

Policy: Environmental, Health & Safety External Audits/Inspections

Policy Number: E-10

Responsible for Policy:

Procedure: **Environmental, Health & Safety External Audits/Inspections**

Responsible for Procedure: Environmental, Health and Safety

Governance Body Oversight: College Council

Date of Last Review: January 2022

Procedure Number: **E-10**

Most recent effective date: April 2022

Procedures

If a Finger Lakes Community College employee is aware of an Environmental, Health and Safety regulatory agency representative or inspector on a Finger Lakes Community College campus, the employee must immediately notify Environmental, Health and Safety and their immediate supervisor.

As the nature and purpose of agency audits/inspections is highly variable, there is no single procedure or protocol for regulatory agency interaction during visits. This procedure is designed to provide personnel with general guidance in responding to environmental, health and safety agency compliance inspections and provide the appropriate information needed to successfully comply with the audit/inspection. Regulatory audits/inspections are most successful if they are conducted in a non-confrontational atmosphere and are conducted in accordance with an organized format.

The following is a general summary of recommended actions for FLCC EHS personnel involved in an agency audit/inspection.

Identification:

Politely verify the inspector's credentials upon arrival. Ensure that you obtain the names, addresses and telephone numbers of the inspector(s) (e.g., obtain business card). Always ensure that a knowledgeable person is available to answer questions and accompany the inspector(s) at all times during inspection tours, personnel interviewii-2 (t-2.9 (l(p)-0.65 (n)

John Inspector, from the Federal Environmental Protection Agency. He is here today inspecting FLCC's hazardous waste handling procedures, and he would like to inspect our facility. He is interested in how our facility ensures that chemicals are handled properly before and after use, how we ensure that chemicals are managed as hazardous waste, and the fact that people working in our facility have received training in the proper use of chemicals. You might like to accompany us so you can answer any questions that Mr. Inspector might have."

Communications:

To the extent possible, limit the size of the group dealing with agency representatives. Respond to the inspector's questions honestly, directly, and concisely since the inspector will tell you if elaboration is needed. Provide only the information that is requested. Provide answers where requested, but if you don't know the answer to a particular question, inform the inspector that you do not have the answer. At such time, obtain the answer from someone who can respond and provide the answer to the inspector yourself, or notify the inspector(s) that you will provide a response at a future time after consulting appropriate personnel.

Interviews:

Agency inspectors may wish to interview personnel to verify that any required training has been provided, to verify operator competency, to determine if established procedures are being followed, or for other purposes relevant to the inspection. Ensure that your personnel follow the Identification, Notification and Communications guidelines listed above.

Records and Photographs:

Agency inspectors may wish to examine or photocopy records, or photograph processes or conditions that they observe during the inspection. If your area's security measures prohibit photography by outside personnel, provide a staff person to take photographs as requested by the inspector. Photographs must be provided to the agency within a reasonable period of time. If the inspector takes photographs or photocopies records, obtain your own set of duplicates for later review.

Sampling:

Agency inspectors may wish to obtain samples of various media (e.g., wastewater discharges, building materials, waste materials, air quality, etc.) during the visit. If (dw.eoh obesh eeqpch.pp Ang,y

report. This information may or may not be provided upon request, depending on Agency policy.

Suspected Non-compliance:

It is expected that any suspected non-compliance issues be corrected immediately, and that documentation of the corrective action and non-compliance issue be maintained by FLCC EHS.

Follow-up Report:

Write a follow-up report as soon as possible after the completion of the inspection visit. Copies of the follow-up report should be provided to the Environmental Health and Safety Department, and legal representation. This report should detail the inspecting agency, inspector names, nature and purpose of the visit, areas inspected, records reviewed or exchanged, sampling activities and results, personnel interviewed, and details of the closeout meeting.

Records Retention:

Make a permanent record of the inspection visit, results, analyses, photographs, follow-up reports, corrective actions and related correspondence. Maintain a duplicate of any records that are photocopied for the inspector and photographs that are taken. Maintain for at least five years.

Forms/Online Processes

None

Appendix

None

Review dates/action taken:

March 2014: original effective date (new procedures)

July 2015: no revisions

December 2019: