



*Division of
Administrative Affairs*

ENVIRONMENTAL HEALTH AND SAFETY

Policy #P&P-07 EH&S Inspection Policy

Version #2

Effective: 10/03/23

Revised: 10/03/23

1. PURPOSE:

- 1.1. For the protection of the health and safety of the FAU community and the environment,
- 1.2. Environmental, health, and safety-related inspections are conducted to foster learning, correct unsafe conditions, maintain compliance with local, state, and federal regulations, and improve future performance around environmental health and safety.
- 1.3. This policy establishes a framework for managing environmental, health, and safety-related inspections required under University Policy 4.1.2. Environmental Health and Safety and associated EH&S programs.
- 1.4. This policy applies to internal and external inspections of all FAU-owned/leased facilities and operations on all campuses.

2. POLICY STATEMENT:

FAU is dedicated to the well-being of people and the environment. To fulfill our commitment, we have established this EH&S Inspection Policy, which outlines our systematic approach to identifying, assessing, and mitigating risks associated with our operations. Inspections addressed under this policy include, but are not limited to inspections (internal or external) for:

- General workplace safety
- Employee, staff, and student safety
- Biological, chemical, and radiological safety
- Public health
- Environmental programs
- Risk management
- Building code and permitting
- Construction and renovations
- Electrical, mechanical, utility, and structural work
- State regulations such as Florida Building Code and Florida Administrative Codes
- State regulators such as Florida Department of Health and Florida Department of Environmental Protection
- Federal regulators such as DOT and EPA
- State Fire Marshal
- High hazard work such as electrical, elevated, or confined space
- FAU permits and licenses
- Industrial hygiene
- Incident investigations

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- Laboratory self-inspections

Key elements of this policy include:

- General inspections of all FAU properties annually
- Hosting outside regulatory inspections as required
- Conducting inspections in a timely and efficient manner
- Timely reporting of inspection findings and incidents to relevant stakeholders
- Prioritization of corrective actions based on the severity of identified issues
- Implementation of immediate interim controls
- Tracking and follow-up for open findings until corrective action is complete
- Documentation and record-keeping to track compliance and improvements

3. CONCEPTS AND DEFINITIONS:

- 3.1. Inspection – A formal process of evaluating and documenting facilities and operations on FAU owned/leased properties against internal or external environmental, health, and safety, regulations.
- 3.2. Interim Controls – Interim controls means a set of measures designed to temporarily reduce human exposure or likely exposure to hazards including, but not limited to, signage, barriers, guarding, modified work practices, engineering controls, or the use of personal protective equipment, if those measures are reasonably expected to adequately reduce the likelihood of an accident/injury pending the implementation of permanent corrective actions. Interim controls are not intended to be utilized for extended periods of time, only to bridge the gap between identification of the hazard and completion of permanent corrective actions. Interim controls must be approved by the Director, Environmental Health and Safety.

4. RESPONSIBILITIES:

4.1. EH&S

- 4.1.1. Development and oversight of programs designed to identify and eliminate hazards and maintain compliance with local, state, and federal regulations regarding environmental, health, and safety.
- 4.1.2. Conduct a wide variety of Environmental Health and Safety inspections of university facilities and properties and accompany inspectors from external regulatory agencies during inspections of university facilities.
- 4.1.3. Schedule, facilitate, and host external regulatory agencies during inspections of university facilities.
- 4.1.4. Document or collect documentation of inspections conducted at FAU.
- 4.1.5. Communicate inspection findings to responsible departments or individuals, as appropriate.
- 4.1.6. Monitor status of corrections. If the responsible department or individual has not corrected discrepancies, submitted a plan of corrective action, or requested an extension by the original deadline, escalate the notification to the head of the college, division, etc.
- 4.1.7. If the deficiency constitutes an imminent danger, EHS will work with the department to institute an interim measure that removes the immediate hazard until a permanent solution can be implemented. Where interim controls are not

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established, the area(s) containing the hazard or affected by the hazard will be closed until interim controls or permanent corrections can be completed.

