

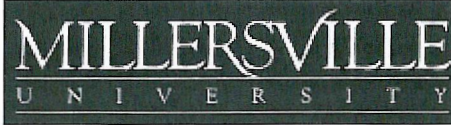


ACCIDENT ILLNESS PREVENTION PROGRAM

OFFICE OF ENVIRONMENTAL HEALTH & SAFETY

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A. Background

The 1993 amendments of the Pennsylvania Workers Compensation Act (Pennsylvania Act 44) reemphasized to employers in the Commonwealth, the responsibility for, and importance of protecting the health & safety of their workforce.

Among the amendments are provisions requiring insurance carriers and self-insureds to establish and maintain loss prevention programs, and creating an incentive for employers to establish health and safety committees in their workplaces; these are aimed at reducing the incidence of work-related disease and injury and, in turn, lower insurance premiums.

The amendments require self-insured employers (in order to maintain self-insured status) to establish, implement, and maintain an effective illness and injury prevention program, including, but not limited to, a written program for identifying and evaluating hazards; procedures for correcting unsafe conditions; a system for communicating safety information to employees; regularly scheduled safety meetings; employee training programs; compliance strategies; on-going documentation and record keeping; and, identification of a person responsible for the program.

1. Regulatory Authority

Commonwealth of Pennsylvania, Department of Labor and Industry, Act 44-1993, Article X, Health and Safety.

2. Administering Agency

Commonwealth of Pennsylvania, State System of Higher Education, Millersville University.

3. Scope

Although provisions of this program apply to all employees, the University is committed to providing for the health and safety of students and members of the public. Employees of the University are defined as all faculty, staff, administrators, managers, and directors.

4. Millersville University – Responsible Parties

The authority and responsibility for the implementation and maintenance of the program is in accordance with applicable University policy and is held by the following individuals:

President – Millersville University

Policies and programs, which govern the activities and responsibilities of the Environmental Health and Safety program, are established under the President's final authority.

Vice President – Finance & Administration

The policies and programs, activities, and responsibilities of the Environmental Health and Safety program, are established under the Vice President's authority.

Associate Vice President – Human Resources

The day-to-day responsibilities of the Environmental Health and Safety program, are established under the Associate Vice President's authority.

The Human Resources Office is responsible for the development, implementation and maintenance of all occupational injury/illness records, including the housing and storage of previous years records. Human Resources is responsible for training employees, supervisors and management in the proper reporting of injuries/illnesses and how to access the University designated Panel of Physicians to access if medical attention is necessary.

Director – Safety & Environmental Health

The Environmental Health & Safety Office is responsible for the development, implementation, and maintenance of the Accident and Illness Prevention Program. This includes assisting departments with compliance including safety meetings, training, and reporting programs, informational materials, safety inspections, and accident investigations to identify unsafe conditions or work practices, and record keeping.

Safety Committees

A network of safety and health committees exists to discuss safety, health, and environmental issues. Activities may include self-inspections, review of procedures and incidents, evaluation of present and potential safety hazards and anything else determined relevant by the individual committees. Committees are also encouraged to make recommendations for improvements. The department or group must maintain minutes of these meetings and attendance rosters, with copies sent to Environmental Health & Safety. Standing safety committees at Millersville University include:

- Campus Safety Committee
- School of Science and Math Safety Committee
- Student Senate Safety Committee
- Americans with Disabilities Act (ADA) Committee

Deans/Chairs/Department Managers/Supervisors

These positions are responsible for maintenance of this program by promoting a safe work/teaching environment for all employees and student staff under their direction. This includes conducting or providing training on equipment operation, safe work methods, chemical safety, the safe and appropriate use of personal protective equipment, etc. This also includes the appropriate safety precautions to protect employees from hazards, and evaluating employee compliance with established policies and procedures.

