CENTRAL CONNECTICUT STATE UNIVERSITY
COMPREHENSIVE SAFETY PLAN

A. INTRODUCTION

Central Connecticut State University is committed to providing an environment that is free from recognized safety hazards and complies with applicable laws concerning environmental health and safety. To effectively meet our responsibilities the University has developed this Comprehensive Safety Plan. The Plan is managed by the Environmental Health and Safety Office and reviewed annually to meet the appropriate needs of the University. The purpose of the plan is to provide guidance and direction for the environmental health and safety program at the University. All written programs and records associated with this Safety Plan may be reviewed in the Environmental Health and Safety Office.

B. ORGANIZATION

1. University Safety & Health Committee

The University Safety and Health Committee was established in 2006 in accordance with Section 31-40v of the Connecticut General Statutes, which require that all state agencies covered under the workers' compensation laws of the State of Connecticut establish a safety and health committee. Regulations 31-0v-1 through 31-40v-11 specify the rules for "establishing and administering committees which will bring employers and employees together in a non-adversarial, cooperative, and effective effort to promote safety and health at each worksite."

The Committee's role is to share ideas with the University administration regarding safety, accident and illness prevention programs, training in the identification and reduction of workplace hazards, and safety and health education.

The University Safety and Health Committee has representatives from all employee groups - AAUP; SUOAF; Administrative and Residual; Administrative Clerical; Protective Services; and Maintenance and Service, as well as members of University management; the Office of Environmental Health and Safety; the CCSU Public Safety Department; and the Student Government Association.

2. Environmental Health & Safety Office

The Environmental Health & Safety (EH&S) Office consists of the Director of EH&S, an EH&S Assistant, and a Fire Lieutenant. The purpose of the EH&S Office is to ensure that faculty, staff, students, and visitors of the University are provided a safe and healthy working and living environment. The University's EH&S programs ensure that the regulatory responsibilities of the University are being met. The applicable responsibilities included in this Safety Plan may include OSHA, EPA, CT DEEP, NFPA, DOT, and other local environmental, health and safety regulations.

The Fire Lieutenant inspects all buildings on campus to ensure compliance with federal, state, and local fire code regulations. Routine testing and maintenance are performed on fire alarm systems, fire

protection and life safety equipment, and a code compliance review for construction and renovation projects.

3. Faculty, Staff and Students

Faculty, Administrators, and Supervisors are responsible for being thoroughly informed of the contents of this Plan as it relates to their areas of responsibility and authority. They are expected to ensure that all provisions of this Plan are implemented in their areas of responsibility. Faculty are responsible for making sure all staff and students working in their area(s) have the proper safety training to help minimize the potential for injury, loss of research materials, and/or property damage.

Students, employees, and visitors are expected to comply with all provisions of this Plan as it relates to their areas.

C. FUNCTIONS OF THE ENVIRONMENTAL HEALTH & SAFETY OFFICE

The EH&S Office conducts inspections, performs industrial hygiene sampling, recommends methods to correct hazardous conditions, develops procedures, provides training to employees and students, investigates accidents and occupational illnesses, maintains records, and monitors and evaluates program performance. The purpose of the program is to improve the safety and health of the work environment by reducing hazardous conditions that can cause occupational illnesses and injuries.

1. Inspections

To ensure that the University's commitment for a safe and healthy environment is maintained, the EH&S Office conducts periodic inspections of all campus facilities. The goal is to reduce accidents and injuries by eliminating or reducing safety and health hazards, and examining unsafe practices among employees. Inspections also ensure compliance with OSHA, NRC, NFPA, EPA, and applicable state and local codes. Certain high risk areas such as laboratories may be inspected frequently.

Problems are resolved by written or oral consultation with employees, supervisors or department heads. Unsafe acts conducted by employees are discussed with the employee and/or immediate supervisor. In some instances it may be necessary to pursue matters to a higher level of authority or conflicts may be brought before the Safety and Health Committee for resolution. The EH&S Office has the authority to shut down operations that are an imminent hazard to life, limb, property, or the environment.

