

Environmental Health & Safety:

Compliance with Occupational Health and Environmental Laws at Clemson University

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Environmental Health and Safety Program

Clemson's Environmental Health and Safety (EHS) program is implemented through a series of manuals, handbooks, and other documents, as appropriate to the operations of the University. These manuals are listed below. EHS is responsible for the development, distribution, and maintenance of these manuals. Manuals provide specific policies and procedures and recommended practices for implementation.

- Clemson Health and Safety Management Plan (this document)
- Radiation Protection Manual
- Biosafety Manual
- Chemical Waste Management Manual
- Chemical Hygiene Manual
- Hazard Communication Manual
- Dive Safety Manual
- Respiratory Protection Manual
- Exposure Control Plan
- Main Campus General Safety Manual
- Spill Prevention, Control and Counter Measure Plan
- Indoor Air Quality Plan
- Hazardous Materials Emergency Response Plan
- Ergonomics Plan

These manuals provide information on environmental health and safety policies that students, faculty, and staff must follow at University workplaces. The policies are intended to provide personnel with information to meet all local, state, and federal requirements for environmental compliance, occupational health, and safety.

Information on environmental health and safety training programs is available by contacting Clemson Environmental Health and Safety. EHS safety programs are designed to reduce or prevent occupational injuries and illnesses through appropriate training and preventive activities.

Our Goal

Clemson believes that the health and safety of students, faculty, and staff are of the greatest importance. Clemson will conduct its operations and construct and maintain its facilities in a manner conducive to the creation of a healthy and safe work environment for all personnel and the surrounding community. Employees should realize the following goals through the health and safety policy:

- The development of an ongoing safety consciousness among all members of the University community, and

- A reduction in occupational injuries and illnesses and the associated loss of productivity.

Safety Principles

The success of the University's health and safety effort depends on:

- Acceptance of the concept that all serious injuries can be prevented;
- Administrators assuming responsibility for preventing occupational injuries and illnesses, and
- All students, faculty, and staff participating in health and a safety training programs and recognizing that it is to everyone's advantage to work safely.

Individual Responsibilities

All individuals who are using Clemson University materials or equipment, working on Clemson University property or in leased space, or who are contracted to perform work on behalf of Clemson University have an individual responsibility to:

- Know and follow all health and safety rules, policies, and procedures for the area in which they are working
- Maintain a safe work environment
- Use good judgment
- Report to their supervisor immediately all:
Unsafe conditions, accidents, and
Work related injuries and illnesses (every occupational accident or injury must be reported immediately to Risk Management)
- Know the hazards of the materials and equipment they work with and follow the specified precautions
- Properly use all safety equipment provided
- Participate as needed in exposure hazards measurement programs
- Participate as needed in safety training programs, and
- Assure that their work activity is conducted in such a way as to not affect the safety of others.

First Level Supervisor, Work Area Supervisor, or Lab Manager

Managers and supervisors are responsible for being knowledgeable of and implementing applicable policies and directives and taking other action, as required, to assure that personnel and operations they supervise comply with applicable requirements. This includes:

- Taking positive action to determine and reduce the accidents and incidents associated with their operations;

- Informing employees of the safety hazards associated with their work;
- Instructing employees in safe work methods;
- Keeping the individual performing the specific tasks apprised of the most recent procedure and trained in its implementation;
- And ensuring that employees perform their work according to requirements.

Deans, Directors, and Department Heads

Deans, Directors and Department Heads have the primary responsibility for operations in their organizations and for taking the necessary measures to make certain that all division or department-related activities comply with established safety requirements. They shall comply with all components of the Clemson safety program as set forth in the Clemson Comprehensive Environmental Health and Safety Plan, including all Clemson policy and procedures applicable to their operations, as well as other directive memoranda.

Deans are directly responsible to the Provost for all aspects of safety in their respective organizations. Within their organizations, management is responsible for conforming facility operations and all other activities under their direction to the requirements specified by the Clemson Comprehensive Environmental Health and Safety Plan, health and safety policies, and implementing plans and procedures.

President

Within the University, the President has the ultimate responsibility for safety. That responsibility is met through having EHS establish requirements on all operations.

