



INSTITUTE POLICY

California Institute of Technology Environment, Health and Safety Policy

Introduction

The California Institute of Technology (Caltech or Institute) is committed to conducting activities in a manner that promotes the safety and health of faculty, staff, students, and visitors and minimizes risk to Caltech property. Activities at Caltech are to be conducted in accordance with the following guiding principles:

- The responsibility for implementing and maintaining a safe environment rests on all staff, faculty, students, and visitors at Caltech.
- Supervisors are responsible for establishing safe practices in their respective laboratories or workplaces and for providing safe equipment and facilities for staff, students, and visitors.
- All faculty, students, staff, and visitors are expected to follow proper and safe procedures, to report accidents promptly to their supervisor, including any unsafe conditions or practices.
- Institute activities must comply with all applicable federal, state, and local environmental and safety laws and regulations.
- Waste is minimized through efficient and appropriate use of resources and is disposed of in a way that protects individuals and the environment and complies with applicable regulations.
- Those who do business with Caltech, such as contractors, consultants and vendors, are responsible for performing their work on Caltech property in a manner that protects the Institute from environmental and safety risks.

Roles and Responsibilities

The Institute has the responsibility to establish policies and provide resources to ensure compliance with environmental and safety laws. Caltech performs this function through the following committees and administrative and management structure:

- **Institute Environment, Health and Safety Committee (IEHSC)**

The Institute Environment, Health and Safety Committee will serve as the primary source of policy guidance on all matters pertaining to environmental and workplace safety compliance and related regulatory developments.

The committee is responsible for making recommendations regarding the allocation of Institute resources so as to maintain environmental (air emissions, soil contamination, water discharges, hazardous waste management) and workplace safety compliance. In addition, the committee develops Institute environmental and safety policy recommendations for approval by the president and monitors developments through the Environment, Health, and Safety Office to ensure that Institute policies are observed, remain current, and are consistent with the anticipated changes in regulatory climate.

This committee also provides an annual report to the president, summarizing the status of environmental and safety programs and risks affecting the Institute.

- **Environment, Health, and Safety Office (EHS)**

The Environment, Health, and Safety Office (EHS) provides technical, regulatory, and related advisory services to the Institute community. EHS works in partnership with the divisions and administrative offices to develop and implement safety programs that provide technical guidance and training support relevant to the operations of the laboratory or workplace, are practical to carry out, and comply with the law. This includes general orientation in prudent laboratory practices, emergency response procedures, occupational safety, and familiarity with Institute EHS policies and plans. EHS also initiates site reviews to assess potential hazards and determines effective controls, coordinates hazardous waste training and pickup, and helps analyze specific problems.

EHS, working closely with the Office of the General Counsel as appropriate, conducts accident investigations and investigates and reports environmental and safety incidents.

- **Division chair and head of administrative office**

Caltech consists of divisions conducting research and educational activities and administrative offices supporting the operations of the Institute. It is the responsibility of the division chair and the head of each administrative office to ensure their units conduct operations in accordance with applicable laws and regulations, and to implement the Institute's environmental and safety policies.

Each division chair and the head of each administrative office maintain responsibility for day-to-day management and implementation of their environmental and safety programs.

Each division chair and head of each administrative office can designate an individual with the authority to implement, manage, and enforce environmental and safety compliance programs within the division or administrative office. With guidance and assistance from EHS, the responsible individual (i.e. the division chair, administrative office head, or their designee) shall manage the environmental and safety activities in the division or department.

- **Supervisor responsibilities (all Institute supervisors and faculty)**

Each supervisor has responsibility for conducting operations in accordance with all applicable laws and regulations and Institute policies.

Faculty bear full responsibility for the safety of work undertaken in their labs but can designate an individual to implement and manage the day-to-day activities related to environmental and safety practices within their research group.

With guidance and assistance from EHS, the responsibilities of supervisors include training and informing employees, students, and visitors about workplace-specific hazards and safety procedures; providing personal protective equipment; correcting violations; investigating incidents and complaints by employees and students; overseeing proper storage and disposal of hazardous materials; enforcing policies (including appropriately disciplining employees and students who violate environmental and safety requirements); and appropriately documenting activities and processes.

- **Institute faculty, staff, students, and visitors**

It is the responsibility of each individual to conduct activities at Caltech in compliance with all applicable government, Institute, and division or department policies, procedures and guidelines. The success of the Institute's environmental and safety management activities requires the active involvement of individuals through participation in training; compliance with established safety and environmental procedures; reporting hazards and potential violations of regulations; and recommending improvements.

It is the responsibility of all employees and students of the Institute to disclose fully any activity that may result in a violation of environmental and safety regulations, and to cooperatively participate in the investigation and remediation of any incidents.

- **Contractors**

It is the responsibility of those under contract, consultants, vendors, and contractors to conduct their activities at Caltech in adherence with sound safety practices and to comply with all applicable environmental and safety laws and regulations as well as Institute policies in their contracts.

Reporting

In matters of actual or potential regulatory enforcement action, investigations, or employee complaints, EHS, working closely with the Office of the General Counsel, coordinates the Institute's response to external regulatory agencies concerned with workplace health, safety, and environmental compliance. EHS, Institute management, and the Office of the General Counsel work closely to ensure that a unified and consistent Institute position is provided in response to a governmental inquiry, complaint, or lawsuit.

Any questions or concerns regarding compliance should be brought to the attention of the relevant supervisor or to the director of EHS. Alternatively, concerns can be raised with the appropriate division chair or vice president or the EHS office.

Enforcement

Governmental agencies have established increasingly strict policies to ensure compliance with environmental and safety regulations, including harsh civil penalties and individual criminal prosecution leading to possible imprisonment and substantial fines. Accordingly, the Institute expects all faculty, staff, and students to be vigilant in complying with all environmental and safety requirements to properly conduct their activities at the Institute.

Caltech views compliance with all laws, regulations, and Institute guidelines as conditions of employment, and violation of such requirements shall be considered grounds for disciplinary action, including termination of employment.



Jean-lou Chameau
President