In addition to in-house inspections, the University is routinely inspected by the State Fire Marshal's Office and the Insurance Carrier. The University is also subject to unannounced inspections from the Connecticut OSHA, Connecticut Department of Public Health, the Nuclear Regulatory Commission, Connecticut Department of Energy and Environmental Protection, and the U.S. Environmental Protection Agency.

2. Training Program

The EH&S Office has developed an Environmental Health & Safety Training Program. Ensuring that employees and students receive proper safety training is an important function of the safety program. Several safety training programs are OSHA mandated and must be completed when a new employee is hired or transferred to a new job, when new equipment is installed or a new task assigned, or any time a

lack of employee knowledge or skill is creating accidents or hazards. Supervisors and Faculty who teach and/or supervise students are responsible for ensuring that the employees and students possess the necessary knowledge and skills to safely operate machinery and equipment or use chemicals or materials in their area.

Training programs may be developed and taught by the EH&S Office through lecture or video, or may be administered electronically. All training is documented and records are maintained with the EH&S Training Program in the EH&S Office.

3. Accident Investigations

Work related accidents and incidents are investigated or reviewed by the EH&S Director, in cooperation with the employee's supervisor, to determine the causes and to recommend corrective actions to eliminate or minimize the event. All accident reports are filed with the Human Resources Department and a copy of the First Report of Injury should be sent to the EH&S Office for review. Emphasis is placed on the importance of reporting all accidents and incidents to supervisors, whether they result in personal injuries, illnesses, property damage, or near misses. Accident investigations are based on fact finding, not fault finding. Based on the investigation conducted by the EH&S Office the following actions may be taken:

- A work order may be executed to make appropriate repairs to eliminate or control a hazard
- The employee may be counseled about safe practices
- A safety program may be created to include procedures and training
- Personal protective equipment may be issued

4. Recordkeeping

Environmental, health and safety regulatory agencies require employers to maintain certain records. The maintenance of good records is important in showing control over safety programs, defending the University against law suits, monitoring the effectiveness of the safety program, analyzing accident trends, and justifying program expenditures. The EH&S Director maintains employee training records, inspection reports, accident investigations, industrial hygiene reports, environmental reports, and hazardous waste manifests, among other required documentation. The Human Resources Department maintains records on occupational injuries and illnesses (OSHA forms 300 and 300A), and medical records.

D. ACCESS AND SECURITY

1. Hazardous Environments

In general, laboratories, art studios, workshops, and building mechanical spaces are considered either hazardous or non-hazardous. A non-hazardous environment does not contain materials or equipment which could adversely affect the safety of the individuals working there. A hazardous environment may contain a wide variety of tools, equipment, machinery, and/or substances that can become dangerous if the worker is untrained, unsafe, or unsupervised. An immediately hazardous environment describes any laboratory, art studio, workshop, or mechanical space in which materials, activities, or circumstances could cause instantaneous incapacitation rendering an individual unable to seek assistance. Examples

include, but are not limited to: potential exposure to poisonous chemicals and gases; work with pyrophoric and explosive chemicals; work with pressurized chemical systems; work near high voltage equipment; work with power equipment that could pinch, grab, or sever body parts and/or clothing, etc.

Working alone in a hazardous environment is never permitted. In addition, work in immediately hazardous environments is never allowed to take place after normal business or building hours without proper training, supervision, and authorization. Departments will determine the nature and extent to which supervision is needed for use of the hazardous environments beyond normal business hours. All access to these spaces must be authorized through the Facilities Management Department and may require coordination with University Police.

E. LABORATORY SAFETY

1. Chemical Hygiene Plan

To protect employees and students from hazards associated with the use of chemicals in laboratories and to ensure compliance with OSHA's Laboratory Standard, 29 CFR 1910.1450, CCSU has developed a Chemical Hygiene Plan. The CCSU Chemical Hygiene Plan is comprised of the following elements:

