UNIVERSITY SYSTEM OF GEORGIA
Clayton State University
ENVIRONMENTAL MANAGEMENT SYSTEM

EMS Procedure Manual

EMS Procedure	1.0
Effective Date:	December 5, 2012
Reviewed/ Revised:	December 21, 2022 November 17, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Environmental Management

Introduction and Overview
Environmental Management System

Welcome to Clayton State University's (CSU) Environment Management System. This Manual is designed to serve as a guide to the Environmental Management System (EMS) and all of its related components. It provides an overview of the EMS and a discussion of its components. The Manual provides an understanding of CSU's environmental requirements and the tools available to meet those requirements. Clayton State University's faculty, staff, and students should read the Manual to assist them in complying with environmental requirements and good practices. The EMS consists of various components set out in three sections:

1. Planning and Preparing for Managing Environmental Concerns

1.1. Environmental Policy

1.1.1. Procedures for Environmental Policy

1.2. Environmental Aspects (Risks to Environment)

1.2.1. Procedure for Identification of Aspects/Impacts
1.2.2. Environmental Aspects/Impacts Assessment Table
1.2.3. List of Environmental Aspects/Potential Impact

1.3. Regulatory and Other Requirements

1.3.1. Procedure for Identification of Environmental Regulatory and Other Requirements

1.3.2. List of Environmental Regulations and Other Requirements

1.4. Evaluation of Aspects (Risks to Environment)

1.4.1. Procedure for Evaluation of Aspects/Impacts
1.4.2. EMS-Significant Aspects Evaluation Form
1.4.3. List of Environmental Aspects Evaluation Criteria

1.5. Goals and Objectives

1.5.0. Procedure for Setting Objectives and Targets
1.5.1. Worksheet for Setting Objectives and Targets for Hazardous Waste Storage-Labs
1.5.2. Worksheet for Setting Objectives and Targets for Hazardous Waste Disposal Preparation-Labs
1.5.3. Worksheet for Setting Objectives and Targets for Universal Waste-Bulbs-Facilities Management
1.5.4. Worksheet for Setting Objectives and Targets for Universal Waste-Bulbs-Residence Life
1.5.5. Worksheet for Setting Objectives and Targets for Wastewater Management
1.5.6. Worksheet of Setting Objectives and Targets for Biological Waste

2. Taking Action to Address Environmental Concerns

2.1. Roles and Responsibilities

2.1.1. List of Roles and Responsibilities
2.1.2. Procedure for Identifying and Assigning Roles and Responsibilities
2.1.3. EMS- Assignment of Roles and Responsibilities

2.2. Operational Controls (Environmental Programs)

2.2.0. Procedure for Identifying Operation Controls

2.2.1. List of Operation Controls for Hazardous Waste Storage-Labs
2.2.1.a. List of Major Risks and Operation Controls
2.2.1.b. Written Controls

2.2.2. List of Operation Controls for Universal Waste Disposal Preparations-Labs
2.2.2.a. List of Major Risks and Operation Controls

2.2.2.b Written Controls

2.2.3. List of Operation Controls for Universal Waste-Bulbs-Facilities Management
2.2.3.a. List of Major Risks and Operation Controls
2.2.3.b. Written Controls

2.2.4. List of Operation Controls for Universal Waste-Bulbs-Residence Life
2.2.4.a. List of Major Risks and Operation Controls
2.2.4.b. Written Controls

2.2.5. List of Operation Controls for Wastewater Management
2.2.5.a. List of Major Risks and Operation Controls
2.2.5.b. Written Controls

2.2.6. List of Operation Controls for Biological Waste Management
2.2.6.a. List of Major Risks and Operation Controls
2.2.6.b. Written Controls

2.3. Communication

2.3.1. Procedure for Handling Communications
2.3.2. Means of Communication and Groups to Reach
2.3.3. Planning Communication

2.4. Training

2.4.1. Procedure for Identifying Training Needs
2.4.2. List of Training
2.4.3. EMS-Training

2.5. Document and Document Control

2.5.1. Procedure for Managing Controlled Documents
2.5.2. List of EMS Documents
2.5.3. List of EMS Controlled Documents

2.6. EMS Records List

2.6.1. Procedure for Managing Records
2.6.2. List of EMS Records
2.6.3. EMS Records Management

2.7. Emergency Preparedness and Response

2.7.1. Procedure for Emergency Preparedness Planning and Response
2.7.2. Evaluation of Potential Emergency Incidents
University Emergency Procedures, Chapter 3, Emergency Management Plan

3. Checking and Reviewing

3.1. Environmental Sampling and Monitoring

3.1.1. Procedure for Conducting Monitoring and Measuring
3.1.2. List of Information and Activities to be Measured/Monitored

3.2. Reporting Environmental Incidents/Corrective and Preventive Actions

3.2.1. Procedure for Identifying Non-Compliance/Non-Conformances, and Taking Corrective and Preventive Actions
3.2.2. List of Non-Compliance Issues

3.3 Environmental Inspections and Self-Audits

3.3.1. Procedure for Conducting Audits
3.3.2. Lab Audit 2014
Wastewater Profile Analysis 2017

3.4. Senior Administrative Environmental Review

3.4.1. Procedure for Conducting Administration Review
3.4.2. 2013 Annual Review
3.4.3. 2014 Annual Review
3.4.4. 2015 Annual Review
3.4.5. 2016 Annual Review
3.4.6. 2017 Annual Review

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Reading the Manual will provide an overview on the purpose, approach, and tools CSU is using to help meet and surpass its environmental requirements, as well as information on particular components of the EMS.

EMS Framework and Document Structure

Overall EMS Framework

The focus of the EMS is to help ensure that Clayton State University meets all of its regulatory requirements and improves its performance in non-regulated environmental arenas such as recycling and energy usage.

The basis of the EMS is a commitment to continual improvement. This EMS is based on the "Plan, Do, Check, and Act" model. A visual representation of this model is set out below.



The EMS is a systematic approach to environmental performance. It consists of various components that together ensure effective environmental performance through accountability, assigned responsibilities, employee involvement, written policies, training, corrective action, senior management review and senior staff involvement. All components will work together to continually improve Clayton State University's environmental performance.

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Goals and Objectives

CSU has built its EMS on many practices already in place to meet federal and state regulatory requirements, and policies of the USG and CSU.

One of the initial actions of the EMS is to have Clayton State University identify its most significant environmental issues and to address these issues through objectives and targets because being in compliance with environmental regulations is a priority of CSU. In addition, by including pollution prevention in this process, CSU can improve its operating efficiencies and achieve cost savings through implementing waste reduction and energy efficiency opportunities.

EMS Documentation Structure

The documentation for the Environmental Management System is grouped into several categories:

1) Environmental Policy;
2) EMS Procedures; and
3) Plans, Standard Operating Procedures, and Work Instructions.

These documents provide the framework for how the Clayton State University EMS functions, producing a framework for managing and continually improving environmental performance.

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EMS Form	1.1
Effective Date:	May 8, 2012
Reviewed/ Revised:	October 18, 2016
	October 20, 2014
	May 8, 2012
Subject:	CSU Environmental Policy

Clayton State University
Environmental and Occupational Safety Policy

Web Link: www.clayton.edu/EH&S/ems

Environmental and Occupational Safety

Clayton State University (CSU) is committed to achieving excellence in providing a safe working and learning environment, and supporting environmentally sound practices in the conduct of institutional activities. CSU shall, at a minimum, comply with applicable environmental and occupational safety laws and regulations, and shall designate the Vice President of Business and Operations to oversee compliance. In the absence of specific laws or regulations, each institution will follow industry standards and good management practices. CSU shall maintain policies and procedures to govern activities to meet the goal of comprehensively integrating occupational safety and environmental considerations, and will periodically review and update such policies and procedures. The Vice President of Business and Operations, in consultation with the institution's Environmental Compliance Advisory Committee, is responsible for developing standards, guidelines, and processes to promote, support, and access the implementation of environmental and occupational safety management programs and initiatives.

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EMS Procedure	1.1.1
Effective Date:	May 8, 2012
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	May 8, 2012
Subject:	Environmental Policy

Procedure for Environmental Policy

PURPOSE

This procedure documents how Clayton State University (CSU) develops, maintains, communicates, reviews and revises its Environmental and Occupational Safety policy ("Environmental Policy") for its Environmental Management System (EMS).

