
UCLA Policy 811: Environment, Health, and Safety

Issuing Officer: Administrative Vice Chancellor

Responsible Dept: Environment, Health, and Safety

Effective Date: December 6, 2024

Supersedes: UCLA Policy 811, dated 11/20/2020

I. PURPOSE & SCOPE

II. POLICY STATEMENT

III. RESPONSIBILITIES

IV. EH&S PROGRAMS

V. REFERENCES

VI. ATTACHMENTS

I. PURPOSE & SCOPE

The University of California Los Angeles (UCLA) 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. POLICY STATEMENT

University activities are to be conducted in a manner that promotes the protection of human health and the environment for the UCLA community, inclusive of 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, safety, and environmental 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

A critical 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 specific [lawful responsibility](#) for implementing the principles and practices of this Policy:

- A. The Chancellor is responsible for the implementation of UCLA's EH&S-related University and campus policies and procedures pursuant to state and federal mandates at all facilities and properties under campus control.
- B. Vice Chancellors (VCs) are responsible for implementation and enforcement of UCLA's EH&S-related University and campus policies and procedures pursuant to state and federal mandates in all facilities and operations within their respective jurisdictions.
- C. The Office of the Administrative Vice Chancellor (AVC) is responsible for appropriately resourcing the delivery of high-quality customer-oriented services and programs encompassing health, safety, and environmental compliance through EH&S.
- D. Deans, directors, department heads, and administrative officers are responsible for establishing, maintaining, and enforcing programs in their areas that will support a safe and healthy work and living environment. Each campus unit will provide ongoing support for its health, safety, and environmental compliance program in its annual budget.
- E. Principal investigators, supervisors, and departmental safety coordinators are responsible for working collaboratively with EH&S on compliance with this Policy and associated health, safety, and environmental compliance regulations, mandates, protocols, and recognized professional organization's guidelines as related to operations and activities under their control.
- F. All members of the UCLA community (employees, students, volunteers, etc.) are responsible for reading, understanding, and following safety guidelines, policies, and procedures relevant to their area. Additionally, they should complete any safety training provided by EH&S or their department and actively contribute to fostering a culture of safety by reporting hazards and ensuring the well-being of themselves and others.
- G. 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 AVC;
 - partnering with campus- and UC 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 Administration (Cal/OSHA) and/or the State Fire Marshal's Office 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.
- H. The Assistant Vice Chancellor of EH&S (AVC-EH&S) or designee, in partnership with campus officials, is responsible for leading EH&S and advocating for the adequate resourcing of divisions/programs. The AVC-EH&S 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 community, including but not limited to acts and/or 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 UCLA Capital Programs.

IV. EH&S DIVISIONS & PROGRAMS

EH&S consists of subject-matter experts who 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 Administration Division

The EH&S Administration Division includes the AVC-EH&S and Chief Administrative Officer of EH&S. It 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 Administration supports the business/office functions of the department and oversees contractual agreements/memorandums of understanding (MOUs) between EH&S and partner organizations or agencies.

EH&S Administration partners with campus officials including but not limited to VCs, Deans, Department Chairs, UC Police Department, Insurance & Risk Management, Legal Affairs, Strategic Communications, Campus Safety Committee Chairs, and the UC Office of the President's (UCOP) Office of General Counsel, Risk Services, Ethics, Compliance & Audit Services, etc., to set EH&S policies and procedures, and advise on local and system-wide committees. EH&S Administration manages significant and/or escalating environmental health and safety events warranting immediate action, and engages the relevant EH&S divisions and/or programs for response, as appropriate.

B. Biological Safety Division

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

The Biological Safety Division is further responsible for ensuring compliance with regulatory requirements set by Cal/OSHA, regulatory requirements and guidelines prescribed by National Institutes of Health (NIH), Centers for Disease Control and Prevention's (CDC) Biosafety in Microbiological and Biomedical Laboratories (current edition), and any other applicable local, state, and federal regulations and standards.

C. Chemical Hygiene Division

EH&S Chemical Hygiene Division ensures the safe use, handling, and storage of hazardous materials through routine inspection of academic research laboratories and personnel training. The Chemical Hygiene Division provides review and guidance on safety plans generated by the laboratories to ensure hazards are mitigated accordingly. The Chemical Hygiene Division is also responsible for developing, implementing, and maintaining the UCLA Chemical Hygiene Plan which sets provisions, requirements, and guidelines for working safely with hazardous materials.

Campus activities that fall under the purview of the Vice Chancellor of Research & Creative Activities will comply with the regulations issued by Cal/OSHA, University policies, and guidance from the UCLA Chemical and Physical Safety Committee (CPSC) as prescribed by UCLA Policy 996.

D. Environmental Compliance Division

The EH&S Environmental Compliance Division is responsible for implementing the UCLA Environmental Compliance Program to ensure compliance with environmental regulations on pollutants and protection of the environment. The Environmental Compliance Division 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.

Campus activities that fall under the purview of the Environmental Compliance Division 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 Division assists in interpreting environmental regulations, obtaining necessary permits, interfacing with government regulatory agencies, and coordinating all activities related to these matters.

E. Environmental Health Division

The EH&S Environmental Health Division is responsible for implementing the UCLA Environmental Health Program, which monitors activities related to food, recreational waters, and drinking water to ensure compliance with applicable State and county regulations, including compliance with laws, regulations, and ordinances 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. Public Health 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 Environmental Health Division oversees activities that include, but are not limited to:

- proper food-handling hygiene practices;
- safe food preparation and distribution at permanent, temporary, and mobile food facilities and associated events;
- drinking water quality; and
- infection control protocols.