President's Statement

Clemson University has a commitment to provide a safe and healthful workplace and to protect the environment for our faculty, students, staff, and the community.

The success of the University's environmental, health, and safety efforts depend on all of us working together and accepting personal responsibility for our safety and the safety of those with whom we work. No job is so important and no service so urgent that we cannot take time to perform our work safely.

The University will provide a safe working environment, necessary protective equipment, and appropriate medical care. All supervisors will regularly inspect their areas and review accident records to ensure that all unsafe conditions are removed. The supervisor also has the responsibility to pass safety information along to all their workers and conduct regularly scheduled meetings discussing work hazards, accidents, and other safety related items. Environmental Health and Safety has the authority to administer policies relating to environmental compliance, and occupational safety and health, and to establish procedures for keeping the University in compliance.

Each individual's total commitment to and enthusiastic participation in our Safety, Health, and Environmental programs is of the utmost importance regardless of their length of service or position within the University. There are six major elements which encompass the University's Environmental Health and Safety programs:

1. The most important element is you. You are responsible for assuring that all of your activities result in the lowest level of risk to yourself, to others present, to the general public, and to the environment.
2. Your immediate supervisor is responsible for keeping you apprised of the approved procedures and information related to health and safety aspects of your activities.
3. In laboratories, your laboratory director, or in case of work with radiation, the Authorized User, holds the authority for work with hazardous substances, radioactive materials or radiation producing devices and is therefore responsible to ensure that all work is conducted with full regard for personnel health and safety and in accordance with the laboratory safety plan and/or the approved radiation use project.
4. Your Department Head is responsible for establishing and maintaining a work environment which fosters the development of appropriate health and safety procedures in all activities of the department.
5. Environmental Health and Safety administers the environmental health and safety programs of the University. EHS provides professional assistance and expertise to members of the University community in matters of occupational health and safety.

6. Environmental Health and Safety Committees provide appropriate input to EHS and its programs. The voting members of these committees are drawn from the faculty and staff and are recognized scientific experts in areas related to the respective committee's activity. Safety Committees include the Radiation Protection Committee, The Institutional Biosafety Committee (which is responsible for reviewing all research involving recombinant DNA, chemical hazards, and biological hazards) the Environmental Committee, and the Campus Building Water and Air Quality Committee.

The purpose of Clemson's safety programs is to provide employees with a safe and healthy work environment, develop a safety consciousness among employees and others engaged in work for Clemson to reduce accidents and occupational illnesses to a minimum, identify and control safety, public health and environmental hazards associated with its operations, and work constructively with government agencies and others to develop laws, regulations, and standards to protect public health, safety, and the environment. Each member of the University community has the responsibility to work within the framework of established safety programs and policy. They are also responsible for carrying out their activities in a manner that will protect those involved, the rest of the University community, the general public, and the environment.

James Barker

President

Chief EHS Officer's Statement

Clemson University has a comprehensive environmental health and safety program that affects all members of the University community. The purpose of Clemson's safety programs is to provide employees with a safe and healthy work environment, develop a safety consciousness among employees and others engaged in work for Clemson to reduce accidents and occupational illnesses to a minimum, identify and control safety, public health and environmental hazards associated with its operations, and work constructively with government agencies and others to develop laws, regulations, and standards to protect public health, safety, and the environment. Each member of the University community has the responsibility to work within the framework of established safety programs and policy. They are also responsible for carrying out their activities in a manner that will protect those involved, the rest of the University community, the general public, and the environment.

To assist you with your work, there are manuals which describe the structure and goals of the University's programs, your responsibilities as an Clemson employee, and Clemson's responsibilities to you. Please read the appropriate manuals carefully and if you have any questions or comments please call EHS.

W. Robert Newberry, IV CIH, CHMM

Chief Environmental Health and Safety Officer

Responding To Regulatory Agency Visits

Many different regulatory agencies may conduct inspections at Clemson University (Clemson). The University is not exempt from compliance with occupational health and safety and environmental regulations. Agencies that may conduct compliance inspections include the South Carolina Department of Health and Environmental Control (DHEC), SC Department of Labor, Licensing, and Regulation (SC OSHA), and the Nuclear Regulatory Commission (NRC).

