HLC Accreditation 2020-2021

Evidence Document

WSU Policies and Procedures Manual

Chapter 10 / Environmental Health and Safety

Additional information: See the web page at:
https://www.wichita.edu/about/policy/ch_10/ (Accessed March 8, 2021).

Wichita State University

WSU Policies and Procedures

Chapter 10 - Environmental Health and Safety

10.01 / Environmental Health and Safety Guidelines

Effective: July 01, 1997 Revised: July 25, 2001

I. Preamble

Wichita State University is committed to the philosophy that teaching and research are best conducted in laboratories where dedication to safety, health and environmental stewardship is exemplary.

II. Policy

It is the policy of Wichita State University (WSU) to operate in compliance with applicable federal, state, and local requirements which concern human health, animal welfare, and protection of the environment.

A. Laws, regulations and guidelines

WSU employees should be cognizant of and comply with the following laws, regulations, guidelines and/or publications:

- **Emergency Action Plan and Egress -** 29 Code of Federal Regulations (CFR) 1910.35 - .40
  A written plan that tells what to do in the event of a fire, tornado, chemical spill, bomb threat or other emergency; Emergency Building Coordinator Program.
- **Fire Prevention -** 29 CFR 1910.38(b)
  A written plan describing the equipment and procedures used to prevent fires.
- **Hazardous Waste Operations and Emergency Response (Hazwoper) -** 29 CFR 1910.120
  A written plan and training for those who handle hazardous wastes.
- **Blood Borne Pathogens -** 29 CFR 1910.1030
  A written plan and training for those who may come in contact with human blood or body fluids.
- **Hazard Communication Program -** 29 CFR 1910.1200
  A written plan identifying the hazardous materials at a job site and how to protect oneself from those materials.
- **Laboratory Standard -** 29 CFR 1910.1450
  A written chemical hygiene plan which describes safety procedures to be followed in the laboratory.

- **Protection of the Environment -** 40 CFR 260 to 299
  Describes the generation, accumulation, transport, and disposal requirements for hazardous wastes as well as training requirements.
- **Hazardous Waste -** Kansas Statutes Annotated (K.S.A.) Chapter 65, Article 34
  Adopts by reference the guidelines in 40 CFR 260 to 299, the U.S. EPA Protection of the Environment, and additional requirements unique to Kansas.
- **Radiation Sources and Disposal -** The Federal Nuclear Regulatory Commission (NRC) and Kansas Department of Health & Environment (KDHE) Bureau of Air & Radiation (BAR) Radiation Control Program
  A program for control and monitoring of radioactive materials and radiation emitting equipment including lawful disposal from sites within the Central Interstate Radioactive Waste Compact.
- **Animal Use -** The Animal Welfare Act (AWA), the U.S. Department of Agriculture (USDA), and the Association for Assessment and Accreditation of Laboratory Animal Care (AAALAC), International guidelines require an Institutional Animal Care and Use Committee (IACUC) to provide oversight for all animal use.
  The IACUC oversight is to ensure compliance with the AWA and USDA policies and AAALAC accreditation requirements.
- **Animal Activist Action -** The National Association for Biomedical Research *Crisis Management Manual* will guide responses.
- **Biohazards -**
  Use of any biohazardous material requires review and authorization by the Institutional Biosafety Committee.
- **Occupational Health and Environmental Control -** 29 CFR 1910.94 - .98
  Provides guidelines governing ventilation, occupational noise, and non-ionizing electromagnetic radiation.
- **Hazardous Materials -** 29 CFR 1910.101 - .111
  The Compressed Gas Association's Pamphlet P-1 for handling procedures and requirements for various hazardous materials and specific compressed gases.
- **Personal Protective Equipment (PPE) -** 29 CFR 1910.132B - .139
  Eye and face (.133), Respiratory (.134), Hands (.138), Feet (.136).
- **General Environmental Controls -** 29 CFR 1910.141 - .147
  Regulations concerning eating areas, water supplies, rest rooms and washing/shower facilities; color codes and safety signs (.144 and .145); confined space regulations; and Lock-out/Tag-out (.147).
- **Air Contaminants, Permissible Exposure Limits (PELs) -** 29 CFR 1910.1000
  Exposure limits for more than 600 chemicals and materials.

Copies of the regulations and written plans are available in the Environmental Health & Safety (EH&S) Office and in other administrative offices. Additional training, as appropriate for your job assignment, can also be obtained from EH&S.