PROCESS

Step 1

Clayton State University (CSU) has developed and adopted an Environmental and Occupational Safety Policy ("Environmental Policy").

Step 2

CSU will review the BOR Environmental Policy, modify it if needed, and adopt it as CSU's environmental policy. Every two years, CSU's EMS Coordinator, the members of the Environmental Compliance Advisory Committee and other EMS Participants will review the Environmental Policy to be sure that it remains appropriate to the activities occurring at Clayton State University.

Step 3

The EMS Coordinator, the Environmental Compliance Advisory Committee, the EH&S website and other EMS Participants will make the Environmental Policy available to all applicable personnel at Clayton State University.

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EMS Procedure 1.2.1

Effective Date:	December 5, 2012
Last Revised:	December 9, 2025
Subject:	Identify Aspects/Impacts

Procedure for Identification of Aspects/Impacts

PURPOSE

This procedure documents how Clayton State University (CSU) identifies aspects and impacts applicable to activities and operations that occur at the University.

This procedure for the identification of environmental aspects shall be limited to those environmental aspects that Clayton State University can control and over which it can be expected to have an influence within the scope of the EMS.

PROCESS

Step 1

Clayton State University is committed to achieving excellence in providing a safe working and learning environment, and supporting environmentally sound practices in the conduct of institutional activities.

Clayton State University is committed to complying with applicable environmental and occupational safety laws and regulations. In the absence of specific laws or regulations, CSU will follow industry standards and good management practices.

CSU conducts a variety of activities that could have an impact on the environment. Some activities, such as the handling of hazardous and universal waste, the storage of oil, or the application of fertilizer and pesticides, are governed by federal, state, or local regulations because of the potential impact on the environment. Other activities, such as solid waste production or energy consumption, are not subject to regulations, but are still activities that can impact the environment and which the University wants to evaluate.

Step 2 – Identifying Aspects/Impacts

Based on the BOR Policy, Clayton State University (CSU) has designated the Vice President of Business and Operations as the key member of its administrative leadership team to oversee compliance with environmental requirements.

CSU has designated the Environmental Health and Safety/Property Risk Coordinator as the EMS coordinator. CSU has designated an Environmental Compliance Advisory Committee consisting of representatives from key departments to work on the Environmental Management System (EMS).

This year's committee includes the following persons:

Lashaundra Fambro (EH&S Coordinator), Chemistry and Physics
Dr. Boey Khem Tan, Biology
Alan Xie, Art
Brandi Clisham, Dental Hygiene
Darren Thomas, Facilities Management
Richard Pepples, Facilities Management
Charles Bridges, Facilities Management
Angela Cole, Health and Wellness Center
Rodney Starr, Loch Prints
Avindhya Koralagamage, Nursing
Cpt. Gayron Taylor, Public Safety
Dr. Shontelle Thrash, Stage and Screen
Corlis Cummings, General Counsel & Chief Legal Officer
Nick Henry, Vice President for Business and Operations

This committee has compiled a list of the activities and related environmental aspects and impacts that are present at Clayton State.

That list is set out in the Environmental Aspects and Impact Assessment Table and is kept in the office of the EH&S/Planning & Design Manager.

The committee will report its results to the Vice President of Business and Operations, who oversees environmental concerns.

The Director of Public Safety is responsible for emergency response.

The key administrative leadership person will convene the group at least once every year to review the activities, aspects and impacts, and update the list annually (Table 1.2.2).

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Environmental Aspects and Impacts Assessment Table-1.2.2

Operation	**Activity**	**Aspect**	**Impact**
Science Laboratories and classrooms (Chemistry, Biology, Physics)	- Teaching experiments - Research experiment - Compressed gasses - Record keeping	- Use of chemicals - Hazardous waste - Water use - Energy use - Biological waste - Possible spills - Lack of documentation	- Indoor air quality issues - Water quality issues - Exposure - Possibly unsafe working conditions - Outdoor air quality - Explosive - Potential fines - Flammable
Art Department	- Painting (oil-based) - Ceramics	- Use of materials - Use of solvents and toxic chemicals - Use of oil-based paints - Energy use - Water use - Possible spills	- Indoor air quality - Outdoor air quality - Possibly unsafe working conditions - Resource use - Hazardous waste disposal - Water disposal issues
Food Services	- Purchasing food from local growers - Purchasing food from further away - Preparation of food - Disposal of food scraps - Washing dishes - Recycling	- Electricity use - Water use - Solid waste - Food waste - Supporting local farms - Possible spills - Wastewater	- Outdoor air quality - Resource use (water, energy) - Landfill space - Helping local economy - Reducing fuel use - Water disposal issues - Reduce waste in landfills
Grounds Maintenance	- Application of fertilizer and pesticides - Watering grounds using sediment ponds - Pruning, mowing - Landscaping - Signage notifying community of chemical treatments - Tree management - Purchase plants/trees from local growers	- Fuel use - Fertilizer/ Pesticide use - Yard waste - Possible spills - Herbicides - Lack of documentation - Support local growers	- Outdoor air quality - Pollutant runoff - Resource conservation - Chemical exposure - Water conservation - Helping local economy - Potential fines

	- Record keeping		
Building Services	- Interior cleaning - Pest control - Recycling - Record keeping	- Electricity use - Water use - Wastewater - Routine solid waste - Cleaning chemical use - Noxious fumes - Sustainability - Lack of documentation	- Outdoor air quality - Indoor air quality - Resource use (water, energy) - Use of Publicly Owned Treatment Works (POTW) - Landfill space - Exposure to chemicals - Reduce waste in landfills - Potential fines
Central Heating and Cooling Plant	- Providing heat - Providing cooling - Purchasing fuel - Purchasing energy	- Fuel use - Water use - Possible spills - Air emissions	- Resource use - Outdoor air quality - Indoor air quality'
Building Maintenance and Storage	- Painting - Repairs - Renovations - Compressed gasses - Record keeping - Sustainability initiatives	- Water use - Wastewater - Energy use - Chemical use - Waste disposal - Air emissions - Lack of documentation - Participate in "Rebuilding America" - Install water bottle re-filling stations	- Resource use - Outdoor air quality - Indoor air quality - Landfill space - Hazardous waste disposal (oil-based paints, solvents - Potential fines - Energy and water efficiencies and conservation
Construction, Demolition	- Removal of building materials - Renovating buildings - New building construction	- Use of materials - Use of heavy equipment - C&D waste disposal - Dust and air emissions - Asbestos abatement - Erosion and sediment Control - Possible asbestos abatement	- Outdoor air quality - Indoor air quality - Possible asbestos exposure - Possible unsafe working conditions - Storm water runoff violations

Dormitories/ Residences	- Providing lights, HVAC - Providing water - Cleaning - Making repairs, painting - Bathroom facilities - Laundry - Pool maintenance	- Electricity use - Water use - Wastewater - Routine solid waste - End of year solid waste - Cleaning chemical use	- Outdoor air quality - Resource use (water, energy) - Use of POTW - Landfill space - Exposure to chemicals
Fleet Management	- Oil changes - Vehicle cleaning and washings - Green fleet	- Use of chemicals - Water use - Energy use - Wastewater - Possible spills - Electric cart transportation	- Use of POTW - Chemical exposure - Wastewater - Pollutant runoff - Reduce emissions - Fuel conservation
Universal Waste	-Collection and storage of Universal waste - Record keeping	- Storage of unregulated waste - Breakage potential - Battery leaking - Lack of documentation	- Possible chemical exposure - Potential fines
Fuel Management	- Used oil - Use of gasoline and diesel - Record keeping	- Possible spill - Fuel use - Storing fuel - Air emissions - Lack of documentation - Electric cart transport	- Outdoor air quality - Water quality issues - Potential fines - Fuel conservation
Nursing and Dental Clinics and Labs	- Use of pharmaceuticals - X-Rays (digital) - Use of sharps	- Energy use - Water use - Wastewater	- Possible chemical exposure - Possible blood borne pathogen Exposure
Health and Wellness Center	- Use of pharmaceuticals - Use of sharps	- Energy use - Water use - Biohazard waste - Use of chemicals - Wastewater	- Possible chemical exposure - Possible blood borne pathogen exposure
Stage and Screen	-Set building -Painting -Dies for costumes	- Use of materials - Use of solvents and toxic chemicals	- Indoor air quality - Outdoor air quality - Possibly unsafe working

		- Use of oil-based paints - Energy use - Water use - Possible spills	conditions - Resource use - Hazardous waste disposal - Water disposal issues

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EMS Form:	1.2.3
Effective Date:	December 5, 2012
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Subject:	Aspects/Impacts List

List of Environmental Aspects and Potential Impacts

Listed below are the environmental aspects and the potential impact.