State agencies, such as the University, can receive fines from S.C. regulatory agencies. The penalties assessed can be comparable to those assessed in the private sector. The respective University department receiving the penalty is responsible for payment.

It is the policy of Clemson to comply with all applicable environmental health laws and regulations and provide any appropriate documentation during compliance inspections. EHS will provide support to departments and pertinent information to the agency if an inspection occurs.

All faculty and staff will follow these procedures when responding to a visit from a regulatory agency. To help departments respond to inspections, EHS requests your assistance in implementing the following procedures:

- Ask to see identification. All state compliance officers must carry a photographic I.D. Call Environmental Health and Safety at 656-2583. EHS will provide personnel to assist you. We recommend waiting for a representative from EHS before releasing any information to the inspector.
- Ask to have an opening conference and establish the nature of the visit. Request that the conference not proceed until a representative from EHS is present.
- Decide the best route to the location. A tour of your facility is not advisable. Anything seen on the way to the location is also subject to inspection.
- Supply only the information requested. It is not advisable to offer more than what the inspector wants.

The inspector has the right to interview employees, collect samples to assess exposure to chemical or physical agents, review training record documentation, evaluate your written safety plan to assure compliance with OSHA standards, take pictures, etc. If air or other environmental samples are collected, EHS will collect parallel samples to confirm results.

In a closing meeting after the inspection and interviews are finished, have the inspector explain the hazard involved, the corrective action suggested and description of the violation and applicable reference.

In some instances, such as at remote sites, EHS personnel may not be present to assist you. In that case, the following inspection procedures should be followed:

- Have the secretary/receptionist contact the site manager. The site manager should be present during the inspection.

- Insist on an opening and closing conference.
- Request specific details on the purpose of the visit (most regulatory inspections occur because of employee complaints).
- Request copies of photographs if they are to be taken; take the same pictures if you have a camera
Take detailed notes
- Be courteous and provide only information that is specifically requested

If citations are to be issued, request that copies be sent to: Chief EHS Officer, Clemson University Environmental Health and Safety, 208 North Palmetto Boulevard, Moorman House, Clemson, S.C. 29631-3012.

Have the inspector explain the hazard involved, corrective action suggested, and description of the violation and applicable reference.

Disciplinary Procedure

This procedure is established to provide a mechanism for the discipline of employees who repeatedly violate safety and health requirements and guides. Safety and health requirements are established and enforced to protect employees from injury and illness as well as provide for a “safe and healthful place of employment.” The State Personnel Commission established a uniform policy for disciplining and dismissing employees subject to the State Personnel Act. That policy is applicable to discipline and dismissal for violations of safety and health requirements. The basic elements of that policy are set forth below. In the event of any questions, the Commission’s policy is located in the State Personnel Manual and has control over any provision set forth in this section. Management must follow the procedures set in this section.

Employees who violate safety and health requirements and guides will be disciplined in a progressive fashion consistent with the Job Performance category of discipline as follows:

1) First Violation

An oral warning may be given for the first violation for a safety and health requirement or guide. The supervisor shall inform the employee of the violation, and shall also inform the employee of the correct safe practice or procedure. The supervisor shall review with the employee all applicable safety and health workplace requirements and guides. The employee must sign a statement indicating understanding of those requirements and guides. The supervisor should inform the employee that future violations will result in higher levels of discipline and may lead to dismissal.

2) Second Violation

The employee may be given a written warning for the second documented safety and health requirement violation.

This warning will specify the violation. The warning shall also refer the employee to applicable safety and health requirements and guides for review. The warning will also show the date the employee previously read and signed the statement of understanding of safety and health requirements and guides. The employee, the employee's supervisor, the department head and the employee's personnel file shall receive copies of the warning.

3) Third Violation

The employee may be given a final warning for the third documented violation of safety and health requirements or guides. This warning will specify the violation. It shall also state that any further violation of safety and health requirements and guides will result in dismissal. All persons who received a copy of the written warning shall receive a copy of the final warning.