B. Accumulation of Hazardous Wastes

There are only two areas where hazardous waste may be accumulated: satellite areas and the central storage accumulation area. These areas are defined and regulated by law (40 CFR 260 to 299; K.S.A. Chapter 65, Article 34; and K.A.R. Article 31). Individual laboratories and other sites that contain any chemicals are satellite areas.

1. Individuals who handle hazardous waste must be properly trained and the training documented.
2. Storage containers must be in good condition and kept closed when not in use.
3. Containers of hazardous waste must be appropriately labeled with words "hazardous waste" and must be under the daily supervision of the *operator* in the *satellite* area.
4. The *accumulation start date* must be added to a hazardous waste container that is full by the generator when removal to the *central storage accumulation* area is to take place.
5. The satellite hazardous waste container must be removed from the *satellite* area within 72 hours of adding the *accumulation start date* and removed from the *central storage accumulation* area within 90 days.
6. Only one *satellite* container of each hazardous waste can be present in a *satellite* area.

C. Enforcement

The Resource Conservation and Recovery Act of 1976, as amended, prescribes fines for a variety of violations. Fines are typically $25,000 per day per violation but can go as high as $50,000 per day. Endangering someone by improper handling, storage, treatment, or disposal of hazardous waste could subject the responsible person to a $250,000 fine and up to 15 years in prison. The Kansas Department of Health and Environment (KDHE) Bureau of Waste Management can impose penalties.

- Storing hazardous waste in a container in poor condition; $500-$5,000.
- Failure to mark containers of hazardous waste with the *accumulation start date*; $500 + the number of containers x $100. One container would be $600.

- Failure to label a container with the words "hazardous waste;" $500 + the number of containers x $200. One container would be $700.
- Failure to maintain no more than a single container of a particular waste in a *satellite* area; $500 + the number of containers x $100. One container would be $600.

Ignorance of the law is no excuse for violations. Courts have held that the responsibility to know the law lies with the individual. In the area of environmental law, lack of knowledge may result in fines or a jail term. For those who work with hazardous material, it is imperative that they know the regulations to ensure that operations comply with the law. Remember the government does not recognize ignorance of the law as a valid defense.

10.02 / Hazard Communication Program

Effective: July 01, 1997

I. Policy

It is the policy of Wichita State University to promote safety and prevent employee health problems associated with exposure to and use[1] of hazardous materials including chemicals, radioactive material, and biological agents in the workplace. The University will use the "Hazard Communication Standard," 29 CFR Part 1910.1200, from the Occupational Safety and Health Administration (OSHA) as the guide to assure every effort is made to reduce the incidence of illness and/or injury caused by hazardous materials. A copy of the OSHA standard is available in the Environmental Health and Safety Office. The WSU Hazardous Communication Program is to inform employees of the hazards and identifies of chemical, radioactive, and biological materials to which they may be exposed in the workplace and of the protective measures available.

[1] Use is defined as "to package, handle, react, or transfer."

II. Components

The program contains detailed policy on container labeling, chemical inventory, and material safety data sheet (MSDS) information. Also included are provisions for employee hazard communication training, hazards of nonroutine tasks, hazards of chemicals in unlabeled pipes, and communication of hazards to outside contractors.

III. Employees Affected

It is recognized that many physical plant operations, research laboratories, and other essential work areas frequently require the use of materials which have potentially hazardous properties. When using these substances, it is important that all employees who use or may be exposed to them are aware of the identity and toxicity or other hazardous properties of the material.

IV. Availability

The Hazard Communication Program is available to all Wichita State University employees, their designated representatives, the Assistant Secretary of Labor for

Occupational Safety and Health Administration (OSHA), and the Director of the National Institute for Occupational Safety and Health (NIOSH).

V. Hazard Communication Program

A. Hazard Determination

1. Any substance listed in 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances; the Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment published by the American Conference of Governmental Industrial Hygienist (ACGIH), the Annual Report on Carcinogens published by the National Toxicology Program (NTP); or Monographs published by the International Agency for Research on Cancer (IARC) will be considered hazardous.
2. Any human epidemiological study, individual case report, or toxicological testing which indicated that a material presents a health hazard will be considered hazardous provided that the study indicated an adverse health effect that is likely occur, that the results are statistically significant, and that the study was conducted in accordance with scientific principles.

