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Kim Goldenberg, President

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Dear Colleagues:

Until recently, the university was exempt from the Occupational Safety and Health Administration's (OSHA) regulation which addressed employees' health and well-being in the work-place. Effective January 1, 1995, the State of Ohio has enacted an Ohio OSHA program entitled, *The Public Employment Risk Reduction Program for Public Employers and Employees*, which requires the university to provide to its employees a work-place free from hazards consistent with that of federal OSHA.

The ramifications placed on the university will vary depending upon each individual's working environment. Those employees in administrative positions will notice very little impact, while those employees who work with tools, equipment, biologics, chemicals, and/or physical agents will encounter significant regulatory requirements. These regulations will place additional work requirements on all employees and place managers and supervisors in a position of accountability. The Department of Environmental Health and Safety is responsible for the university program and will work with employees and management and supervisor personnel to ensure that the requirements are met.

The attached document constitutes the university's Occupational Safety and Health Management Guidelines. I encourage each employee to read the document and take individual responsibilities seriously. There is nothing more important than the health and well-being of our employees, students and visitors. The Board of Trustees and I are committed to providing a working environment free from hazards.

Sincerely,

Kim Goldenberg
President

Attachment

**OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT GUIDELINES
DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY
WRIGHT STATE UNIVERSITY
APRIL 1, 1995**

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OCCUPATIONAL SAFETY AND HEALTH MANAGEMENT GUIDELINES
DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY
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SECTION I – MANAGMENT COMMITMENT AND EMPLOYEE INVOLVEMENT

Policy: Wright State University endorses the position that it is the university's legal and moral obligation to provide employees and students an environment in which to work, study and conduct research that will be conducive to their health and well-being. The university further holds that this responsibility is held at a level commensurate with other goals and values of the university.

Goals: It is clearly the goal of the university to achieve the objective of providing a campus free of conditions and practices which can lead to employee and student injuries and illnesses. This statement, along with a message that individuals will be expected to fulfill their responsibilities and that they may be held accountable, will be communicated to all employees of the university.

Management Commitment: All levels of management, from the Board of Trustees and the President to the individuals who directly supervise faculty, staff and student employees, are expected to be knowledgeable of their responsibilities as they relate to work-place safety and health. It is also expected that they will take an active role in promoting safe work practices and conditions and in working with the Department of Environmental Health and Safety (EHS) to achieve the lowest rate of injuries and illnesses possible.

Employee Involvement: The success of any program is normally enhanced by the involvement of those individuals on whom the outcome impacts the most. In occupational safety and health, it is important that employees, who by the nature of their jobs have the highest potential for acute and chronic exposure to biological, chemical and physical agents, have the opportunity to participate actively in the program. Participation by way of safety and health committee membership, education and training programs, self and joint work-place inspections, and access and interface with the professional staff of EHS are means by which this can be accomplished. All employees, regardless of position, are encouraged to participate actively in the university program in occupational safety and health, both at university and departmental levels.

Responsibility and Authority: To achieve the university's goal of a safe and healthful university community, it is essential to identify and assign responsibilities at all levels of management and to employees in non-management, non-supervisory roles. This must be followed by providing to those responsible parties the authority and resources by which they can accomplish the health and safety considerations of their jobs. This process must start at the top and work down. The Board of Trustees and the President have stated the university's position relative to employee health and safety. The Provost and Vice Presidents must start the process by defining responsibilities and extent of authority throughout their organizations. Finally, employees at all levels must be held accountable for their performance in health and safety of employees and students. This should be reflected in an employee's annual performance evaluation.

Program Review: OSHA requires the employer to conduct an annual review of its programs in occupational safety and health. Although the lead department for this review will be EHS by way of their annual audits and reports, managers at all levels are required to conduct their own review within their areas of responsibility. Managers responsible for those areas in which deficiencies are identified must initiate corrective action in a timely manner. Inspection/survey records completed by both EHS and managers must be maintained for 30 years.

SECTION II – WORKSITE ANALYSIS

Comprehensive Baseline Worksite Surveys: EHS will conduct a comprehensive baseline survey of each work-place where the potential for occupational exposures to biological, chemical, and physical agents exists. Outside consultants will be utilized for those situations for which specialized expertise or equipment is needed to complete the evaluation. Following the baseline study, an annual audit of each work-place will be completed, as a minimum requirement. A re-evaluation will be done any time there are changes made in a specific work-place which could affect the health and well-being of the employees and/or students of that area. Supervisors of each work-place will be provided with, and instructed on, the audit form used by EHS. Supervisors are encouraged to utilize this instrument to perform periodic self-inspections of the work activities under their jurisdiction.

