

Introduction

The Southwestern University Environmental Management System (EMS) Manual describes the framework and requirements of our Environmental Management “System”.

The EMS is managed by the [Safety & Risk Management Office](#) with special assistance from the EMS Team. The EMS Team is comprised of the following members; Director of Campus Safety & Risk Management, AVP for Facilities and Campus Services, Director of Physical Plant, the Campus Safety Committee along with appointed departmental representatives from Chemistry, Biology, Fine Arts and Physical Plant.

The EMS was developed in response to requirements related to Southwestern’s participation in the Environmental Protection Agency’s ([EPA](#)) Peer Audit Program for Region 6. Southwestern University conducted a peer audit between November 9-11, 2010.

Southwestern University disclosed all violations produced by the peer audit in a final compliance report to the EPA dated May 9, 2011. All noted violations were corrected within the prescribed correction period. As a final step in complying with the stipulations of the peer audit program, Southwestern University created an EMS to ensure continued environmental compliance.

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Director of Campus Safety & Risk Management
4-14-14

Environmental Policy

I. Purpose

This policy serves to maintain compliance with environmental laws and regulations by describing Southwestern University's commitments to environmental regulatory compliance, pollution prevention, and environmental improvement.

II. Scope

In general, this policy applies to the entire campus community, but more specifically to those employees whose activities impact the environment.

III. Definitions

- Environmental Management System (EMS) – a dynamic set of procedures and processes that identifies environmental aspects and impacts and articulates how they are to be mitigated, managed, documented and improved.
- Environmental Aspect – an activity that could affect the environment.
- Environmental Impact – the effect (positive/negative) an activity has on the environment.

IV. Policy Statement

- Southwestern University commits to meeting applicable environmental laws and regulations.
- Southwestern University commits to encouraging pollution prevention strategies through a series of campus programs.
- Southwestern University commits to implementing programs that enhance the health and safety of the campus community and to work towards environmental performance improvements.
- Southwestern University commits to increasing awareness of environmental responsibility among faculty, staff, students and visitors.

V. Environmental Goals

- a. To utilize best practices to eliminate or reduce adverse environmental impacts from teaching, research and operational activities as well as facilities use.
- b. To reduce energy and water consumption.
- c. To encourage and support environmentally sustainable practices throughout campus.

VI. Additional References

"Environmental Management System Guide For Colleges and Universities", US EPA, Office of Environmental Stewardship, (October 2007)

<http://www.epa.gov/region01/assistance/univ/emsguide.html>

"Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations, Part VII (Notice)." Federal Register 65:70 (April 11, 2000) p. 19618. Available from:

www.epa.gov/compliance/resources/policies/incentives/auditing/auditpolicy51100.pdf

EMS Scope

I. Geographical

The Southwestern University EMS includes our main campus location, Georgetown, Texas.

II. Regulatory Program Areas

The EMS includes the following regulatory program areas:

Environmental Concern	Regulatory Program Area
Water Discharges	Waste Water Disposal Spill Prevention, Control & Countermeasures (SPCC)
Air Emissions	Boiler - Generator Emissions CFC Management (Freon) Vehicles and Equipment Appliances Lab Vent Hoods
Chemical Storage and Handling	Emergency Planning & Right to Know Chemical Storage Inventory Pesticides
Waste Management	Hazardous Waste Management Universal Waste Management Medical Waste Management Recycling
Oil Storage and Handling	Aboveground Storage Tanks (AST) SPCC
Environmental Performance	Recycling Energy and Water Conservation

Stand-alone health and safety issues ([OSHA](#)) are generally not included in the EMS, except where there is an overlap between environmental requirements and health and safety regulatory requirements.

EMS Personnel Organization & Oversight

EMS Organization & Oversight

The Southwestern University EMS is actively managed by the [Safety & Risk Management Office](#) with assistance from the EMS Team and EMS Representatives from core stakeholders.

EMS Team

The EMS team is comprised of the Director of Campus Safety & Risk Management, AVP for Facilities and Campus Services, the Director of Physical Plant, members of the Campus Safety Committee along with appointed departmental representatives from Chemistry, Biology, Fine Arts, Physical Plant, Athletics, Health Services. The EMS team is responsible for communicating the contents of the EMS to the appropriate personnel throughout the University as well as assisting with the formation and overall management of EMS working groups with a goal of maintaining compliance, pollution prevention and performance improvement.

