
UCLA Policy 811: Environment, Health, and Safety

Issuing Officer: Administrative Vice Chancellor
Responsible Dept: Environment, Health & Safety
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I. PURPOSE & SCOPE

The University of California (“University”) is committed to achieving excellence in providing a healthy and safe working environment, and to supporting environmentally sound practices in the conduct of University activities. It is University policy to comply with all applicable health, safety and environmental protection laws, regulations and requirements.

This Policy outlines the responsibilities of campus officials designated to implement this Policy and summarizes the UCLA Office of Environment, Health and Safety’s (EH&S) programs and their overall role and enforcement authority as it pertains to the health and safety of the UCLA campus. UCLA Health facilities are excluded from this Policy, with few exceptions to accommodate overlaps within UCLA Health Sciences and David Geffen School of Medicine, associated regulatory investigations, and food facility inspections where applicable.

II. STATEMENT

University activities are to be conducted in a manner that promotes the protection of the environment and the UCLA community, including students, faculty, staff, and visitors.

EH&S will establish campus safety programs, conduct ongoing assessments, and enforce necessary sanctions to ensure programs support safe campus operations and activities. EH&S campus safety programs will establish criteria to assist departments in health and safety compliance activities, and in the absence of formal University and campus policies, appropriate statutes, and/or governmental regulations, the published standards of recognized professional health and safety organizations will serve as guidelines.

III. RESPONSIBILITIES

The goal of the University is to maintain the safety and well-being of the UCLA community, minimize workplace injuries and illnesses, and mitigate environmental incidents and property losses/damages. While achieving this goal is the responsibility of every member of the campus community, the following campus departments and officials have particular responsibility for implementing the principles and practices of this Policy:

- A. The Chancellor is responsible for the implementation of UCLA’s Environment, Health, and Safety-related University and campus policies and procedures pursuant to state and federal mandates at all facilities and properties under campus control.

- B. Vice Chancellors are responsible for implementation and enforcement of UCLA's Environment, Health, and Safety-related University and campus policies and procedures pursuant to state and federal mandates in all facilities and operations within their respective jurisdictions.
- C. Deans, directors, department heads, and administrative officers are responsible for establishing and maintaining programs in their areas that will support a safe and healthy work and living environment. Each campus unit will provide ongoing support for its safety program in its annual budget.
- D. Principal investigators, supervisors, and departmental safety coordinators are responsible for compliance with this Policy and associated safety protocols and mandates as it relate to operations and activities under their control.
- E. The Office of the Administrative Vice Chancellor is responsible for delivering quality customer-oriented services and programs that provide the foundation for UCLA's environmental health and safety programs.
- F. The UCLA Office of Environment, Health & Safety (EH&S) is responsible for:
- establishing campus environmental health and safety programs;
 - conducting safety inspections and implementing enforcement actions as designated by this Policy and the Administrative Vice Chancellor;
 - partnering with campus/system-wide safety committees;
 - monitoring effectiveness of and compliance with this Policy;
 - maintaining appropriate working relationships with official regulatory agencies related to environmental health and workplace safety; and
 - liaising between the campus and California Occupational Safety and Health (Cal/OSHA) for State inspections and associated investigatory proceedings (pursuant to UCLA Policy 820.1, Response to Initiation of Cal/OSHA Safety Inspection Investigation), with support from campus partners and stakeholders as appropriate.
- G. The Assistant Vice Chancellor (AVC) of EH&S or designee (in partnership with campus officials), is responsible and has the authority to terminate activities that pose life safety risks, egregious unsafe acts or conditions, and/or imminent danger to life or health. Such activities will cease until the hazardous condition has ended or adequate measures are taken to minimize exposure to the campus community and the public from such conditions.

This authority applies in all instances that could impact the safety and well-being of the campus, including but not limited to acts and/conditions caused by faculty, staff, students, and visitors. In certain cases, orders to cease operations may apply to conditions caused by third party contractors, pursuant to UC Terms and Conditions of Purchase Article 14, Subpart B. Environmental, Safety, Health and Fire Protection. Safety matters within closed construction sites will be managed by the designated construction inspectors and Capital Programs.

IV. EH&S PROGRAMS

EH&S consists of disciplines and subject-matter experts that support departments in environmental health and safety compliance activities in accordance with applicable regulations, and as appropriate has the enforcement authority to implement this Policy. See Attachment A for related policies and resources.

