

COLORADO SCHOOL OF MINES ENVIRONMENTAL HEALTH AND SAFETY POLICIES AND PROCEDURES

Subject: Storage on University Premises

Effective Date: July 20, 1999

Date of Last Revision/Review: October 3, 2000

Purpose/General Discussion:

Material storage in interior and exterior areas of the campus can create violations of safety and environmental regulations and can be unsightly and wasteful of space. In order to control such problems, the University administration has approved these rules concerning storage on University premises.

The purposes of this policy are as follows:

- To optimize the use of existing storage space.
- To assign responsibilities to individuals who place material in storage on University premises.
- To require departments to supervise departmental personnel who place material in storage.
- To require departments to supervise the use of existing storage space which is allocated for departmental use.
- To distinguish the responsibilities of Plant Facilities from the responsibilities of other departments in matters related to storage.

Authoritative References:

The University seeks to comply with authoritative codes and governmental regulations which pertain to material storage. The Environmental Health and Safety (EHS) Department monitors compliance with these regulations during routine inspections of campus facilities. If discrepancies are discovered, the EHS Department will notify the head of the department which controls the stored material. The Department Head is responsible to take corrective action.

Plant Facilities may provide assistance in moving and disposing of unwanted material at the expense of the sponsoring department.

Organizational Assignments/Responsibilities:

Vice-President for Academic Affairs: The Vice-President assigns storage space to occupant departments in academic buildings.

Vice-President for Student Life: The Vice-President exercises authority over the storage of material in and around residence halls, University-owned apartments and houses (including University-owned sorority and fraternity houses), the Student Center, the

Student Health Center, the Coolbaugh House and in designated areas within Green Center.

Vice-President for Finance/Operations: The Vice-President exercises authority over the storage of material in and around Plant Facilities and in open spaces around the campus with the exception of areas under the jurisdiction of Student Life.

Department Heads: In general, Department Heads exercise authority over the use of assigned storage space within campus buildings. In cases where departmental storage practices create violations of safety or environmental regulation, Department Heads shall act to eliminate these violations in accordance with guidance from the EHS Department.

Director of Plant Facilities: The Director of Plant Facilities exercises authority over storage of material in exterior areas with the exception of areas under the jurisdiction of Student Life.

Director of Student Life: The Director of Student Life assists the Vice-President for Student Life in managing storage space which is under the jurisdiction of Student Life.

Environmental Health and Safety Department: The EHS Department provides guidance to Department Heads, the Director of Plant Facilities and the Director of Student Life concerning safety and environmental regulations which apply to storage practices.

Fraternities and Sororities: House residents are responsible for storage of material in and around fraternity or sorority houses. Residents of houses which are owned by the University shall comply with guidance from the Vice-President for Student Life in matters related to storage. Residents of privately owned fraternity or sorority houses are directly subject to the authority of local governmental agencies in matters related to storage. The University is not responsible for storage in privately owned fraternity or sorority houses.

Discussion/Description:

Storage Facilities and Services:

General: The department which owns or possesses material in storage retains primary responsibility for acquiring authorized storage space and for making related payments for moving, packing, security or use of commercial storage facilities. Managerial and financial consequences which arise due to inattention or lack of planning do not automatically default to Plant Facilities. Abandonment of stored material is prohibited.

Chemical Storage Facilities: The EHS Department operates three chemical storage facilities which are available for use by all campus departments at no charge.

- The "Industrial Chemical Storage Facility" (ICSF) provides protected, secure storage for bulk industrial chemicals which are contained in drums or other large packages.
- The "Hazardous Materials Management Facility" (HMMF) provides protected, secure storage for hazardous chemical waste and radioisotopes.
- The "Chemical Storage and Distribution Facility" (CSDF) provides protected, secure storage for laboratory reagents.

Plant Facilities: Plant Facilities may provide limited, temporary, exterior storage space for use by academic departments. If the need for storage facilities exceeds

the space allocated to academic departments, Department Heads should utilize commercial storage facilities at departmental expense. Acquisition of commercial storage facilities shall comply with state procurement procedures. The University does not provide general storage space beyond that which is assigned to occupant departments in campus buildings.

Plant Facilities will notify academic departments three months in advance of the expiration of temporary storage arrangements. If academic departments do not respond to this notification, material in storage will be considered to be abandoned. Abandoned material will be unilaterally disposed of by Plant Facilities.

Upon request, Plant Facilities may assist academic departments in acquiring moving, packing and disposal services for stored material. These services are provided at the expense of the sponsoring department.

Student Life: Student Life independently manages the use of storage space by occupants of University-owned residence halls, apartments and houses. Storage facilities and services vary from building to building.

Identification of Responsible Person:

All material kept in unattended storage areas which are located in and around academic buildings shall be actively managed by a responsible person. The responsible person must be a full-time employee of the University.

