

Environmental Inspections and Audits

University of Tennessee Safety Procedure EC-060

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Purpose

The purpose of this procedure is to provide guidance for environmental inspections and audits.

Scope and Applicability

This shall apply to all facilities on Knoxville campus of the University of Tennessee. In addition, it shall apply to operations in University leased buildings. This procedure applies primarily to regulations found in Title 40 CFR and regulations administered under the Tennessee Department of Environment and Conservation (TDEC).

Abbreviations and Definitions

Abbreviations

ECT: Environmental Compliance Team

EHS: Environmental Health and Safety

Definitions

ECT: is composed of select members from EHS and Facilities Services who are responsible for auditing campus facilities and activities for compliance with EPA regulations.

Roles and Responsibilities

Environmental Health and Safety and Facilities Services shall:

- Ensure appropriate staff are trained in environmental compliance
- Form and facilitate the ECT to meet periodically to review results of environmental surveys, audits and reviews
- Conduct surveys, inspections and audits to determine compliance
- Make recommendations regarding implementation of environmental regulations and correction of deficiencies
- Investigate complaints, failures and releases
- Collect samples as necessary
- Maintain records as necessary
- Maintain environmental permits and licenses
- Apprise University administration of environmental compliance issues

Procedures

Comprehensive Environmental Audits

- Every four years the University shall use a third party contractor to conduct a comprehensive review environmental compliance of the main campus.
- Results of this review shall be placed in a report and provided to University administration. Corrective action will be taken if appropriate.

Annual Scheduled Environmental Audits

- The ECT shall review select sections of 40 CFR during the intervening years between the comprehensive reviews conducted by the third party contractor. Note that not all sections of 40 CFR will be reviewed during each of the intervening years.

General Inspection of Operations and Facilities

- Staff from EHS and Facilities Services conduct general health and safety inspections of University structures and operations on an annual basis. Opportunities for improvement noted during these inspections shall be documented and submitted to the appropriate person or department for corrective action.

Regulations Required Inspections, Reviews and Audits

- Some environmental regulations require periodic reviews, which can the form of visual inspections, sampling (e.g. water, air, and solid waste), completion of checklist, etc.
- Reviews, audits and inspection required by these regulations shall be placed in the UT Environmental Calendar. The ECT shall meet at least quarterly and use the Environmental Calendar to ensure these activities are being completed in a timely manner and documented.

Recordkeeping

The following records shall be kept

- Environmental sampling and associated laboratory analysis
- Surveys, audits and review results
- Environmental permits and licenses
- Waste disposal records when necessary
- Training records
- Environmental certificates (e.g. Asbestos Inspector, Lead-Paint Inspector)
- Communiqués regarding environmental audits

Training and Information

The ECT shall ensure that individuals charged with conducted environmental audits, reviews, and surveys are adequately trained. Training may be in the form of:

- Attending classes or workshops
- Self-study
- Certification

References

EPA 40 CFR

Appendices

None

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