Employees should be encouraged to communicate health and safety concerns to their supervisor(s) with the expectation that this information will be acted upon positively. Supervisors are encouraged to seek out the guidance of the EHS Director as a resource for determining appropriate compliance methods.

Supervisors are expected to maintain all safety records and to “lead by example” by promoting safety in their area. Supervisors are responsible for maintaining adequate supplies of personal protective equipment and ensuring that employees use the PPE. Supervisors are also to ensure that employees follow safe work practices, using appropriate enforcement action, where necessary.

Employees

Immediate responsibility for work place safety and health rests with each individual employee, including faculty and student staff. This includes following the established work/teaching procedures and safety guidelines, and reporting any unsafe conditions immediately to their supervisor or the Director of Environmental Health & Safety. Employees shall attend education and training sessions relating to safety, which may be applicable to their area of employment. Employees are responsible for the proper use and maintenance of any assigned personal protective equipment. Any employee who fails to follow appropriate safety procedures on the job is open to disciplinary action.

B. Safety Policy Statement

All employees of Millersville University, (faculty, staff, administrators and managers), must make every effort to integrate injury and illness prevention into every part of their daily activities. It is everyone's responsibility to maintain a safe environment for learning, teaching, and working.

The goal of the Accident and Illness Prevention Program (AIPP) is to establish a workplace environment free of hazards, and to manage University activities to minimize hazards, while fostering an environment that ensures the health and safety of students, staff, faculty, and visitors.

Administrators, directors, managers and supervisors shall be directly responsible for the observance of all safe operating procedures, maintenance of safe working conditions, and the reporting and correction of any unsafe condition or personal act.

Each employee is charged with the responsibility for following established safe work procedures and for completing each assigned task in a safe manner.

University Senior Leadership is committed to the establishment of a safe working environment and to the integration of environmental health & safety (EHS) into all University activities.

Management and employees must work together to ensure a healthy and safe work environment at Millersville University.

University operations will comply with all applicable environmental health & safety regulations and standards, and view this as a minimum compliance measure. The goal of all University activities should be to exceed these minimum regulations and standards.

The essential components of the Accident and Illness Prevention Program will be reviewed and modified, as necessary, on a routine basis.

C. Designated AIPP Coordinator

Director – Safety & Environmental Health

D. Responsibility for Development, Implementation, and Maintenance of the Accident and Illness Prevention Program

Director – Safety & Environmental Health

The Environmental Health & Safety Office is responsible for the development, implementation, and maintenance of the Accident and Illness Prevention Program.

E. Goals and Objectives of the Accident and Illness Prevention Program

The goals and objectives of the Millersville University AIPP are:

- To provide a safe and healthy working, teaching, and learning environment for all employees, faculty, and students.
- To minimize the number and severity of work related injuries and illnesses.
- To recognize and control hazards.
- To communicate environmental health & safety information to employees and to receive communication back from the employees.
- To foster an environment where managers and employees can work together to accomplish common safety goals.
- To provide an education, training, and resource center for all aspects of environmental health and safety.
- To assign responsibility to specific groups of individuals for ensuring a healthy and safe work environment.
- To maintain all necessary records relating to environmental health and safety programs.
- To comply with applicable environmental health and safety rules, regulations, and laws.

- To facilitate the successful operation of the Campus Safety Committee and other safety committees at Millersville University.
- To inspect, monitor, evaluate, and periodically update and change the various aspects of the AIPP, as necessary.
- To implement new environmental health and safety programs, as necessary.

F. Methods for Identifying and Evaluating Hazards, Including Corrective Action

General Procedures

Inspections of work areas, equipment, and operations will be performed on at least an annual basis.

Environmental compliance will be determined through audits and inspections conducted by the EHS Director, or Facilities employees.