Environmental Requirements

Applicable Environmental Requirements

There are numerous environmental requirements at the federal, state and local levels applicable to the various regulatory program areas included in the Southwestern University EMS. Southwestern University may also establish non-regulatory (best practices) that augment environmental rules.

Identification of Environmental Requirements & Assignment of Responsibility

A list of applicable environmental requirements is maintained in the *EMS Aspects & Impacts Matrix*. [Add web hyper-link here](#). Each affected Department Head, Supervisor and affected employee bear the responsibility to comply with all applicable environmental rules and EMS procedures.

Tracking of Environmental Requirements

Southwestern University is committed to tracking environmental requirements. Changes to written programs or procedures will be made as necessary to integrate the new rule into practice at Southwestern University. Changes to the EMS will be completed by members of the EMS team.

Document Control & Management

Systems

Documents related to EMS will be managed by members of the EMS Team and Director of Campus Safety & Risk Management. Southwestern will utilize the following document control systems: network files, Google Docs, Safety Reports Audit System, and [SchoolDude](#) work order system.

Document Control

This manual and other written environmental policies, procedures, notices and other directives are stored electronically on the Southwestern University network drives. EMS MASTER documents are regularly reviewed by the EMS Team. Changes to documents are made as needed and the related web based and/or Xitracs document is also updated at that time. Document changes will be coordinated by the Director of Campus Safety & Risk Management.

Records Management

Records are maintained by the EMS Team as required by all relevant federal, state and local laws and regulations. Records will be kept on file according to regulatory recordkeeping requirements, however, Southwestern University may opt to keep EMS records permanently.

EMS records are stored electronically to the extent possible.

Current Records Repositories Include:

- FACS network drives
- EMS Team email – google labels (folders)
- Google Drive
- [SchoolDude](#)[®] work order tracking system
- Hard Copy EMS Binder and files kept in environmental file cabinet (Mundy Hall)
- Xitracs document management system

Environmental Training & Awareness

Overview

Southwestern University provides or coordinates all mandatory environmental and safety training to personnel requiring such training in accordance with applicable regulatory requirements and/or as appropriate for their positions. Training ensures personnel are aware of the Southwestern University EMS and the requirements, tasks and responsibilities it articulates.

Oversight for EMS as well as Health & Safety training in general resides with the Safety & Risk Management Office. Department Heads/Chairs are responsible for contacting the Safety & Risk Management Office whenever new employees are hired to determine if training is required and to help coordinate training sessions. Implementation of EMS related procedures will be the responsibility of the affected Department Head or Supervisor.

Training Administration

Environmental training is coordinated and/or provided by the Safety & Risk Management Office. Some department supervisors coordinate and provide environmental training as well as departmental instructions to their staff. It is the responsibility of each Department Director/Chair to ensure new employees have received training. This can be accomplished by contacting the Safety & Risk Management Office when new employees are hired.

Training included within the Southwestern University EMS is as follows:

- EMS – Executive and In-Depth (I,II)
- Hazard Communication – Globally Harmonized System (GHS)
- Health & Safety Programs
- Laboratory Safety
- Hazardous Waste - Resource Conservation Reclamation Act (RCRA)
- Audit/Inspection and Corrective Action Procedures
- Inventory Procedures
- Reporting Procedures

Training Records

Training records are currently kept in the following locations depending on the type and application of training:

- EMS File cabinet - Sign-in/attendance sheets, copies of training quizzes
- EMS Network Drive folder
- On-line training systems (in2Vate)

Assessment, Prevention & Control

Overview

Southwestern University maintains mechanisms for assessing activities and operations as well as preventing and controlling: (a) the release of hazardous waste or pollutants into the environment, (b) threats to human health or (c) violations of any environmental requirements.

Responsibilities

The Safety & Risk Management Office along with offices designated within the EMS are responsible for conducting regular inspections, notifying appropriate Department Heads and personnel of the inspection results and determining corrective actions. Each Department Head is responsible to ensure that all corrective actions noted are corrected and reported back to the EMS team.

Operational Controls and Ongoing Assessments

Operational controls are documented procedures that apply to specific operations, activities with significant aspects and impacts and for EMS objectives and targets. Inspection logs, checklists, permits, licenses and signage controlling an environmental impact or activity are considered operation controls. The purpose of operational controls is to build consistent environmental performance into daily operations with a diverse range of employees.