- Hazardous Waste – Less than 220 pounds of hazardous waste are being generated each month. Impacts include: cost of disposal, storage, compliance, potential spills, potential drain disposal, potential exposure by staff or students.

- Wastewater – Approximately 2.0 million gallons of wastewater are being generated annually. Impacts include: cost of disposal, and potential drain disposal of improper materials.

- Radiation/Radioactive materials - present at the campus but in minute non-regulated quantities in the dental clinic for x-rays and labs and physics lab.

- Biological agents - we currently do not have any biological agent that is regulated by the Federal Select Agents Program.

- Storm Water - the following are wetlands, streams or other sensitive environmental receptors on-campus and adjacent to the campus: 4 retention ponds that could drain into Panther Creek.The following materials could potentially be released to stormwater: used oil and fuel (leaded and diesel).

- Vehicle/machine maintenance - vehicle maintenance is handled off campus at local auto shops.

- Oil-based paints - the following are locations where oil-based paints are used: Art Studio, all metals such as door jams and handrails.

- Used Oil - 250-gallon tank is located at Facilities Management's landscaping shed.

- USTs - The campus does not have an underground storage tank.

- ASTs - The campus has the following ASTs with the following storage capacity and thefollowing containment and potential for a release:

  500 gallon tank of unleaded gasoline (facilities management)
  110 gallon drum of diesel fuel (facilities management)
  55 gallon drum of paint waste (facilities management)
  55 gallon drum of antifreeze (facilities management)
  30 gallon drum of mineral spirits (facilities management)
  (2) 15 gallon non-combustible cans for rags and contaminated newspaper (art studio)

  Note: all ASTs in facilities management sit on secondary containers and campus has a SPCC plan for potential spills.

- Air Emissions - the campus has 17 boilers which use natural gas for fuel and a cooling system which uses electricity for fuel. The campus has 7 emergency generators that use diesel and natural gas for fuel.

  Diesel fueled: Continue Education and Spivey Hall- changing to Natural Gas
  Natural Gas fueled: Edgewater Hall, Library, University Center, Laker Hall, Lakeview Discovery Science Building

- Vehicles - the campus has a fleet of 31 vehicles and other gas-powered equipment and utility carts that emit exhaust emissions. Daily commuter students also contribute to emissions.

- Fume hoods - there are 60 fume hoods with the following types of chemical vapors being emitted from the fume hoods: Various chlorinated and non-chlorinated organic compounds, acid fumes, and ammonia.

- Landscaping - the following are types and amounts of fertilizers and other materials applied to the grounds and athletic fields: campus uses 15,600 pounds of fertilizer each year; nitrogen, potassium, and phosphorous-based mixture (0-0-7) and (21-0-7) and (24-2-11).

- Pesticides - the following are the types and amounts of pesticides used in the grounds and athletic fields maintenance:

PESTICIDES USED:

- Monosodium Acid Methanearsonate - MSMA 6.6 - 10 gal. per year
- Glyphosate - Roundup -50 lbs dry granular
- Dimethylamine - Trimec Southern – 15 gal. per year
- Tech Pac, LLC - Over N Out Ant Poison - Bifenthrin-Pyrethroid - 350 lbs. per year
- 16-4-8 Weed & Feed Lesco - 0 lbs. per year
- 24-2-11 Turf Fertilizer Lesco - 4500 lbs. per year
- 0-0-7 Pre-Emergent Lesco - 6000 lbs. per year
- 21-0-7 Lesco LockUp – 4500 lbs. per year
- Urea 46-0-0 – 600 lbs. per year
- Three Way Dimethylamine Salt 2,4-D – 15 gallons per year
- Princep Simazine – 25 gallons per year
- Brushmaster 2,4-D,2 ethylhexylester – 5 gallons per year
- Prosecutor Glyphosphate, NGlycine – 25 gallons per year
- Dismess South Sulfentrazone – 1 gallon per year
- EliminateD Dimethylamine Salt of Dicamba – 12.5 gallons per year
- Stonewall 65 WDG – prodamine- 15 gal. per year
- Triclopyr 4, triclopyr- 20 gal. per year
- Freehand, dimethenamidP – 500lbs. per year
- Rm43, Glyphosate, isopropylamine salt- 15 gal. per year
- Dismiss NXXT Sulfentrazone- 60 oz. gallon per year

- Sprinklers - grounds and athletic fields use no municipal or well water, except for CSU-East, and one inch of water per week in the warm season (April-September) of pond and retention water irrigation.

- Cleaning chemicals - campus staff uses various cleaning chemicals, 60% of which are bio-degradable or "green" and 40% are not bio-degradable or "green".

- Fluorescent bulbs (used) - are collected and disposed of in the following manner, and the following steps are taken to prevent any breakage of bulbs: Each building has a satellite collection point for used bulbs. When full the sealed containers will have the proper labeling and accumulation dates and will be stored in the central Universal Waste location until disposed by the contracted vendor.

  All universal waste handlers should wear appropriate gloves and eye protection.

Lamps:

- handle lamps in a manner that will prevent releases (breakage).
- properly store lamps in a box or case to prevent breakage
- do not leave individual lamps leaning in corners of rooms or hallways, lying unprotected on top of equipment or on the floor.
- label all lamp containers
- do not allow box/container to get wet
- do not tape bulbs together
- package bulbs tightly without separators or other packing.
- boxes must be full to avoid the possibility of breakage

If a lamp breaks:

- you must wear leather gloves
- eye protection
- avoid breathing the vapors
- do not dispose in the normal trash.
- package broken bulbs in puncture resistant closable container (heavy cardboard box, trash container with lid, commercial broken glass container)

- Batteries - are disposed of in the following manner: batteries are taped and placed in designated drums until container is full and ready for disposal. All containers are sealed, labeled and properly dated.

- Asbestos - there is asbestos present or believed to be present in all campus buildings.

  The following are staff or students who potentially could be exposed to asbestos: everyone on campus has potential exposure, but mainly personnel in building operations and services.

- Lead Paint - none used in residences or where young children are present.

- Solid/Recycled Waste – An average of 27 tons of solid waste are generated each month; An average of 7 tons are recycled per month.

- Construction debris - construction debris is handled through roll off commercial dumpsters.

- Nuisance - the nearest residential neighbors are 80-100 yards away.

- Energy Usage - *Based on 15 hours a day and 7 days per week operation*. 297,323 kilowatts of energy per fiscal year are being used for lighting; 408,820 kilowatts of energy per fiscal year are being used for mechanical cooling; 37,165 kilowatts of energy per fiscal year are being used for mechanical cooling. *Information provided is based on average Energy Standards percentages and is not actual campus totals.*

- Water Usage - Annual use on campus is approximately 22 million gallons of municipal water per fiscal year.

  The following are noise from activities at the campus that could affect the surrounding community: landscaping equipment (mowers, blowers), loud music during student events

The following are smells from activities at the campus that could affect the surrounding community: expired food, possible fertilizer odors, trash.

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October 23, 2017
October 18, 2016
October 26, 2015
October 20, 2014
October 17, 2013

Subject: Regulatory and Other Requirements

Procedure to Identify Environmental Regulatory and Other Requirements

PURPOSE

This procedure documents how Clayton State University (CSU) identifies environmental laws and regulations applicable to activities and operations that occur at the University.

It is the policy of CSU to maintain compliance with all environmental laws and regulations, and to stay current with environmental best practices.

PROCESS

Step 1

There are numerous environmental laws and regulations at the federal, state, and local levels. In addition, the USG Board of Regents has adopted certain environmental procedures to follow and provides guidance on interpretation of environmental laws and regulations for USG institutions. Further, the institution has adopted certain environmental procedures for CSU's personnel to follow. It is essential that CSU personnel understand which laws and regulations, USG procedures, and CSU procedures apply to its activities and also what these laws, regulations and procedures specifically require.

www.epa.gov/waste/hazard/index.htm
www.usg.edu/facilities/services/environmental health_safety

Step 2

The office or individual assigned to direct a program is responsible for regulatory tracking for that specific program area.