4) Any Subsequent Violation

The employee may be dismissed. If dismissed, the employee will receive a letter specifically identifying the violation of the safety and health requirement or guide, as well as any rights of appeal through the grievance process.

On occasion, an employee will commit a violation of a safety and health requirement or guide that is so careless and reckless, or that so endangers life or property that it can be considered Personal Misconduct. When this occurs, an employee may be dismissed immediately, without benefit of any prior warnings. An employee dismissed in this fashion shall receive a letter specifically identifying the violation and setting out his/her right of appeal within the grievance procedure.

For further information on the disciplining and dismissal of employees subject to the state personnel act, see the Clemson Personnel Manual. Disciplinary actions for Faculty are handled by the Provost.

General EHS Issues

Clemson University has established administrative policies for the reduction and prevention of on-the-job accidents and illnesses, and the protection of the environment. These policies are to be used as a foundation for establishing safety and environmental health programs in each organization. We believe that no job is so important and no service so urgent, that we cannot take time to perform the work safely, and in an environmentally conscientious manner. Clemson will operate its facilities and conduct its operation in compliance with all applicable regulation to protect:

- Employees
- Students
- University property
- The external community, and
- Natural resources and the environment.

Purpose

The purpose of Clemson's environmental health and safety program is to:

- Provide students, faculty, and staff with a safe and healthy work environment
- Develop a safety awareness among employees and others engaged in work for Clemson so that accidents (personal injuries and property damage) and occupational illnesses will be reduced to a minimum
- Identify and control safety, public health, and environmental hazards associated with their operations
- Work constructively with government agencies and others to develop and implement laws, regulations, and standards to protect public health, safety, and the environment, and
- Work with the University administration to assure adequate funding and staffing for environmental health and safety programs.

Emergency Telephone Numbers

Environmental Health & Safety General Number: 656-2583

Radiation Protection: 656-7165

Environmental Compliance and Hazardous Waste Disposal: 656-1770

Biosafety: 656-1806

Industrial Hygiene: 656-7554

Chemical Safety and Material Safety Data Sheets: 656-7557

Other Safety Contacts

Police, Fire, Ambulance, Emergency: 911 or 656-2222

Redfern Health Clinic: 656-2451

Safety Hotline to report safety problems anonymously: 656-2583

University Facilities: 656-2186

Reporting Serious Injury or Illness

In case of serious injury or illness, the immediate concern is to aid the injured or sick person. The following procedure is to be used:

Contact Public Safety immediately in one of the following ways:

- Use any on-campus telephone: DIAL 911
- Use any off-campus telephone: DIAL 656-2222
- Use any Campus blue light phone for immediate response.

A Communications Officer will answer the call and take appropriate action. A Public Safety Officer will arrive at the scene as well as Fire Department Emergency Medical personnel.

Public Safety personnel have training in emergency medical care. They will take responsibility for the accident/illness scene upon their arrival. They will exercise any measure deemed necessary to sustain life or reduce further injury until the arrival of the Fire Department rescue ambulance unit, if needed.

Reports by Risk Management

OSHA requires that records of all occupational injuries and illnesses be maintained and reported to employees and regulatory agencies. Required record keeping includes:

1. A continuously maintained log of each recordable occupational injury or illness
2. A supplementary record, giving detailed data for each individual accident, injury, or illness.

Risk Management will maintain the records noted in item #1. The supplementary detail record (noted in item #2) is prepared and furnished by the affected employee's supervisor or employer.

Prompt reporting insures proper treatment for injuries sustained and that an investigation will be initiated as soon as possible so that:

1. Corrective measures will be taken to prevent a similar accident/incident from recurring
2. Compensation claims may be properly processed
3. Accurate facts and data are compiled.

Forward the Supervisor's Accident/Incident Form to Risk Management WITHIN 5 DAYS.

Accident investigations are necessary to identify accident causation and recommend corrective action. Therefore, supervisors shall immediately investigate and report all accidents which cause injury, illness, or property loss with a written investigation report. These investigations play an important role in providing a safe work environment. Accident investigations help to identify deficiencies in the workplace and management program and to establish corrective measures to prevent future accidents.