When hazards are identified they will be corrected as soon as possible

When any hazard is found to be an imminent threat to life, health, or property, action shall be taken immediately to stop work, remove all personnel from the area, (except those needed to abate the hazard), notify emergency response personnel (such as fire and ambulance), and notify the EHS Director

Any new operation, procedure, or chemical will be assessed for compliance with this accident and illness prevention program, and for compliance with and applicable regulatory criteria

When conditions at a work site or operation change significantly, a worksite inspection will be performed to assess hazard potentials

Job hazard assessment will be performed on all operations to identify potential hazards and to recommend ways to control the hazard (such as engineering controls or personal protective equipment)

Analyses of accident and incident data will be performed as necessary to identify trends and to develop prevention programs

It is the responsibility of each employee to report hazards to their supervisor

Inspections

Supervisors must do routine and frequent inspections of the workplace to identify hazards. Departmental or self-inspections such as these are important to minimize health and safety hazards.

Employees are responsible to inspect their own work area(s) for hazards and potentially unsafe conditions on a daily basis. Any identified hazards must be reported to the supervisor and/or the Director of EHS immediately.

Examples of routine inspections include, but are not limited to:

- Housekeeping – Inspect areas where janitorial chemicals are stored, inspect floor cleaning and other equipment, inspect the eye protection and other personal protective equipment used by employees, etc.
- Facilities – Inspect all trades areas, equipment, machinery, chemicals, vehicles, public walkways, vehicles, etc.
- Police – Inspect vehicles, equipment, PPE, etc.
- Food Services – Inspect tables, chairs, cutlery, ovens, steamers, etc.
- Faculty – Inspect laboratories, chemical storage areas, personal protective equipment used by students, etc.

If a potential hazard is identified, the area supervisor must be notified so that the potential hazard may be eliminated. If an imminent hazard is identified, the area supervisor and the Director of Environmental Health and Safety must be notified to ensure that immediate corrective actions are taken.

Inspections should be conducted on a frequent enough basis to ensure practices, procedures, equipment, and other factors have not changed, or new hazards have developed.

Inspections should follow a routine methodology including a checklist or standard operating procedure (SOP) that includes safety aspects. Each department should develop inspection checklists that are applicable to the processes, equipment, machinery, procedures, and services they use or provide.

Where necessary (usually as a result of a serious accident) an inspection team may be convened, usually under the leadership of the EHS Director, to investigate the incident.

Inspections are necessary immediately after any new process, procedure, equipment, chemical, etc., has been added to the work environment, to ensure hazards did not develop as an outcome. Please see the SOP for Pre-Operational Process Review for specific information.

The Director of EHS will make surprise, and unannounced inspections of ongoing construction sites, and building renovation/remodeling projects, to determine compliance with appropriate standards and regulations.

Facilities managers and quality assurance personnel will routinely inspect construction sites, and building renovation/remodeling projects, to determine compliance with appropriate standards and regulations.

Audits

Audits are another tool to evaluate safety programs, and recognize and identify hazards. Like inspections, audits should follow a specified procedure, including an audit form, to make sure all aspects of the program have been evaluated.

Each specific program (such as the respiratory protection program, confined space entry program, etc.) will be audited on at least an annual basis by the Director of EHS to determine if changes need to be made, equipment replaced or purchased, new procedures developed, training implemented or improved, etc.

Communication and Feedback

Another way to gather information and evaluate the workplace to identify hazards is through routine communication with supervisors, faculty, employees, the safety committee, and others. Examples include:

- Questions and concerns brought to the attention of individual safety committee members
- Routine meetings with managers and supervisors
- Emails and verbal communications with employees, faculty, and students
- Employee exit interview comments pertaining to the health and safety of their work environment
- Feedback left through the Human Resources or EHS web pages
- Surveys of the workplace conducted on a periodic basis by the Human Resources department

Corrective Action

Once a hazard has been identified it is the responsibility of the supervisor, working in conjunction with the employee, and in consultation with the EHS Director, and others, to correct the problem.

The hazard must first be evaluated to determine the correct course of action, and most appropriate means for correcting the hazard. Hazard evaluation can be conducted by the EHS Director, or the supervisor/employee in consultation with the EHS Director.