It will be the annual duty of the person responsible to review the legal requirements regarding the compliance of all programs within their operations.

Clayton State University's Environmental Health and Safety Office serves as a resource to oversee regulatory developments by subscribing to environmental newsletters and regulatory bulletins, attending relevant conferences and seminars, monitoring agency web sites, and participating in agency advisory committees. EH&S must uphold all duties assigned to the role. The offices of EH&S, Human Resources, AcademicDepartments, Facilities Management and other departments regarding job specific training willcoordinate programs to train personnel on regulatory requirements.

CSU personnel who become aware of a new or revised law or regulation that may apply to the institution should notify the EH&S Office.

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EMS Form 1.3.2

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October 23, 2017
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October 17, 2013

Subject: Regulations/Other Requirements

List of Environmental Regulations and Other Requirements

Clayton State University has identified the following environmental regulations and other requirements that are to be complied with in conducting environmental activities at University.

Legal Category	Potential Area of Campus Where Applicable	Brief Description	Regulatory Citation	Requirement
Hazardous Waste	Throughout the Campus	Management of Hazardous Waste	40 C.F.R Parts 260-265 and 268; GA DNR EPD Chapter 391-3-11-.08 and .10	Generators must determine if waste is hazardous, and then follow the applicable requirements (storage, manifest, pre-transport, record-keeping, training and special requirements)
Universal Waste Management	Throughout the Campus	Collect and store Universal Waste (Batteries, Thermostats, and Mercury-containing Material and Lamps)	40 C.F.R. Part 273; GA DNR EPD Chapter 391-3-11-.18	Management (collecting and handling) of certain widely generated wastes (batteries, thermostats, and mercury-containing material and lamps)
Wastewater Discharge	Laboratories and Physical Plant buildings	Sewer use conditions set by Clayton County Water Authority	Sewer Ordinance Ordinance 2002-51 and Ordinance 2007-180	Adhering to local discharge limits
	Clayton Station	Residence	www.clavtoncountv	.15 (d) Backwash water

	Apartments Food Services locations	swimming pool Dishwashing and location cleaning	gublichealth.org/env Health/gools/rules and regulations.htm www.claytoncounty gublichealth.org/gdfs/env Health/swimming p o ols regs sec 15.gdf Section -.15Water Supply and Disposal Sewer Ordinance Ordinance 2002-51 and Ordinance 2007-180	may be discharged into a sanitary sewer through and approved air gap or into an approved subsurface disposal system or by other means approved by the Health Authority. Adhere to local discharge limits
Hazardous Chemical Inventory and Reporting	Throughout the Campus	Specific amounts of certain hazardous chemicals are subject to planning and reporting	Federal Emergency Planning and Community Right-to-Know Act (EPCRA). 40 C.F.R. Parts 355 and 370, and USG BOR Policy	Reporting hazardous chemicals and extremely hazardous chemicals (EH&Ss) present or released above a threshold to SERC, LEPC and local fire department. Providing Safety Data Sheets (SDS) one time and filing annual Tier II Report by March 1.
Storage of oil above 1350 gallons in above ground tanks	Throughout the Campus	Requires a facility storing oil to prepare a Spill Prevention, Control, and Countermeasure Plan	Federal Clean Water Act 40 CFR Part 112; Clayton State University SPCC plan	Procedures for storing and handling oil, planning for possible spills and conducting training
Air Emissions/Clean Air	In buildings where air emissions sources are located	Management of air emission	40 C.F.R. Parts 52, 60, 63 and 82; GA DNR EPD Chapter 391-3-1 Clean Air Act, 1970 Title I, Air Pollution Prevention/Control	Regulates major sources and modifications to major sources in "attainment" areas; regulates certain boiler equipment; regulates Title V and synthetic minor facilities; and regulates use of refrigerants

Asbestos Management	In buildings where asbestos is present	Management of asbestos and record keeping	40 C.F.R. Parts 61 and 763; GA DNR EPD Chapter 391-3-14	Procedures for handling asbestos waste properly and maintaining certain records
Pesticide Program	In buildings where pesticides are stored and locations where pesticides are applied	Management of pesticides	40 C.F.R. Parts 160, 162, 170, 171, and 172; GA DA Chapter 40-21-2 to 21-9	Procedures for storage, use and record keeping for pesticides and restricted use pesticides
Lead-based Paint	Residences that have a separate bedroom and day care centers	Notice concerning lead-based paint and managing lead-based paint activities	40 C.F.R. Part 745; GA DNR EPD Chapter 391-3-24	Disclosures to residents of “lead-based paint" housing and regulations for lead-based paint activities
Storm Water	Throughout the institution	Management of discharges to "waters of the United States" and "waters of the State"	40 C.F.R. Part 122; GA DNR EPD Chapter 391-3-6; GA General Permits for Storm Water Discharge	Preventive measures to avoid discharge of pollutants to waters of the US or the State
TSCA Polychlorinated Biphenyls (PCBs)	Transformers and equipment using hydraulic fluid, and locations where PCB wastes are stored	Management of equipment containing PCBs and of PCB waste	40 C.F.R. Part 761	Label PCB transformers; handle, store. label and dispose of PCB waste
Used Oil	Locations where used motor oil and used kitchen oil are stored	Management of used oil	40 C.F.R Part 279; GA DNR EPD Chapter 391-3-11-.17	Label, store and dispose of used oil properly
Employee Right-to-Know	Throughout the Institution Where Employees Exposed to Toxic/Hazardous Chemicals in the Workplace	Employee Access to SDS Chemical Container Labeling and Employee Training	29 C.F.R Section 1910.1200 and GA Public Employee and Hazard Chemical Protection and Right to Know Act	Inform employees on chemical hazards found in the workplace; label chemical containers; SDS made available to Employees

Biological/Biohazard Waste	Health, Nursing, Dental Clinics, andlabs	Management of biohazard waste and bloodborne pathogens	OHSA bloodborne pathogen standard; O.C.G.A. 12-8-20, et seq; Rule 391-3-4-.15 Biomedical Waste. Amended.	Adhere to procedures to prevent contamination and health issues
Safe Drinking Water	Throughout the campus	Ordinance and treatment managed by Clayton County Water Authority	Safe Drinking Water Act, 1974	Provisions to protect public health by regulating public drinking water

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EMS Procedure 1.4.1

Effective Date: December 5, 2012
Reviewed/ Revised: December 9, 2025

Subject: Evaluate Aspects/Impacts

Procedure for Evaluation of Aspects/Impacts

PURPOSE

This Environmental Management System (EMS) procedure documents how Clayton State University (CSU) evaluates aspects and impacts applicable to activities and operations that occur at the University.

This procedure for the evaluation of environmental aspects shall be limited to those environmental aspects that CSU can control and over which it can be expected to have an influence within the scope of the EMS.

PROCESS

Step 1

Clayton State University is committed to achieving excellence in providing a safe working and learning environment, and supporting environmentally sound practices in the conduct of institutional activities.

Clayton State University is committed to complying with applicable environmental and occupational safety laws and regulations. In the absence of specific laws or regulations, Clayton State University will follow industry standards and good management practices.

Based on the Environmental Policy, CSU will manage all significant environmental impacts to provide a safe working and learning environment.

CSU has designated the Vice President of Business and Operations as the key member of its administrative leadership team to oversee compliance with environmental requirements.

CSU conducts a variety of activities that could have an impact on the environment. Some activities such as the handling of hazardous waste, the storage of oil, or the generation of air emissions are governed by federal, state, or local regulations because of the potential impact on the environment. Other activities such as solid waste production or energy consumption, are not subject to regulations, but are still activities that can impact the environment and which Clayton State University wants to evaluate.

Step 2 - Process for Evaluating Aspects/Impacts

The EMS Coordinator will convene this year's Environmental Compliance Advisory Committee:

Lashaundra Fambro (EH&S Coordinator), Chemistry and Physics
Dr. Boey Khem Tan, Biology
Alan Xie, Art
Brandi Clisham, Dental Hygiene
Darren Thomas, Facilities Management
Richard Pepples, Facilities Management
Charles Bridges, Facilities Management
Angela Cole, Health and Wellness Center
Rodney Starr, Loch Prints
Avindhya Koralagamage, Nursing
Cpt. Gayron Taylor, Public Safety
Dr. Shontelle Thrash, Stage and Screen
Corlis Cummings, General Counsel & Chief Legal Officer
Nick Henry, Vice President for Business and Operations

This committee conducts this evaluation, compiles a list of criteria to be used to evaluate the environmental aspects and impacts that are present at CSU and addresses the waste management proposal.