The Environmental Health Division oversight applies, with limited exception, to all activities conducted at UCLA-owned and -operated facilities, buildings, swimming pools, living quarters, and food service operations, including campus-operated restaurants and UCLA Health cafeterias (at Ronald Reagan UCLA Medical Center, Santa Monica UCLA Medical Center, and West Valley Medical Center), and food businesses operated by third-party entities on UCLA-owned property.

F. Field Research Safety Program

The UCLA Field Research Safety Program prioritizes the safety of researchers engaged in fieldwork activities outside the boundaries of the UCLA Westwood campus. As highlighted under Section L – Occupational Safety & Compliance, Cal/OSHA regulations require campus departments to submit Injury & Illness Prevention Plans for all employees under their purview; this includes field researchers.

The Program is dedicated to identifying, assessing, and mitigating field research risks through a structured approach to risk management in their fieldwork. The program also offers specialized safety training and a safety equipment loaner program to further support researchers in maintaining safety standards. It promotes a culture of safety among field researchers through educational initiatives and recognition of safe practices. Additionally, routine inspections are carried out at UCLA field stations to identify safety hazards, evaluate adherence to safety protocols, and promptly implement any necessary corrective measures.

G. Fire Department

The 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 (California Fire Department Identification Number 19945; California Health and Safety Code § 13146; California Penal Code § 830.37).

In accordance with UC's systemwide MOU, 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 UCLAFD peace officers include:

- mitigating threats/hazards to the University involving fires, explosions, and/or incidents impacting life safety;
- 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;
- reviewing, approving, and monitoring special events; and
- engineering and plan review.

UCLAFD ensures that all departments are equipped with Emergency Action Plans (EAPs). EAPs, including evacuation routes, will be established and, with the support of other EH&S divisions, 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.

H. Hazardous Waste Management Division

The Hazardous Waste Management Division ensures that UCLA-generated waste, with limited exception, 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 applicable local, state and federal mandates and requirements (Department of Transportation, Department of Toxic Substances & Control, Environmental Protection Agency, etc.). The EH&S Hazardous Waste Management Division 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, and
- Facilities and Capital Program projects generating hazardous waste during construction, renovations, and maintenance of UCLA property.

I. High Containment Program

UCLA's High Containment Program is organized in alignment with the UC System's commitment to safe and appropriate use of high-risk infectious agents in biological and biomedical research. In addition to compliance with NIH and CDC policy governing BSL-3 appropriate research, the program

is aligned with (and assists in the development of) UC system standards intended to define best practices in design, construction, maintenance, and operation of high containment facilities. The High Containment Program receives guidance from the UCLA High Containment Laboratory Oversight Group (HCLOG) and manages the following:

- planning and directing safe laboratory operations and practices;
- conducting safety and security training programs; and
- overseeing the UCLA Tier 1 Federal Select Agent Program.

The High Containment Program Director oversees the design, renovation, maintenance, and validation of these facilities and serves as the Responsible Official (RO) to the CDC Federal Select Agent Program.

All high containment research activities will comply with requirements set by UC High Containment standards, applicable regulations stipulated by the Centers for Disease Control and Prevention (CDC), CDC Division of Select Agents and Toxins (DSAT), National Institutes of Health (NIH), Department of Health and Human Services (HHS), and the IBC.

J. Industrial Hygiene Division

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

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

- respiratory protection and respirator fit-testing;
- hazard/exposure assessments;
- establishing exposure control plans for similar exposure groups; 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). The IH Program works with EH&S partners and the campus community to make recommendations and establish adequate controls to mitigate exposure risks.

K. Occupational Safety and Compliance Division

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

The Program coordinates with departments on the following:

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

Under the umbrella of the IIPP, the Occupational Safety & Compliance Division oversees safety programs specific to occupational hazards including, but are not limited to:

- confined space
- electrical safety
- hot work
- lock out / tag out
- machine guarding

- trenching and excavation
- working from heights

Programs will comply with the regulations issued by Cal/OSHA, University policies, and applicable local regulatory agencies.

L. Radiation Safety Division

Radioactive material and radiation-producing machine use on the UCLA campus 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 research, clinical, and academic settings at UCLA in accordance with applicable regulations and appropriate standards.

The Radiation Safety Division is also responsible for laser and photobiological safety. The UCLA Campus 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 and in compliance with applicable Cal/OSHA regulatory requirements. 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.

M. Scientific Dive & Boat Safety Program

The EH&S Scientific Dive & Boat Safety Program provides training, logistics, and support for all UCLA faculty, staff, and student researchers engaging in diving and boating activities. All diving policies and procedures are based on the diving standards set forth by the UCLA Diving Control Board and the American Association of Underwater Scientists (AAUS). All research diving projects and divers diving under the auspices of UCLA must be qualified and authorized according to the UCLA/AAUS Standards and abide with the current version of the UCLA Diving Safety Manual.

N. Vivarium Safety Program

The EH&S Vivarium Safety Program provides expertise on safe practices for UCLA personnel working with and around research animals in campus vivarium. In collaboration with the UCLA Animal Research & Occupational Health Safety Committee, AAALAC International, and other UCLA animal research program stakeholders, the Vivarium Safety Program ensures that all animal-related activities conform to Cal/OSHA mandates, UCLA policies and expectations, and related animal research regulations and best practices.

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

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Michael J. Beck

Administrative Vice Chancellor

**Questions concerning this policy or procedure 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 Policy 996: Chemical & Physical Research Safety
16. UCLA Environment, Health & Safety: <https://www.ehs.ucla.edu/>
17. UC Terms and Conditions of Purchase Article 14, Subpart B. Environmental, Safety, Health and Fire Protection
18. University of California High-Containment Laboratory Oversight Committee Charter
19. University of California Office of the President Systemwide Environment, Health & Safety