- Standard Operating Procedures
    - General laboratory safety rules
    - Protective clothing and equipment
    - Chemical procurement, distribution, and storage
    - Compressed gas cylinders
    - Chemical inventory
    - General procedures for toxic, flammable, reactive and corrosive chemical use
    - Chemical Spills and Accidents
    - Chemical Waste Disposal Program
- Engineering Controls
    - Chemical fume hoods
    - Biological safety cabinets
    - Eyewash and safety showers
- Safety Data Sheets (SDS's)
- Housekeeping and laboratory safety inspections
- Control Equipment Inspections and Training
- Employee information and Training
- Special or Non-routine Procedures
- Exposure Assessments/Medical Surveillance Programs/Environmental Monitoring
- Designated Chemical Hygiene Officer – Director of EH&S
- Safe Handling of Particular Hazardous Substances
    - Standard Operating Procedures for Particularly Hazardous Substances

The Chemical Hygiene Plan is currently being updated by the EH&S Office.

2. Chemical Inventory

The University uses Chemical Environmental Management System (CEMS) software to manage the chemical inventory and provide SDS's for chemicals on campus. This system is also used in the event of an incident or accident in order to provide chemical safety information to emergency responders. The inventory is currently being updated by the EH&S Office.

3. Training

Training is key to assuring the safe operation of laboratory facilities. Students receive training in laboratory safety principles before working in laboratories. Professors are responsible for training students and assuring safe practices in laboratories. Employees shall be provided with training on the Chemical Hygiene Plan, the hazard assessment and PPE determination for their laboratory, and on the use of safety equipment present in the lab.

4. Safety Equipment

Laboratory safety equipment is designed to protect personnel from injury and minimize damage if an accident occurs. Adequate equipment to fight or prevent fires is essential to safety in a laboratory. Portable ABC fire extinguishers are located in all laboratories. Class-D reactive metal fire extinguishers are located in the Chemistry and Engineering departments. All fire extinguishers are inspected monthly by the EH&S Office. Flammable liquids storage cabinets and flammable or explosion proof refrigerators are located in many labs in Copernicus. In addition, fire blankets are located in several laboratories. Safety showers and eyewash units are located in all laboratories using hazardous chemicals. Showers are tested every quarter and eyewash stations are tested monthly by the EH&S Office. Chemical fume hoods are located in Copernicus, Bichum Engineering, and one in Social Sciences. Face velocities are continuously monitored by TechAir alarm systems. Acceptable face velocities are 100-125 fpm at a sash opening of 12-18 inches. Unacceptable face velocities are reported to EH&S and Facilities for repair. The fume hoods are certified annually by a licensed contractor.

F. WORKSHOP SAFETY

Machine and woodworking shops are present in many locations and departments throughout the University. The equipment located within these shops is routinely used by employees and students to complete various tasks that have the potential to result in serious injury. It is the goal of CCSU to provide a safe working environment within all University machine and woodworking shops.

The CCSU Shop Safety Program sets forth operating procedures and practices to help maintain machine and woodworking shops throughout the University in a safe and compliant manner at all times. The information within this Program has been developed in accordance with multiple OSHA regulations and publications, and applicable Operating and Maintenance Manuals for machines and equipment.

The CCSU Shop Safety Program is comprised of General Safety Rules for Machine and Woodworking Shops, Personal Protective Equipment Requirements, and Specific Safety Information and Precautions for each type of Tool and Equipment in CCSU machine and woodworking shops. The applicable sections of this program may be used for training in the safe use of each piece of equipment.

G. BIOSAFETY

1. Biosafety Level 2 lab

The Department of Biomolecular Sciences has registered Copernicus Room 306 with the Connecticut Department of Public Health as a Laboratory Utilizing Agents for Teaching, Research, and/or Quality Control because of the presence and possible use of potentially infectious bacteria which are classified as Biosafety Level 2 agents. This lab adheres to standard practices, special practices, safety equipment and facilities outlined in the CSC/NIH Guidelines "Biosafety in Microbiological and Biomedical Laboratories."

2. Vertebrate Animals

At CCSU, the Institutional Animal Care and Use Council (IACUC) is the University's organization charged with the responsibility for reviewing the University's program for humane care and use of animals; for reviewing concerns involving the care and use of animals; for inspecting the University animal housing facilities and study areas; for reviewing and approving, requiring modifications (to secure approval) or withholding approval of proposed activities or of significant changes in activities relating to the care and use of animals; and, if necessary, for suspending activities involving animals. In its deliberations, the IACUC is guided by federal and state regulations and policies set forth in the "Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS 1986), the Guide for the Care and Use of Laboratory Animals (ILAR 2011) and the USDA Animal Welfare Regulations (CFR 1985).

