their level of administrative management, supervisory or non-supervisory responsibilities and their job duties. Training programs may be provided by EHS to managers, supervisors, and principal investigators in a train-the-trainer style. These train-the-trainer programs will be designed to allow for the manager, supervisor, or principal investigator to provide job specific training to their employees.

(2) EHS shall establish outreach efforts to identify individuals on campus who require training. But it is the responsibility of individuals and departments as specified in paragraph (C) of this rule to fulfill the requirement of identifying faculty, staff, or students who require training and notifying EHS of this need. Training criteria shall be established by EHS for use by all employees to identify



job specific required training for their position or their employees. This policy shall also be used by individuals to identify which EHS programs apply to them and their employees.

(3) New employee training. EHS shall develop, maintain and implement an Employee environmental health and safety training program to familiarize new employees with this Wright way policy and to communicate to them the programs managed by EHS, and other departments, that are operated to protect employees and minimize the university's impact on the environment. EHS shall utilize the resources of the department of human resources to ensure all new employees receive this training.

(4) EHS shall maintain records for all individuals when they provide the training. Recordkeeping for job specific training provided by managers, supervisors, or principal investigators to their staff is the responsibility of the manager, supervisor or principal investigator.

(F) Enforcement authority.

The department of environmental health and safety is authorized to ensure compliance with any programs or policies developed under the direction of Wright way policy 6001 unless such responsibility has been delegated to a committee established by an administrative office at the level of vice president or above. Compliance shall be accomplished by communicating identified deficiencies to the responsible manager or supervisor, who will take corrective action. When this course of action does not mitigate the deficiency the director of environmental health and safety shall work with the vice president, dean, director, or chair of the affected unit to implement corrective action. Final enforcement authority, if necessary, will come from the office of the provost.