



POLICY STATEMENT 19 ENVIRONMENTAL HEALTH & SAFETY

POLICY DIGEST

Monitoring Unit: Office of Environmental Health & Safety
Initially Issued: June 1, 1996
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I. PURPOSE

This Policy Statement outlines the major roles and authority of the Office of Environmental Health and Safety (EHS) at Louisiana State University (LSU). The document also provides a framework that facilitates the protection of life, property, and the environment. Lastly, this Policy Statement sets forth safety and environmental responsibilities, provides support for safety rules and procedures, and establishes activities/programs which are necessary for the successful implementation of the University's Environmental Health and Safety Program.

II. DEFINITIONS

For the purposes of this Policy Statement, the following definitions shall apply:

“Institutional Biological and Recombinant DNA Safety Committee (IBRDSC)” shall be defined as the committee which is charged by the University and AgCenter with overseeing the safety and security of biological research on campus. The IBRDSC operates under joint oversight of the Vice President for Research and Economic Development and the LSU AgCenter and Director Louisiana Agricultural Experiment Stations. Specific activities/responsibilities of the IBRDSC are outlined in the [IBRDSC Policies and Procedures Manual](#) and are to be considered as an extension of this policy. **“Radiation Safety Committee”** shall be defined as the committee whose charge is to oversee safety and security in the use of radioactive materials and other sources of radiation on campus.

III. GENERAL POLICY

The University has a strong commitment to the health and safety of all employees, students, and visitors at the institution. Recognizing that a healthy environment is critical to the quality of life of all living organisms, LSU is committed to protecting the environment from harm due to campus operations and activities. This includes protecting the air, both indoors and out, lakes, and streams and grounds. In keeping with these commitments, the Office of Environmental Health and Safety (EHS) shall have the authority to enforce compliance with the requirements referenced in this policy, and other applicable environmental and safety regulations. Enforcement action will be taken only after consultation with senior administration, unless there is an immediate danger to the health and safety of personnel or an immediate danger to University property. In the event of immediate danger or major noncompliance, the Director for EHS will be responsible for taking any actions, including facility closure, required for protection of the health and safety of personnel or protection of University property. The Executive Director for Risk Management will notify central administration of any facility closures. Remedial actions will be required before a closed facility will be reopened.

In addition, the following shall be followed:

- In the interest of providing a safe environment for employees, students and visitors, all University activities, including, but not limited to, the design, construction, operation and maintenance of University facilities, shall be conducted in accordance with all applicable safety codes such as the National Fire Protection Association (NFPA), American National Standards Institute, (ANSI), American Society of Mechanical Engineers (ASME), American Society for Testing and Materials (ASTM), and with all governmental safety and environmental standards, including, but not limited to, those issued by the Louisiana State Fire Marshal, the Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), Louisiana Department of Environmental Quality (LDEQ), Department of Transportation (DOT), Nuclear Regulatory Commission (NRC), and other similar state, federal or local agencies. Guidelines of the State Office of Risk Management (ORM) will form the foundation for the University safety program.
- Safety and environmental rules and procedures in the [University Safety Manual](#) are essential to the safety program and shall be vigorously enforced by supervision, using disciplinary action where appropriate. In addition to enforcement activities, supervisors are responsible for planning and assigning work that is within the training, capability, and skills of workers.
- Critical program elements such as periodic safety inspections, safety training, accident investigations, and safety meetings shall be implemented for all work groups, including those elements outlined in the [University Safety Manual](#).
- Recognizing that proper training is critical to employee safety, the University will provide safety and skills training to achieve a skilled and safe work force.

IV. ENVIRONMENTAL CONTROL

It is the University's intent to provide a safe environment that is conducive to studying, learning, and working, and to minimize any recognized hazards. Any situation or department which disrupts the studying, learning, or working process, or introduces a hazard, is prohibited. Eating and drinking is prohibited in classrooms except for University approved events. The use of classrooms for activities other than scheduled classes must first be approved by the responsible party. Smoking is prohibited in all University learning and working environments. All animals, except those specifically required for research or teaching purposes, or those that are medically approved, are prohibited in all University facilities, including all learning and working environments. The Veterinary School Clinic, which regularly services clients, is the only area of the School of Veterinary Medicine with the authority to maintain client animals on the LSU campus. Deans, Directors, and Department Heads are responsible for enforcement of this policy within their units and faculty members are responsible for the enforcement of this policy in their classrooms.