3. Infectious waste

Infectious waste containing human blood or other potentially infectious materials are double bagged in red plastic bags and disposed by a licensed disposal company. Infectious waste from microbiological laboratories is autoclaved and placed in red bag collection containers.

H. RADIATION SAFETY

1. Lasers

The goal of the laser safety program at CCSU is to protect laser users from potentially serious hazards associated with lasers and laser systems. These hazards include the risk of eye and skin damage due to exposure to laser radiation as well as non-beam hazards such as electric shock from high-voltage laser power supplies, fire, and chemical injuries from toxic laser chemicals and materials vaporized from laser targets. Lasers are classified according to their potential to cause personal injury. The standard classification system established by the American National Standards Institute (ANSI) consists of four main classes, in which Class 3B and Class 4 lasers are of sufficient power output to be of paramount concern to operators and bystanders. Eye exposure to a direct or specularly reflected beam from a Class 3B or 4 laser can cause serious injury, and for a Class 4 laser even diffused reflections can be hazardous. Additionally, a Class 4 laser beam may burn the skin, may be a fire hazard, may produce toxic laser-generated air contaminants, and may operate at high voltages.

The Physics Department has Class 3B and Class 4 lasers for use in teaching and research labs, including a light detection and ranging (LIDAR) and micro pulse LIDAR laser system. The LIDAR system has required CCSU to obtain approval from the U.S. Federal Aviation Administration under specific requirements. Despite the risks, laser systems can be operated safely if the dangers are recognized and proper precautions are taken. A Laser Safety Manual, which describes the fundamental hazards associated with laser operations, establishes the rules and procedures governing the safe use of lasers, and outlines the responsibilities of the laser users and the Laser Safety Officer in mitigating those hazards, is under development. This Manual is based on the recommendations of ANSI Z136.1-2014, the American National Standard for Safe Use of Lasers developed by the American National Standards Institute.

I. FIRE SAFETY

1. Systems

All Residence Halls and most campus buildings are fully sprinklered. All life safety systems including fire alarm, sprinkler, fire suppression, emergency lighting and power, and fire pumps are routinely tested, maintained, and inspected in accordance with state and local fire codes and the Connecticut State Fire Marshall's office. Semi-annual fire drills are conducted in all Residence Halls in conjunction with EH&S, University Police, Facilities, and Residential Life.

Evacuation Procedures, policies and restrictions are provided in the Student Handbook and in the Emergency Procedures Guide.

2. Hot Work

A hot work permit is required for any temporary operation involving open flames or producing heat and/or sparks. This includes, but is not limited to: brazing, cutting, grinding, soldering, torch-applied roofing and welding. Hot work permits can be received by contacting the University Fire Lieutenant or EH&S.

J. OCCUPATIONAL SAFETY

1. Aerial Lifts

Aerial lifts are used on campus for roof maintenance, building maintenance and elevated work structure inspection. An Aerial Lift Use and Inspection Program is being developed in accordance with the OSHA standards 29 CFR 1910.67 and 29 CFR 1926.453 to ensure the protection of employees from the hazards of aerial lift use. Elements of the Aerial Lift Use and Inspection Program will include safety inspections, training and authorized operator requirements, and inclusion in the Fall Protection Program.

2. Confined Spaces

The Confined Space Entry Program protects authorized employees that will enter confined spaces and may be exposed to hazardous atmospheres, engulfment in materials, conditions which may trap or asphyxiate due to converging or sloping walls, or contains any other safety or health hazards. This program was developed in accordance with 29 CFR 1910.146. Elements of the confined space entry

program include hazard assessments, procedures for atmospheric testing, entry permits, rescue procedures, and training. Hazard assessments for permit required confined spaces on campus are available for review in the EH&S Office.

