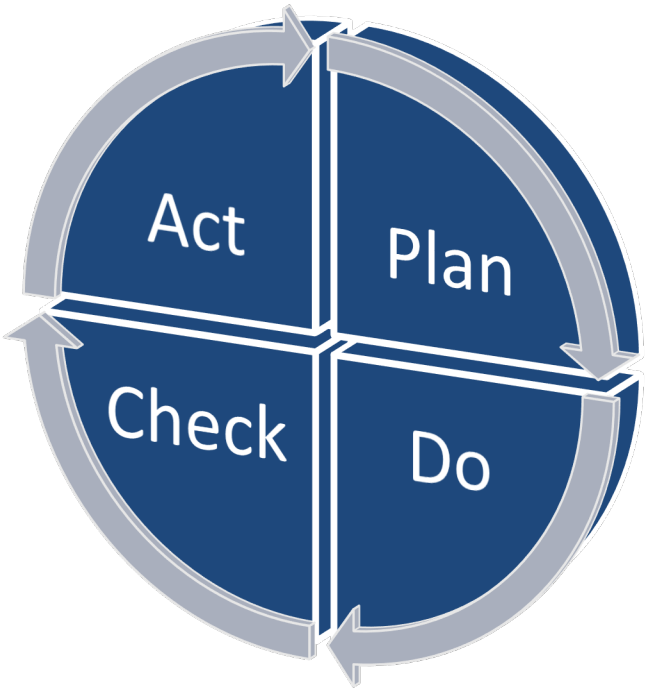
UNIVERSITY OF GEORGIA

Comprehensive Environmental Health and Safety Management System Manual



Version 1.2

Effective Date: 12/20/2022

Preface

The University of Georgia is committed to protecting the environment and ensuring the health and safety of students, faculty, staff, and visitors. As a university community, we strive to foster a culture of safety, compliance, and environmental stewardship. An Environmental Health and Safety Management System provides an important framework for the University to focus proper attention on health, safety and environmental protection through compliance with existing regulations and standards, implementation of best practices, and the identification and mitigation of potential hazards. These activities are essential to the success of the University.

This Environmental Health and Safety Management System Manual is a comprehensive and process-driven approach to the implementation of an Environmental, Health, and Safety Management System. A high level of awareness and attention to safety and compliance is critical at all levels of the University. Administrators, Deans, Directors, Faculty, Principal Investigators, Managers, and Supervisors are responsible for ensuring that an adequate system is in place for study, work, research, and outreach activities to occur in a safe, compliant, and environmentally responsible manner. Each member of the University community must take personal responsibility and accountability for a safe and compliant campus. This includes completing all required training to become knowledgeable of the environmental health and safety requirements related to their area of work, remaining vigilant in recognizing and addressing safety hazards or noncompliant situations, and being attentive to avoid and prevent injuries and minimize adverse environmental impacts.

The Environmental Health and Safety Executive Committee is pleased to present this original Environmental Health and Safety Management System Manual and trust that it will be helpful and informative to the UGA community as we work together to maintain a culture of safety and compliance in fulfilling the important mission of UGA.

Version 1.0 Approved by the EHSMS Executive Committee

Russell Mumper, Ph.D., Chair, Executive Committee — Date
Vice Provost for Academic Affairs

David Lee, Ph.D. — Date
Vice President for Research

Victor Wilson — Date
Vice President for Student Affairs

Phil Williams, Ph.D. — Date
Dean, College of Public Health

Alan Dorsey, Ph.D. — Date
Dean, Franklin College of Arts and Sciences

Lisa Nolan, Ph.D. — Date
Dean, College of Veterinary Medicine

Ryan Nesbit — Date
Vice President, Finance and Administration

Record of Revisions

Revision No.	Date Approved	Revision Description
1.0	02/08/2018	Initial version of the EHSMS Manual as approved by the EHSMS Executive Committee
1.1	03/04/2020	Revised language in Chapter 16 to reflect current Board of Regents Policy Manual
1.2	12/20/2022	Revised Chapter 11 to include the UGA Professional Education Portal. Revised the name of the Office of Research Safety and Integrity throughout the document. Revised the status of the Academic/Research Steering Committee on page 10

Record of Annual Review

Review Date	Next Review Due	Comments
02/08/2018	02/08/2019	Initial EHSMS Manual approved by the EHSMS Executive Committee
02/04/2019	02/04/2020	No Revisions
03/04/2020	03/04/2021	Revised language in Chapter 16 to reflect current Board of Regents Policy Manual
03/03/2021	03/03/2022	No Revisions
12/20/2022	12/20/2023	Revised Chapter 11 to include the UGA Professional Education Portal. Revised the name of the Office of Research Safety and Integrity throughout the document. Revised the status of the Academic/Research Steering Committee on page 10
10/18/2023	10/18/2024	No Revisions

Introduction

Welcome to the University of Georgia (UGA) Comprehensive Environmental, Health and Safety Management System (EHSMS). This manual provides an overview of the formally approved institutional framework through which UGA meets and surpasses environmental, health and safety (EHS) requirements as well as guidance and information on particular components of the EHSMS. This manual assists faculty, staff, and students in understanding how UGA meets regulatory and health and safety standards by articulating the institutional requirements for all operations and activities on the UGA main campus and at any other sites where faculty, staff, and students work, study, conduct research, and engage in service and outreach activities.

The UGA EHSMS was established in accordance with Academic Affairs Policies 6.01 and 6.02 and is intended to guide how UGA manages all facets of environmental compliance, health, and safety. The EHSMS serves as an integrated set of processes and procedures for managing the day-to-day EHS compliance operations, enhancing the level of compliance, and increasing the efficiency of operations in a comprehensive manner. The EHSMS uses a process-driven approach to track information, identify EHS risks, set EHS goals, and take action to ensure safety and compliance, assess results of those actions, and adjust processes as necessary to produce the intended results. The EHSMS is governed by the Executive Committee and two steering committees with execution by a variety of operational units.

UGA developed this EHSMS framework with institutional policies, procedures and practices already in place to meet or exceed federal and state regulatory requirements and safety standards along with corresponding policies of the University System of Georgia, Board of Regents (USG, BOR). This framework provides an organized method for managing and continually improving EHS performance. This manual applies to all UGA facilities, operations, activities, and campuses. There is no unit or part of any campus that is exempt from this manual.

Table of Contents

Chapter 1

Purpose and Scope

Purpose

The EHSMS manual provides a formally approved institutional framework for achieving EHS goals through consistent review, evaluation, and improvement of EHS performance. Through the EHSMS, UGA can address regulatory demands in a systematic and cost-effective manner. It consists of various components and procedures that together ensure effective EHS performance through accountability, assigned responsibilities, faculty and staff involvement, written policies, training, corrective action, senior management review and senior staff involvement. All components are designed to work together to continually improve UGA's environmental, health and safety performance. This proactive approach and consistent review and evaluation will identify opportunities for improving EHS performance, reduce the risk of non-compliance, and improve health and safety practices for faculty, staff, and students. The EHSMS can also help address non-regulated issues, such as energy and water conservation, and can promote stronger operational control and environmental stewardship.

This document describes the structure for the management of EHS and the expectations for each element of the EHS Management System. The EHSMS is intended to provide the University community with a clear understanding of UGA's concern and responsibility for protecting faculty, staff and students from injury and illness, protecting the environment and complying with federal, state and local EHS regulations and standards.

Scope

The EHSMS manual applies to all UGA campuses, facilities, and work areas. There is no unit or part of any campus that is exempt from these procedures. This manual represents the institutional requirements and overarching methods for the implementation of the EHSMS. Implementation is accomplished through a combination of university-wide programs and department, division, or work unit functions. University-wide programs involve all UGA operations and individuals. Department, division, or work unit functions include managing the people, operating the facilities, and conducting the activities. Many UGA activities occur away from the main campus and all activities are covered by the EHSMS.

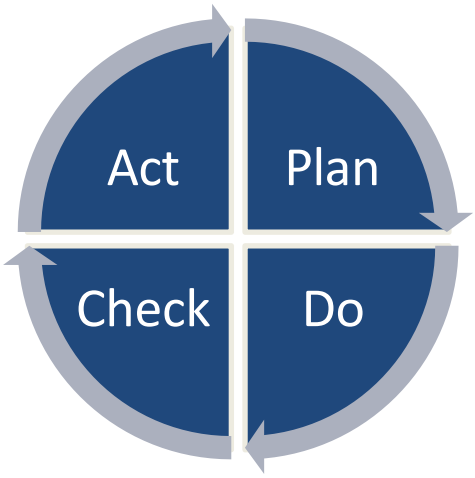
The University community is made up of students, staff, faculty, instructors, scholars, researchers, administrators, and a variety of visitors and guests, including, but not limited to, visiting professors and scholars, adjunct professors, guest lecturers and volunteers who are conducting work or activity on behalf of UGA. UGA expressly promotes the health and safety of all members of the community and the environment through implementation of the EHSMS.

Chapter 2

EHSMS Overview

Continual Improvement Model

The basis of the UGA EHSMS is a commitment to continual EHS improvement. The EHSMS is based on the "Plan, Do, Check, and Act" model as shown below.



During the "Plan" phase, aspects and impacts of operations and activities are identified and prioritized to establish EHS goals and objectives that support the UGA mission. The "Do" phase involves the establishment of operational controls, documented policies and procedures, and specific roles and responsibilities as well as providing training to manage those activities with high priority or significant impacts. During the "Check" phase, the management system is monitored and assessed through internal and external audits and management reviews. Corrective actions are proposed for identified discrepancies. Senior Leadership reviews the performance status of the EHSMS during the "Act" phase and takes the necessary corrective actions to improve the EHSMS and overall EHS performance.

Structure

The EHSMS consists of various components and procedures that together ensure effective EHS performance through accountability, assigned responsibilities, faculty and staff involvement, written policies, training, corrective action, senior management review and senior administration involvement. All components of the EHSMS are designed to work together to continually improve the EHS performance of UGA. This manual makes reference to key EHS policies, procedures and practices and for the sake of clarity provides a link or reference to where the live and updated documents may be viewed.

The overall expectation at UGA is that operations and activities are conducted in a manner that is compliant with the requirements defined by UGA policies and procedures, applicable federal, state, and local regulations, and nationally accepted health and safety standards. Periodic internal and external audits provide assurance that the EHSMS requirements are implemented and are effective in reducing EHS risk. Continual system review ensures that the EHSMS remains an effective means of satisfying the institutional EHS policy commitments. Through periodic updates, modifications, and improvements, the EHSMS will continue to provide the framework for assuring a safe, and compliant environment, the correction of program deficiencies, and the ongoing improvement of EHS performance.