Any person using outdoor areas of the LSU campus has the responsibility of maintaining control of their animals at all times.

NOTE: Learning and working environments include classrooms, studios, laboratories, offices, conference facilities, seminar rooms, practice rooms, libraries, designated study areas, and carrels.

V. RESPONSIBILITIES

- A. Each and every employee shall be responsible for their own safety, for promoting the safety of co-workers, and for protecting the local environment. Employees must report and/or correct all safety and environmental concerns, including, but not limited to, those

relating to facilities or procedures. Failure to follow appropriate safety standards may result in disciplinary action, up to and including termination of employment.

- B. Vice Presidents, Deans, Directors, and Department Heads shall implement the safety and environmental program in their areas of administrative responsibility and shall be accountable through their respective administrative channels for the control of accidents and hazardous exposures in the work environment. They shall also set the example for environmental control by emphasizing and adopting good environmental practices in processes and procedures, including, but not limited to, prudent purchasing, use and disposal of chemicals and materials. LSU is subject to environmental regulations promulgated and enforced by local, state, and federal environmental agencies. Any individual or group found to be in violation of these regulations will be potentially responsible for fines levied by the enforcement authorities and will be subject to other appropriate corrective action.
- C. The Office of the Director of Environmental Health and Safety (EHS) is the principal provider/coordinator of all University safety and environmental requirements, including, but not limited to:
 - 1. Providing resources for the identification, evaluation, and control of hazardous situations,
 - 2. Providing safety, security criteria, and assessments for research and teaching labs working with potentially hazardous chemicals, biological or physical agents or processes,
 - 3. Developing and issuing rules and procedures,
 - 4. Consulting with employees and management, and
 - 5. Providing safety training, hazardous waste disposal, and occupational safety and health exposure evaluations.

EHS, jointly with environmental permit holders, will monitor laws and regulatory rules and procedures relating to the environment, act as contact point for interface with environmental regulatory agencies such as the Louisiana Department of Environmental Quality (LADEQ), US Environmental Protection Agency (EPA) and the City of Baton Rouge on regulatory issues, and interface with legal representatives for the University in citations/disputes on environmental issues.

NOTE: Radiation safety is the responsibility of the Radiation Safety Committee on campus.

- D. The University Safety Committee is an advisory committee reporting to the Director of Environmental Health and Safety. The University Safety Committee shall provide recommendations to the administration that will enhance the University Environmental Health and Safety Program.

VI. ADMINISTRATIVE POSITIONS HOLDING ENVIRONMENTAL PERMITS (Discharge permits to the Air or Water, Hazardous Waste Disposal, etc.)

Administrative department heads shall assure that environmental permits are obtained where required under law. The permit holder shall:

- A. Assure that permitted activities are conducted in strict compliance with the environmental

permit through proper operation and maintenance of equipment, adequate procedures, recordkeeping, reporting and periodic inspections;

- B. Jointly with EHS, monitor developments in regulations and laws affecting the permit;
- C. Maintain permit in up-to-date status, with appropriate renewals, data submittals, reporting and other requirements;
- D. Cooperate with and assist EHS personnel in its role in monitoring permitted activities and investigating incidents; and
- E. Jointly with EHS, obtain proper permits or permit modifications from permitting agencies for new or re-furbished processes or equipment.

NOTE: Where appropriate, refer to the Environmental Programs section of the University Safety Manual for guidance in administering this program.

VII. CHEMICAL USE AND RESEARCH – SAFETY AND SECURITY

The US Department of Homeland Security enforces the Chemical Facility Anti-Terrorism Standard (CFATS) which applies to possession, use and transfer of certain high hazard chemicals. EHS, through the Chemical Safety Manager, assures that adequate compliance controls and procedures are in place, through consultation, training, inventory procedures, inspections and other compliance requirements under CFATS.

