

January 2017

University of Hawaii
Environmental Health and Safety Office

PROTOCOL FOR UNIVERSITY PERSONNEL IN HANDLING OUTSIDE AGENCY INSPECTION

PURPOSE

To establish procedures for managing and reporting regulatory agency inspections at the University of Hawaii.

SCOPE

A regulatory inspection can occur at any time and for various reasons. Regulatory agencies that may inspect the University include, but are not limited to:

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

State - Department of Health (DOH)- Environmental Management Division (Clean Water Branch, Clean Air Branch, Hazard Evaluation and Emergency Response, Solid and Hazardous Waste Branch, Wastewater Branch), Department of Agriculture (DOA), Department of Labor and Industrial Relations (DLIR)/Hawaii Occupational Safety and Health (HIOSHA)

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

General Procedures

1. **Immediately notify the Environmental Health and Safety Office (956-8660).** The EHSO director should be notified of the inspection and the director will designate the appropriate EHSO program manager or staff to escort the inspector(s). Ask the inspector(s) to wait until the EHSO program manager arrives to escort him or her around the facility.
2. **Review the inspector's credentials.** Inspectors are required to present identifying credentials.
3. **Determine the scope.** Request an initial/opening conference and an explanation of the scope of the investigation.
4. **Be prepared and be safe.** Require all inspectors to take the same types of safety precautions that employees and visitors are required to take. If this includes the use of hard hats, safety goggles/glasses, or other appropriate personal protective equipment (PPE), then inspectors and all others present should wear the same PPE and take the same safety precautions that employees and visitors take. Other items that the EHSO staff should have are a note pad and pen, building floor plans, sampling containers, camera, access keys, etc.
5. **Be courteous and responsive.** Treat visiting inspectors with respect and courtesy. Be responsive and provide the inspectors with the information they ask for, but also be careful what you say. You do not have any obligation to volunteer additional information. If you do not know or do not have the information they are asking for, do not speculate or guess at the

answer. Simply indicate that you will get back to them with the answer and provide it in a timely manner. Never misrepresent facts or lie to an inspector; always answer truthfully.

6. **Accompany the inspector everywhere.** Do not leave the inspectors unattended. If you must leave for any reason, wait for the arrival of your replacement before doing so. Stay with the inspector to provide requested access, introductions and to know what is happening. Request a copy of the inspection checklist prior to inspection, so that you can better follow the inspection procedure.

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.

Take good notes and transcribe them as soon as possible. Take notes on what the inspector observes, specific questions asked, information provided and any other items of interests.

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

7. **Records/Documents.** Keep track of documents you provide to the inspector such as in-house training records, inspections and written programs/procedures or policies. Request a photo copy of the inspector's notes and inspection form(s) for the University's retention.
8. **Request Post-Inspection Debriefing.** Ask for a closing conference if it is not part of the inspector's standard operating procedure (SOP). The EHSO director will invite appropriate management and/or legal staff to meet with the inspector and show their commitment to resolve regulatory deficiencies and provide a rapid correction of any problems.

Before the inspector leaves, obtain contact information, where to send follow-up information and/or responses and know the exact deadlines set by the inspector for responses.