3. Electrical Safety

A written Electrical Safety Program is being developed to address electrical safety requirements that are necessary for the safeguarding of employees in their workplaces. The program is designed to address concerns that electricity is a serious workplace hazard, exposing employees to electric shock, electrocution, fires and explosions. This program covers electrical safety work practices for qualified and unqualified persons. Qualified persons are those who are familiar with the construction and operation of the equipment and the hazards involved. Qualified persons may be permitted to work on or near exposed energized parts and have been trained in avoiding electrical hazards. Unqualified persons are those with little or no such training but have received an awareness level of training. This program shall be based on the requirements of NFPA 70E, Standard for Electrical Safety in the Workplace.

4. Lockout/Tagout

The University has established a Lockout/Tagout Program in accordance with the OSHA Standard for the Control of Hazardous Energy, 29 CFR 1910.147, to ensure that equipment is isolated from potentially hazardous energy, and locked and tagged out prior to maintenance or repair. This program includes procedures for shutdown, equipment isolation, lockout/tagout, release of stored energy, verification of isolation, and training. Lockout/tagout equipment has been provided to the Facilities Management maintenance trades and training completed with those authorized and affected employees. Periodic inspections are conducted by the EH&S Office.

5. Fall Protection

CCSU's Fall Protection and Inspection Program ensures that employees and students are protected from fall hazards and was developed in accordance with multiple OSHA regulations for general industry and construction. This program includes the use of fall protection systems such as guard rails, personal fall arrest systems, warning line systems, safety monitoring, covers and guards, the use of ladders and man lifts, inspections, and training.

6. Hazard Communication

CCSU's Hazard Communication Program has been developed in accordance with OSHA's Hazard Communication Standard, 29 CFR 1910.1200 and the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This program ensures that information about the identities and hazards of chemicals in the work place are available and understandable to employees. This is accomplished through the University's chemical inventory, chemical labeling, availability of Safety Data Sheets (SDS), and training.

The University uses Chemical Environmental Management System (CEMS) software to manage chemical inventory and provide SDS's for chemicals on campus. This system is also used in the event of an incident or accident in order to provide chemical safety information to emergency responders.

7. Personal Protective Equipment (PPE)

A Personal Protective Equipment Program is being developed in accordance with multiple OSHA regulations. Personal protective equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, physical, electrical, mechanical, or other workplace hazards. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, coveralls, vests and full body suits. When engineering, work practice, and administrative controls are not feasible or do not provide sufficient protection to employees, PPE is provided with the appropriate training. The program will include hazard assessments, the selection, maintenance and use of PPE, inspection, and training.

8. Materials Handling and Storage

Procedures are being developed for materials handling and storage. Training is available in proper lifting techniques and back injury prevention as well as other ergonomic evaluations and training.

9. Powered Industrial Trucks

A Powered Industrial Truck program is being developed to ensure that forklift trucks, pallet trucks, and motorized hand trucks are operated safely. Only qualified operators who have received training in safe operations are permitted to operate powered industrial trucks on campus. Training is coordinated by the EH&S Office and an experienced driver. The training program consists of a lecture on proper procedures, video tape, and an evaluation of driving skills. Authorized drivers must pass a driving test. Powered industrial trucks are inspected before operation and receive regular maintenance as recommended by the manufacturer.

K. OCCUPATIONAL HEALTH

1. Asbestos

CCSU Facilities Management employees and contractors may be required to perform maintenance or repair work where there may be asbestos containing or presumed asbestos containing materials. These employees receive Asbestos Awareness training in order to recognize these materials and their potential hazards, follow procedures in order to prevent disturbance of these materials, and report any poor conditions to EH&S.

The University works with the Connecticut Department of Public Works for assessment and management or abatement of asbestos containing materials using licensed contractors and consultants in accordance with OSHA's Asbestos Regulations (29 CFR 1910.1001), Connecticut General Statutes and EPA's AHERA and NESHAP rules. Records of testing, abatements, and air clearances are maintained in the Facilities Management Department.