Inactive Storage:

The long-term storage of material which has no reasonable purpose or timetable for future use is prohibited. When such material is identified it will be disposed of by Plant Facilities at the expense of the sponsor/owner. Student Life will initiate disposal of such material in areas which are under its jurisdiction.

Labeling of Stored Material:

All material which is kept in unattended storage areas which are located in and around academic buildings shall be clearly labeled with the name of the responsible person, the sponsoring department and the date when the material was placed in storage. Unlabeled material shall not be accepted for storage by any academic department or by Plant Facilities.

Checkout Procedure:

Departments shall implement checkout procedures for employees and graduate students who are leaving the University. One purpose of the procedure shall be to require individuals to remove, dispose or redistribute all material which they have placed in storage including equipment, documents, samples and chemicals. Student Life independently administers a checkout procedure for University-owned residence halls, apartments and houses.

Storage of Potential Environmental Contaminants:

The storage of potential environmental contaminants in exterior areas is prohibited. This includes materials such as fertilizer, pesticides, water treatment chemicals, surfactants, corrosives, metal bearing ores, oil, hydraulic fluid, paint, solvents, etc. These materials may not be stored in a manner which exposes them to precipitation or surface water and may not be stored in proximity to storm drains. Unprotected exterior storage of such material in 55-gallon drums is specifically prohibited. In addition, these materials may not be stored in interior locations where leaks could be discharged into floor drains.

The EHS Department identifies improper storage of environmental contaminants and may require the sponsoring department to solve related problems. When necessary, the EHS Department accomplishes sampling and analysis of environmental contaminants at the expense of the department which is responsible for release of the contaminants.

Due to the environmental persistence and toxicity of mercury and the difficulty in controlling mercury spills, equipment which contains this material may not be placed in storage in campus buildings. The EHS Department provides special storage facilities for mercury.

Equipment or Vehicles Which Contain Coolant, Fuel, Oil or Hydraulic Fluid:

Leaks of coolant, fuel, oil or hydraulic fluid from active or inactive equipment and vehicles must be immediately repaired or contained. If leaks cannot be repaired or contained, leaking fluids shall be drained from active or inactive equipment or vehicles. Drip pans shall be protected from precipitation and shall be regularly emptied. Contaminated soil shall be removed and containerized by the responsible person. This material shall be turned over to the EHS Department for disposal.

Storage of Hazardous Materials:

Hazardous materials include those which are toxic, reactive, corrosive, flammable, radioactive or infectious as defined by applicable state or federal regulation. These materials shall never be stored in common, unsecured areas, inside or outside of buildings. Hazardous materials are subject to special handling and storage procedures. The EHS Department prescribes these procedures on a case-by-case basis.

Individuals who procure, use, store or handle hazardous materials are responsible for proper storage. Laboratory supervisors, workshop supervisors, supervising faculty members and Department Heads are responsible to provide guidance and instruction to subordinates concerning storage procedures for hazardous materials.

Abandonment of hazardous waste on University premises is prohibited. Such an act may qualify as a crime and may be investigated by Police Officers.

Open Spaces Around the Campus:

The Vice-President for Finance/Operations manages the use of open space around the campus including the area which borders Clear Creek, the Claypits, and areas which

border 6th Avenue. The Vice-President for Student Life manages the use of exterior areas around University-owned residence halls, apartments and houses. Storage of equipment, vehicles and other material in these areas is prohibited unless specifically authorized by the appropriate Vice-President.

Storage Inside Buildings:

- Fire and safety codes prohibit storage which obstructs exits and paths to exits inside buildings. In addition, combustible material may not be stored in passageways and stairways which offer protected paths to exits. In keeping with these code requirements, stored material may not be placed in hallways, stairwells, in under-stair areas or around exits in University facilities.
- Material may not be stored in mechanical rooms, around electrical panels, in utility tunnels or on building roofs.
- Storage which contributes to an "excessive combustible fireload" inside campus buildings is prohibited. EHS personnel or the local Fire Marshall make judgments as to when a combustible fireload is excessive.
- Student Life independently administers rules for storage in University-owned residence halls, apartments and houses. Storage practices in these locations shall comply with applicable fire and safety codes.

Unightly Storage:

Storage practices which degrade the appearance of the interior or exterior of campus buildings, open spaces and grounds are prohibited. Vice-Presidents may assist the Director of Plant Facilities in making judgments concerning necessary improvements in the appearance of stored material.

Bulk storage drums, whether full or empty, are unightly and may only be stored in areas designated for this purpose. The EHS Department operates an Industrial Chemical Storage Facility which is located in the Plant Facilities' equipment yard. The facility shall be used by all University Departments for the storage of bulk material in 55-gallon drums and for the storage of empty drums.

Implementation of This Policy:

Departments will be notified six months in advance of implementation of this policy. During this period, departments should inventory material in storage and act to bring storage procedures into compliance with this policy. Plant Facilities and the EHS Department will fully implement the policy upon expiration of the six month notification period.