Standards and Requirements

EHS laws, regulations, and standards are complex and often confusing. There are many EHS laws and regulations developed and administered by a number of national, state and local governmental agencies. In addition, there are many national and international standards and directives that may be considered "best practices." Determining which of these legal requirements, standards, and best practices are applicable to activities and operations at UGA is a difficult but important task. Failing to comply with a requirement or standard may lead to an otherwise avoidable injury, substantial fine, or other penalty. Imposing unnecessary requirements on operations and activities may use resources that could be better utilized elsewhere. The EHSMS addresses this issue by:

- Establishing an EHS policy which includes a commitment to compliance with applicable legal and other requirements
- Establishing, implementing and maintaining a procedure to identify applicable legal and other requirements
- Ensuring that applicable legal and other requirements are considered in the management system and
- Periodically evaluating compliance with the applicable legal and other requirements.

Environmental Requirements

UGA is regulated under each of the 14 regulatory programs administered by the United States Environmental Protection Agency (USEPA). The State of Georgia has been authorized by the USEPA to administer many of these programs at the state level through the Georgia Environmental Protection Division (GAEPD). Additionally, some environmental programs have been delegated by the State to certain local governments. The following is a list of the environmental programs under which UGA is regulated along with a brief explanation of the program and the agency responsible for compliance and enforcement.

1. Air Quality: The federal Clean Air Act and the Georgia Air Quality Control Act regulate most emissions to the air which include combustion (i.e., incinerators, fuel-fired boilers, engines,

turbines, water heaters, etc.), refrigeration, and other specific emission sources. GAEPD is the responsible regulatory agency.

2. Asbestos Management: The federal Clean Air Act also contains the air toxics regulation for asbestos. Georgia has adopted by reference the federal requirements for asbestos. The state has additional asbestos licensing and disposal requirements, as well as more stringent notification and work practice requirements. GAEPD has authority to administer the asbestos program, however, as of March 20, 2009, GAEPD relinquished inspection and enforcement authority for asbestos projects to EPA due to state budget constraints. GAEPD retains authority over project and abatement notifications and USEPA is the primary regulatory enforcement agency.

3. Safe Drinking Water: The federal Safe Drinking Water Act and the Georgia Safe Drinking Water Act require permitting, testing and reporting of drinking water supplies by a municipality or institution that provides drinking water to 25 or more people for 60 or more days per year. GAEPD is the responsible regulatory agency.

4. EPCRA and Right-to-Know: The federal Emergency Planning & Community Right-to-Know Act (EPCRA) requires emergency planning, emergency release notification, and hazardous chemical reporting for facilities storing hazardous substances of a specified quantity. USEPA is the responsible regulatory agency. The Georgia Public Employee Hazardous Chemical Protection and Right to Know Act requires that state employees be educated and informed about potentially hazardous chemicals in the workplace. The Georgia Office of Insurance and Safety Fire Commissioner is the responsible regulatory agency.

5. Hazardous Waste and Solid Waste Management: The federal Resource Conservation and Recovery Act (RCRA), the Georgia Hazardous Waste Management Act, and the Georgia Comprehensive Solid Waste Management Act are the primary laws governing the requirements for the handling, storage and disposal of solid and hazardous waste. The hazardous waste regulations primarily affect waste streams generated from laboratories and facility operations. Hazardous waste is a solid, liquid, semi-solid, or contained gaseous waste with properties that make it dangerous (characteristic or listed) or potentially harmful to human health or the environment. Solid waste is similarly defined but does not have the hazardous properties that make it dangerous or potentially harmful to human health or the environment. GAEPD is the primary responsible regulatory agency; however, USEPA retains and frequently utilizes the authority to administer the Hazardous Waste Program in Georgia.

6. Lead-Based Paint Management: The federal Lead Renovation, Repair and Painting (RRP) requirements and the Georgia Lead RRP Rules for Georgia are the regulations designed to minimize the spread of lead debris and dust during RRP activities in child-occupied facilities that were built before 1978 and during renovation or demolition projects. There are specific rules for abating the lead paint hazard for child-occupied facilities, as laid out by the

Department of Housing and Urban Development. Regardless of whether work is being done in child occupied facilities or not, renovation and demolition work on UGA owned facilities is subject to the Lead Based Paint RRP Rules enforced by GAEPD.

7. Pesticide Management: The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Georgia Pesticide Use and Application Act, and the Georgia Hazardous Waste Management Act provide requirements for worker protection, best practices for research laboratories, state registration for pesticides, and certification requirements for applicators. Any UGA facilities applying, storing, purchasing, or researching pesticides will be affected to varying degrees. USEPA is the regulatory authority for FIFRA, GAEPD is the regulatory authority for the disposal of pesticides that are determined to be hazardous, and the Georgia Department of Agriculture is the regulatory authority for pesticide use.

8. Spill Prevention Control & Countermeasures (SPCC): The federal Clean Water Act, the federal Oil Pollution Prevention Act, and the Georgia Water Quality Control Act provide requirements to prevent oil from entering navigable waters through the prevention and control of oil spills. Facilities that store either petroleum or vegetable-based oil or oil-containing products (containers or tanks of 55 gallons or more) exceeding a total aboveground oil storage capacity greater than 1,320 gallons, or total capacity greater than 42,000 gallons in completely buried underground storage tanks must meet certain requirements including a SPCC Plan, training, inspections, etc. USEPA and GAEPD are the primary responsible regulatory agencies.

9. Storm Water Management: The federal Clean Water Act and the Georgia Water Quality Control Act regulate storm water discharges associated with industrial activity from a “point source” to any water of the state or water of the U.S. These regulations also apply to construction projects disturbing one acre or more of land. GAEPD is the primary responsible regulatory agency. Permitting for land disturbing activities is administered by the local government.

10. Toxic Substances and Polychlorinated Biphenyls (PCB) Management: The federal Toxic Substances Control Act (TSCA) governs certain chemical substances produced or imported in the US. The most notable chemical that affects UGA facilities are PCBs from electrical distribution equipment such as transformers, and PCB containing building materials such as caulking. USEPA is the responsible regulatory agency.

11. Underground Ground Storage Tank (UST) Management: The UST provisions of the federal Energy Policy Act and the Georgia Underground Storage Act provide requirements for registration notification, operator training, leak detection, installation, inspection, financial responsibility, corrective action, closure, and enforcement. GAEPD is the responsible regulatory agency.

12. Universal Waste Management: The federal Universal Waste regulations under RCRA and the Georgia Hazardous Waste Management Act specify that certain categories of commonly generated wastes may be managed in accordance with streamlined universal waste standards rather than as hazardous waste. These wastes can include mercury-containing lamps (i.e., fluorescent bulbs), rechargeable batteries containing heavy metals (i.e., nickel cadmium), mercury-containing thermostats, mercury containing equipment, and unused pesticides. GAEPD is the primary responsible regulatory agency; however, USEPA retains and frequently utilizes the authority to administer this program in Georgia.

13. Used Oil Management: Federal Used Oil regulations under RCRA and the Georgia Hazardous Waste Management Act specify requirements for how used oil is to be managed. Used oil is "any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities." Examples of used oil can include used lubricants, synthetic oils, transmission fluids, brake fluids, refrigeration oils, compressor oils, etc. These regulations primarily affect UGA facility operations that service vehicle fleets or other motorized equipment. GAEPD is the primary responsible regulatory agency; however, USEPA retains and frequently utilizes the authority to administer this program in Georgia.

14. Wastewater Management: The federal Clean Water Act and the Georgia Water Quality Control Act regulate the discharge of any waste material to waters of the state or waters of the United States. This includes direct discharges as well as discharges to publicly owned sanitary sewer systems that eventually discharge into public waters or onto the land. GAEPD is the primary responsible regulatory agency. Certain pretreatment permitting and sewer use regulations are administered by the local county government.

Health and Safety Requirements and Standards

Worker health and safety requirements for public employers in the state of Georgia are administered by the Georgia Office of Insurance and Safety Fire Commissioner. The federal Occupational Safety and Health Act (OSH Act) overrides state worker safety and health laws and regulations in certain states. Workers within state and local government agencies are not covered by the OSH Act but have OSH Act protections if they work in a state or territory with a federally approved state program. Georgia is not one of the states with an approved program. Georgia has a Public Employee Hazardous Chemical Protection and Right-to-Know law that governs worker chemical right-to-know in public sector workplaces such as UGA. There are no additional state workplace safety and health rules for public sector employers. UGA looks to many other national and international standards for health and safety benchmarks in program and subject areas that are not addressed directly by Georgia Department of Labor regulations. The following is a list of health and safety programs under which UGA operates, along with a brief explanation of the program and the organization or committee responsible for implementation oversight.

1. Chemical Laboratory Safety: The UGA Chemical and Laboratory Safety Manual (http://research.uga.edu/docs/units/safety/manuals/Chemical-Laboratory-Safety-Manual.pdf) establishes the minimum requirements and procedures that individuals working in laboratories or using hazardous chemicals must use to protect people and property from the physical and health hazards associated with the storage, handling, and use of hazardous chemicals. The Manual provides detailed guidance and procedures outlining the safe and compliant operation of all research, teaching, and public service laboratories on the University of Georgia campuses. The manual defines roles and responsibilities, safe laboratory practices, and details the operational structures in place to maintain proper accountability and compliance with all federal, state, and local regulations. The Chemical Laboratory Safety Manual is maintained by the Research Safety Committee in cooperation with the Office of Research Integrity and Safety (ORIS) and The Environmental Safety Division (ESD).

2. Radiation Safety: The UGA Radiation Safety Manual (http://research.uga.edu/safety/wp-content/uploads/sites/56/2015/06/RSM-complete-5.2014.pdf) establishes the minimum requirements and procedures that individuals using radioactive materials must use to protect people and property from the hazards associated with storage, handling and use of radioactive materials and meet the requirements of Federal and State regulations. Through the requirements of the Manual, radiation exposure to university personnel, members of the public, and the environment is kept As Low as Reasonably Achievable (ALARA) and in compliance with state and federal regulations. The ALARA concept dictates that UGA implement safety measures that are commensurate with the level of risk presented by the radiation hazard. This risk may be minimized by education and the application of appropriate radiological controls. The Radiation Safety Manual is maintained by the Radiation Safety Committee in cooperation with ORIS. GAEPD is the primary responsible regulatory agency.

