University of Houston Clear Lake

MEMORANDUM OF ADMINISTRATIVE POLICY

SECTION: General Administration **Number:** 01.B.07
AREA: Facilities and Physical Plant

SUBJECT: Environmental Health and Safety

I. PURPOSE AND SCOPE

The purpose of this document is to inform University of Houston-Clear Lake (UHCL) faculty, staff, students, contractors and visitors of the University of Houston-Clear Lake's Environmental Health and Safety (EHS) department's policies, procedures, manuals and programs. This document applies to all UHCL employees, students, contractors and visitors.

II. POLICY

UHCL is committed to maintaining a safe environment for all faculty, staff, students, contractors and visitors. It is the university's policy to comply with all environmental health and safety-related regulations that govern the university's operations, teaching and research. The UHCL EHS department develops safety-related policies, procedures, manuals and programs to relay and accomplish this objective.

This policy is written in accordance with the University of Houston System Administrative Memorandum 01.C.07 Safety Administration and modeled after the University of Houston's Manual of Administrative Policies and Procedures 06.02.03 Environmental Health and Safety.

III. DEFINITIONS

A. **Laboratory**: Any space owned or leased by the university that supports research and/or teaching activities within the University location or otherwise designated by the Facilities Space Use Code or by EHS for hazard identification or control purposes equipped for scientific experiments, research, or teaching.

B. **Shop**: Any space owned or leased by the university that supports building systems maintenance (non-moveable) activities, building equipment maintenance (moveable) or supports fleet maintenance, campus postal functions, campus printing functions, IT functions, woodworking, mechanical engineering or similar equipment.

C. **Studio**: Any space owned or leased by the university that supports teaching and/or research activities within the University location or University official business off-site location for art, theatre and the performing arts.

D. **University**: For the purposes of this document, "university" refers strictly and only to UHCL.

IV. RESPONSIBILITIES

A. **UHCL EHS:**

a. Monitor federal and state rules and regulations/local ordinances to evaluate their effect on university programs.

b. Consult with university faculty, staff and students on best/safe work practices.

c. Provide technical assistance to all employees and students to promote a safe working environment.

d. Provide training to employees and students on potential workplace hazards.

e. Develop policies, programs and initiatives to address workplace hazards.

f. Perform safety reviews and hazard assessments of regulated activities.

g. Investigate accidents, incidents and near misses and develop corrective action plans.

h. Conduct inspections and audits of all locations and workplace activities.

i. Suspend, restrict or close unsafe operations and those deemed Immediately Dangerous to Life and Health (IDLH).

i. Ensure compliance with EHS safety policies according to department established policies.

j. Act as a central point of contact and coordination with regulatory bodies where EHS holds registrations, licenses, permits, or certificates on behalf of the University.

k. Develop interim procedures, manuals and programs for the immediate approval and implementation by the Associate Vice President, Facilities Management and Construction or designee.

l. Annually, conduct a review of and update as necessary all Environmental Health and Safety Procedures and Manuals.

B. **EHS Safety & Compliance committees:**

EH&S Safety & Compliance committees as may be established or eliminated in the future, will act as internal consultants, maintaining oversight regarding safety policies, and provide guidance and advisory to university senior management and the EHS department, consistent with the charter/bylaws on environmental health and safety matters to promote health, safety and compliance with applicable regulations.

C. **College Deans, Department Chairs, Research Center Directors, and Administrative Heads:**

a. Establish, promote, and maintain safety culture within their area.

b. Ensure prompt registration of assigned/reassigned laboratory and shop spaces by filling out appropriate forms and communicating with EHS and FMC about these changes.

c. Assist laboratory Principal Investigators and Shop Supervisors in implementing EHS programs in their areas.

d. Make efforts to ensure employees and students are aware of university EHS policies, procedures, manuals and programs.

e. Ensure the college, department or area complies with applicable EHS rules, Policies, guidelines, Procedures, Manuals, and participates in applicable EHS programs.

f. Be aware that environmental or chemical clean-up costs, where such costs are not covered by insurance or another funding source, will be the responsibility of the department.

D. **Laboratory Principal Investigators and Shop Supervisors:**

a. Maintain safe working conditions for those being supervised.

b. Promptly register laboratory and shop spaces with Facilities Management and Construction/EHS.

c. Promptly register Visiting Researchers and Minors in University Laboratories.

d. Maintain knowledge of EHS Policies, Procedures, Manuals, programs and guidelines.

e. Ensure department is responsible for the proper handling, storage, inventory and use of hazardous and non-hazardous materials, wastes and contents in the laboratory and/or other spaces.

f. Promptly report unsafe conditions in the work area to EHS.

g. Ensure employees and students receive appropriate and timely safety training.

h. Provide personal protective equipment (PPE) to employees, students and visitors in their laboratory or shop, and ensure that appropriate PPE is worn.

i. Provide job-specific training to their workers and retain training records.

j. Monitor their areas for compliance with all EHS policies, procedures, manuals and programs.

E. **Faculty, Staff, Students and Visitors:**

a. Comply with applicable local, state and federal EHS and university Policies, Procedures, Manuals and regulations.

b. Promptly report unsafe conditions in their workplace to supervisors.

c. Promptly report accidents, incidents, near misses as a result of exposure to hazardous materials, spill or accidental environmental release of hazardous materials to EHS.

F. **Contractors and Subcontractors:**

a. Comply with health and safety rules established by EHS and agency regulations. It is also the responsibility of the college or department engaging the contractor to ensure that the contractor follows EHS rules.