A. EH&S Executive Leadership

EH&S Executive Leadership (which consists of the Assistant Vice Chancellor and Executive Officer of EH&S) is responsible for executing EH&S's strategic goals and objectives in support of the safety and well-being of the campus community and the environment in alignment with state/federal/local mandates and University and campus policies.

EH&S Executive Leadership partners with campus officials (UCPD, UCFD, Emergency Management, IRM, Legal Affairs, Strategic Communications, etc.), and the UC Office of the President (UCOP)/UC Office of General Counsel (OGC) to manage significant and/or escalating environmental health and safety events warranting immediate action, and engages EH&S programs for response as appropriate. EH&S Executive Leadership is authorized to discontinue operation of any University function or activity that poses imminent danger to life or health of members of the campus community, and/or substantial endangerment to the environment.

EH&S Executive Leadership as appropriate and within EH&S jurisdiction, manages investigations, supports information gathering for administrative enforcement or litigation against the Regents, and oversees contractual agreements/memorandums of understanding (MOUs), and engages input from EH&S Directors as appropriate.

EH&S Executive Leadership authors, reviews, and promulgates EH&S policies and procedures and advises on local and system-wide committees, including, but not limited to, the systemwide EH&S Leadership Council, UC workgroups and task forces, UCLA Emergency Management Policy Group (EMPG), UCLA Injury Prevention Committee, UCLA Public Access Defibrillation (PAD) Advisory Board, and UCLA Office of Vice Chancellor for Research Safety Oversight Committee (OSOC).

EH&S Executive Leadership is supported by communication, training, and administrative personnel to deliver systematic and consistent messaging across the EH&S divisions specifically and to the campus more broadly.

B. Environmental, Occupational, and Safety Programs Division

The EH&S Environmental, Occupational, and Safety Programs Division oversees campus operations and the necessary programs and abatement to promote safety and environmental health. This division consists of Environmental Health, Environmental Compliance, Industrial Hygiene, and Occupational and Safety programs.

1. Environmental Health Program

The EH&S Environmental Health Program monitors activities related to food, recreational waters, and drinking water to ensure compliance with applicable State and county regulations, including compliance with laws and regulations promulgated by the U.S. Food and Drug Administration, California Department of Public Health (CDPH), and/or associated local county agencies such as the Los Angeles County Department of Public Health. Environmental surveillance programs and inspections are executed by EH&S in accordance with [California Health and Safety Code § 106615\(e\)](#), which outlines the authority of a Registered Environmental Health Specialist (REHS) in this context.

The EH&S Environmental Health Program oversees activities that include, but are not limited to:

- proper hygiene practices;
- safe food preparation and distribution at campus food facilities and associated events;
- drinking water quality; and
- infection control protocols.

The EH&S Environmental Health Program oversight applies to activities conducted at UCLA-owned and -operated facilities, buildings, swimming pools, living quarters, and food service operations, including campus-operated restaurants and UCLA Medical Center cafeterias (at Ronald Reagan Medical Center and Santa Monica Hospital). Businesses operated by third-party entities on UCLA property will fall under the jurisdiction of the Los Angeles County Department of Public Health (LACDPH).

2. Environmental Compliance Program

To ensure compliance with environmental regulations and protection of the environment, the EH&S Environmental Compliance Program evaluates and implements programs on behalf of campus operations in the following areas:

- hazardous materials business plans;
- industrial wastewater;
- storm water;
- air emissions; and
- aboveground and underground storage tanks.

Programs will comply with the laws and regulations issued by the Environmental Protection Agency (EPA), South Coast Air Quality Management District (SCAQMD), Certified Unified Program Agencies (CUPA), Los Angeles Fire Department (LAFD), and/or associated regulatory bodies.

The EH&S Environmental Compliance Program assists in interpreting environmental regulations, obtaining necessary permits, interfacing with government regulatory agencies, and coordinating all activities related to these matters.

3. Industrial Hygiene Program

The EH&S Industrial Hygiene (IH) Program assists with the identification, monitoring, and control of potentially harmful airborne contaminants, substances, and physical agents in the campus environment.

The scope of the IH Program includes, but may not be limited to:

- respiratory protection and fit-testing;
- hazard/exposure assessments; and
- consultation on occupational exposures and illnesses.

Exposure assessments will include investigations and sampling/monitoring (when applicable) for odors, dust/particulates (including any associated airborne toxic contaminants), mold/microbials, volatile organic compounds (VOCs), and/or physical hazards (e.g., noise, heat, vibration).