Preventative measures, including training, will then be implemented using the following priorities:

- Where possible, all hazards will be corrected using engineering controls first.
- Only if engineering controls are impossible or impractical will other means of correction be implemented
- The use of personal protective equipment to eliminate or minimize the hazard will be a method of last resort

Appropriate training will be conducted for all affected employees in a manner consistent with the evaluation of the hazard.

G. Industrial Hygiene Surveys

Industrial hygiene is the science of recognition, evaluation, and control of workplace hazards (chemical, biological, physical, etc.).

Industrial hygiene surveys will be conducted by the Director of EHS, or by an outside vendor, under the direction of the EHS Director. Industrial hygiene surveys may also be conducted, under the supervision of the EHS Director or the Occupational Safety and Environmental Health (OSEH) Department faculty member, by students in the OSEH program.

Examples of industrial hygiene surveys at Millersville University include, but are not limited to the following:

- Noise exposure in the Printing and Duplicating department
- Chemical exposure to janitorial chemicals for housekeeping employees
- Exposure to radioactive materials in the science departments

Industrial hygiene surveys will be conducted following established methodologies published by the EPA, OSHA, NIOSH, or other standard setting organization.

Workplace exposures which exceed established permissible exposure limits, or other hazards identified during the survey, will be corrected using either engineering or administrative controls, or personal protective equipment.

H. Industrial Health Surveys

Where necessary, external medical services, consultants, specialists, counselors, or other professionals may be utilized to evaluate an employee's ability to safely perform their job in such areas as:

- Operating motor vehicles
- Operating heavy equipment
- Use of personal protective equipment

The goal is to analyze the environmental conditions under which the employee works to determine if the work place environment has caused or aggravated an injury or illness, or is in some way contributing to an employees unsafe work practices and behaviors.

I. Orientation and Training

All new employees receive overall and basic safety training during the new employee orientation process. This training is performed by the Director of EHS and includes the following topics:

- Radiation safety
- Chemical safety/Right to Know
- Workplace safety
- Fire safety
- Workers compensation and injury reporting
- Emergency preparedness and response
- Smoking policies

In addition, all employees receive specific safety training in their department or area, designed for the job they will perform. For example, supervisors will instruct new housekeepers in the safe way to handle janitorial chemicals, how not to mix incompatible chemicals, how to use their personal protective equipment, how to safely operate floor machines, etc.

Additional safety and health training is offered, by the EHS office, the Human Resource department, University Police, or by outside vendors, on an as needed basis.

Safety outreach programs are conducted by members of the campus safety committee. Examples of recent outreach programs were efforts to involve the campus community in fire safety awareness, and to inform the campus community of the enhanced 911 phone system and emergency phone call procedures.

In addition, representatives of the Wellness and Sports Sciences Department conduct safety topic and informational training on health & safety topics such as bloodborne pathogens, first aid and CPR, etc.

The complete AIPP is available at the Human Resources web page on the Millersville University web site. Copies of the AIPP are kept in binders with specific departmental supervisors for those who do not have internet access.

J. Emergency Operations Plan

The Millersville University Emergency Operations Plan (EOP) was developed to implement emergency response contingency plans for many possible emergencies that could befall the campus and surrounding community. These include fire, natural disaster, terrorism, nuclear power plant incident, health, violent criminal behavior, utility failures, etc.

The plan was developed by the campus safety committee and the EHS Director and is regularly reviewed and updated. The EOP follows the recommended format for emergency plans set forth by Pennsylvania state emergency planning officials.

Practice emergency scenarios and drills have been conducted, including tabletop emergency exercises.

Millersville University works closely with the local school district and Millersville Borough authorities to plan and coordinate emergency operations for the Millersville area.