Inspection/Audit Program

The Safety & Risk Management Office, along with designees in various other departments, conducts periodic inspections of buildings, laboratories, mechanical rooms, classrooms, offices and other campus areas as well as monitors renovation and construction projects. The scope and frequency of these inspections vary depending on the regulatory program area involved, applicable environmental requirements, and risk level involved.

The inspection program is administered as follows:

- Inspections are carried out by trained personnel.
- The Safety & Risk Management Office or Department Heads maintain inspection records and rosters of all qualified inspection personnel identifying at minimum, one primary inspector and one backup inspector for each inspection area.
- All items that require corrective action are noted in the inspection/audit form.
- Inspection forms and any corrective action items are promptly communicated to the appropriate Department Head via campus mail, e-mail, or in work orders in the SchoolDude® work order tracking system. Safety-Reports® will be used to conduct audits/inspections and track status and corrective actions. In general, most corrective

actions items are to be completed within five business days of receipt. Additional time is allotted for larger scale corrective actions. The Department Head is responsible to ensure corrective action items are completed in the timeframe requested.

- Paper and/or electronic copies of inspection forms are kept in the EMS file cabinet or EMS network drive under the applicable program file.
- Upon completion of the corrective/preventative action, the Department Head is responsible to notify the Safety & Risk Management Office with the corrective action item dates of completion – usually noted on the same inspection form. A re-inspection of the deficiencies noted may be conducted prior to a regularly scheduled inspection to ensure completion of the corrective/preventative action.
- Deficiencies not corrected and noted during the re-inspection process will be reported to the Senior Staff member overseeing that operational area. At this point the Senior Staff member will be responsible to ensure corrective action items are completed promptly.

Environmental Incident Reporting & Investigation

Reporting

Southwestern University has a reporting procedure in place for all environmental incidents. Incidents can be reported in several ways including: contacting Physical Plant front desk at 863-1914, contacting Campus Police at 863-1944, contacting Switchboard Operator at 863-6511. Notification of the incident will be promptly reported to Director of Campus Safety & Risk Management, Director of Physical Plant and AVP for Facilities and Campus Services. A summary of the incident if warranted will be provided to Senior Staff.

Notification to Federal, State, local agencies as well as our insurance carriers will be coordinated by the Director of Campus Safety & Risk Management.

Incident Investigation

An investigation of the incident will be conducted to determine the causes of the incident. Identification of corrective actions needed to reduce or eliminate a recurrence will be completed and reported/communicated to the appropriate department for implementation.

Corrective Measures & Accountability

Overview

Southwestern University will take the necessary corrective actions to address non-compliance with environmental requirements, university policy (best practices) and this EMS.

Southwestern University investigates the causes of such non-compliance and implements corrective and preventative procedures and actions where necessary.

Corrective Measures Notices

Items needing corrective/preventative action may be identified through routine inspections, an EMS compliance audit, a regulatory agency inspection, departmental self-audit or by user reports. Inspection/audit forms that indicate a deficiency will also contain corrective action items. Inspection/audit forms will be sent to the affected Department Head so that he/she can facilitate necessary corrective actions within their department. Some corrective/preventative action requests are made through the [SchoolDude](#)[®] work order tracking system or through [Safety-Reports](#)[®] audit software.

Once deficiencies are noted, our goal is for corrective action measures to be completed within five (5) business days. Corrective measures which cannot be rectified within the standard five (5) day timeframe must be reported back to the [Safety & Risk Management Office](#).

Responsibility for ensuring that corrective measures are implemented is the responsibility of the Department Head.

Environmental Planning

Campus Planning

Impacts to the environment related to capital improvements, renovations, new construction, etc., will be considered and addressed during the planning stages by the AVP for Facilities and Campus Services.

Pollution Prevention

Overview

Southwestern's pollution prevention program is based on several programs and initiatives. The core pollution prevention program is incorporated in our [Hazardous Waste Manual](#). In addition, several other programs such as our recycling program work toward sustainable practices.

Continuing Evaluation & Improvement

Overview

During the implementation of the EMS, Southwestern University will work to improve environmental performance through pollution prevention, energy and water management and other sustainability practices. It is anticipated that the implementation and continuous improvement process will be on-going into the future.