3. Biosafety: The UGA Institutional Biosafety Manual (http://research.uga.edu/docs/units/biosafety/UGA-Institutional-Biosafety-Manual.pdf) outlines appropriate practices, policies, and regulatory requirements for working safely in a research laboratory with biohazardous materials at UGA facilities. Information provided in this manual is supported by a number of federal regulations and guidelines. The Biosafety Manual provide guidance and assistance to faculty, staff and students in order to protect them from exposure to biohazardous materials in the research setting and to guard against the accidental release of such materials that may be harmful to humans, animals, plants or the environment. The Biosafety Manual is maintained by the Institutional Biosafety Committee in cooperation with the ORIS.

4. Laser Safety: The UGA Laser Safety Manual (http://research.uga.edu/safety/wp-content/uploads/sites/56/2015/01/uga_lsmanual.pdf) establishes the minimum requirements and procedures that individuals working with lasers must use to protect people and property from the physical and health hazards associated with use of lasers or laser systems at UGA. The Laser Safety Manual encourages responsible behaviors that will promote safe laser use

at UGA campus and off-campus facilities The Manual follows the American National Standards Institute's Safe Use of Lasers (ANSI136.1-2000) as a guideline for safe laser use and injury prevention. The Manual also ensures compliance with the state of Georgia Department of Community Health Rules and Regulations of Laser Radiation. The Laser Safety Manual is maintained by ORIS.

5. Occupational Safety: The UGA Occupational Safety Manual (currently under development) will establish the minimum requirements and procedures that individuals employed by UGA must use to prevent workplace accidents. Under all circumstances, employees must be properly trained to perform their required tasks. These guidelines are to be used as building blocks for individual units to properly provide adequate safety protection for their workers. Their purpose is to create an overall awareness of the hazards of the job as well as to offer guidelines for safe work practices. Employees should review, be familiar with, and understand the information set forth in the guidelines. The Occupational Safety Manual is maintained by ESD.

6. Fire and Life Safety: There are several sets of laws and standards that govern fire and life safety related issues in the State of Georgia. Title 8 of the Official Code of Georgia, "Buildings and Housing," provides for the statewide application of minimum building standards. The State of Georgia "Rules and Regulations for the State Minimum Fire Safety Standards" establish the state minimum fire safety standards and requirements for the prevention of loss of life and property from fire, panic from fear of fire, explosions or related hazards in all buildings, structures and facilities. The National Fire Protection Association codes & standards are intended to minimize the possibility and effects of fire and other risks. NFPA codes and standards, administered by more than 250 Technical Committees comprising approximately 8,000 volunteers, are adopted and used throughout the world. The International Code Council provides minimum safeguards for people at home, at school and in the workplace. They are a complete set of comprehensive, coordinated building safety and fire prevention codes. The Fire Safety Program of the Environmental Safety Division is responsible for the proper application of fire and life safety codes at all UGA buildings and facilities. The Office of the State Fire Marshal is the primary regulatory agency with responsibility for enforcing fire and life safety regulations.

7. Environmental Health: The Department of Public Health, through the Official Code of Georgia, was granted authority to adopt statewide rules and regulations for onsite sewage management systems and approve alternative and experimental onsite sewage management systems prior to use in the state. The county boards of Health, under O.C.G.A. 31-3-5, are limited to regulate in specific areas including specifying locations where onsite sewage management systems can be used, specifying minimum lot sizes, specifying the types of facilities that may be served by onsite sewage management systems, issuing permits for the installation of systems, and inspecting systems upon the completion of installation. Although permitting and enforcement are carried out through the county board

of health, the regulations for the permitting and use of such systems are assigned to the Georgia Department of Public Health.

The Rules and Regulations for Food Service, also referred to as the Georgia Food Code or the Chapter, are based on the United States Food and Drug Administration's (FDA) Model Food Code. The Georgia Food Code assumes the same purposes and goals as that of the 2005 FDA Food Code, which is to safeguard public health and provide to consumers food that is safe, unadulterated, and honestly presented. These stated purposes and goals of the 2007 Georgia Food Code are achieved through its establishment of definitions; setting standards for management and personnel, food operations, and equipment and facilities; and providing for food establishment plan review, permit issuance, inspection, employee restrictions, and permit suspension and revocation. The Georgia Department of Public Health is the primary regulatory agency with responsibility for enforcing food safety regulations.

Other Requirements

Georgia Environmental Policy Act (GEPA): In accordance with USG, BOR policy (http://www.usg.edu/facilities/resources/completing_gepa_evaluations), a GEPA evaluation must be completed to assess potential adverse environmental impacts of any planned governmental action. The GEPA evaluation is generally completed during the design phase of a project. The GEPA evaluation assesses potential adverse environmental impacts that could be created during construction and operation of the project. State-funded projects require a GEPA evaluation if the project:

- Is a land disturbing activity, including but not limited to scraping, plowing, clearing, dredging, grading, excavating, transporting or filling of land, or placement of any structure or impervious surface, dam, obstruction or deposit
- Involves the moving or altering of any structure on or eligible for placement on the Georgia Register of Historical Places
- Includes the sale or exchange of more than five acres of state-owned land or
- Includes the harvesting of five acres or more of trees over two inches in diameter at breast height.

The Georgia Environmental Protection Division is the primary regulatory agency with responsibility for enforcing GEPA requirements. ESD is responsible for maintaining, reviewing, and implementing UGA's GEPA Procedures.

Chapter 3

EHS Organization Responsibilities and Services

There are multiple organizations, committees, and individuals with EHS responsibilities at UGA. Communication, coordination, and continual gap analysis are critical to a seamless comprehensive EHS program.

Environmental Safety Division (ESD): ESD provides support and consultative services to the UGA community in the areas of hazardous waste management, RCRA compliance, hazardous communication and right-to-know, laboratory chemical inventory, environmental affairs, fire and life safety, and industrial hygiene and occupational safety.

Office of Research Integrity and Safety (ORIS) ORIS provides guidance to UGA faculty, staff, and students on chemical laboratory safety, radiation safety, laser safety, biosafety, animal care and use, and human subjects. The program is committed to safety, health, environmental protection, and compliance based on current government regulations, guidelines, and best practices. The Office of Research Safety (ORS) is housed within ORIS. ORS is comprised of the chemical laboratory safety, radiation safety, and laser safety programs.

EHSMS Executive Committee: The EHSMS Executive Committee reviews and provides guidance on the design, development, and implementation of the EHSMS. The Executive Committee also meets periodically to review and provide oversight on the EHSMS. In accordance with Academic Affairs Policy 6.02, the Executive Committee is also tasked with forming and charging standing and ad hoc committees as needed.

Academic/Research Steering Committee: The EHSMS Academic/Research Steering Committee guides the development and implementation of those aspects of the EHSMS that improve EHS programs and research compliance at UGA. This committee is currently inactive but it can be reconstituted at any time as deemed necessary by the EHSMS Executive Committee.

Administrative/Operations Steering Committee: The EHSMS Administrative/Operations Steering Committee guides the development and implementation of those aspects of the EHSMS that improve EHS programs and the compliance of administrative operations at UGA.

Institutional Research Safety Committee: The Institutional Research Safety Committee is a standing committee charged with guiding the development and implementation of a campus-wide chemical and laboratory safety program consistent with EHS Policies 6.01 and 6.02. The Research Safety Committee is appointed by the President of UGA through the EHSMS Executive Committee. It is advisory to the Vice President for Research, and works directly with ORIS, ESD, and their respective leaders. The Research Safety Committee reviews safety

trends regarding chemical and laboratory safety and addresses and mitigates issues of non-compliance. The Research Safety Committee works in collaboration with ad hoc working groups as well as the Animal Care and Use, Biosafety, and Human Subjects compliance committees.

Institutional Radiation Safety Committee: The Institutional Radiation Safety Committee is a standing committee within the EHSMS and is charged with guiding the development and implementation of a campus-wide radiation safety program consistent with Academic Affairs Policies 6.01 and 6.02. The Radiation Safety Committee Chair and the Radiation Safety Officer are appointed to the committee by the President of UGA. The Radiation Safety Committee is advisory to the Vice President for Research and works directly with ORIS. The Committee is charged to review safety trends regarding radiation safety and definitively address and mitigate unresolved issues of non-compliance.

Institutional Biosafety Committee: The Institutional Biosafety Committee (IBC) reviews and approves all research and teaching projects involving hazardous biological materials to ensure that work is conducted in a manner that does not pose significant risk to the health and safety of laboratory workers, the public, or the environment, and to ensure compliance with applicable external regulations and UGA policies. The IBC reviews and approves all research and teaching projects involving hazardous biological materials, including Recombinant DNA, Select Agents, all RG-2 or greater human or zoonotic pathogens, and strict animal and plant pathogens that are either reportable or non-indigenous to Georgia. The IBC must also review and approve any diagnostic testing that involves the propagation of RG3 pathogens or Select Agents and Toxins.

Institutional Animal Care and Use Committee (IACUC): IACUC conducts animal care facility inspections; evaluates programs of animal care; reviews and approves animal use proposals; ensures through staff development activities that people who work with laboratory animals are appropriately trained; and ensure research and teaching with vertebrate animals is conducted in compliance with the applicable federal, state, and institutional policies and procedures.

Institutional Review Board (IRB): The IRB is the research oversight committee charged with ensuring that human subjects research is conducted in compliance with the applicable federal, state, and institutional policies and procedures.

Chapter 4

Review of Institution-Level EHS Policies and the EHSMS Manual

Institution-Level EHS Policy Review

The EHSMS Executive Committee has developed and adopted institution-level EHS policies for UGA. The policies are subject to revision and the most current policies are housed in the Academic Affairs Policy Manual in the Office of the Provost.
https://provost.uga.edu/policies/academic-affairs-policy-manual

1. Policy 6.01: University of Georgia's Environmental Health and Safety Policy
2. Policy 6.02: Policy and Procedures for Adoption and On-Going Review of the University of Georgia's Comprehensive Environmental Health and Safety Management System and Roles and Responsibilities
3. Policy 6.03: Hosting Inspections of UGA Facilities and Laboratories by Outside Agencies

Other UGA websites may link to these current policies.

In accordance with EHS Policy 6.01, the EHSMS Executive Committee will review and make recommendations to the President for possible revisions. Any revisions to EHS Policy 6.02 and 6.03 will be approved by the Executive Committee and communicated to UGA faculty, staff, and students through coordinated communications from ORIS and ESD. The Institution-Level EHS Policies will be made available to UGA faculty, students, and staff in the following ways:

1. The web page of the Senior Vice President for Academic Affairs and Provost at http://provost.uga.edu/index.php/policies/academic-affairs-policy-manual/section-6-environmental-health-and-safety/
2. The ORIS website https://research.uga.edu/, the ESD website https://esd.uga.edu/, and the Finance and Administration Policy Library website http://policies.uga.edu/
3. Various other electronic and print media as means of communication to share information about the Institution-Level EHS Policies.