The committee determines that aspects/impacts with a score of 19 and above will be "significant."

The committee evaluates and scores the environmental aspects and impacts using the Evaluation Form.

The results of the committee's meetings and the Evaluation Form are kept in the office of the EH&S/Property Risk Coordinator.

The committee will report its results to the Vice President of Business and Operations who oversee environmental concerns.

The key administrative leadership person will convene the group at least once every year to review the activities, aspects and impacts, and update the list.

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EMS Form	1.4.2
Effective Date	December 5, 2012
Reviewed/Revised	October 23, 2017
Subject:	Evaluate Aspects/Impacts

EMS - SIGNIFICANT ASPECTS EVALUATION FORM

	CRITERIA									
Aspect	**Staff / Student Exposure**	**Community Exposure**	**Environmental Impact/Exposure**	**Regulatory Compliance Concerns**	**Regulatory Compliance Costs**	**Potential for fines/penalties**	**Impact on Reputation**	**Noise/nuisance**	**Use of Natural Resources**	**Score or Rank**
Hazardous waste generation, storage and disposal in Labs and classrooms	3	3	3	3	3	3	3	1	1	23
Wastewater generation, handling and disposal	3	3	3	3	3	3	3	0	0	21
Biological waste management	3	2	3	3	3	3	3	0	0	20
Used Florescent bulb generation storage, disposal	3	2	3	2	2	3	3	0	1	19
Air Emissions/ Refrigerants	2	2	2	3	3	3	2	0	0	17
Compressed gasses/ Fire suppression	2	1	2	3	3	3	2	0	0	16
Used motor oil generation, storage and disposal	2	1	2	3	3	3	1	0	0	15
Oil /Fuel Storage (ASTs)	1	1	2	3	3	3	1	0	0	14
PCB Storage/disposal	1	1	2	3	3	1	1	0	0	12
Used batteries to be reused or disposed	1	0	1	3	3	3	1	0	0	12
Storm water	1	0	1	3	3	3	1	0	0	12
Used cooking oil generation, storage and disposal	1	1	2	2	2	2	1	0	0	11
Cleaning chemicals	1	0	1	3	3	2	1	0	0	11

Impact Scoring O - 3 0 - no impact; 1 - low impact; 2 - moderate impact; 3 - high impact

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Aspect	Staff / Student Exposure	Community Exposure	Environmental Impact/Exposure	Regulatory Compliance Concerns	Regulatory Compliance Costs	Potential for fines/penalties	Impact on Reputation	Noise/nuisance	Use of Natural Resources	Score or Rank
Radiation/X-Ray	1	0	1	3	3	2	1	0	0	11
Asbestos	1	0	1	3	3	2	1	0	0	11
Vehicle/machine maintenance and repair	1	0	1	3	3	2	1	0	0	11
Painting (oil based)	1	0	1	3	3	2	1	0	0	11
Lead Paint	1	0	1	3	3	2	1	0	0	11
Pesticide/Herbicide use	1	0	1	3	3	2	1	0	0	11
Vehicle use	0	0	1	3	3	1	0	0	0	8
Boiler and Chiller units	0	0	1	3	3	1	0	0	0	8
Solid waste generation/trash	0	0	1	3	3	1	0	0	0	8
Construction debris	0	0	1	3	3	1	0	0	0	8
Nuisance (noise, smells)	0	0	0	3	3	0	0	0	0	6
Energy usage	0	0	0	3	3	0	0	0	0	6
Water usage	0	0	0	3	3	0	0	0	0	6
Recycling paper	0	0	1	0	0	0	2	0	0	3
Recycling bottles and cans	0	0	1	0	0	0	2	0	0	3
Landscaping/Tree Management	0	0	1	3	3	0	0	0	0	7
Erosion and sediment control	0	0	1	3	3	0	0	0	0	7
Food Services/prep and disposal	0	0	0	3	3	0	1	0	0	7

Impact Scoring O - 3 0 - no impact; 1 - low impact; 2 - moderate impact; 3 - high impact

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EMS Form 1.4.3

Effective Date: December 5, 2012

Reviewed/ Revised: **November 18, 2021**
October 23, 2017
October 18, 2016
October 26, 2015
October 20, 2014
October 17, 2013

Subject: Aspects/Impacts Evaluation Criteria

List of Environmental Aspects Evaluation Criteria

Listed below are the criteria used to evaluate the potential impact of each aspect and the priority or weight assigned to each.

Also below is how the meaning of the scores and what score is determined to be "significant":

List of Criteria Used to Evaluate Environmental Aspects (Risks):

Criteria	Priority/Weight
Hazardous waste generation, storage and disposal in labs and classrooms	23
Wastewater management	21
Biological waste management	20
Universal waste-bulbs	19

The aspects are evaluated on a scale of 0 (lowest possible score) to 3 (highest possible score) with atotal maximum score of 27 for an aspect.

Aspects with scores of 19 or higher are considered to be significant and receive priority attention.

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EMS Procedure	1.5.0
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Setting Objectives and Targets

Procedure for Setting Objectives and Targets

PURPOSE

This procedure documents how Clayton State University (CSU) sets EMS objectives and targets applicable to activities and operations that occur at the University

PROCESS

Step 1

The EMS Coordinator and Environmental Compliance Advisory Committee are responsible for developing the EMS objectives and targets. The EMS Coordinator and the Environmental Compliance Advisory Committee will also seek input from the following departments to ensure that objectives and targets are achievable:

Academic Departments
Dental Clinic
Residence Life
Facilities Management
Health and Wellness Center

Objectives are goals that are consistent with USG's environmental and occupational health policy, CSU's environmental policy, priorities, priority aspects, and applicable regulations.

Targets are detailed goals related to, and supporting a particular objective. Targets should be realistic, measurable, related to baseline data, normalized when possible, and have a designated time frame.

Step 2

Objectives and targets will be linked to significant environmental aspects and compliance issues identified by Clayton State.

The EMS Coordinator and the Environmental Compliance Advisory Committee will develop an action plan for each objective. Each action plan will describe specific actions needed to achieve the objective and targets, the resources needed for each action, the person(s) responsible for each action and the deadline(s).

Step 3

Progress in achieving EMS objectives and targets will be tracked by the individual or department responsible for the compliance.

Annually, the EMS Coordinator and the Environmental Compliance Advisory Committee will review objectives, discuss the impact of actions taken, determine if existing objectives should be modified, and develop new EMS objectives when needed.

Annually, the EMS Coordinator and the Environmental Compliance Advisory Committee will prepare a status report of progress made on each objective and target for the Vice President of Business and Operations at CSU to review and assess.

Step 4

Documentation concerning objectives and targets will be kept in the department responsible for the compliance. Documentation will be retained for at least three years.

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EMS Form	1.5.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	October 23, 2017 October 18, 2016 October 26. 2015 October 20, 2014 October 17, 2013
Subject:	EMS Objectives and Targets

Worksheet for Setting Objectives and Targets- Hazardous Waste Storage-Labs

Individual responsible	Objective	Target	Measurable Data for Tracking Progress
Lab manager(s)	Compliant with all regulations	**Inspections-** All SAAs receive 100% over a 12 month period	All inspection reports receive all positive responses
Lab manager(s)	Compliant with all regulations	**Training-** 100% participation of all department personnel (faculty, lab manager, techs, student workers)	Sign-in roster
Lab manager(s)	Compliant with all regulations	**Safety-** 0% incident reporting over a 12 month period	No reports
Lab manager(s)	Establish hazardous storage policy manual	Adopted Hazardous Waste Manual 12/13	Ensure adopted policies and procedures are followed

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EMS Form 1.5.2

Effective Date: December 5, 2012

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October 17, 2013

Worksheet for Setting Objectives and Targets- Hazardous Waste Disposal Preparation-Labs

Individual Responsible	Objective	Target	Measurable Data for Tracking Progress
Lab Manager(s)	Compliance with applicable all regulations	**Waste Inventory:** Prepare accurate waste inventory	Send waste inventory to vendor at least one week prior to waste pickup (at least 2-3 times per year
Lab Manager(s)	Compliance with applicable all regulations	**Waste Containers:** All waste containers shall be properly labeled, closed, and intact. No leakage, breakage, etc.	Each container is examined and checked off on waste inventory as OK for shipment theday prior to pickup,
Lab Manager(s)	Compliance with applicable all regulations	**Training:** The Lab Manager will keep current on all training requirements.	Up to date training certificate.
Lab Manager(s)	Compliance with applicable all regulations	**Safety:** No incidents of breakage, spillage, etc. during preparation for disposal causing exposure to lab personnel or students.	No safety incident reports during preparation for disposal. Lab Manager will document that no events occurred.
Lab Manager(s)	Establish Hazardous Waste Storage Manual	Policy manual adopted December 2013. A review will be conducted in 2017 for updated policies.	Established policies and procedures are followed.