- 4.1.8. Perform spot checks to evaluate completion of corrective actions or maintenance of compliance.
- 4.1.9. Maintain records of all inspection documents.

4.2. Lab Owners/PIs/Departments/Colleges/Divisions

- 4.2.1. Cooperate with EH&S and external regulatory agency inspectors.
- 4.2.2. Assign a leadership representative to participate in the inspection.
- 4.2.3. Correct deficiencies within 30 days (or as directed) and collaborate with EH&S to identify interim controls for any imminently dangerous conditions.
- 4.2.4. Provide updates on open deficiencies in a timely manner.
- 4.2.5. Notify EH&S of all environmental, health, and safety inspections conducted by external regulatory agencies without EH&S participation, and forward a copy of any inspection reports received to EH&S.
- 4.2.6. Complete FAMIS work orders to correct deficiencies which require building repair or maintenance. Indicate that the repair or maintenance needed is a safety discrepancy. Send copy of work order confirmation to EH&S.
- 4.2.7. Submit a Minor Projects Request to correct deficiencies which require the services of design and construction. Indicate that the minor project needed is a safety discrepancy. Send copy of work order confirmation to EH&S.

4.3. Facilities Maintenance Departments

- 4.3.1. Place a priority on correcting safety discrepancies within the established deadline.
- 4.3.2. If repairs or maintenance cannot be completed on time, contact the initiator of the request and EH&S to let them know when the repairs or maintenance will be completed.
- 4.3.3. If the repair or maintenance is beyond the capability of Physical Plant due to complexity or cost, submit a request for correction to Design and Construction Services with copy to EH&S.
- 4.3.4. Develop plans, find appropriate funding, and initiate a project to correct safety discrepancies.
- 4.3.5. Notify EHS and affected department of plan of action and the timeline for completion.

4.4. Employees

- 4.4.1. Cooperate with EH&S, its contractors, and external regulatory agency inspectors.
- 4.4.2. Report hazards and concerns regarding environmental health and safety matters in the workplace with immediate supervisors.

5. PROCEDURES:

- 5.1. EH&S coordinates annual inspections (and follow-up inspections) with departments/PIs and conducts additional unscheduled inspections as needed.

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- 5.2. Departments will provide leadership support during all scheduled inspections, as requested by EH&
- 5.3. EH&S communicates the inspection findings to the PI, department, college, or division and collaborates for necessary interim controls, pending final corrective actions.
- 5.4. EH&S monitors the status of the interim control and corrective actions.
- 5.5. The Director of EH&S may direct discontinuance of work activities, closure of the area(s), controlled access, or other actions as deemed necessary for safety, until interim controls or corrective actions can be implemented. If such actions are necessary, they will be conducted in accordance with University Policy 4.1.2 Environmental Health and Safety.
- 5.6. Departments provide timely feedback regarding the status of open findings.

6. ENFORCEMENT:

Oversight and enforcement activities for this program are conducted by Environmental Health and Safety.

Violations of this policy by faculty, staff and students may be grounds for disciplinary action up to and including termination or expulsion in accordance with applicable university and Florida Board of Governors regulations and/or collective bargaining agreements. Such disciplinary actions may also include reprimand, suspension, or other sanctions. Violations of this policy by visitors, contractors, guests and other third parties may be grounds for terminating or suspending their access to and/or use of university property.

7. RELATED INFORMATION:

- University Policy 4.1.2 Environmental Health and Safety

Approved and issued by order of:


Wendy Ash Graves

DATE: 10/2/23

ENVIRONMENTAL HEALTH AND SAFETY

POLICY MAINTENANCE SECTION

Last Revision Date	10/03/2023
Last Revision By	W. Ash Graves
Next Review Due	10/03/2026
Review Frequency	3 years
Version	2.0
Time-sensitive Items	

THIS POLICY RESCINDS ALL OTHER WRITTEN DIRECTIVES REGARDING THIS TOPIC.

8. RECORD OF CHANGES/STATUS CONTROL:

Version	Date	Summary of Changes	Reviewed By
2.0	10/03/2023	New template and layout	<input type="checkbox"/> W. Ash Graves