EHSMS Manual Review

Annually, ORIS and ESD will review the entire Comprehensive EHSMS Manual and update or amend it as necessary in coordination with the EHSMS Steering Committees, the standing institutional safety committees, and other appropriate stakeholders. Any revisions to the manual will be approved by the EHSMS Executive Committee and communicated to faculty, staff, and students through coordinated communications from ORIS and ESD.

Chapter 5

Institution-Level EHS Policies

UGA Environmental Health and Safety Policy (EHS Policy No. 6.01)

https://provost.uga.edu/policies/academic-affairs-policy-manual/6-01-university-of-georgias-environmental-health-and-safety-policy/

The University of Georgia (UGA) community, including all stakeholders, has a long-standing commitment to provide a safe place to live, study, learn, conduct research, engage in public service and outreach activities, and work.

To this end, UGA is deeply committed to ensuring that the University community through all of its academic and research programs and operating units places paramount importance on safety, health, and protection of the environment.

All UGA faculty, staff and students are stakeholders and have shared responsibility and accountability to the University and to each other to ensure a safe learning, working, and research environment. UGA is committed to achieving a high standard of institutional accountability for environmental health and safety stewardship, while maintaining the independence necessary for world-class research and teaching. UGA will define the responsibilities of all stakeholders and hold each stakeholder accountable to those responsibilities and overall compliance with this policy and all associated policies.

UGA will be a leader in developing and implementing best practices in all areas relating to environmental health and safety.

Consistent with the Board of Regents Policy 9.12.4 titled “Environmental and Occupational Safety,” UGA will develop and maintain policies and procedures to govern activities to meet the goal of comprehensively integrating occupational safety and environmental considerations. To this end, through EHS Policy No. 6.02, UGA will develop, implement and maintain a Comprehensive Environmental Health and Safety Management System (“Comprehensive EHSMS”) that will govern how it manages all aspects of environmental health and safety. An EHSMS Executive Committee, reporting directly to the President, will have the responsibility and authority to oversee the Comprehensive EHSMS. EHS Policy No. 6.01 will be reviewed annually, and all changes must be approved by the President, upon recommendation of the EHSMS Executive Committee.

Approved by the President of the University of Georgia on April 14, 2016

Policy and Procedures for Adoption and On-Going Review of the University of Georgia's Comprehensive Environmental Health and Safety Management System and Roles and Responsibilities (EHS Policy 6.02)

https://provost.uga.edu/policies/academic-affairs-policy-manual/6-02-adoption-and-on-going-review/

1. **Purpose.** The purpose of this policy is to describe the policy and procedures for adoption of UGA's Comprehensive Environmental Health and Safety Management System ("Comprehensive EHSMS") and to define roles and responsibilities as required by EHS Policy No. 6.01 titled "University of Georgia's (UGA's) Environmental Health and Safety Policy."

2. **Scope.** EHS Policy No. 6.01 and this policy will be the dominant governing policies at UGA defining how UGA approaches and manages all aspects of environmental health and safety. EHS Policy No. 6.01 and this policy will cover all campuses and units of the University of Georgia, with no exceptions.

3. **Required Review.** This policy will be reviewed annually, and all changes to this policy must be approved by the EHSMS Executive Committee. All other associated policies, tied to and stemming from this policy, will be revised accordingly.

4. **Procedures for Adoption and Review of UGA's Comprehensive EHSMS.**

    a. Adoption. The Executive Committee will have oversight over the adoption and annual review of the Comprehensive EHSMS. The Executive Committee will coordinate, work with and direct various university committees, academic and operating units, the Office of the Vice President for Research, and the Environmental Safety Division as needed, on all matters relating to environmental health and safety at UGA. The Comprehensive EHSMS will govern how UGA manages all aspects of environmental health and safety. It will be an integrated set of processes and procedures for managing the day-to-day EHS compliance operations to enhance the level of compliance and to increase efficiency of operations in a comprehensive manner. The Comprehensive EHSMS will use a process-driven approach to track information, identify safety risks, set safety goals, take action to ensure safety, assess results of those actions, and adjust processes as necessary to produce the intended results.

    b. Annual Review. The Executive Committee, working together with various faculty and administrative staff, will review annually the Comprehensive EHSMS and all subsequent associated policies to ensure adherence with UGA's Environmental Health and Safety Policy (EHS Policy No. 6.01). Any revisions to the Comprehensive EHSMS will be approved by the Executive Committee and communicated to all UGA employees through coordinated communications from the Office of the Vice President for Research and the Environmental Safety Division.

c. Accountability and Compliance. UGA will define the responsibilities of all stakeholders and hold each stakeholder accountable to those responsibilities and overall compliance with UGA's Environmental Health and Safety Policy (EHS Policy No. 6.01), this policy, and the Comprehensive EHSMS. Any stakeholder determined not in compliance will be required to complete additional training and to remedy the noncompliance matter. Any stakeholder found to be in repeated non-compliance will be subject to appropriate disciplinary action including possible removal from the laboratory or work environment, suspension, or dismissal from UGA.

d. Training. All stakeholders must complete defined training offered by the University prior to carrying out their assigned responsibilities and work and must complete on-going training no less than annually. All training must be documented.

5. **Roles and Responsibilities.**

a. Academic and Research Units.

i. Laboratory Personnel. Laboratory Personnel are any persons who work, teach or observe within a designated research or instructional laboratory or field environment. Laboratory personnel include, but are not limited to, students, non-students, teaching assistants, instructors, and any visiting personnel. The responsibility of each Laboratory Personnel is to conduct activities in compliance with all laboratory-specific procedures, applicable EHS federal, state, and local regulations and UGA policies and procedures and to assist the lead investigator or their designee with all EHS matters.

ii. Laboratory Supervisor/Laboratory Coordinator. The responsibility of each Supervisor or Coordinator is to provide day-to-day supervision of research and activities in the laboratory and to ensure that those activities comply with all applicable EHS federal, state, and local regulations and UGA policies and procedures and to keep informed and assist the Principal Investigator, Instructor, or Lead Investigator or their designee with all EHS matters.

iii. Principal Investigator/Instructor/Lead Investigator ("PI"). The responsibility of each PI is to ensure that all laboratory activities under his/her direction are conducted in compliance with laboratory-specific procedures defined by the PI, applicable EHS federal, state, and local regulations, as well as UGA policies and procedures. With assistance from the Office of Research Safety and the Environmental Safety Division, each PI is responsible for developing, implementing, and updating a laboratory-specific chemical hygiene plan for the safe use, storage, and disposal of chemicals and other hazardous materials in his/her laboratories. PIs must ensure that all personnel working in their laboratories have adequate training to carry out their assigned tasks and receive on-going training. PIs have the responsibility to remedy all non-compliance matters. PIs vacating any laboratory spaces have the

responsibility to leave the space ready for future occupancy.

iv. Department Head and Center/Institute Director. The responsibility of each Head or Director is to ensure that all research and activities in the Department or Center/Institute are conducted in compliance with all applicable EHS federal, state, and local regulations and UGA policies and procedures. Heads and Directors must ensure that all laboratory spaces under their direction or oversight are properly maintained while in use and safely cleaned after the spaces are vacated. Heads and Directors have the responsibility to remedy all non-compliance matters and have overall financial responsibility on such matters.

v. Deans. The responsibility of each Dean is to ensure that all research and activities in the college or school are conducted in compliance with all applicable EHS federal, state, and local regulations and UGA policies and procedures. Deans must ensure that all laboratory and non-laboratory spaces under their direction or oversight are properly maintained while in use and safely cleaned after the spaces are vacated. Deans have the responsibility to remedy all non-compliance matters. Colleges or Schools will have overall financial and compliance responsibility for all laboratory spaces to which they have been assigned.

b. Administrative and Operations Units.

i. Administrative and Operations Staff. The responsibility of each Administrative and Operations staff person is to conduct activities in compliance with all applicable EHS federal, state, and local regulations and UGA policies and procedures, to help ensure that the administrative or operating unit is in compliance with EHS regulations and UGA policies and procedures and to assist the Supervisor, Unit Head, or Director.

ii. Administrative and Operations Supervisor. The responsibility of each Supervisor is to provide day-to-day supervision of activities in his/her designated area to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and UGA policies and procedures, and to assist the Administrative or Operations Unit Head or Director with all EHS matters.

iii. Administrative and Operations Unit Head/Director. The responsibility of each Unit Head or Director is to ensure that all activities in the administrative units are conducted in compliance with all applicable EHS federal, state, and local regulations and UGA policies and procedures. Unit Heads and Directors must ensure that all personnel working in their units have adequate training to carry out their assigned tasks and receive on-going training. Unit Heads and Directors have the responsibility to remedy all non-compliance matters.

c. Environmental Safety Division (ESD) and the Office of the Vice President for Research (OVPR).

i. ESD and OVPR staff. The responsibility of each ESD and OVPR staff person is to provide assistance and maintain a level of expertise in designated EHS regulatory and program areas. The responsibility of each ESD and OVPR staff person is to maintain his/her certifications or training needed to perform his/her responsibility, communicating with various academic and administrative units across the campus, developing and reviewing policies, procedures and guidelines, providing EHS training, responding to requests for assistance, addressing incidents, and maintaining EHS training and compliance records.

ii. Associate Vice President ESD. The responsibility of the Associate Vice President ESD is to oversee and supervise the ESD, and to be the primary contact for EHS matters, both within non-research areas at UGA and with the external community. The responsibility of the Associate Vice President ESD is to ensure that ESD is providing assistance and support to UGA regarding EHS matters, to handle administrative and personnel matters, and to communicate to the UGA Administration as needed regarding EHS matters. The Associate Vice President ESD is a member of the EHSMS Academic/Research Steering Committee and the EHSMS Administrative/Operations Steering Committee.

iii. Associate Vice President for Research. The responsibility of the Associate Vice President for Research is to oversee and supervise the EHS staff in the OVPR and to be the primary contact for EHS matters within research areas at UGA. The responsibility of the Associate Vice President for Research is to ensure that OVPR is providing assistance and support to UGA regarding EHS matters, to handle administrative and personnel matters, and to communicate to EHSMS Executive Committee as needed regarding EHS matters. The Associate Vice President for Research is a member of the EHSMS Academic/Research Steering Committee and the EHSMS Administrative/Operations Steering Committee.

d. UGA Committees

i. EHSMS Academic/Research Steering Committee (currently inactive). The EHSMS Academic/Research Steering Committee will meet as necessary to guide the development and implementation of those aspects of the UGA EHSMS that will enhance environmental, health, and safety programs and compliance of academic/research activities at UGA.

ii. EHSMS Administrative/Operations Steering Committee. The EHSMS Administrative/Operations Steering Committee will meet periodically, as necessary, to guide the development and implementation of those aspects of

the UGA EHSMS that will enhance environmental health and safety programs and compliance of administrative/operations activities at UGA.

iii. EHSMS Executive Committee. During the implementation of the EHSMS, the EHSMS Executive Committee will meet periodically, but not less than quarterly, to review and provide guidance on the design, development and implementation of the EHSMS. After implementation of the EHSMS, the Executive Committee will meet periodically, but not less than semi-annually, to review and provide oversight on the Comprehensive EHSMS.

iv. Standing and Ad hoc Committees. The EHSMS Executive Committee, directly or through the Comprehensive EHSMS, will form and charge standing and ad hoc UGA committees as needed. Standing committees include the Research Safety Committee, the Radiation Safety Committee, Institutional Review Board, and the Institutional Biosafety Committee.

e. Senior Administration.