B. Labeling System for Hazardous Materials

1. Container labels must be legible. Labels that are illegible, defaced, or missing shall be replaced immediately.
2. Each container of a hazardous material in the workplace shall be prominently labeled in English and must include:
    a. Name of the substance as corresponds to its material safety data sheet;
    b. Identity of the chemical contained within;
    c. Identity of primary hazard associated with the material;
    d. Appropriate hazard warnings.
3. No employee shall remove any label unless specifically directed to do so by a supervisor. Any container without a label should be reported immediately to the work area supervisor.
4. In situations involving individual stationary process containers, the label may be replaced by a sign, placard, process sheet, batch ticket, or other means to convey the warnings.
5. Containers designated for washing or rinsing of hazardous material must be appropriately labeled.
6. If the hazardous chemical is regulated by OSHA as a substance-specific health hazard, the label used will be in accordance with the requirements of that standard.
7. Labels are not needed for:
    a. Portable containers of hazardous materials intended for immediate use by the employee who performs that transfer.
    b. Pipes or piping systems.

C. Material Safety Data Sheets (MSDS's)

1. Wichita State University does not commercially produce or generate hazardous chemicals; therefore, MSDS's for hazardous materials on campus are furnished solely by outside vendors.
2. The most current MSDS supplied by the chemical manufacturer, importer, or distributor for each hazardous chemical known to be present at Wichita State University is maintained by the Environmental Health and Safety Office. MSDS's are accessible to all employees, their designated representatives, the Assistant Secretary of Labor for Occupational Safety and Health, and the Director of the National Institute for Occupational Safety and Health (NIOSH).
3. MSDS stations containing MSDS's for particular work areas are maintained by departments with assistance from the Environmental Health and Safety Office. These stations are accessible during each work shift to employees who frequently use or are exposed to chemicals.
4. If new and significant information comes to light about any hazardous material used on campus, a revised material safety data sheet will be obtained and the employees who use the material notified.
5. No hazardous material will be used in the workplaces unless a MSDS has been obtained and is on file in the work area. A waiver to this requirement may be granted by the Environmental Health and Safety Office if a MSDS for a similar material is on file and readily accessible to the department using the chemical.
6. In a work area where it is more appropriate to address the hazards of the process rather than individual hazardous chemicals, material safety data sheets may be kept in the form of operating procedures and may be designed to cover groups of hazardous chemicals.
7. When ordering new hazardous chemicals, the purchaser must ensure that the words "Hazardous: MSDS Required" are included in bold letters in the description block of the purchase request.

D. Employee Information and Training

1. Employee information and training are primarily provided by the Environmental Health and Safety Office and employee supervisors.
2. Training will be renewed annually, at minimum, for all employees who use or are exposed to hazardous materials.
3. Initial hazard communication training is required for all employees during new employee orientation sessions. This training includes:
    a. Introduction to the Hazard Communication Program and Chemical Hygiene Plan and their requirements.
    b. Presence of hazardous materials on campus
    c. Types of hazards
    d. Potential exposure and risks
    e. Labeling and warning systems on packages and containers

f. Locations and availability of Material Safety Data Sheets
g. Safety controls
h. Emergency and safety resources

4. Additional training for employees who are frequently exposed to hazardous materials is required. Current training programs available from the Environmental Health and Safety Office provide for:
    a. Understanding material safety data sheets
    b. Trade secret provisions
    c. Handling hazardous chemicals
    d. Detecting the presence or release of hazardous chemicals
    e. Physical and health hazards of materials
    f. Symptoms of exposure to hazardous materials
    g. Personal protective equipment and its use
    h. Proper action in case of a chemical splash, spill, or other emergency
    i. Engineering controls
    j. Use of radioactive material
    k. Laboratory safety
    l. Chemical fume hood and biological safety cabinet use
5. On-the-job training is provided for employees who frequently use or are exposed to hazardous materials by department supervisors. This training includes:
    a. Standard safety procedures and personal protective equipment needed for each assigned task.
    b. Procedures to be used during nonroutine operations.
    c. Potential for exposure to chemicals present in the work area including chemicals in unlabeled pipes.
    d. The location and availability of the written Hazard Communication program, list of hazardous chemicals, and MSDS station.
    e. Emergency procedures
6. New training programs are developed to meet the needs of employee groups as needed.

E. Outside Contractors

1. As part of any contractual arrangement between an outside contractor and Wichita State University, the contractor must list all hazardous chemicals that are to be used by his employees in the course of their work on WSU property.
2. Prior to beginning work on WSU property, all contractors will be given a copy of the University's Hazard Communication Program. The particular hazards associated with the work area(s) will be identified. Material safety data sheets for relevant hazardous chemicals will be provided to the contractor.