2. Bloodborne Pathogens

CCSU's Exposure Control Plan explains the provisions for protecting employees from exposure to blood and other potentially pathogenic and infectious materials and from exposure which could result in the

transmission of such pathogens. The Plan includes methods for eliminating or reducing exposure and requires the use of universal precautions, engineering controls, work practice controls, and the use of appropriate PPE, in accordance with OSHA's Bloodborne Pathogens Standard, 29 CFR 1910.1030.

Affected employees have potential occupational exposure, meaning that it is reasonable to anticipate skin, eye, or mucous membrane contact with blood or other potentially infectious materials during the performance of an employee's duties. Affected employees are trained by EH&S or other qualified persons on the requirements of the Standard and HIV, Hepatitis B and C. Hepatitis B vaccinations are offered to affected employees at risk for contacting blood as part of their job duties. The following departments include employees who are at risk: Health Center, Police, Athletic Trainers and Coaches, Custodians, and some Facilities trades. Appropriate engineering controls and PPE have been distributed to affected departments.

3. Hearing Conservation

EH&S conducted noise sampling of activities taking place in multiple locations on campus. The locations identified as having elevated noise levels included wood shops, machine shops, and the Energy Center. The purpose of this sampling was to determine if CCSU staff, faculty and/or students conducting activities in these areas are exposed to noise levels above the OSHA exposure limit of 90 dBa over an 8 hour period. According to the results of this exposure assessment, CCSU is not required to implement a Hearing Conservation Program in accordance with OSHA's standard for Occupational Noise Exposure, 29 CFR 1910.95.

Hearing protective devices such as ear plugs and ear muffs are provided in elevated noise areas and may be voluntarily worn by employees exposed to noise. EH&S conducts random noise surveys using a sound level meter as necessary.

4. Indoor Air Quality

The EH&S Office is responsible for responding to indoor air quality complaints or concerns. All complaints are investigated and appropriate action taken in coordination with the Facilities Management Department.

5. Respiratory Protection

CCSU conducted air sampling of activities taking place in classrooms and laboratories for ceramics, theater scene shop, sculpture and rock cutting labs. The purpose of this sampling was to determine if CCSU staff, faculty and/or students conducting activities in these areas are exposed to levels of respirable crystalline silica, total particulate dust, and formaldehyde above the OSHA exposure limits in accordance with OSHA's Respiratory Protection Standard, 29 CFR 1910.134. According to the results of this exposure assessment, exposure limits were not approached and there is no need for respiratory protection in those areas sampled. Exposure assessments will continue to be performed by EH&S as needed.

Potential exposure to respiratory hazards in laboratory spaces are discussed in the Chemical Hygiene Plan. Most, if not all, potential exposures are eliminated by the use of fume hoods. Occasionally employees may desire to use dust masks voluntarily, though conditions exist that do not require their use. In such

cases, EH&S shall give dust mask awareness training and the employee will sign a Voluntary Use of Dust Masks statement.

6. Silica

A program is being developed to eliminate or reduce the workplace exposure to crystalline silica at the University in accordance with OSHA's Respirable Crystalline Silica standard, 29 CFR 1910.1053, which became final in June 2018. Exposure to crystalline silica can cause silicosis, lung cancer, and kidney disease. Work practices involving cutting, sawing, grinding, drilling, and crushing stone, rock, concrete, brick, block, and mortar may produce respirable crystalline silica above the permissible exposure limit. Other activities such as abrasive blasting with sand, sawing brick or concrete, sanding or drilling into concrete walls, grinding mortar, making ceramic products, and cutting or crushing stone result in worker exposures to respirable crystalline silica dust.

The program will include engineering and work practice controls, exposure assessments, respirator use, medical surveillance, exposure control plans, and training.

L. ENVIRONMENTAL HEALTH

1. Air Quality

Universities contribute to air pollution through releases of carbon monoxide, nitrogen oxides, sulfur oxides, lead and particulate matter, and toxic air pollutants from laboratories and physical plant operations. Possible sources include laboratory fume hoods, paint booths, vehicles, boilers, chillers, and generators. The University actively pursues methods to reduce air pollution, including reducing toxic vapors released during painting operations through the use of low solvent and latex paints.