Senior Administration are all UGA cabinet members including the Director of Athletics, Associate Provosts, Vice Presidents, Vice Provost, Provost, and President. The responsibility of Senior Administration to environmental health and safety is consistent with their organizational and reporting responsibility.

Approved by the EHSMS Executive Committee on April 14, 2016

Hosting Inspections of UGA Facilities and Laboratories by Outside Agencies (EHS Policy 6.03)

https://provost.uga.edu/policies/academic-affairs-policy-manual/6-03-hosting-inspections-of-uga-facilities-and-laboratories/

The property, facilities, and operations of the University of Georgia (UGA) are subject to announced and unannounced inspection by outside federal, state, and local regulatory agencies responsible for enforcing environmental, health, and safety regulations. It is the policy of UGA to comply with all relevant regulations and to cooperate with the agencies responsible for compliance inspections and enforcement. To ensure compliance in executing our mission, UGA expects regulatory inspections to be conducted safely and professionally, with excellent communication and transparency with outside agencies and their representatives and with all UGA stakeholders.

This policy requires that each inspector of the outside agency assessing compliance with federal, state, or local regulations be accompanied by at least one authorized UGA employee at all times during the inspection of any UGA space (property, facility, or lab). The authorized UGA employee must represent either the Environmental Safety Division (ESD) or the Office of Research Safety (ORS).

Any UGA employee receiving a request from a representative of an outside environmental, health, or safety regulatory agency for access to any UGA owned or operated property or facility for the purpose of conducting a compliance inspection must immediately notify the Environmental Safety Division at (706) 542-5801 and provide the following information: employee name, department, location and phone number; the agency official's name and affiliation; and the stated purpose of the visit and time of arrival. ESD will notify the employee's Department Head/Dean or their Administrative and Operations Unit Head/Director, as applicable. ESD also will notify and coordinate with ORS to provide an authorized University representative who will meet the agency official in a timely manner and determine the appropriate response to the request for access.

ESD and ORS may cooperatively or separately develop and implement a standard operating procedure to host inspections of UGA facilities that is consistent with this policy.

Approved by the EHSMS Executive Committee on July 19, 2017

Chapter 6

Identifying EHS Regulatory Requirements and Best Practices

There are numerous environmental health and safety laws and regulations at the federal, state, and local levels that regulate operations and activities and facilities at UGA. In addition, the University System of Georgia Board of Regents has adopted certain EHS procedures for USG institutions to follow. Further, UGA has adopted or in the future may adopt certain EHS policies procedures for UGA administration, faculty, students, and staff to follow. It is essential that everyone associated with UGA understand which laws and regulations, USG procedures, and UGA policies apply to their operations, activities, and facilities, and what these laws, regulations and policies specifically require.

Identifying the Regulatory Requirements, Best Practices, and other requirements

ESD maintains a comprehensive listing of applicable environmental laws and regulations, right-to-know regulations, fire and life safety regulations, and laboratory safety equipment standards. ESD maintains an Environmental Compliance Assessment tool that enables departments or work units to determine which environmental regulations are applicable to their activities, operations or facilities. This tool can be found at https://esd.uga.edu/environmental-affairs

ORIS, in coordination with the standing institutional safety committees, maintains required health and safety standards and best practices for chemicals, laboratories, radioactive materials, biosafety, and lasers in the form of approved University safety manuals. ORIS and ESD in coordination with the EHSMS Executive Committee will be responsible for informing the campus community of new regulations and requirements that relate to EHS aspects and impacts identified at UGA. UGA's Office of Legal Affairs may assist with this responsibility as needed. The standing institutional safety committees may also assist with this responsibility as needed.

Reviewing and updating the Regulatory Requirements, Best Practices, and Other Requirements

Annually, ORIS and ESD review the lists of regulations and institutional safety manuals and update them as needed, in consultation with the appropriate institutional standing safety committees. To stay up to date on developments with regulations, standards and best practices, ORIS and ESD management and staff attend conferences, participate in web-based discussions, subscribe to list-serves, network with EHS staff at other institutions, review EHS periodicals and publications, attend trainings, and participate in professional meetings.

Communication of Regulatory and Other Requirements.

ORIS and ESD will communicate information concerning regulatory, best practices, and other requirements using the methods and tools set out in Chapter 11, “Communication”.

Chapter 7

Identifying EHS Objectives and Targets

EHS Aspects and Impacts

The fundamental purpose of the EHSMS is to control and minimize the negative environmental, safety, and health impacts of UGA's operations and activities. For this reason, a critical element of the EHSMS involves identifying and documenting the EHS aspects and impacts. An EHS aspect is an element of UGA activities, products, or services that can interact with the environment or present a safety or health hazard. An EHS impact is the effect of UGA activities or services on health, safety, or the environment. This chapter describes how UGA identifies and updates the EHS aspects and impacts of its operations and activities.

The EHSMS Executive Committee, the Academic/Research Steering Committee, the Administrative/Operations Steering Committee, ORIS, and ESD are responsible for identifying, significant EHS aspects and impacts. Only those aspects UGA can control or influence will be considered. Annually, ORIS and ESD, in consultation with the EHSMS Executive Committee, will review and update the list of significant aspects and impacts for the institution.

Evaluating EHS Aspects and Impacts

In evaluating the aspects and impacts, the EHSMS Executive Committee, ORIS, and ESD will use the following criteria:

- Employee/student exposure
- Environmental exposure
- Non-compliance with EHS regulations
- Cost of non-compliance with EHS regulations
- Potential for fine/penalty by regulatory agency
- Impact on UGA reputation
- Likelihood of occurring or recurring

Annually, the EHSMS Executive Committee, ORIS, and ESD will review the evaluations that have been done for any ongoing activities and make any changes to the prioritization as needed. In the event that any new activity is started at UGA or if there is a major change to any existing activity, ORIS and ESD in coordination with the appropriate standing Institutional Safety Committee will evaluate any aspects and impacts associated with that new activity using the criteria and scoring set out in this procedure. Annually, the EHSMS Executive Committee will review the criteria and make any changes to the process as needed.

Objectives and Targets

Objectives are overall goals that are consistent with UGA EHS policies, priorities, aspects and impacts, and applicable regulations, standards, and best practices. An example of an EHSMS goal might be to maintain compliance with federal and state hazardous waste regulations.

Targets are specific, focused efforts that are related to and support a particular objective. Targets should be realistic and measurable and have a designated time frame. An example of an EHS target might be to have 100% compliance of hazardous waste requirements in the Central Accumulation Area periodic inspections over a twelve-month period.

Responsibilities

ORIS and ESD, in consultation with the EHSMS Executive Committee, are responsible for developing and reviewing objectives and targets based on the identified and prioritized significant aspects and impacts. UGA safety committees may assist with this responsibility as needed. Annually, ORIS and ESD will report to the EHSMS Executive Committee on the progress made in achieving the objectives and targets. That report will be provided to UGA Senior Administration and the report will include a discussion of any resource issues or other concerns related to achieving the objectives and targets as appropriate. ORIS and ESD will provide necessary information to appropriate governmental agencies as required by regulations or any formal or informal agreements. Records related to the objectives and targets will be housed in the ORIS and ESD offices.

Chapter 8

Roles and Responsibilities

The roles and responsibilities of administration, faculty, staff, and students at UGA regarding EHS matters and the EHSMS are outlined in Chapter 3 of this manual, EHS Policy Number 6.02, “Policy and Procedures for Adoption and On-Going Review of the University of Georgia’s Comprehensive Environmental Health and Safety Management System and Roles and Responsibilities”

Overarching Responsibilities

It is the responsibility of each individual to read, understand, and implement the UGA EHS Policies within their work, study, or research area; to ask for any assistance needed to create or maintain a safe and compliant work environment; and to work with others to achieve EHS targets and objectives. http://provost.uga.edu/index.php/policies/academic-affairs-policy-manual/section-6-environmental-health-and-safety/

Consequences for Non-Compliance

Members of the UGA community, including faculty members, researchers, staff, and students, are responsible for complying with EHS standards as well as federal, state, and local EHS regulations and bests practices. In the event any member of the UGA community fails to fulfill his or her responsibility, appropriate consequences, as described in EHS Policy 6.02, “Policy and Procedures for Adoption and On-Going Review of the University of Georgia’s Comprehensive Environmental Health and Safety Management System and Roles and Responsibilities”, apply. Consequences will be applied in a way that is consistent with UGA Human Resources or academic disciplinary procedures.

Chapter 9

EHS Programs and Operational Controls

UGA currently has the various organizations, programs, and committees described in Chapter 2 of this Manual for addressing significant risks and concerns. Whenever a new aspect or impact is identified, the EHSMS Executive Committee, ORIS, ESD, and the standing institutional safety committees will determine if an existing program addresses those risks or, if needed, will modify a program or develop a new program to address those risks.

Academic departments and administrative units are responsible to inform ORIS and/or ESD when they are considering engaging in a new activity that could pose a risk to human health or the environment. ORIS, ESD and the standing institutional safety committees may assist with this responsibility as needed. This should occur early in the planning stages to ensure that there is appropriate time to arrange for necessary protocols and resources to support this new activity, and to be sure that the new protocols are in place and followed when the new activity starts.

ORIS and ESD have responsibility for developing, communicating, and providing information for the new programs and protocols needed to ensure that the new activity is conducted in a manner that addresses and minimizes any risk to human health and the environment. Standing institutional safety committees may assist with this responsibility as needed. Once the program has been implemented, ORIS, ESD, and the academic departments or administrative units will have responsibility for providing training as set out in Chapter 12, “Training.” The academic department and administrative unit supervisors have responsibility for ensuring that the new programs and protocols are properly followed by faculty, staff, and students in their departments or units. ORIS, ESD, and the standing institutional safety committees will provide assistance as needed.