4. Occupational Safety and Compliance Program

The EH&S Occupational Safety and Compliance Program oversees occupational safety and compliance programs for campus employees, including departmental Injury and Illness Prevention Programs (IIPP) and associated exposure-specific plans, as required by state and federal mandates.

EH&S Occupational Safety and Compliance Program coordinates with departments on the following:

- execution of incident investigations;
- workplace inspections;
- safety consultations; and
- safety trainings/presentations for campus faculty and staff.

Hazard-specific programs include, but are not limited to:

- machine shops;
- electrical safety;
- working from heights;
- performing arts safety; and

- campus housing and facilities maintenance operations.

Programs will comply with the laws and regulations issued by California Occupational Safety and Health (Cal/OSHA), University policies, and applicable local regulatory agencies.

C. Research Safety Division

The EH&S Research Safety Division oversees campus activities in order to identify, monitor, and control exposures to potentially harmful agents within the campus environment specific to scientific research and creative research activities. This division consists of chemical safety, radiation safety, biological safety, laser and photobiological safety and hazardous waste programs.

1. EH&S Chemical Safety

EH&S Chemical Safety will routinely inspect academic research laboratories and train campus personnel in the safe use, handling, and storage of hazardous chemical materials.

Programs will comply with the laws and regulations issued by California Occupational Safety and Health (Cal/OSHA), University policies, and guidance from the UCLA Chemical and Physical Safety Committee (CPSC).

2. EH&S Radiation Safety

Radioactive material and radiation-producing machine use at UCLA is strictly controlled, in accordance with federal and state regulations, license conditions, radiation usage guidelines, and campus policies and procedures (see UCLA Policy 994 and UCLA Procedures 994.1 and 994.2).

EH&S Radiation Safety coordinates with the Radiation Safety Committee (RSC) to manage, oversee, and enforce the safe use of radioactive materials and radiation-producing machines in clinical, research, and academic settings at UCLA in accordance with applicable regulations and appropriate standards.

3. EH&S Biological Safety

EH&S Biological Safety coordinates with the Institutional Biosafety Committee (IBC) to ensure that applicable regulations and accepted standards governing the use, storage, and disposal of hazardous biological substances are observed in clinical, research, and academic settings.

Programs will comply with controls stipulated by National Institutes for Health (NIH), Institutional Biological Safety Committee (IBC), Cal/OSHA, and guidance from the Office of the Vice Chancellor for Research Safety Oversight Committees (OSOC). In addition, the care and use of laboratory animals will comply with applicable regulations and accepted standards for humane treatment in accordance with UCLA Policy 990, Use of Animals in Research and Teaching, and applicable state and federal standards.

4. EH&S Laser and Photobiological Safety

The EH&S Laser and Photobiological Safety (LPS) Program, through guidance and training, helps minimize unintentional exposures of laser radiation in excess of the maximum permissible exposure (MPE) limit to the human eye or skin.

The LPS Program ensures that all lasers and laser systems are operated in a manner comparable to the American National Standards Institute (ANSI) Z136 series of Standards for the Safe Use of Lasers. Additionally, the LPS Program is designed to ensure that adequate protection against collateral hazards is provided. These collateral hazards include the risk of electrical shock, fire hazard from a beam or from use of dyes and solvents, and chemical exposures from use of chemicals and vaporization of targets.

5. EH&S Hazardous Waste Management Program

The Hazardous Waste Management Program ensures that UCLA campus-generated waste that is considered “hazardous” under state or federal law (i.e., ignitable, corrosive, reactive, or toxic) is collected, packaged, transported, and disposed of in accordance with local, state and federal mandates and requirements. The EH&S Hazardous Waste Management Program also provides training and guidance for:

- the campus community regarding the proper packaging, labeling, and transportation of hazardous waste to authorized pickup locations throughout campus
- Facilities and Capital Program projects generating hazardous waste during construction, renovations, and maintenance of UCLA property.

D. High Containment Program

The EH&S High Containment Program provides expertise in the management of research conducted in campus high containment laboratories. The EH&S High Containment Program receives guidance from the Office of the Vice Chancellor for Research Safety Oversight Committees (OSOC) and manages the following:

- planning and directing safe laboratory operations and practices;
- conducting safety and security training programs; and
- overseeing the UCLA Federal Select Agent program.

The EH&S High Containment Program Director oversees the design, renovation, maintenance and validation of these facilities and serves as the Responsible Official (RO) for the UCLA Federal Select Agent Program.

Programs will comply with regulations stipulated by the Centers for Disease Control (CDC), CDC Division of Select Agents and Toxins (DSAT), National Institutes of Health (NIH), Health and Human Services (HHS), Cal/OSHA, and the UCLA Institutional Biological Safety Committee (IBC).