Principal investigators and unit heads assure safety and environmental compliance through activities such as inventory control and reporting as required by EHS; supervising and training laboratory and support workers to assure safety and security; cooperating with inspections and investigations; and correcting deficiencies identified in these activities.

VIII. BIOLOGICAL RESEARCH - SAFETY AND SECURITY

To assure that activities involving biological research, diagnostics, instruction, and other activities involving biological materials and toxins are conducted in a safe and secure manner, the Institutional Biological and Recombinant DNA Safety Committee (IBRDSC) has been delegated the authority for registration, approval and oversight of recombinant DNA (rDNA) and biological research activities.

- A. All research activities involving the use of rDNA, pathogenic microorganisms infecting humans, animals or plants, and biological toxins must be registered with, and approved by, the IBRDSC. Principal investigators' and unit heads' responsibilities include, but are not limited to:
 - 1. Registering research with the IBRDSC;
 - 2. Supervising and directing laboratory and support personnel;
 - 3. Ensuring that lab personnel have proper training; and
 - 4. Providing access to labs for inspections and assuring that prompt corrective action is employed upon notice of a safety/security violation or concern.
- B. The Biological Safety Manager in EHS supports the activities of the IBRDSC, and

provides:

1. Technical advice and training for committee members and principal investigators;
2. Inspections of laboratories and other facilities involved in covered activities to:
 - a. Assure that proper safety equipment and practices are employed and research is being conducted as approved by the IBRDSC;
 - b. Assure that federal/state regulations are being followed; and
 - c. Provide an inspection report and follow-up inspections to assure correction action is completed.

NOTE: Where significant or serious violations are found that may pose a danger to personnel, plants/animals or the community, the Biological Safety Manager is responsible for issuing instructions to halt activities and secure the agents and laboratory until a satisfactory resolution is found.

IX. SELECT AGENTS

In addition to the requirements above on safety and security, special requirements exist for “Select Agents.” The Centers for Disease Control (CDC) and the Animal and Plant Health Service (APHIS) have issued rules that control research using “Select Agents and Toxins” which are identified as potentially harmful to public safety and the environment under federal law. The Responsible Official, appointed jointly by the Vice President for Research and Economic Development, and the LSU AgCenter and Director of Louisiana Agricultural Experiment Station, is responsible for:

- A. Applying for CDC/APHIS registration and obtaining approval for labs and researchers prior to permitting handling, transporting or using select agents and toxins;
- B. Assuring institutional compliance with all requirements contained in and associated with the CDC and APHIS regulations; and
- C. Issuing guidelines/policies relating to safety and security in this research.

NOTE: No transfer, receipt of, or research with, select agents and toxins may occur prior to approval from CDC/APHIS. All such approvals must be obtained by and received through the Responsible Official. Guidelines for access to, use of or transfer of select agents and toxins are in the “Select Agent Program Biological Safety Plan” administered by and accessed through the Responsible Official. The Responsible Official can be contacted through EHS. Select agents and toxins are listed on the web sites of the [CDC](#), [APHIS](#), and [EHS](#).

Questions or comments regarding this Policy Statement should be submitted to EHS at 225.578.5640 or via e-mail at LSUEHS@lsu.edu

X. SOURCE

- A. [Louisiana State Office of Risk Management – Loss Control Program](#)

- B. [Louisiana Department of Environmental Quality – Resource Conservation and Recovery Act \(RCRA\) and other applicable EPA rules](#)
- C. [Louisiana State Fire Marshal – Enforcement of National Fire Protection Association \(NFPA\) Standards](#)
- D. [United States Department of Agriculture – Animal Plant and Health Inspections Service 7CFR Part 331 and 9CFR Part 121](#)
- E. [United States Department of Health and Human Services – Centers for Disease Control \(CDC\) 42CFR Part 73.](#)
- F. [United States Department of Education – Higher Education Opportunity Act \(HEOA\)](#)
- G. [United States Department of Homeland Security – Chemical Facilities Antiterrorism Standard \(CFATS\)](#)