Hazard Assessments

The various technical programs within ORIS and ESD conduct hazard identification/mitigation and regulatory assessments in campus laboratories and work areas on a routine basis. Additionally, potential hazards and regulatory issues are identified through the following activities.

- Information collected during the laboratory opening/closing process identifies activities involving hazardous and/or regulated materials or practices
- Chemical/Radiological/Biosafety laboratory inspections identify an unsatisfactory condition
- Environmental regulatory compliance assessment of a laboratory or work area reveals noncompliant condition
- Investigation of an accident, incident, or near miss reveals discrepancies

- Laboratory or work area assessment requested by UGA faculty, staff or students.

Assessments are conducted by ORIS or ESD technical staff. The objective of an assessment is to determine if improvements are needed in guidance, procedures, training, engineering or administrative controls, facility or equipment maintenance, or implementation of policies to reduce or eliminate EHS impacts.

Hazard Control

When an assessment results in a determination that improved controls are needed, a report is written that includes recommendations for the type of controls needed. The report is sent to the responsible person, usually a PI or Supervisor. It is the responsibility of the responsible person to ensure the controls are implemented. ORIS or ESD staff provide assistance to the responsible person, communicate facility issues that are outside of the responsible person's purview to the Facilities Management Division for correction, and track actions to ensure the controls are implemented.

EHS Programs and Services

The EHS services provided by ORIS and ESD promote the implementation of best practices, compliance related activities, and initiatives that advance the commitment of UGA to a culture of compliance and safety. These services are designed to fully support all aspects of the EHSMS. ORIS and ESD services are delivered to the UGA community through teams of professionals from each technical program area. ORIS is organized around four technical programs: Chemical Laboratory Safety, Biosafety, Radiation Safety, Laser Safety, Animal Care and Use, and Human Subjects. ESD is organized around 4 technical programs: Hazardous Waste Management and Compliance, Environmental Affairs, Industrial Hygiene and Occupational Safety, and Fire Safety. ORIS and ESD provide EHS services for incidents that occur after hours, on weekends, or during holidays through the Programs for Research Environmental Health and Safety (PREHS) On-call System.

Operational Controls, Communication, and Training

ORIS and ESD, in consultation with the EHSMS Executive Committee and the standing institutional safety committees, will develop appropriate protocols and operational controls to minimize the risk that new activities may pose to human health and the environment. Depending on the particular issue or activity, the EHSMS Executive Committee, ORIS, or ESD may establish Standard Operating Procedures (SOPs) and apply for necessary permits or approvals from regulatory agencies. These SOPs will be made available on the appropriate UGA websites.

As part of the planning process, the EHSMS Executive Committee, ORIS or ESD may consult with academic departments or administrative units, or the standing institutional safety

committees. When appropriate, individual department or unit personnel will develop specific procedures and operational controls for particular activities in consultation with ORIS and ESD. The EHSMS Executive Committee, ORIS, and ESD will communicate information concerning any programs, procedures, and protocols to the administration, faculty, staff, and students, involved in an activity. For senior administration, this communication may be in a report or briefing.

ORIS and ESD will determine if training is required, and the frequency of that training. ORIS, ESD, and/or academic department or administrative unit will provide the training, as set out in the EHSMS Management System Training Procedure (Chapter 13 of this Manual).

Assessment and Review

Annually, the EHSMS Executive Committee, EHSMS Steering Committees, ORIS, and ESD, in consultation with the standing institutional safety committees, will conduct an annual assessment of the management programs and operational controls to evaluate if there are any modifications or changes that need to be made to ensure their effectiveness. As needed, the EHSMS Executive Committee, ORIS, and ESD will modify programs, procedures and protocols and will communicate those changes to the academic departments and administrative units.

Chapter 10

Communication

Communication methods are in place to promote the full integration of EHS Policy 6.02 and EHSMS into research, study, and work processes to ensure compliance and promote achievement of UGA's EHS standards. Clear and effective channels for communication are essential to ensure awareness and understanding of EHS standards and regulatory requirements, the components and operation of the EHSMS, and of the supplemental policies, plans, and procedures established at UGA to address EHS issues. Since UGA is subject to EHS regulatory requirements, another important component of the communication program is a well-defined procedure for communicating with regulatory agencies and responding to inspections and requests for information. These procedures address communicating both compliance issues and achievements, as well as obtaining information for interpreting regulations and guidance documents. Each academic department and administrative unit have responsibility for communicating information related to EHS matters to ORIS, ESD, and the EHSMS Executive Committee.

EHSMS Organizational Structure and Communications

The EHSMS governance structure was designed with the importance of effective communications in mind. A key component of the governance structure is the creation of steering committees comprised of representatives from the research, academic, operations and administrative organizations on campus. This structure was created to facilitate important communications from the EHSMS Executive Committee to the UGA community and vice versa. The standing Institutional Safety Committees are another important feature of the organizational structure is the institutional safety committees. These Committees provide an opportunity for the EHSMS Executive Committee, ORIS, and ESD, to communicate EHS concerns, policies, procedures, and regulatory updates, as well as provide an opportunity for faculty and staff to provide feedback regarding the impacts, effectiveness, and problems with both the EHSMS and specific programs established to assure EHS compliance. Individual administration, faculty, staff and students will meet in person, talk by telephone and communicate by email or in writing with EHSMS Executive Committee as needed. If an individual is not sure of who to contact within the EHSMS Executive Committee, the ORIS and ESD websites lists each EHSMS Executive Committee member and their areas of responsibility, as well as the contact information for the Associate Vice President for Research Compliance and the Associate Vice President for Environmental Safety.

Responsibilities

The EHSMS Executive Committee determines the institution-level EHS communication needs for the UGA community based on input from the Academic and Research Steering Committee,

the Administrative and Operations Steering Committee, ORIS, ESD, and the institutional safety committees. The Executive Committee may develop a Communications Plan as necessary for fulfilling those needs. The Plan will identify the stakeholders or target audience of the information and the responsible parties charged with ensuring the communication is carried out.

ORIS and ESD have responsibility for communicating relevant EHS information to the rest of campus based on the EHS programs they oversee respectively. Each academic department and administrative unit have responsibility for communicating information relating to EHS matters to ORIS and/or ESD as appropriate.

EHSMS Communication Tools

Personal communication between ORIS and ESD professional staff and EHS clients is recognized as the most effective form of communication. A variety of tools are available to promote effective communication and information sharing. These tools include UGA websites; email; placards, signs, and posters; presentations to UGA departments and administrative units on particular EHS matters; and meeting with individuals, committees or groups within departments or units as needed.

Communications with Regulatory Agencies

Effective communication with regulatory agencies is a critical component of implementing the EHSMS. The Management System is designed to accommodate and facilitate communication between ORIS and ESD personnel and local, state, and federal regulatory authorities. Open and clear channels of communication are important to convey information on compliance-related issues, good practices, and regulatory questions and interpretations.

Because timely and effective communication with regulators is crucial for effective EHS performance, communication requirements have been included in institutional EHS Policy 6.03 to clarify roles and responsibilities and thresholds for contacting regulatory authorities. Policy 6.03 also ensures that regulators contacting UGA personnel are quickly and efficiently routed to the appropriate personnel or resources.

Chapter 11

Training

UGA personnel participating in or overseeing activities that are regulated because of potential risks to the environment, health, or safety must complete training appropriate to the regulated activity. This training must be completed prior to beginning the activity. Periodic refresher training is also required for many specific activities.

Professional Educational Portal

The UGA Professional Educational Portal (PEP) is the University-wide learning management system to provide, track, coordinate, quantify and otherwise manage all EHS training, education and certifications for the diverse array of learning and e-learning requirements. This system also provides the platform for housing the institutional policies, plans, manuals, and management systems that have been developed to ensure compliance with regulatory requirements, industry standards, and best practices.

Individuals who intend to engage in an EHS-regulated activity are required to coordinate with their supervisor, Primary Investigator, or instructor to determine their training requirements and successfully complete those requirements through the PEP. This includes faculty, staff, researchers, visitors and students.

Determining Training Needs and Delivering Training

Required EHS training is administered through the PEP as a collaborative effort among ORIS, ESD, and the Human Resources Division. Academic departments and administrative units are responsible for identifying faculty, staff, students, and administrators with training needs related to EHS matters based on the activities in which they are involved and the types of materials to which they may be exposed. Supervisors identify individuals engaged in regulated activities, assess the types and levels of EHS risks they may encounter and regulations that apply to their activities, and create and track a customized training program for each individual.

- The ORIS Research Training Core Office tracks the required training and refresher training for personnel associated with laboratories.
- The ESD Information Systems Support Program tracks the required training and refresher training for personnel responsible for managing hazardous waste throughout campus.
- The ESD Right to Know Coordinator tracks the required Chemical Right to Know training
- Human Resources is responsible for providing basic new hire training for all faculty, administration and staff.
- Academic department and administrative unit supervisors are responsible for providing and documenting department level training for all faculty, students, administration and staff.

Introductory Orientation Training

All new UGA faculty, administration and staff are required to participate in "On-Boarding Training" that is provided by the Human Resources Division. Each new hire to an academic department or administrative unit receives department/unit orientation by their department or unit. Part of that orientation addresses EHS matters specific to the department/unit. In some circumstances, ORIS and/or ESD staff may provide the EHS portion of this training.

Each new student in an academic department/administrative unit receives training through his/her academic department/administrative unit. This training is specific to the department or unit. As part of that training, the academic department/administrative unit addresses EHS matters specific to the activities in which they will be engaged.

In addition to the basic academic department/administrative unit training, the faculty member or supervisor provides detailed training to laboratory, classroom or project staff concerning environmental, health and safety concerns related to the project or protocol. The particular training will depend on the person's particular role, responsibility, and activities. Academic departments/administrative units are responsible for ensuring that employees receive periodic refresher training.

For the new hire on-boarding training handled by Human Resources, ESD and ORIS have access to the database that maintains the training records. For the department/unit new orientation training, each department/unit maintains its training records. For the training that ESD delivers, in person, online or by an outside consultant or vendor, ESD maintains training records.

ESD and ORIS staff take required initial and periodic refresher training as needed to maintain all needed certifications and qualifications. Copies of training records are maintained in the ESD and ORIS office respectively and in the PEP.