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EMS Form	1.5.3
Effective Date:	December 5, 2012
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	October 20, 2014
	October 17, 2013
Subject:	EMS Objectives and Targets

Worksheet for Setting Objectives and Targets- Universal Waste Storage-Bulbs-Facilities Management

Individual responsible	Objective	Target	Measurable Datafor Tracking Progress
Building Operations Manager	Compliance with allEPA regulations	**Inspections-** receive 100% over 12 month period	Inspection reportsto receive all positive responses
Building Operations Manager	Compliance with allEPA regulations	**Training-** 100% participationfor all Building Operations andBuyer	Sign-in roster
Building Operations Manager and Buyer	Compliance with allEPA regulations	**Safety-** 0% incident reporting over a 12 month period	No reports

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EMS Form 1.5.4

Effective Date: December 5, 2012

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October 23, 2017

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Subject: EMS Objectives and Targets

Worksheet for Setting Objectives and Targets- Universal Waste Storage-Bulbs-Residence Life

Individual responsible	Objective	Target	Measurable Datafor Tracking Progress
Director of Housing	Compliance with allEPA regulations	**Inspections-** Receive 100% over 12 month period	Inspection reportsTo receive all Positive responses
Director of Housing	Compliance with allEPA regulation$	**Training-** 100% participati onof all building maintenance personnel	Sign-in roster
Director of Housing	Compliance with allEPA regulations	**Safety-** 0% incident Reporting over a12 month period	No reports

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EMS Form	1.5.5
Effective Date:	December 5, 2012
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Subject:	EMS Objectives and Targets

Worksheet for Setting Objectives and Targets- Wastewater Management

Individual responsible	Objective	Target	Measurable Data for Tracking Progress
Building Operation Manager, Art InstructorLab Manager(s), and Dental Clinic Manager	Comply with all EPA Clean Water regulations and Clayton County Water Authority Ordinances	Training to ensure awareness of non-sanitary Wastewater discharges	Only approved non-sanitary Wastewater is discharged into public water systems
Building Operation Manager, Art InstructorLab Manager(s), and Dental Clinic Manager	Comply with all EPA Clean Water regulations and Clayton County Water Authority Ordinances	Weekly inspectionsto include drain inspections	Receive 100%on inspections
Building Operation Manager, Art InstructorLab Manager(s), and Dental Clinic Manager	Comply with all EPA Clean Water regulations and Clayton County Water Authority Ordinances	Periodic communication andinspections by Clayton County Water authority reps	Receive 100% oninspections

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EMS Form	1.5.6
Effective Date:	December 5, 2012
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	October 18, 2016
	October 26, 2015
	October 20, 2014
	October 17, 2013
Subject:	EMS Objectives and Targets

Worksheet for Setting Objectives and Targets- Biosafety and Biowaste Disposal

Individual responsible	Objective	Target	Measurable Data forTracking Progress
Lab Manager(s)	Compliance with all regulations	Inspections: All reports receive 100% over a 12 month period	Inspection reports receive positive responses
Lab Manager(s)	Compliance with all regulations	Waste Containers: Waste containers shall be properly labeled, closed and intact	Each container is examined for any spillage/ leakage
Lab Manager(s	Compliance with all regulations	Training: Lab manager(s) will keep current on all required training	Up to date training certificates
Lab Manager(s)	Compliance with all regulations	Safety: Adhere to all safety regulations and policies	No safety incidents to report
Lab Manager(s)	Establish Biosafety and Biowaste Disposal Manual	Manual adopted December 2013. A review will be conducted in 2017 for updated policies	Adhere to established policies and procedures

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Individual responsible	Objective	Target	Measurable Data for Tracking Progress
Dental Clinic Manager, Nursing Manager, UHS Director	Compliance with all regulations	Inspections: All reports receive 100% over a 12 month period	Inspection reports receive positive responses
Dental Clinic Manager, Nursing Manager, UHS Director	Compliance with all regulations	Waste Containers: Waste containers shall be properly labeled, closed and intact	Each container is examined for any spillage/ leakage/punctures
Dental Clinic Manager, Nursing Manager, UHS Director	Compliance with all regulations	Training: All applicable personnel with be current with blood borne pathogen and sharps training	Up to date training certificates
Dental Clinic Manager, Nursing Manager, UHS Director	Compliance with all regulations	Safety: Adhere to all safety regulations and policies	No safety incidents to report

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EMS Form	2.1.1
Effective Date:	December 5, 2012
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	October 23, 2017
	October 18, 2016
	October 26, 2015
	October 20, 2014
	October 17, 2013
Subject:	Roles/Responsibilities

List of Roles and Responsibilities

Listed below are the EMS organizational roles and responsibilities for Clayton State University's EMS.

Board of Regents

Role: Oversee environmental issues across USG.
Responsibilities: Issue and review USG Environmental and Occupational Safety Policy.

President/Senior Administration

Role: Oversee environmental issues across institution.
Responsibilities: Provide necessary resources and support to ensure implementation of EMS.
Provide necessary resources and support for efforts to maintain compliance with environmental regulations, policies and best practices.

Deans/Department Heads

Role: Oversee environmental issues across their departments or organizational units.
Responsibilities: Implement applicable parts of EMS in their areas.
Assign responsibilities to appropriate personnel who assist in the implementation of the EMS.
Ensure that personnel under their supervision are adequately trained.

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Environmental Compliance Advisory Committee

Role:	Oversee environmental issues across the institution in their substantive areas.
Responsibilities:	Provide support for implementation of EMS applicable to their substantive areas.

Directors/Supervisors

Role:	Oversee environmental issues across their departments or organizational units.
Responsibilities:	Implement applicable parts of EMS in their areas. Assign responsibilities to appropriate personnel who assist in the implementation of the EMS. Ensure that personnel under their supervision are adequately trained. Manage contract service providers.

EH&S Coordinator

Role:	Manage/implement designated regulatory programs address environmental and EMS issues that arise in their area.
Responsibilities:	Coordinate and implement compliance efforts for designated regulatory programs. Coordinate and implement complying with applicable regulatory requirements and best practices. Take required training. Maintain EMS related records. Manage contract service providers.

Laboratory/Art Studio Staff

Role:	Address environmental and EMS issues that arise in their area.
Responsibilities:	Comply with applicable regulatory requirements and best practices. Identify environmental issues. Notify EH&S office of environmental and EMS related issues that arise. Take required training. Maintain EMS related records.

Facilities Staff

Role:	Address environmental and EMS issues that arise in their area.
Responsibilities:	Comply with applicable regulatory requirements and best practices. Identify environmental issues. Notify EH&S office of environmental and EMS related issues that arise. Take required training. Maintain EMS related records. Manage contract service providers.

Human Resources Staff

Role:	Oversees and manages hiring and orientation of employees.
Responsibilities:	Maintain training records. Inform new employees of environmental policies and principles.

Corporate Communications Staff

Role:	Oversees and manages communication within CSU and with the wider community.
Responsibilities:	Assist with providing information to external parties about EMS. Respond to inquiries about EMS policy or EMS/environmental issues.

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EMS Form	2.1.2
Effective Date:	December 5, 2012
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	October 18, 2016
	October 26, 2015
	October 20, 2014
	October 17, 2013
Subject:	Roles/Responsibilities

Procedure for Identifying and Assigning Roles and Responsibilities

PURPOSE

This procedure documents how Clayton State University (CSU) identifies and assigns the organizational roles and personnel responsibilities for the University's Environmental Management System (EMS).

