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## UAP 6110: Environmental Health and Safety

Authorized by [RPM 7.14 \("Risk Management and Insurance"\)](#)

Process Owner: Director, Environmental Health and Safety

### 1. General

The University of New Mexico is committed to providing a safe and healthy work, educational, and living environment, to protecting the natural environment, and to protecting the University's physical resources and financial assets. UNM commits to ensuring all health and safety programs are accessible and inclusive to all community members, including those with disabilities.

To help achieve these goals, the University is committed to instilling a culture of health, safety, and environmental protection across all of UNM. To further enhance the culture of health and safety, the University established an occupational safety and environmental health program administered by the Environmental Health and Safety Department, and a loss control program administered by the Risk Services Department, described more fully in [UAP 6100 \("Risk Management"\)](#).

The Environmental Health and Safety Department supports the University's core mission by advancing the safety and health of the University community through training, education, consultation, collaboration and risk management. The Environmental Health and Safety Department staffs the Loss Prevention & Control Safety Committee and the Chemical & Laboratory Safety Committee, both of which work with the University community to identify, evaluate, and control hazards and potential losses. To ensure compliance with federal, state and local occupational health and safety and environmental regulations, UNM departments should engage in training provided by the EHS Department and consult with EHS when starting or developing a new process or procedure with potential health, safety, or environmental compliance impacts.

### 2. Campus Wide Responsibility

Responsibility for safety, however, cannot be delegated to one department and must be assumed by

every member of the University community. Every member of the UNM community must actively participate in safety programs, contributing to a culture of safety, accountability, and mutual respect. As part of this responsibility, faculty, staff, and students are expected to comply with the University's safety programs, regulations, and policies, which have been designed to prevent and/or decrease job-related injuries and illnesses, and to protect the environment. The Environmental Health and Safety Department shall assist with mitigating penalties and fines for violations. However, the unit that received the violation bears responsibility for paying the penalty or fine.

Within their respective units, deans, directors, department heads, principal investigators, and other supervisors must prioritize the health and safety of their faculty, staff, students and visitors by:

- Including safety as an integral part of all courses, research and creative works
- Identifying the hazards present in courses, research and creative works
- Communicating the hazards and the methods of hazard protection to all individuals who may be exposed to the hazards during courses, research and/or creative works
- Collaborating with EHS to eliminate, minimize, and/or mitigate hazards
- Collaborating with EHS to provide training on how to work safely when hazards cannot be eliminated
- Ensuring that safety protocols and programs are accessible and easily available

## 2.1. Stop Work Authority

If an employee or department is out of compliance with a UNM policy or state or federal law or regulation, or if there is a threat of injury, illness, or imminent large-scale environmental harm, the Environmental Health and Safety Department has the authority to stop the activity. The Environmental Health and Safety Department shall contact the stakeholders and supervisors overseeing the project immediately after stopping work.

University staff have the duty and the authority to stop work if there is an imminent or immediate threat to life, health, safety, or the environment. A threat to public safety will be communicated in accordance with UNMPD procedures. The use of stop work is governed by the [EHS Stop Work Program](#). All work stoppage that cannot be resolved on-site should be reported to EHS either through the [incident report web form](#) or by phone to (505) 277-2753.

## 2.2. Embedded Safety Professionals

Embedded Safety Professionals (ESPs) serve a vital role on UNM campus by providing direct support, advice, and training to units across campus.

ESPs report to unit leadership either through a dotted or direct line and are accountable to the unit and EHS. The ESP should meet regularly with EHS to discuss emerging safety issues, unique unit concerns, and potential policy changes. EHS must be informed when someone is assigned or vacates the role of an an ESP.

Within a unit, an ESP is expected to follow and enforce all applicable regulations including but not limited

to those issued by the Occupation Health and Safety Administration (OSHA), International Code Council (ICC), and United States Environmental Protection Agency (EPA). Embedded Safety Professionals are responsible for:

- : Integration of EHS standards and programs into the function of the unit.
- : Coordinating the evaluation of workplace hazards.
- : Monitoring corrective actions related to identified safety and health deficiencies.
- : Collaborating with and functioning as the interface between EHS and the department.
- : Coordinating and tracking health and safety training for departmental employees.
- : Working to improve safety culture within the department.

### **3. Regulatory Agencies**

If a representative of a federal, state, or local regulatory agency contacts an employee or student to conduct a safety or environmental inspection, the employee or student should contact the Environmental Health & Safety Department immediately. The Environmental Health and Safety Department will facilitate the inspection and provide trained professionals to work with the agency.