G. **University Police:**

a. At least annually, review and update key control and access cards information.

V. ENVIRONMENTAL HEALTH AND SAFETY PROGRAMS

EHS programs address a variety of health and safety needs on campus that ensure compliance with various regulatory agencies and proper use of safety protocols. EHS programs as may be established or eliminated in the future include, but are not limited to:

A. **Asbestos Safety Program** – provides guidance related to occupational asbestos on the UHCL campus and non-occupational use in UHCL labs.

B. **Biological Safety Program** – provides guidance for work with biological agents and toxins, human and animal tissue and cells, recombinant/synthetic nucleic acid molecules, etc.

C. **Bloodborne Pathogens Infection Control Program** – provides guidance to all employees, students and researchers working with bloodborne pathogens, health care workers and trainees who conduct health care related activities with potential for exposure to bloodborne pathogens.

D. **Chemical Safety Program** – provides guidance on safe use and storage of hazardous chemicals in UHCL laboratories, shop and studio locations with emphasis on Particularly Hazardous Substances that pose a physical or health hazard and need special procedures, handling, training, PPE, etc.

E. **Construction Safety** – ensures that all construction and renovation projects and contractors on campus follow appropriate OSHA construction regulations and SORM guidelines.

F. **Environmental Protection Program** – involves petroleum spill prevention, storm water, and other environmental permits designed to minimize environmental impacts from daily operations. All activities that may generate controlled or uncontrolled emissions such as air emissions, runoff, or other releases must be conducted in accordance with the policies and procedures detailed in the appropriate safety manual or plan.

G. **Hazard Communication Program** – increases employee awareness of hazardous chemicals used in the workplace to enable recognition of known or potential hazards and take proactive measures to minimize potential harm.

H. **Laboratory Safety Program** – provides guidance and safety oversight of laboratory activities through laboratory registration with EHS prior to start of laboratory activities and deregistration prior to ending laboratory activities in assigned spaces.

I. **Occupational Safety Program** – involves occupational safety, shop safety, asbestos, indoor air quality, ergonomics, respiratory protection, hearing protection, confined space, industrial hygiene, etc. regardless of the location.

J. **Radiation Safety Program** – provides guidance with activities using state licenses involving radioactive materials, radioactive waste, x-ray machines and ionizing radiation producing devices, laser safety, etc.

K. **Regulated Waste Program** – involves the generation and disposal of hazardous waste, chemical waste, biomedical waste, regulated medical waste, used oil, universal waste, and other wastes that are regulated on an institutional or site-specific basis as well as spill response and prevention.

L. **EHS Safety Training Program –** involves mandatory/required safety trainings for all categories of employees, students and visitors.

VI. PROCEDURES

EHS manuals, procedures and forms may be established or eliminated and are maintained on the UHCL EHS website. These are intended to provide guidance and instruction in compliance with this EHS Policy. Regulated activities and personnel covered by this policy and these procedures must undergo hazard review to ensure proper setup and that procedures, training guidance, PPE, etc. are followed. Procedures established may include, but are not limited to the following:

A. Asbestos verification review prior to work
B. Animal Research and Care (within IACUC/OSP)
C. Biological Agent, Recombinant/Synthetic Nucleic Acid Molecules
D. Chemical Inventory/Particularly Hazardous Chemicals/University Controlled Chemicals
E. Construction/Renovation Contractors/Projects
F. Class 3b & 4 Lasers
G. Radioactive Materials
H. X-ray Machines and Ionizing radiation producing devices
I. Research & Instructional Laboratories and personnel
J. Shops, Studios (equipment safety) - maintenance, Mechanical Engineering, Art, Theater
K. Visiting Researchers in University Laboratories
L. Minors in University Research Laboratories
M. Waste Generation, Storage/Accumulation and Disposal

VII. ACCIDENT, INCIDENT, AND NEAR-MISS REPORTING

Accident, Incident and Near-Miss reporting is required by various federal, state and local agencies. Promptly report accidents, incidents, near misses, exposure to hazardous materials, spills or accidental environmental releases of hazardous materials to EHS utilizing the appropriate Incident Reporting Form found on the UHCL EHS website.

VIII. SAFETY TRAINING

Many EHS safety programs have required safety training that must be completed prior to any activities starting. Other EHS topic specific safety trainings are found on the UHCL EHS website, listed in the training matrix or in the appropriate registration form. Training programs established may include, but are not limited to the following:

a. Hazardous Communications (HAZCOM) - Annual requirement for employees that work with chemicals.
b. Bloodborne Pathogens Training - Annual requirement for applicable employees.
c. General Laboratory Safety Orientation - Requirement for every faculty, staff, student and visitor working in the laboratory (for lab course, or Advanced).
d. Regulated Waste Training – Requirement for all employees that participate in the generation or accumulation of regulated waste.

IX. REFERENCES

University of Houston System Administrative Memorandum 01.C.07, Safety Administration

University of Houston Memorandum of Administrative Policies and Procedures 06.02.03 Environmental Health and Safety.

X. REVIEW AND RESPONSIBILITY

Responsible Party: VP Admin & Finance

Review schedule: Every 5 years

XI. APPROVAL

/Martin Baylor/
Interim Vice President Administration and Finance

/Richard Walker Ed.D/
President

Date of President's Approval: February 28, 2025

Revision Number	Approval Date	Description of Changes
1	May 2, 2024	Original Interim Policy
2	February 28, 2025	Minor changes for Final Policy