Training Records

Training records for each individual must be retained by the department, division, or work unit through individual training records or the PEP. Required information includes, but is not limited to:

- Name
- PI(s)/Supervisor(s)/instructor for which the individual works or studies
- Training requirements
- Required completion dates for each course; and expiration dates of the initial training if retraining is required
- Verification of successful completion of each training requirement including, in some cases, competence.

Chapter 12

Documents, Document Control, and Recordkeeping

ORIS and ESD currently have several systems for managing documents, records, and other EHS data. Both offices are moving to electronic data storage which allows for better organization and retrieval; however, many historical records remain in paper format.

Documents

A basic component of the EHSMS is the institution-wide effort to capture, formalize, and disseminate written documentation on the EHS programs, services, and standard operating procedures for communicating and addressing regulatory requirements, standards, EHS hazards, and promoting the adoption of EHS best practices. Once the need for documenting a procedure, activity, program or issue is established, the appropriate ORIS or ESD technical program determines the most appropriate type of document and a process for planning developing, reviewing, communicating, implementing, and updating the document. The different types of documentation include written program descriptions, standard operating procedures (SOP), guidance documents, and fact sheets. The primary means of making these documents available to the UGA community is by posting them to the ORIS and/or ESD web site. Reviews of all controlled documents are conducted at least annually.

Records

Appropriate records are maintained to ensure compliance with EHS regulatory requirements, EHS standards and good practices. Records are maintained as either paper or electronic files. ORIS and ESD retain records in a consistent, systematic and reliable manner so that they can be retrieved promptly when required for legal, regulatory or operational reasons. Each office has determined the types of records that must be maintained and follows regulatory and Board of Regent's guidance for records retention.

Academic/research departments and administrative/operations units will document EHS related information such as accidents and incidents, inspections, repairs and training. The Facilities Management Division will document any EHS related repairs, maintenance or inspections that they conduct, oversee or contract out to a third party. The Facilities Management Division will maintain any EHS related documents and records and make them available to ESD for periodic audits. ESD and ORIS have the responsibility to document any EHS-related issues, including, but not limited to, inspections, generation of waste, standard operating procedures, training, and incident reports.

Controlled Documents Related to EHS Matters

Within the scope of the EHSMS, all "controlled documents" have an effective date, a review date, identify who has issued the document, and who has approved the document. The EHSMS Executive Committee, Steering Committees, ESD, and ORIS are involved with the review and approval of the EHS Policy and with the development, review and approval of the EHSMS procedures. The resulting controlled documents are maintained by the Office of the Provost, ESD, or ORIS. Access/links to these policies and procedures are available on Office of the Provost, ESD, and ORIS websites.

Maintenance of Records

ESD and ORIS generate most of the EHS related records at UGA. All records generated by ESD and ORIS are maintained at the respective unit office in electronic form or in paper form. Activities that are subject to EHS regulations occur in various locations across UGA. These activities include but are not limited to training, compliance inspections, and equipment maintenance and repairs. Many of the departments or units involved in activities that are subject to EHS regulations generate or receive records related to those activities. Records generated by other departments (Facilities Management Division, Auxiliary Services, Student Housing, etc.) are maintained in the respective departments in either electronic form or paper form. Those records are maintained in the department or unit office that created or compiled the records.

Records Retention

ORIS and ESD and other departments or units maintaining EHS records must follow the records retention requirements of the Board of Regents found at
http://www.usg.edu/records_management/schedules/all_schedules

Chapter 13

Accidents, Incidents, and Regulatory Non-Compliance

When accidents or incidents occur, or when events of non-compliance are observed, it is important to investigate to determine the root cause and to initiate and confirm completion of appropriate corrective action.

Accident Reporting, Investigating, and Recordkeeping

Accidents or incidents involving injuries are part of the Human Resources reporting and record keeping procedures, as described in the "Supervisors' Guide to the Workers' Compensation Process" at https://hr.uga.edu under the "Current Employees" tab. An injury report must be completed by the supervisor for any injury to an employee that requires medical attention.

Accidents and incidents with an EHS component are investigated at different levels of detail, depending on their severity, by ORIS and/or ESD. Emergencies and accidents with significant injuries are investigated by ORIS and/or ESD, as appropriate, to determine the cause of the emergency, equipment malfunction, or operating procedure problem. A Root Cause Analysis is completed to determine root causes or contributing causes of the incident, underlying factors, and the roles that design, skills, maintenance, and procedures played in the occurrence of the incident. ORIS or ESD will develop a report with recommendations for corrective action, and coordinate with the appropriate institutional safety committee and the affected parties to ensure that the corrective measures are carried out. When corrective action is required by the ORIS, ESD, an institutional safety committee, or UGA Administration, the appropriate ORIS and/or ESD program initiates and confirms completion of the corrective action.

For minor accidents and incidents, the head of the academic department or administrative unit or his/her designee has responsibility for ensuring that an investigation is conducted to determine the root cause(s) of the actual or potential accident or incident, and for communicating those findings to ORIS, ESD, UGA Police Department, Office of Emergency Preparedness, and others as appropriate.

Preventative and Corrective Actions

An After Action Review may be initiated by ORIS, ESD, the Office of Emergency Planning, or the UGA Police Department after an incident to determine the level and quality of response as described in the After Action Review SOP. The After Action Review report is completed by a team assembled by the ORIS and/or ESD after the incident and includes:

- Incident information

- Date and time
- Location
- Contacts
- Corrective action
- Preventative action
- Verification of implementation

Where corrective actions (including non-compliance or non-conformance items) are identified through the After-Action Review, the After-Action Review team is responsible for:

- Identifying appropriate corrective and preventative actions (including modifying or creating procedures and work practices) in a written report
- Planning and implementing corrective and preventative actions and
- Verifying the completion and effectiveness of corrective and preventative actions.

Responsibilities

The individual(s) involved in the actual or potential accident or incident has responsibility to immediately inform their supervisor of the event details. The academic department or administrative unit supervisor has responsibility to immediately notify the UGA Police Department, Office of Emergency Preparedness, ORIS, and ESD, as appropriate, that an actual or potential accident or incident has occurred that has or could cause an injury to a person or harm to property or the environment.

In the event of an injury requiring immediate medical attention, the supervisor, PI or person in charge has the responsibility to have the person obtain medical attention as needed and to complete an Injury Report (available at https://hr.uga.edu/ under the “Current Employees” tab) as Workers Compensation may need to be notified.

The faculty member or administrative unit supervisor who oversees the area or his/her designee where the accident or incident occurred has responsibility to take action to prevent any recurrence of a situation. ORIS, ESD and the appropriate institutional safety committee(s) will provide support and assistance as appropriate.

ORIS and ESD have responsibility to maintain records concerning an actual or potential accident or incident report that ORIS or ESD prepares or receives. ORIS and ESD and representatives of appropriate institutional safety committees have responsibility for conducting periodic analysis of parts of the campus to evaluate the effectiveness of corrective actions and preventive actions, and to determine what, if any, additional corrective or preventive action measures should be implemented.

Regulatory Non-Compliance

UGA is committed to taking all necessary actions to identify non-compliance with environmental regulations, University policy and this EHSMS, investigating the causes of such non-compliance, and implementing corrective and preventive procedures where necessary. Non-compliance on may be identified during a routine assessment, as a result of an inspection by a regulatory agency, or discovered and reported by faculty, staff, students or visitors. Hosting inspections of UGA facilities and laboratories by outside agencies is addressed in EHS Policy 6.03. https://provost.uga.edu/policies/academic-affairs-policy-manual/6-03-hosting-inspections-of-uga-facilities-and-laboratories/

Environmental Incident and Non-Compliance Investigations

Environmental non-compliance is any nonconformance with federal, state, or local environmental regulation or UGA policy. Environmental release incidents are defined as any spill, release, discharge or emission of any pollutant or other potentially hazardous contaminants or agents into the environment above a regulatory threshold or allowable limit. As part of the environmental training program described in Chapter 12 of this Manual, appropriate faculty and staff will be trained on recognizing and identifying environmental compliance violations and environmental release incidents that can potentially occur at UGA.

When an environmental release or an incident of environmental non-compliance occurs, the first individual becoming aware of the release or non-compliance is responsible to report the situation to their department head or supervisor and to either ESD at (706) 542-5801 or the Office of Biosafety at (706) 542-7265 whichever is appropriate for the situation. It is the responsibility of the department head or immediate supervisor within the department where the incident occurred to ensure that ESD and/or the Office of Biosafety is notified. In the event a supervisor is not present, reporting the incident is the responsibility of the witness to the incident or condition. Reporting such non-compliance or release will allow for investigation and for initiation of actions to cleanup and to prevent similar incidents in the future.

External Reporting and Investigation of Environmental Non-compliance and Release Incidents

After obtaining the critical information from the individual(s) reporting the condition, ESD or the Office of Biosafety, as appropriate, will determine the requirement to notify any external regulatory agencies. ESD or the Office of Biosafety is responsible for conducting an investigation of the cause(s) of the incident or non-compliance. The cause(s) will be evaluated in the following manner:

1. Interviewing any faculty, staff, students, or visitors having knowledge of the facts or circumstances related to the incident

2. Reviewing applicable documents, records and data that may be associated with the non-compliance or release incident
3. Inspecting the location, equipment or operation where the incident or non-compliance occurred.

Verification of Corrective and Preventative Actions

Corrective action is a reactive process that addresses problems after they have occurred. Preventive action is a proactive process intended to prevent problems before they occur or become more severe. ESD or the Office of Biosafety will work in coordination with the responsible department or work unit to develop an effective corrective action plan that addresses the problem and the cause(s) of the problem and will determine a date for completion. Every effort will be made to correct the problem identified within 30 days of discovery. ESD or the Office of Biosafety will track the progress of the corrective and preventive actions implemented by the department or work unit and is verify the effectiveness of the solution.

The responsible department or work unit is responsible for determining specific appropriate actions and taking all necessary steps to accomplish these actions. The recipient is also responsible for communicating with ESD or the Office of Biosafety regarding the corrective or preventive action taken. If the responsible department or work unit cannot resolve the problem by the specified date, the department or work unit is responsible for determining an acceptable alternate due date along with ESD or the Office of Biosafety. Following corrective action, ESD or the Office of Biosafety will document the acceptable correction and include this item on the next routine compliance assessment or recommend follow-up actions to complete acceptable corrective action.

Programs for Research Environmental Health and Safety On-Call System

The Programs for Research Environmental Health and Safety (PREHS) include the programs and personnel of ESD and ORIS that are responsible for safety, health and environmental concerns at UGA. PREHS is responsible for providing timely, consistent, and accurate advice and technical support in response to urgent calls for EHS assistance from the UGA community on a 24 hours per day, 7 days a week basis for incidents involving hazardous materials, radioactive materials, a release of any material with the potential to negatively impact human health or the environment, and other environmental, health and safety issues.

