University of Hawaii
Environmental Health and Safety Office

PROTOCOL FOR EHSO STAFF IN HANDLING OUTSIDE AGENCY INSPECTION

The purpose of this protocol is to establish procedures for managing and reporting regulatory agency inspections at the University of Hawaii.

Regulatory agencies that may inspect the University include but not limited to:

Federal - Environmental Protection Agency (EPA), Nuclear Regulatory Commission (NRC), Department of Defense (DOD), Homeland Security

State - Department of Health (DOH)/Clean Water Branch, Department of Agriculture (DOA), Department of Labor and Industrial Relations (DLIR)/Hawaii Occupational Safety and Health (HIOSH)

City and County - Honolulu Fire Department (HFD), Honolulu Police Department (HPD), Board of Water Supply

1. Inspectors are required to present identifying credentials and provide explanation for facility inspection. The inspectors should be directed to the appropriate EHSO program manager or staff. The EHSO Director should also be notified that an inspection is occurring.

2. Before escorting the inspector, the EHSO staff should possess any of the following items if deemed necessary: a note pad and pen, building floor plan, safety glasses and other appropriate personal protective equipment, sampling containers, access keys, camera, etc.

3. EHSO staff shall accompany the individual on inspection and as a matter of good practice, conduct themselves in the following manner:

   - Be cordial and gracious but keep idle conversation away from regulatory concerns. It’s usually safe to talk about traffic, the weather and a good place to eat lunch.

   - Always answer questions truthfully.

   - Stay with the inspector to provide requested access, introductions and to know what’s happening. Request a copy of the inspection checklist prior to inspection, so that you can better follow the inspection procedure. Take good notes, transcribe them as soon as possible. Take notes on the specific questions asked by the inspectors as well as information provided to and gathered by the inspector(s).

   - Ensure that all access requirements are followed, e.g. access to “restricted areas”: there
are areas (labs) which require special authorization, training, or personal protective equipment (PPE) to enter.

- If the inspector takes photos, take photos of the same scenes, if possible. If the inspector takes samples, get duplicate or split samples for independent analysis should there be discrepancy in results. A photo and sample log should be generated that corresponds to the photos and samples taken.

- If you are uncomfortable about how things are going or your ability to cope with the inspection, call for assistance from other EHSO staff or Director. Do not leave until backup has arrived (this also applies if you need to leave for any other reason).

- During the inspection, do not speculate on issues. If faculty, lab personnel, or staff are not available to provide the information, you should advise the inspector that the information will be obtained and provided. Document the specific information requested by the inspector.

- If the inspector finds easy-to-fix problems, try to get them corrected immediately and report the fix before the inspector leaves.

- Ask for a closing conference if it is not part of the inspector’s SOP. The Director will invite appropriate management and/or legal staff to meet with the inspector and show their support for regulatory compliance and for rapid correction of any problems.

- Request a photo copy of the inspector’s notes and inspection form for retention by the University.

- Before the inspector(s) leaves, obtain information on how to contact them, where to send follow-up information and/or responses and know the exact deadlines set by inspectors for responses.