E. UCLA Fire Department

UCLA Fire Department (UCLAFD) is responsible for fire and life safety law enforcement and compliance with the UC/State Fire Marshal Memorandum Of Understanding (MOU) and University and campus EH&S policies in order to protect life and minimize the risk of injury and harm to property or the environment from fire and explosions (California Fire Department Identification Number 19945; California Health and Safety Code § 13146; California Penal Code § 830.37).

In accordance with UC’s systemwide MOU with the Office of the State Fire Marshal, UCLAFD protects life and property through the development and application of fire prevention technologies and methods, engineering, training and education, and enforcement. New, renovated, and existing UCLA buildings and structures will be maintained, occupied, and operated in compliance with minimum fire life safety regulations pursuant to California Code of Regulations Titles 19 & 24.

The duties of its peace officers include:

- mitigating threats/hazards to the University involving fires, explosions, and/or incidents impacting life safety;
- preparing the public to manage an emergency;
- responding to fire, explosion, hazardous materials, and rescue calls for service;
- partnering with stakeholders in preventing, protecting, mitigating, responding to, and recovering from emergencies and disasters;
- investigating and prosecuting incidents involving fire and/or explosions;
- conducting fire, life safety, construction, and annual occupancy inspections;

- monitoring special events; and
- engineering and plan review.

F. Office of Emergency Management

The EH&S Office of Emergency Management (OEM) prepares the campus to respond to and recover from a natural or man-made disaster/emergency. OEM is responsible for reviewing and maintaining emergency notification systems for mass messaging (see UCLA Policy 130), the Emergency Operations Plan (EOP) and all supporting Annexes, fostering partnerships both internally and externally to assist the UCLA community in preparing for, responding to, or recovering from events that threaten the continuity of our campus mission. OEM manages emergency notifications, messaging, and relevant updates via Bruin Alerts, Bruins Safe Online (www.bso.ucla.edu), and the Bruins Safe App in partnership with campus officials and the EMPG.

OEM also maintains oversight of the Emergency Operations Center (EOC) location, equipment and organization. The EOC centrally coordinates information and resources to manage and support the response to and recovery from an emergency. With delegated authority during its activation period, the EOC institutes protocols and procedures that conform with federal, state, and local orders along with campus leadership and/or UCOP requirements relative to emergency response, mitigation and recovery.

Emergency Action Plans (EAPs), including evacuation routes, will be established and steps taken to ensure adequate familiarity with the plan(s) on the part of campus personnel. Department designees will be responsible for maintaining EAPs and supporting equipment for personnel.

V. REFERENCES

1. University of California Policy on Management of Health, Safety and the Environment;
2. Guiding Principles to Implement the University of California Policy on Management of Health, Safety and the Environment.

VI. ATTACHMENTS

- A. Other Related Policies, Procedures and Resources.

Issuing Officer

Michael J. Beck

Administrative Vice Chancellor

Questions concerning this policy should be referred to the Responsible Department listed at the top of this document

Other Related Policies, Procedures and Resources

1. UCLA Policy 130: Emergency Notifications (BruinAlert).
2. UCLA Policy 131: Weapons on Campus.
3. UCLA Policy 135: Animals on University Property.
4. UCLA Policy 810: Smoke-Free Environment.
5. UCLA Procedure 820.1: Response to Initiation of Cal/OSHA Safety Inspection-Investigation.
6. UCLA Policy 905: UCLA Policy 905 Research Lab Personal Safety and Protective Equipment
7. UCLA Interim Policy 906: Undergraduate Researcher Laboratory Safety
8. UCLA Policy 907: Safe Handling of Particularly Hazardous Substances
9. UCLA Policy 990: Use of Laboratory Animal Subjects in Research.
10. UCLA Policy 991: Protection of Human Subjects in Research.
11. UCLA Policy 992: Use of Biohazardous Materials and Recombinant or Synthetic Nucleic Acid Molecules in Research and Teaching Activities
12. UCLA Policy 994: Radiation Safety
13. UCLA Procedure 994.1: Radiation Producing Equipment
14. UCLA Procedure 994.2: Volunteers and Visitors in Non-Clinical Radiation Use Areas.
15. UCLA Environment, Health & Safety: <https://www.ehs.ucla.edu/>
16. UC Terms and Conditions of Purchase Article 14, Subpart B. Environmental, Safety, Health and Fire Protection