PROCESS

Step 1

CSU will designate an EMS Coordinator whose role is to oversee the EMS development and implementation. The EMS Coordinator, the Environmental Compliance Advisory Committee and other EMS Participants are responsible for implementing the EMS.

Step 2

The EMS Coordinator and the Environmental Compliance Advisory Committee will develop and assign EMS roles and responsibilities.

The Vice President of Business and Operations will review and approve the Responsibility Matrix and Organization Chart.

Step 3

The EMS Coordinator, the Environmental Compliance Advisory Committee and other EMS Participants will annually review and update the EMS roles and responsibilities.

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EMS Form	2.1.3
Effective Date	December 5, 2012
Reviewed/Revised	November 18, 2021
Subject:	Assign Roles and Responsibilities

EMS - ASSIGNMENT OF ROLES AND RESPONSIBILITIES FORM

Responsibility	Senior Admin.		Environ. Health and Safety	Facilities and Building Maintenance			Academic Depts.			Public Safety	Environ. Oversight Committees	
	President/Provost	VP Business and Operations	EHS Coordinator	Department Managers	Facilities Supervisors	Facilities Staff	Department Heads	Laboratory Manager	Faculty	Public Safety	Environmental Advisory Compliance committee	Academic Departments Safety Committee
Communicate importance of environmental management, compliance, sustainability	x	x	x	x	x		x	x	x	x	x	
Conform with EMS requirements		x	x	x	x	x	x	x	x	x	x	x
Comply with EHS requirements		x	x	x	x	x	x	x	x	x	x	x
Review/ adopt EHS Policy	x	x	x								x	
Identify environmental aspects of activities			x								x	
Review environmental aspects/impacts			x	x	x	x		x		x	x	
Track/analyze new regulations		x	x	x				x				
Review/approve new regulatory analysis		x	x								x	
Evaluate priority of aspects			x								x	
Review/approve evaluation of aspects		x	x	x				x			x	

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Responsibility	Senior Admin.		Environ. Health and Safety	Facilities and Building Maintenance			Academic Depts.			Public Safety	Environ. Oversight Committees	
	President/Provost	VP Business and Operations	EHS Coordinator	Department Managers	Facilities Supervisors	Facilities Staff	Department Heads	Laboratory Manager	Faculty	Public Safety	Environmental Advisory Compliance committee	Academic Departments Safety Committee
Establish environmental objectives and targets			x	x			x	x	x		x	
Review/approve envir. objectives and targets		x	x								x	
Assign roles and responsibilities				x			x	x			x	
Review/approve assignment of roles/responsibilities		x	x								x	
Integrate environmental goals into performance appraisal process		x		x			x					
Conduct training					x			x		x		x
Take training			x	x	x	x	x	x	x	x		x
Coordinate communication with interested parties		x	x									
Communicate with contractors on environmental expectations/concerns		x		x								
Maintain EMS records			x	x			x	x		x		
Coordinate EMS document control efforts		x	x								x	
Monitor/measure processes with priority aspects			x	x			x	x			x	
Develop emergency preparedness response								x		x		
Handle accident/incident response			x	x			x	x	x	x		

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Responsibility	Senior Admin.		Environ. Health and Safety	Facilities and Building Maintenance			Academic Depts.			Public Safety	Environ. Oversight Committees	
	President/ Chancellor/ Provost	Sr. Administrator overseeing EHS	EHS Coordinator	Department Managers	Field Supervisors	Field Staff	Department Heads	Laboratory Supervisors	Faculty	Public Safety	Environmental Advisory Compliance	Academic Departments Safety Committee
Coordinate auditing efforts		x	x									
Report on performance of EMS to top administration			x								x	
Participate in top administration EMS review		x	x								x	
Obtain permits and develop compliance plans				x								
Prepare reports required by regulators			x								x	
Comply with applicable regulatory requirements	x	x	x	x	x	x	x	x	x	x	x	x
Maintain equipment/tools to control environmental impact				x	x	x	x	x				
Develop budget for environmental management		x	x	x			x					

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EMS Form	2.2.0
Effective Date:	December 5, 2012
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	October 23, 2017
	October 18, 2016
	October 26, 2015
	October 20, 2014
	October 17, 2013
Subject:	Operational control

Procedure for Identifying Operational Controls

PURPOSE

This procedure documents how Clayton State University (CSU) identifies operational controls needed to address the risks posed by significant aspects and impacts that occur at CSU.

This procedure is used to document and track which significant environmental aspects/impacts at CSU need operational controls.

PROCESS

Step 1 - Process for Identifying Operational Controls

Using the list of significant environmental aspects developed from the aspects review completed as part of Section 1.4.1 (Aspects Evaluation), the EMS Coordinator and the Environmental Compliance Advisory Committee, with the assistance of appropriate departmental and facility staff, will identify the operations at CSU with significant aspects/impacts for which operational control is achieved through existing procedures.

The EMS Coordinator and the Environmental Compliance Advisory Committee with the assistance of appropriate departmental and facility staff, will identify the operations at CSU with significant aspects/impacts that require new procedures to achieve operational controls.

The EMS Coordinator and the Environmental Compliance Advisory Committee, with the assistance of appropriate departmental and facility staff, will identify the operations at CSU with significant aspects/impacts that potentially require new written procedures to achieve operational controls.

Depending on the significance and risk associated with each operation, the EMS Coordinator, and the Environmental Compliance Advisory Committee, with the assistance of appropriate departmental and facility staff, will determine the level of detail, training required, and frequency of review and revision for each operational control; details will be recorded in the procedure for each operation.

Documentation of operational controls will be retained by the department responsible for compliance.

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EMS Form	2.2.1
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	October 23, 2017
	October 18, 2016
	October 26, 2015
	October 20, 2014
	October 17, 2013
Subject:	Operational control

List of Operational Controls for Hazardous Waste Storage-Labs

Listed below are possible operational controls that can be used to address situations to avoid or prevent a problem.

Chemical Hygiene Plan

https://www.clayton.edu/EH&S/ Chemical Inventory

Management System- ChematixHazardous Waste

Storage manual

Secondary containment/spill kits

Mandatory and job specific training

Labeling and storage procedures

Waste instruction and signage

Purchasing controls on hazardous chemicals

Standard laboratory procedures for storage, handling and disposal of waste

Periodic inspections/checklists

UNIVERSITY SYSTEM OF GEORGIA
Clayton State University
ENVIRONMENTAL MANAGEMENT SYSTEM

EMS Form	2.2.1a
Effective Date:	December 5, 2012
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	October 23, 2017
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	October 26, 2015
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	October 17, 2013
Subject:	Major Risks-Operational control

List of Major Risks (Significant Aspects) and the Operational Controls that help to manage Hazardous Waste Storage-Labs

Listed below are the significant risks that are at the university and the operational controls that are being used to prevent or minimize a problem.

Significant Risk (Aspect)	Operational Control
Hazardous waste storage	Hazardous waste manual
	Periodic inspections/checklists
Use of chemicals	Hazardous chemical management training
	Safety training
Possible spills	Secondary containment/spill kits
	Emergency Response manual
Lab-PPE	Standard lab PPE procedures, training
	Chemical Inventory Management System

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Subject:	Major Risks-Operational control

Written Operational Control For - Hazardous Waste Storage-Labs

- All bottles to be used for hazardous waste storage shall be clear glass for chemicals no larger than 2.5 L capacity and plastic bottles used for dies (Microbiology and staining dies). Bottles previously containing acids or bases may be used after a thorough cleaning.
- All bottles shall have a label affixed clearly marked with the words "Hazardous Waste", the date waste was first added to the container, the course number (or individual) generating the waste, the specific experiment that generated the waste or an indication of what type of waste it is (e.g., halogenated organic waste), and the Lab Manager's telephone number. Such a label will be affixed to the bottle prior to adding any waste.
- The appropriately labeled bottles shall be set out in a fume hood prior to the beginning of the lab class or prior to the preparation of solutions, media, etc. needed for the class. All waste bottles will be in a secondary container of appropriate size.
- Funnels shall be provided for each waste bottle.
- Waste bottles shall remain capped when not in use.
- Students and lab personnel shall carefully pour waste from experiments and preparations into the appropriate waste bottle. Students and lab personnel shall wear appropriate Personal Protective Equipment (safety glasses, lab coat, gloves, and appropriate footwear) while adding waste to the waste bottles.
- Waste bottles shall only be filled to the fill line marked on the bottle.
- As soon as possible after the class or preparation is finished, lab personnel shall place waste bottles in the area identified as "Satellite Accumulation Area (SAA)" in the lab in

which the waste was generated. Incompatible waste shall not be stored in same SAA. Each SAA shall have a secondary container on which the individual waste bottles are stored.