Plans and Process Review: All university departments must contact EHS whenever changes are to be made in the work-place which could be detrimental to the health and well-being of employees and students. Areas of concern are primarily those which involve procedural or process change or changes in the biological, chemical, or physical agents used. If there is any doubt as to the impact of the change, get EHS involved. It is important that EHS involvement be as early as possible in the conceptual or planning stages.

EHS currently exercises control over the purchasing and use of such things as radioactive materials, radiation-producing equipment, lasers and personal protective devices, such as respirators, ear protection, safety shoes, etc. All uses of radioactive materials, radiation-producing devices, and biological materials are approved through EHS's involvement in the activities of the Radiation Safety and Biosafety Committees. Plans for major and minor constructions and renovations are reviewed and approved by EHS. Approval of other activities will be required in the future to achieve compliance with new standards or to maintain a posture of "prudent practice."

Job Hazard Analysis: Each work-place should be inspected on a regular basis to ensure that new or previously missed hazards are identified and controlled. Supervisors, because of their job knowledge and availability, are in the best position to accomplish this analysis. All supervisors, as part of their daily routine, should be alert to identifying hazards or unsafe practices. EHS, aside from its annual audit of each work-place, is always available to supervisors to discuss potential problems in the work-place.

Reporting of Hazards: All employees must be provided with a channel which they can report hazardous or potentially hazardous conditions to both management and Environmental Health and Safety. For academic and research areas, this might be accomplished by allowing the faculty member or lead staff member to communicate directly with EHS. In the support services, such as Physical Plant, Printing Services, Materials Management, etc., it is appropriate to funnel those findings through the immediate supervisor, the manager, or the assistant director level. Failure on the part of management to report unsafe or potentially unsafe conditions to EHS in a timely manner can result in the following:

- 1) The employee has the right to refuse to work if, in the employee's opinion, the situation offers the potential for imminent injury or illness. Supervisors must be totally familiar with the "right to refuse work" provisions in Ohio House Bill 308, The Ohio OSHA Standard for Public Employees.
- 2) The employee has the right to go directly to EHS for resolution.
- 3) Possible disciplinary action against the management personnel who took no action.

There shall be no reprisal against an employee who reports an unsafe or potentially unsafe condition to management, EHS, or Ohio OSHA. The Ohio OSHA Standard addresses disposition of employees who misuse this right or refuse to return to work after it is determined that no risk to the employee is present.

Injury and Illness Reporting and Investigation: [The Wright Way: Policies and Procedures No. 6032](#), "Reporting Injuries and Illnesses," outlines the university's procedures for reporting occupational injuries and illnesses. EHS will investigate all reported incidents (an occurrence which could have resulted in injury or illness, but did not, i.e., a "near miss event), injuries and illnesses to determine cause and effect relationship. Measures necessary to prevent reoccurrence will be communicated to the applicable management personnel. EHS will, at least annually, analyze injury and illness data and submit a summary report to appropriate levels of management.

SECTION III – HAZARD PREVENTION AND CONTROL

Prevention and Control Methodology: To ensure that identified hazards are corrected or controlled in a timely manner, the following methods will be applied as specified:

Modification of the Process: The first method of control will be to try to eliminate employee's exposures by using a less hazardous/toxic material. This can sometimes be done with chemicals and biological materials without any or very minimal adverse effects on the operation.

Engineering Techniques: Whenever a positive method of control is needed to control employees' exposures to biological, chemical, and physical agents, engineering techniques, when feasible, will always be applied first. Even with substitution of a less hazardous/toxic material, there will almost always be a need for engineering control. When engineering methods are applied, the development of procedures for use and the training of personnel become the critical elements for controlling personnel exposures. Following this, it becomes the immediate supervisor's responsibility to ensure that safe work practices are adhered to and to apply disciplinary action when an employee continues to violate work-place rules. EHS, in conjunction with the using party, will determine the best engineering techniques to apply.

Administrative Control: This normally encompasses the control of employees' exposures by reducing the duration (time) of exposures. This method would appear to have limited application to university operations. The use of administrative control would be applied only following the review and approval of the Director of Environmental Health and Safety, the Radiation Safety Officer, or their designated representatives.