CCSU operates under the Connecticut General Permit to Limit the Potential to Emit (GPLPE) Registration 110-0057-GPLPE. All required permit conditions are in compliance and recordkeeping is completed by EH&S in accordance with the General Permit, Connecticut General Statutes, and EPA's Abatement of Air Pollution Regulations.

2. Aboveground and Underground Storage Tanks

CCSU has five underground storage tanks and multiple aboveground storage tanks containing petroleum fuel for vehicles, emergency generators, and heating equipment. Tank inspections are performed monthly and annual testing and inspections of underground systems are performed. All documentation and notifications are managed by EH&S in accordance with Connecticut General Statutes. Procedures for any potential releases from tank systems are covered under the CCSU Spill Prevention Control and Countermeasures (SPCC) Plan.

3. Emergency Planning and Community Right-to-Know Act (EPCRA)

EPCRA requires the University to report on the storage, use, and releases of certain quantities of particular hazardous substances to the federal, state, and local governments. The EH&S office prepares and submits the required Tier 2 report each year to the State Emergency Response Commission, the Local Emergency Planning Committee, and New Britain Fire Department.

4. DOT Hazardous Materials Shipping

The U.S. Department of Transportation mandates that in order to transport hazardous materials by highway, rail, vessel, or air, the hazardous material must be properly classed, described, packaged, marked, labeled, and in condition for shipment as required or authorized by the DOT regulations described in 49 CFR. In order to assure our responsibilities are met, specifically with the potential shipments of hazardous materials by the academic departments performing research, EH&S is developing a Hazardous Materials Shipping Manual and training program.

5. Hazardous and Regulated Waste

CCSU is a conditionally exempt small quantity generator (CESQG) of hazardous waste and maintains satellite accumulation areas and a central storage area as required by state and federal regulation. The waste streams fall under a variety of classifications including flammables, corrosives, toxics, and reactives. Under normal conditions, hazardous waste is generated in quantities less than 100 kilograms per month, or 1 kilogram of acutely hazardous waste per month, as a result of teaching and research laboratory activities, studio arts, and physical plant operations. On occasion however, CCSU may generate larger quantities of hazardous waste (>1000 kilograms) related to building renovations or demolitions, or one-time clean outs of maintenance storage areas or laboratories.

Inspections, recordkeeping, and spill response are managed by the EH&S Office.

6. Spill Prevention Control and Countermeasures (SPCC) Plan

CCSU's SPCC Plan was developed to comply with the oil storage and spill requirements in 40 CFR Part 112. The elements of the SPCC Plan include petroleum storage containment equipment and practices, inspections and testing, leak detection and spill response, notifications and reporting, and personnel training.

7. Wastewater Discharges

CCSU has registered for coverage under the Connecticut DEEP Miscellaneous Waste General Permit. This registration included the approval from the City of New Britain Department of Public Works. Wastewater discharges which are covered under this general permit include boiler blowdown, filter backwash, water softener filter regeneration wastewater, non-contact cooling water, and building maintenance wastewater. Records are maintained by the EH&S Office.

M. EMERGENCY PREPAREDNESS

CCSU's Emergency Management Response Plan (EMRP) is a guide for managing threats, incidents, disasters, and associated events that imperil the people, properties, programs, and viability of the University. It describes the steps the University will take during an incident and gives the critical information needed to respond to threats by natural and man-made hazards. It is reviewed and updated at least annually and is maintained by the University Police and Facilities Management.

N. CONSTRUCTION SAFETY

The EH&S Office is developing a Contractor EH&S Manual which will contain performance expectations applicable to all contractors and their personnel regarding environmental, health and safety responsibilities while working at CCSU. To ensure the protection of students, faculty, staff, visitors, and property, contractors are expected to provide a safe and secure workplace and operate in an environmentally sound manner.

Contractors are responsible for awareness and full compliance with all applicable rules, regulations, laws and practices applicable to their work and their subcontractor's work that are prescribed by the University and any federal, state or local government or agency that governs the safety and health of employees, students, faculty, staff, and the general public. These include, but are not limited to, regulations promulgated by the following federal and state agencies: OSHA, EPA, DOT, DOE, NRC, ConnOSHA, CT DPH, CT DEEP, and ConnDOT.