F. Responsibilities

1. Administration
    a. Supports and implements policy to protect the health and safety of Wichita State University employees.
    b. Ensures compliance with current federal, state, local, and institutional regulations.
2. University Safety Committee
    a. Monitors institutional compliance with Hazard Communication Program requirements.
    b. Receives and investigates complaints related to safety issues and prepares recommendations for complaint resolution.
    c. Serves as a campus resource for information promoting safety in the workplace.
    d. Assists in employee training sessions as needed.
    e. Identifies and supports methods to achieve more effective worker protection and reduce the occurrence of illnesses, injuries, and fatalities due to chemical mishandling and exposure.
3. Environmental Health and Safety
    a. Monitors federal, state, and local regulations concerning hazardous materials and recommends action.
    b. Monitors institutional compliance with Hazard Communication Program requirements.
    c. Maintains material safety data sheets for every hazardous chemical known to be used on campus.
    d. Trains employees and maintains records of training.
    e. Receives and investigates complaints relating to hazardous materials.
    f. Assists departments in all aspects of Hazard Communication Program implementation.
    g. Identifies work areas in need of more effective worker protection including engineering controls, monitoring, personal protective equipment, etc., and prepares recommendations for improvement.
    h. Maintains and provides safety information on all hazardous materials including chemicals, biological agents, and radioactive material.
    i. Recommends safe alternatives for hazardous materials.
4. Office of Purchasing
    a. Provides outside contractors with copies of the Wichita State University Hazard Communication Program and relevant material

safety data sheets with assistance of the Environmental Health and Safety Office.
   b. Reviews purchase requests for hazardous materials.
   c. Identifies means to reduce the amount of hazardous materials purchased by the institution.
   d. Prepares bids and contracts which comply with all federal, state, local, and institutional regulations concerning hazardous material testing, monitoring, removal, etc.
5. Department Supervisors and Chairs
   a. Effectively implement all aspects of the Hazard Communication Program in the work area.
   b. Ensure all hazardous chemicals in the work area have material safety data sheets and are available during all work periods to employees who frequently use or are exposed to these materials.
   c. Provide appropriate on-the-job training.
   d. Identify work areas in need of more effective worker protection and prepare recommendations for improvement.
6. Employee
   a. Is alert to and understands the potential hazards of materials in the work areas.
   b. Consults material safety data sheets and other relevant sources or information concerning hazardous materials with which he or she works.
   c. Follows appropriate work practices.
   d. Identifies work areas in need of more effective worker protection and brings to supervisor's attention.

10.03 / Radiation Sources

Effective: July 01, 1997

I. Policy

The use and disposal of radioactive materials and radiation-emitting equipment in activities such as teaching, research, or other services is regulated by federal and state statutes. Control and monitoring of activities involving radioactive materials and radiation-emitting equipment as well as disposal of wastes is the responsibility of the Radiation Safety Officer (RSO) in the Environmental Health and Safety Office working under the aegis of the Vice President for Research and Technology Transfer and the Radiation Safety Committee (RSC). All personnel (faculty, staff, students, guests) using such materials must comply with all applicable regulations. Authorization to use such materials is only available from the RSO and the RSC and must be obtained prior to acquiring materials or equipment. Information describing the procedures for obtaining authorization, purchase, use, and disposal of materials and equipment is available from the Environmental Health and Safety Office. RSO access to laboratories and other facilities to perform inspections is a necessary part of compliance with regulations governing purchase, storage, use, and disposal of radioactive materials and radiation-emitting equipment.

10.04 / Chemicals

Effective: July 01, 1997 Revised: July 25, 2001

I. Policy

Chemicals used in activities including teaching, research, or other services as well as disposal are regulated by federal and state statutes. Control and monitoring of activities involving chemicals and disposal of hazardous wastes in all areas of WSU is the responsibility of the Environmental Health and Safety Office (EHSO) working under the aegis of the Vice President for Research and Technology Transfer. All personnel (faculty, staff, students, guests) using such materials must comply with all applicable regulations. Faculty and staff members are responsible for reporting activities involving hazardous and extremely hazardous materials to the EHSO and cooperating with the office to ensure compliance with applicable regulations. EHSO access to laboratories and other facilities to perform inspections is a necessary part of compliance with regulations governing purchase, storage, use, and disposal of all chemical materials. Also review Section 10.01, Environmental Health and Safety Guidelines, and Section 10.02, Hazard Communication Program, for more specific requirements.