## **4. Environmental Health and Safety Department**

The Environmental Health and Safety Department is responsible for providing comprehensive occupational safety, health, and environmental management services to the University, excluding UNM Hospital and UNM Medical Group. EHS works with University departments to identify and eliminate or mitigate hazards, to decrease the number of accidents and injuries, and to promote behaviors that can help reduce the University's impact on the environment. The Environmental Health and Safety Department includes the following divisions:

- Research and Laboratory Safety
- Occupational Safety
- Construction Safety
- Environmental Affairs
- Fire Safety

### **4.1. Research and Laboratory Safety**

The EHS Research and Laboratory Safety Division works with those creating new knowledge and creative works to ensure the health and safety of students, faculty, staff, and visitors. The program consists of inspections, consultation and training. EHS strives to create inclusive training programs that address the specific needs and contexts of research environments, promoting equitable safety standards. This program is separate from Occupational Safety as the hazards encountered in laboratory environments or creative endeavors can vary significantly from other Occupational Safety areas.

Everyone who works in a lab or studio environment should have proper training on the hazards they will encounter and the controls in place to protect them. Additionally, given the complex nature of creating

new knowledge and creative works, all participants should be trained to assess and mitigate foreseeable hazards before beginning work. It is incumbent upon the lab manager, studio manager, or PI to ensure proper training, safety procedures, and hazard controls are in place.

This Division is responsible for coordinating a variety of written safety programs, conducting inspections, providing training, coordinating chemical inventories, and facilitating the clean-up of large-scale chemical spills.

## **4.2. Occupational Safety**

The Occupational Safety Division inspects University facilities to identify unsafe conditions or actions that could cause accidents or injuries. This Division oversees compliance with the Occupational Safety and Health Act ("OSHA") by maintaining programs and providing training on topics such as confined space, lock-out/tag-out, and personal protective equipment. EHS strives to create inclusive training programs that address the specific needs and contexts of each occupational environment, promoting equitable safety standards. This Division also investigates accidents, works to reduce or eliminate occupational risks, and provides a variety of training and consultations that promote the well-being of the University's workforce.

Employees are expected to complete all required safety trainings for their respective unit. Supervisors and managers are to provide a safe working environment through the elimination, substitution, and control of hazards. Where hazards cannot be completely eliminated or controlled, the supervisor or manager will provide Personal Protective Equipment (PPE), documentation and training on these hazards in accordance with written EHS programs.

## **4.3. UNM Construction Safety**

The UNM Construction Safety Division ensures that the University's construction projects comply with applicable health and safety standards. The program is involved in all construction, construction-like activities, renovation, and demolition, whether performed internally or externally (see section 4.3.1). This program also ensures that liabilities associated with safety and health risks, including future costs and ongoing maintenance issues, are addressed during the planning and design phases of construction.

At all stages of construction, the Construction Safety Program works to identify, evaluate, and mitigate recognized construction-related hazards. Involvement begins at the design phase, continues through the construction phase, and ends at project closeout upon issuance of the certificate of occupancy. All project managers should use EHS-provided documents, as appropriate, including:

- Construction Safety Manual
- Laboratory Design Standards
- Laboratory Renovation & Demolition Procedures
- Lead & Asbestos Management Program
- Stormwater Guidance

During the planning phases, UNM's Environmental Health and Safety will assist in determining applicable

regulations, best practices, and design standards to be followed.

Working closely with Institutional Support Services and other stakeholders, the Construction Safety Program identifies and informs the Project Manager of safety regulations and best practices in order to mitigate potential hazards. The Construction Safety Program ensures regulatory compliance through inspections, but is not involved in the actual performance of construction projects. The UNM project manager is ultimately responsible for safety on the construction site and shall ensure all applicable standards are being followed.

All personnel working on a construction project, including Construction Safety Program staff, have the authority and responsibility to pause or stop work when an imminent danger or condition is observed or reported that could adversely impact health or safety, the environment, or the University's reputation. Please see the stop work section above for reporting guidelines. For other identified health and safety hazards, such as infrastructure problems or necessary design changes, the Construction Safety Program will coordinate with the project manager in charge of the project prior to pausing or stopping work.

### **4.3.1. Construction Contractor Health and Safety Program**

The University's contractors are responsible for the health and safety of their workers and for protecting the environment. Compliance with health and safety requirements is a condition of a contractor's performance contract and a failure to fulfill the requirements may lead to contract termination. Regardless of the level of activity or applicable health and safety requirements, the general contractor and subcontractor bear responsibility for developing and submitting a Contractor Safety Plan (CSP) that addresses all health and safety topics required to appropriately execute the scope of work. Work will not commence on the project until the Contractor Safety Plan has been reviewed and approved by UNM EHS.