The PREHS System identifies the roles, responsibilities, and actions to be taken by PREHS personnel in the event of an incoming call to any office of ESD or ORIS requesting assistance or notifying the office of an urgent PREHS issue during normal working hours and the roles, responsibilities, and actions to be taken by PREHS personnel in the event of an urgent PREHS issue during off-hours. UGA Police Dispatch is provided with the PREHS On-Call phone number plus additional key staff and management contact phone numbers to ensure proper response to urgent requests for assistance.

PREHS On-Call is not an emergency response or first responder system. Emergency situations are always directed immediately to the UGA or Athens-Clarke County 911 system for immediate response by the appropriate emergency response agency. During emergency situations, PREHS On-Call will provide advice, technical assistance, and technical support to emergency response agencies and personnel as requested by emergency response personnel.

Chapter 14

EHS Monitoring and Measuring

Academic departments and administrative units have responsibility for informing ORIS and/or ESD when they are engaged in, or are considering engaging in, an activity that could pose a significant risk to human health or the environment. ORIS, ESD, and the institutional safety committees may assist with this responsibility as needed. For any new activity, this needs to be early in the planning stages to ensure that there is appropriate time to arrange for necessary protocols and resources to support this activity, and to be sure that any needed monitoring and measuring are in place and followed when the activity starts.

The ORIS and ESD have responsibility for developing procedures to monitor and measure activities related to programs and protocols needed to ensure that the activity is conducted in a manner that minimizes any risk to human health and the environment or is helping to achieve the goals set out by UGA. The EHSMS Executive Committee and the standing institutional safety committees may assist with this responsibility as needed. When required, ORIS and ESD have responsibility to submit monitoring and measuring data to the appropriate regulatory agency, Board of Regents, or other entity.

The academic department and administrative unit supervisors have responsibility for ensuring that the monitoring and measuring procedures are properly followed by faculty, students, administration and staff in their departments or units. When required, the academic department or administrative unit has responsibility to submit monitoring and measuring data to the EHSMS Executive Committee, ORIS, and/or ESD.

Identify Need to Monitor and Measure

Based on the aspects and impacts that have been identified or the goals that have been set, ORIS and ESD, in consultation with the EHSMS Executive Committee, will determine what activities require monitoring and measuring and identify key performance indicators in order to track their performance. The EHSMS Executive Committee, ORIS, and ESD will consult with the institutional safety committees as needed.

As appropriate, ORIS, and ESD will meet with the academic department or administrative unit personnel who will be involved in the activities, to ensure that everyone has a full understanding of the issues and concerns and what role personnel in the department or unit have in conducting monitoring and measuring.

Conducting Monitoring and Measuring

ORIS and ESD, in consultation with the EHSMS Executive Committee and/or the EHSMS Academic/Research or Administrative/Operations Steering Committees and the institutional

safety committees, will develop procedures for conducting monitoring and measuring of certain activities. Based on the procedures that are developed, ORIS and ESD will conduct monitoring and measuring, or as appropriate, UGA personnel in academic departments and administrative units or third-party contractors will conduct monitoring and measuring with oversight and assistance from ORIS and ESD.

ORIS and ESD with assistance as necessary from the EHSMS Executive Committee and the institutional safety committees, will communicate information concerning monitoring and measuring to the faculty, students, administration and staff involved in an activity to be monitored and measured. ORIS and ESD will provide training to all UGA persons involved in monitoring and measuring who need such training.

Assessment and Review of Monitoring and Measuring Procedure

Annually, ORIS and ESD, in coordination with the EHSMS Executive Committee and the standing institutional safety committees, will assess the monitoring and measuring procedures to evaluate if there are any modifications or changes that need to be made to ensure the effectiveness of the programs and the achievement of goals set out by UGA. ORIS and ESD will report to the EHSMS Executive Committee concerning the annual evaluation of monitoring and measuring of management programs and operational controls and any related issues. The EHSMS Executive Committee will discuss the issues and provide comments and recommendations as appropriate.

Chapter 15

EHS Assessments

Various ORIS and ESD programs provide a coordinated and consistent assessment mechanism for professional EHS staff to evaluate performance, correct problems, and prioritize areas for EHS improvement across UGA. These programs also serve to educate faculty, students, and staff on EHS issues, requirements, and best practices.

Assessment Programs

ORIS provides guidance to UGA faculty, staff, and students on chemical laboratory safety, biosafety, radiation safety and laser safety. The programs are committed to safety, health, environmental protection, and compliance based on current government regulations, guidelines, and best practices.

- The **Chemical and Laboratory Safety Program** conducts safety and compliance assessments of laboratory and workspaces in which potential hazards are primarily chemical in nature. This Program provides guidance to UGA faculty, staff and students on the safe use of chemical agents. This is accomplished through a hierarchy of manuals, policies, and SOPs which provide structure, standards, and responsibilities for implementation. The Chemicals and Laboratory Safety program supports the activities of the University Research Safety Committee. Specific information is available from the Chemical and Laboratory Safety Program web page https://research.uga.edu/safety/chemical-laboratory/. The UGA Laboratory Safety Manual is available at https://research.uga.edu/docs/units/safety/manuals/Chemical-Laboratory-Safety-Manual.pdf.

- The **Radiation Safety Program** conducts safety and compliance assessments of laboratory and work areas where radioactive materials or sources are present. The Radiation Safety Program provides service and assistance to researchers using ionizing radiation in their operations. Many of the activities of this program are mandated by Georgia state law and controlled by manuals, policies and procedures established by the Radiation Safety Committee. Specific information is available from the Radiation Safety program web page https://research.uga.edu/safety/radiation/. The Radiation Safety Manual is available at http://research.uga.edu/safety/wp-content/uploads/sites/56/2015/06/RSM-complete-5.2014.pdf.

- The **Office of Biosafety** conducts safety and compliance assessments of research laboratories where biohazardous materials are present. Biosafety oversees the use of biohazardous materials that may harm humans, animals, plants or the environment, and manages the compliance activities of the Institutional Biosafety Committee (IBC). It also administers the Select Agent and Toxin Program for the UGA main campus facilities. The Institutional Biosafety Committee (IBC) reviews and approves all research and teaching

projects involving hazardous biological materials to ensure that work is conducted in a manner that does not pose significant risk to the health and safety of laboratory workers, the public, or the environment, and to ensure compliance with applicable external regulations and UGA policies. The Institutional Biosafety Manual and Exposure Control Plan outline appropriate practices, University policies, and regulatory requirements for working safely in the research laboratory with biohazardous materials at UGA facilities. Specific information and the Institutional Biosafety Manual are available from the Office of Biosafety web page https://research.uga.edu/biosafety/.

ESD provides support and consultative services to the UGA community in the areas of hazardous waste management, RCRA compliance, hazardous communication and Right to Know, laboratory chemical inventory, environmental affairs, fire and life safety, and industrial hygiene and occupational safety. This is accomplished through a hierarchy of manuals, policies, and SOPs which provide structure, standards, and responsibilities for implementation. Specific information is available from the ESD web page https://esd.uga.edu/.

- The **Industrial Hygiene and Occupational Safety Program** conducts safety and compliance assessments of laboratory and workspaces in which potential hazards are primarily non-chemical in nature.

- The **Environmental Affairs Program** conducts compliance assessments of activities and operations subject to environmental regulations or public health regulations.

- The **Hazardous Waste Compliance Program** conducts compliance assessments of hazardous waste generation points in laboratories and other work areas. The University Hazardous Waste Manual is available here.

- The **Fire Safety Program** conducts fire and life safety code compliance assessments in any facilities owned or occupied by UGA.

Each academic department or administrative unit is required to address and correct the issues identified by any assessment promptly. If the issue requires a significant period of time to be addressed, the academic department or administrative unit needs to provide a status update on the progress of the actions being taken. ORIS, ESD, and the appropriate institutional safety committee will provide support and assistance as needed to the academic department or administrative unit.

After the issue has been addressed and corrected by the academic department or administrative unit, ORIS or ESD conducts follow-up assessments of the area to confirm that the area is in compliance with regulatory and other requirements.

Results of the inspections and corrective actions taken to address issues identified in the inspections are included in reports or presentations submitted to the EHSMS Executive Committee and may be included in a report or presentation to the UGA Senior Administration as part of a review of the EHSMS by Senior Administration.

Annually, the EHSMS Executive Committee, ORIS, ESD and the appropriate institutional safety committee(s) assess the procedures for conducting assessments to evaluate if there are any modifications or changes that need to be made to ensure their effectiveness.

Chapter 16

Annual EHSMS Review for Senior Administration

Annually, the EHSMS Executive Committee, in consultation with the appropriate institutional safety committee(s), will report on the status of the EHSMS to the UGA Senior Administration. The UGA Senior Administration has responsibility for reviewing and providing comments to the EHSMS Executive Committee on the EHSMS.

Annually, ORIS and ESD will report to the EHSMS Executive Committee on the status of the EHSMS and any issues or recommendations that require attention regarding the EHSMS and EHS matters. The EHSMS Executive Committee will review and comment on the information provided by ORIS and ESD.

USG Board of Regents

The EHSMS Executive Committee will provide environmental and occupational safety performance data to the USG Board of Regents, consistent with the USG Board of Regents Environmental and Occupational Safety Policy https://www.usg.edu/policymanual/section9/C553/#p9.11.4_environmental_and_occupational_safety

Additional Review

In addition to the EHSMS Executive Committee, ORIS, ESD, and the UGA Senior Administration, there are various other groups that assist in the administration of the EHSMS at UGA. Although there will not be a formal regular review of the EHSMS by these groups, as needed, the EHSMS Executive Committee will meet with any of these groups to discuss and review issues concerning the EHSMS and EHS matters as appropriate.

Appendix 1

Acronyms

EHS	Environmental Health and Safety
EHSMS	Environmental Health and Safety Management System
EPCRA	Emergency Preparedness and Community Right to Know Act
ESD	Environmental Safety Division
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
GAEPD	Georgia Environmental Protection Division
IBC	Institutional Biosafety Committee
LMS	Learning Management System
ORS	Office of Research Safety
ORIS	Office of Research Integrity and Safety
OSH Act	Occupational Safety and Health Act
PI	Principal Investigator
PREHS	Programs for Research Environmental Health and Safety
RCRA	Resource Conservation and Recovery Act
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasure
TSCA	Toxic Substances Control Act
UGA	University of Georgia
USEPA	United Stated Environmental Protection Agency
USG, BOR	University System of Georgia, Board of Regents