It is the responsibility of management to ensure a safe and healthful work environment for their employees. Management must also comply with state policy and government regulations. Therefore, they must investigate and report all accidents causing injury/illness or property loss immediately with a written investigation report. It is the responsibility of supervisors to complete these reports and transmit them to management and EHS. Employees are responsible to report all accidents to their supervisor.

Supervisors can help improve accident reporting in several ways:

- Train new employees to report all accidents
- Encourage employees to report all accidents and near misses
- Take action on all reports immediately
- Emphasize the importance of reporting accidents in regular meetings with employees.

A successful accident investigation program contains standard investigation techniques or steps. These techniques are:

- Notification of accident/care for injured person(s)
- Control hazards/secure accident site
- Investigate promptly
- Use photographs to capture accident scene
- Use diagram or sketch accident site
- Interview employee and witnesses-one at a time
- Analyze the data to identify causes-implement corrective action
- Prepare accident report
- Report accident information

EHS can provide supervisor accident investigation training. Call EHS at 656-2583 or email ehs@clermson.edu for more information.

When a single accident involves four or more injured persons, results in the death of a state employee, or results in a chemical release to the environment the supervisor must immediately notify EHS. Within 24 hours Environmental Health and Safety shall notify SC OSHA, and other necessary agencies.

Occupational Accidents, Illnesses, and Reports

The State of South Carolina and the Federal Department of Labor require that the University collect data about all occupational accidents, injuries, and illnesses to employees. The data from all such occurrences is compiled in several reports by Risk Management. These reports also initiate investigations designed to reduce both the number and severity of such incidents.

All accidents must be investigated to reduce the likelihood of their being repeated. Many times a bad situation that causes a near-miss or minor accident is not corrected and results in a much more serious accident the second time.

The supervisor has the responsibility to investigate all accidents happening in their work area. Once the investigation is complete, the supervisor must fill out a Supervisor's Accident/Illness Report form. Risk Management will compile all data and disseminate reports as required by law.

If an employee is injured during working hours, his supervisor should immediately call CompEndium Services @877-709-2667. CompEndium Services will direct the injured worker to an approved medical facility. Employees on campus will be directed to Redfern Health Center.

In an emergency situation, the supervisor should immediately call 911. After the injured employee has been transported to an emergency facility, the supervisor should call CompEndium Services to report the work injury.

Inspecting University Facilities

Inspections have always been the principle method of evaluating safety. The inspector must examine two things to be effective: unsafe acts and unsafe conditions. Regular inspections must be conducted by the supervisor and is routinely audited by an EHS staff member; additionally, the departmental inspector's supervisor should audit the inspector periodically. The supervisor must be held accountable for his or her departments' safety performance.

Inspections of all University facilities is the primary responsibility of the occupying department; EHS staff will perform periodic reviews to supplement the departmental inspections. Inspections should be carried out on a regular basis and documented. It is recommended that appropriate forms be obtained or developed. Contact EHS for assistance.

The inspector must record observed non-compliance of safety standards and deficiency items in written inspection reports. Notification of non-compliance must be given to the department head or the appropriate college for appropriate corrective action.

In the event of discovering a manipulation, action, or condition that is an imminent danger to personnel, the inspector should order the immediate cessation or modification of such manipulation, action, or condition. Alternatively, the inspector can request that EHS conduct an assessment. EHS personnel, after the assessment, are authorized to require the cessation of the hazardous condition.

The Chief EHS Officer will notify the department head immediately of such action. If, through discussion, there is disagreement on the justification of cessation, the next level of management in both departments will become involved.

EHS encourages any member of the University community, and respective safety committee, to participate in the inspection process, including citing possible violations to the inspector.

Violations and deficiencies observed by affected personnel may be reported directly to EHS. However, personnel should consult their supervisor first before calling EHS. EHS will make an inspection in response to such complaints. EHS will notify the appropriate individual(s) of the inspection results. Another mechanism for reporting safety hazards is through the EHS general number (656-2583).

The rights of personnel reporting complaints of matters affecting occupational safety and health, shall be without retaliation on the part of any other person.