## **4.4. Environmental Affairs**

The Environmental Affairs Program is responsible for ensuring the University is compliant with regulations of the Environmental Protection Agency ("EPA"), State and local agencies, and for facilitating the proper disposal of all hazardous wastes generated at UNM.

The Environmental Affairs Division ensures UNM is compliant with the following regulations:

- Compliance with the Clean Air Act
- Local Sanitary Sewer Disposal Ordinances
- Public Reporting of Drinking Water Consumer Confidence Report on the Albuquerque Campus
- EPA Resource Recovery and Conservation Act - hazardous waste disposal compliance
- EPA Stormwater regulations including permitting and compliance with the National Pollution Discharge Elimination System
- Compliance with Petroleum Storage tank rules

Students, faculty, and staff are required to comply with all environmental rules and guidance from EHS. Specific examples include, but are not limited to:

- Contacting EHS before beginning any project that requires an air quality permit

- Complying with the Sewer Use Ordinance and contacting EHS if there are any questions about what can and cannot be disposed of down the drain
- All generators of hazardous waste must be trained by EHS on the proper labeling, handling, and disposal of hazardous waste
- Only discharging runoff from rain into a storm drain
- Contacting EHS before installing or modifying any petroleum storage tank

## 4.5. Fire Safety

The Fire Safety Program promotes fire safety in the University's work, academic, and living environments. It oversees the University's compliance with the International Fire Code, National Fire Protection Association regulations, the State Fire Prevention Code, and other applicable fire safety laws and standards. As part of this work, the Fire Safety Division provides fire safety education and training, and investigates all fires that occur on University property.

The Fire Safety Program is responsible for the following programs:

- Coordinating State Fire Marshall inspections
- Fire Alarm and Fire Suppression Testing and Inspections
- Fire Extinguisher Inspection and Maintenance
- Conducting training tailored to unique campus environments and hazards

Employees, managers, and supervisors shall follow and correct all State Fire Marshall inspections, follow Fire Code, and comply with EHS fire safety programs.

## 5. Reporting of Accidents, Incidents, and Near Misses

Proactive reporting of accidents, incidents, near-misses, and hazards by the UNM community is a basic tenet of a proactive safety culture. All students, faculty, or staff involved in an occupational safety, laboratory safety, or environmental affairs accident, incident, or near miss must submit a report to EHS through the [web form](#). Reporting is important because it is commonly required by OSHA, helps prevent recurrence, and begins the workers compensation process by Risk Services, if applicable. Accidents incidents and near misses include but are not limited to:

- Slips, trips, and falls
- Needlesticks
- Vehicle accidents that occur while on duty
- Injuries that require more than simple first aid or could have been significantly more severe
- Chemical Spills of particularly hazardous chemicals or of regular hazardous materials greater than 1L
- Chemical releases to the environment including improper disposal of hazardous wastes, oil spills, or asbestos releases

- When in doubt it is better to report

Any severe injury listed below must be reported to EHS as soon as possible via a phone call to (505)-277-2753 or to the Duty Officer Pager, (505) 951-0194, if the front desk is not answered. EHS must report the following injuries to OSHA on the timescales provided below:

- Worker Fatality – 8 Hours
- Any Amputation – 24 Hours
- Loss of an Eye – 24 Hours
- Hospitalization of a worker – 24 Hours

## References:

State Loss Prevention and Control Program 1.6.4 NMAC

Occupational Safety and Health Act of 1970

Occupational Safety and Health Standards 29 CFR 1910

Recording and Reporting Occupation Injuries and Illness 29 CFR 1904

Safety and Health Regulations for Construction 29 CFR 1926

State of New Mexico Occupational Health and Safety 11.5 NMAC

2018 International Fire Code

Applicable codes of The National Fire Protection Association

The Clean Air Act

Regulations of the Albuquerque – Bernalillo County Air Quality Control Board 20.11 NMAC

The Clean Water Act

The EPA National Pollution Discharge Elimination System

Albuquerque Bernalillo County Water Utility Authority Sewer Use Ordinance

The Safe Drinking Water Act

US Environmental Protection Agency – Resource Conservation and Recovery Act 40 CFR 239- 282

New Mexico Hazardous Waste Regulations 20.4 NMAC

New Mexico Petroleum Storage Tank Regulations 20.5 NMAC

## Approval Signatures

**Step Description**

**Approver**

**Date**

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## Applicability

UNM Policies, University Administrative (UAP)

DRAFT