K. Employee AIPP Suggestion and Communication

There are a number of avenues by which students and employees may communicate with regards to the AIPP. Examples include:

- Campus safety committee or other safety committees
- The Environmental Health and Safety web site

- Safety discussions between supervisors and employees
- Safety training sessions/public speaking conducted by the EHS Director
- Phone or email contact with the EHS Director

L. Employee Involvement

There are a number of avenues by which students and employees may become involved with the AIPP. Examples include:

- Campus safety committee or other safety committees. These committees participate in AIPP such as campus inspections and audits, fire drills, hazard assessment, safety policy development, etc. Examples include the campus safety committee evaluation of campus lighting (illumination) and recommendations for improving lighting around the campus grounds. Also, the School of Science and Mathematics safety committee developed a high hazard material inventory, inspection, and disposal procedure to minimize the risk of purchasing materials, which can be shock sensitive or explosive. Safety committees are also one avenue by which members of the campus community can communicate concerns related to the AIPP. The Student Senate Safety committee works closely with the campus safety committee and has participated in inspections, audits, and project development.
- Students from the Occupational Safety and Environmental Health (OESH) department work with the EHS Director and their faculty members to conduct campus safety inspections, audits, industrial hygiene sampling, and assist in program development.
- Volunteers from the University are utilized as building coordinators for responding to emergencies at specific campus buildings.
- Volunteers from the University, including students, are utilized to play rolls in or assist in periodic emergency preparedness drills

M. Safety Rules and Methods of Enforcement

Written safety rules are defined in multiple campus documents such as SOP's, essential functions, job descriptions, contracts, Resident Life programs and policies, EHS programs and policies, Human Resource programs and policies, specific department programs and policies, Finance and Administration programs and policies, and University programs and policies.

All employees are required to follow these written safety procedures.

Corrective action processes are instituted to enforce policies, procedures or goals. They will be consistent with union bargaining agreements. Disciplinary measures can include written or verbal warnings, up to and including termination of employment or legal action or arrest.

N. Accident Investigation, Reporting, and Recordkeeping

The purpose of accident reporting and investigation is to identify the cause of the accident so that corrective action and preventative measures can be implemented to prevent similar accidents from reoccurring

Timely reporting of accidents is essential. All injuries or accidents must be reported as soon as possible after occurrence. Standard injury report forms must be completed by the workers and the supervisor, and sent to the Human Resources Department and EHS Office

Accident investigation will be conducted by the Director of EHS, departmental supervisors, or by University police, or as a team effort.

Results and findings of the accident investigation
Injury and accident records will be maintained by the Human Resource Office

All student injuries (for non student employees) are tracked by the EHS Director to identify any trends, patterns, or injuries that need investigation.

O. First Aid, CPR and Other Emergency Treatments

On site emergency medical treatment is provided by the staff of Witmer Infirmary (nurses and doctors). Witmer Infirmary is located on campus.

Off site emergency medical treatment is provided by the three hospitals located in Lancaster County, PA, or by NovaCare Occupational Health Services.

Emergency transportation is provided by local ambulance services.

University Police carry Automated External Defibrillators (AED's) in the police cars. There is also an AED located at the Witmer Infirmary.

Millersville University has enhanced 911 emergency response capability. All campus phones have unique identifications (building name, address, room number/description) and a phone call to the Lancaster County 911 dispatch center will identify the exact location from which the emergency call originated. This speeds up response time for emergency responders.

First aid and CPR training course are offered to the campus community on a periodic basis by the Center for Wellness.

P. Evaluating the AIPP Effectiveness

Evaluations of the effectiveness of the AIPP are performed by:

- Conducting internal, routine audits of the program
- Gathering information from students, faculty, employees and supervisors/managers/administrators,
- Review of safety statistics such as work injuries, incidents, lost time injuries, etc.
- Review of hazardous waste accumulation and disposal records
- Comparisons of safety statistics against national, regional, local, or other University benchmarks
- Outside audits of the AIPP elements

Q. Standard Operating Procedures

See attached SOP's