10.06 / Animal Care and Immunizations

Effective: October 21, 2002

I. Purpose

The purpose of this statement is to set forth University policy with regard to immunizations for those who have substantial animal contact in their work or studies at the University.

II. Preamble

Individuals who have substantial animal contact as a result of their occupation or education at the University may be at risk of acquiring an infection or allergy. The University believes it is in the best interests of such individuals to inform and educate them about such risks and to make free immunizations available.

III. Policy

A. Individuals who have substantial animal contact as a result of their occupation or education at the University are to be informed about the risks of acquiring an infection or allergy as a result of such contact and about the recommendations of physicians as to immunizations.
B. Individuals who have such animal contact shall be given the opportunity to be immunized at no cost to them.
C. Individuals who choose not to have the immunization shall be required to sign a statement confirming their choice.

IV. Implementation

This policy shall be included in the *WSU Policies and Procedures Manual* and shared with appropriate constituencies of the University.

The Director of Environmental Health and Safety shall have primary responsibility for publication, dissemination and implementation of this University policy.

10.07 / Biohazards

Effective: July 01, 1997 Revised: July 25, 2001

I. Policy

Biohazardous materials include all agents or processes which pose a risk of immediate or delayed harm to any living organisms. Project associated hazards include radionuclides, chemical hazards (controlled substances); health hazards such as carcinogens, teratogens, mutagens, nephrotoxins, neurotoxins, hepatotoxins and hematopoetic toxins; physical hazards such as flammables, reactives, oxidizers, and corrosives, recombinant DNA, human tissues or fluids, cancer viruses, etiological agents and animals. The guidelines for use of biohazards are intended to complement but not replace guidelines established by the Radiation Safety Committee (RSC), the Institutional Animal Care and Use Committee (IACUC), and the Institutional Review Board (IRB). The use of any biohazardous material requires review and authorization by the Institutional Biosafety Committee (IBC). The IBC chair and members are appointed by the Provost. Institutional Biosafety Report Forms are available from the Environmental Health and Safety Office.

10.08 / Hazardous Waste and Radioactive Waste Disposal

Effective: July 01, 1997

I. Policy

All grants that generate hazardous wastes or radioactive wastes must include a budget to cover the costs of disposal of these wastes. Contact the Director of Environmental Health and Safety for a cost estimate. To expedite the process, please furnish a list of radioisotopes and chemicals, including quantities, to be purchased.

10.09 / Radiation Monitoring for Pregnant Employees and Students

Effective: July 01, 1997 Revised: October 21, 2002

I. Purpose

The purpose of this statement is to set forth University policy with regard to optional radiation monitoring for pregnant employees and students.

II. Preamble

State of Kansas administrative regulations set forth requirements relative to occupational radiation exposure and pregnant women. Wichita State University wishes to implement such regulations for women who choose to declare their pregnancy.

III. Policy

A. General radiation safety training will be given to employees and students who can be anticipated to receive occupational exposures exceeding 100 mrem per year.
B. Employees and students may "declare their pregnancy" when and if they so choose.
C. Employees and students who declare their pregnancy will follow written procedures developed by Environmental Health and Safety to monitor exposures to radiation and to help protect the unborn child.
D. A pregnancy may be "un-declared" in writing by the employee or student and monitoring will cease.

IV. Implementation

This policy shall be included in the *WSU Policies and Procedures Manual* and shared with appropriate constituencies of the University.

The Director of Environmental Health and Safety shall have primary responsibility for publication, dissemination and implementation of this University policy.

10.10 / Hot Work Permits

Effective: May 01, 2009

I. Purpose

The purpose of this statement is to set forth University policy with regard to the performance of any repair or construction work involving open flames or producing heat and/or sparks.

II. Preamble

Fire prevention and safety concerns require that precautionary procedures be put in place to regulate and control any repair or construction work involving open flames or the possibility of producing heat and/or sparks in University buildings.

III. Policy

The University Fire Safety Office must approve, in advance, any work requiring heat or open flame, including, but not limited to, welding, torch cutting, grinding, brazing, flame soldering and thawing pipes with torches, in any Wichita State University buildings. To facilitate the review and approval process, the University Fire Safety Office will develop and put in place procedures for the issuance of "hot work" permits.

IV. Implementation

This policy shall be included in the *WSU Policies and Procedures Manual* and shared with appropriate constituencies of the University.

The Vice President for Finance and Administration shall have primary responsibility for publication, dissemination and implementation of this University policy.