Personal Protective Clothing and Equipment: The only time that personal protective clothing and equipment is permitted to be used as a means of controlling exposures is when engineering controls are not feasible or during the interim period of time required to install engineering controls. There are certain operations, such as asbestos abatement projects, epoxy painting of facilities, pesticide applications, and transfer of hazardous and toxic materials, which dictate the use of protective clothing and respiratory protective devices. Reference is made to [The Wright Way: Policies and Procedures No. 6051, "Respiratory Protection Program Administration,"](#) and the Respiratory Protection Program Manual as developed and maintained by EHS. There are other procedures where routine use of protective eyewear, gloves, safety shoes, hard hats, ear protection, etc. are required or considered "prudent practice." All uses of protective equipment, for both routine operations and emergency response situations, will be determined by EHS.

Equipment Maintenance: Managers and supervisors have the responsibility of ensuring that the work facility, equipment and tools are maintained in a clean and usable condition. Particular concern should be shown to equipment which, because of employees' proximity to, or use of, places those employees at an increased risk for injury or illness. Equally important is the upkeep of equipment designed and installed to eliminate or reduce employees' exposure to biological, chemical, and physical agents. These can be mechanical systems, such as chemical fume hoods, biological safety cabinets, or personal protective equipment, such as respirators, eye goggles, safety shoes, etc.

Emergency Planning: Managers and supervisors are required to include emergency planning as part of their operations. Plans should include the appropriate response to a variety of emergency situations, such as fire, severe weather, and spills involving biological, chemical, and/or radioactive materials, and injuries and illnesses in the work-place. The Chemical Hygiene Plan, which is available in all laboratories that utilize chemicals, provides general guidelines from which managers and supervisors can develop more detailed plans that address their specific operations. The University Radiation Safety Manual provides guidance for incidents involving radioactive material or radiation-producing equipment. EHS can provide guidance in the development of emergency plans. Managers and supervisors must also ensure that all employees receive initial and periodic (at least annual) training and

testing on what the appropriate response is to a specific situation. An acceptable emergency response plan is one in which an employee's response becomes "second nature."

Medical Care for Occupational Injuries and Illnesses: [The Wright Way: Policies and Procedures No. 6031, "Emergency Care for Injuries and Illnesses"](#) and [No. 6032, "Reporting Injuries and Illnesses,"](#) provide all the information managers, supervisors, and employees need to obtain medical care for injuries and illnesses and for reporting of such events to EHS. These policies are required reading for all employees in managerial and supervisor positions.

SECTION IV – SAFETY AND HEALTH TRAINING

Responsibilities: It is the university's responsibility to ensure that all employees understand the hazards to which they may be exposed and how they can prevent harm to themselves and others from exposure to these hazards. With an understanding of the hazards present in the work-place, employees are more inclined to follow established safe work practices with the end result being fewer occupational injuries and illnesses.

Environmental Health and Safety: EHS will be responsible for those training requirements specifically called for in an OSHA standard which has broad application to university operations. This will include, but not necessarily be limited to, hazard communications, bloodborne pathogens, hearing conservation, hazardous materials, laboratory safety and health, radiation safety, asbestos abatement, and respiratory protection.

Work-Place Managers and Supervisors: Managers and supervisors overseeing operations that offer the potential for exposure to biological, chemical, and physical agents are responsible for providing training specific to the operations conducted within that work-place. This would include, but not necessarily be limited to: electrical lockout/tagout, equipment safe operating procedures, tree trimming, pesticide applications, accident prevention signs and tags, compressed gas safety, fire alarm signaling systems, driver/vehicle safety, and emergency response. Managers and supervisors need to gain familiarity with OSHA standards applicable to their work-place and identify their training requirements. EHS can assist by providing access to OSHA standards, interpretation of the rules, and identifying training requirements by way of supervisors' comprehensive safety and health evaluation of the work-place. The normal course of supervisor involvement in safety and health training is to:

- 1) Analyze the work under his/her supervision to identify unrecognized potential hazards;
- 2) Maintain physical protection of equipment and processes in his/her employees' work-place; and
- 3) Reinforce employee training on the nature of potential hazards and on needed protective measures through continual performance feedback and, when necessary, through enforcement of safe work practices.