- Satellite Accumulation Areas shall be inspected weekly for appropriate storage, labeling, breakage, and leakage.
- Any leakage from the waste containers shall be immediately contained using the appropriate spill kit or other acceptable cleanup procedure.

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EMS Form	2.2.2
Effective Date:	December 5, 2012
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Subject:	Operational controls

List of Operational Controls for Hazardous Waste Disposal Preparation-Labs

Listed below are possible operational controls that can be used to address situations to avoid or prevent a problem.

Hazardous Waste Disposal Preparation procedures

Secondary Containment/spill kits

Labeling and storage procedures

Waste instruction and signage

Purchasing controls on hazardous chemicals

Standard laboratory procedures for storage, handling and disposal of waste

Periodic inspection/checklists

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Subject:	Major Risks-Operational controls

List of Major Risks (Significant Aspects) and the Operational Controls that help to manage Hazardous Waste Disposal Preparations- Labs

Listed below are the significant risks that are at the university and the operational controls that are being used to prevent or minimize a problem.

Significant Risk (Aspect)	Operational Control
Hazardous waste disposal	Hazardous waste disposal procedures
	Periodic inspections/checklists
Use of chemicals	Hazardous chemical management training
	Safety training
Possible spills	Secondary containment/spill kits
	Emergency Response manual
Lab-PPE	Standard lab PPE procedures, training

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Subject:	Written Operational controls

Written Operational Control For - Hazardous Waste Disposal Preparations-Labs

- CSU personnel prepare hazardous waste for pickup by a vendor who treats and disposes of the waste. CSU itself does not treat or dispose of hazardous waste.
- Hazardous waste pickup is scheduled at the end of each semester (three times a year).
- At least one week prior to a scheduled hazardous waste pickup, the Lab Manager shall prepare a Waste Inventory listing each type of waste and the associated size and number of each container to be removed.
- The Waste Inventory shall be faxed or emailed to the vendor providing the pickup service. The Inventory shall be kept in the Lab Manager's files.
- At the time of preparation of the Inventory and again the day prior to pickup, each waste container shall be carefully examined for closure, appropriate labeling, leakage, and breakage. The Lab Manager shall note on the Inventory that the waste container was in good condition suitable for pickup.
- The waste containers shall be grouped by type (halogenated, etc.) or source (class experiment) of waste on the day of pickup for ease of referring to the Inventory duringpickup.
- Upon arrival at CSU of the vendor, the Lab Manager shall escort vendor personnel to the Satellite Accumulation Areas and review the Inventory with them. It is then the vendor's responsibility to properly pack and load the waste containers for shipment.
- The Lab Manager shall maintain DOT certifications through appropriate annual training.
- The Lab Manager shall document any safety related incidents occurring during preparation of hazardous waste for pickup and disposal. He/she shall document that no safety related incidents occurred if there were none.

- The Lab Manager shall include this Operational Control in a section on waste preparation for pickup and disposal in the Hazardous Waste Storage Manual and shall document that all procedures outlined in the Manual were followed.

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EMS Form	2.2.3
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Subject:	Operational controls

List of Operational Controls for Universal Waste- Bulbs
Facilities Management

Listed below are possible operational controls that can be used to address situations to avoid or prevent a problem.

Secondary containments/spill kits

Universal Waste Training - https://www.clayton.edu/EH&S/universal-waste-management

Labeling and storage procedures

Posted waste instruction and signage

Periodic inspection/checklists

Proper storage containers

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EMS Form	2.2.3a
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Subject:	Major Risks-Operational controls

List of Major Risks (Significant Aspects) and the Operational Controls that help to manage Universal Waste-Bulbs- Facilities Management

Listed below are the significant risks that are at the university and the operational controls that are being used to prevent or minimize a problem.

Significant Risk (Aspect)	Operational Control
Universal waste storage	Universal waste training
	Posted waste instructions and signage
	Periodic inspections/checklists
	Labeling and storage procedures
Possible spills	Clean up kits/spill kits
	Proper storage containers and lids

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EMS Form	2.2.3b
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Subject:	Written Operational controls

Written Operational Control For - Universal Waste-Bulbs- Facilities Management

Handling and Safety Procedures

All universal waste handlers should wear appropriate gloves and eye protection.

Lamps:

- handle lamps in a manner that will prevent releases (breakage)
- properly store lamps in a box or case to prevent breakage
- do not leave individual lamps leaning in comers of rooms or hallways, lying unprotected on top of equipment or on the floor
- label all lamp containers
- do not allow box/container to get wet
- do not tape bulbs together
- package bulbs tightly without separators or other packing
- boxes must be full to avoid the possibility of breakage

If a lamp breaks:

- you must wear leather gloves
- eye protection
- avoid breathing the vapors
- do not dispose in the normal trash
- package broken bulbs in puncture resistant closable container (heavy cardboard box, trash container with lid, commercial broken glass container)

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	October 17, 2013
Subject:	Operational controls

List of Operational Controls for Universal Waste- Bulbs Residence Life

Listed below are possible operational controls that can be used to address situations to avoid or prevent a problem.

Secondary containment/spill kits

Universal Waste Training https://www.clayton.edu/EH&S/universal-waste-management

Labeling and storage procedures

Posted waste instruction and signage

Periodic inspections/checklists

Proper storage containers

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Clayton State University
ENVIRONMENTAL MANAGEMENT SYSTEM

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Subject:	Major Risks- Operational controls

List of Major Risks (Significant Aspects) and the Operational Controls that help to manage Universal Waste-Bulbs- Residence Life

Listed below are the significant risks that are at the university and the operational controls that are being used to prevent or minimize a problem.

Significant Risk (Aspect)	Operational Control
Universal waste storage	Universal waste training
	Posted waste instructions and signage
	Periodic inspections/checklists
	Labeling and storage procedures
Possible spills	Clean up kits/spill kits
	Proper storage containers and lids

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EMS Form	2.2.4b
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Subject:	Written Operational controls

Written Operational Control For - Universal Waste-Bulbs- Residence Life

Handling and Safety Procedures

All universal waste handlers should wear appropriate gloves and eye protection.

Lamps:

- handle lamps in a manner that will prevent releases (breakage)
- properly store lamps in a box or case to prevent breakage
- do not leave individual lamps leaning in corners of rooms or hallways, lying unprotected on top of equipment or on the floor
- label all lamp containers
- do not allow box/container to get wet
- do not tape bulbs together
- package bulbs tightly without separators or other packing
- boxes must be full to avoid the possibility of breakage

If a lamp breaks:

- you must wear leather gloves

- eye protection
- avoid breathing the vapors
- do not dispose in the normal trash
- package broken bulbs in puncture resistant closable container (heavy cardboard box, trash container with lid, commercial broken glass container)

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	October 26, 2015
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Subject:	Operational controls

List of Operational Controls for Wastewater Management

Listed below are possible operational controls that can be used to address situations to avoid or prevent a problem.

Wastewater instructions and signage

Policies and procedures for contacting Clayton County Water Authority

Wastewater analysis conducted by Clayton County Water Authority

Solvent Usage guideline policy

Drain traps

Policies and procedures for staining biological specimens

Scheduled inspections

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EMS Form	2.2.5a
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Subject:	Major Risks-Operational controls

List of Major Risks (Significant Aspects) and the Operational Controls that help to manage Wastewater

Listed below are the significant risks that are at the university and the operational controls that are being used to prevent or minimize a problem.

Significant Risk (Aspect)	Operational Control
Solvent and toxins spillage into drain	Solvent Usage Guide Policy
	Drain traps
	Periodic inspections
Lab spillage into drain	Procedures for staining biological specimens
	Procedures to not allow any chemicals down the lab drains
Cooling tower/boiler blow down	Emergency response policy
Grease trap overflow	Procedures to contact Clayton County Water Authority
Construction debris/soil erosion	Procedures for standard construction permits

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Subject:	Written Operational controls

Written Operational Control For - Wastewater Management

Facilities Management in coordination with the Department of Public Safety is responsible for contacting Clayton County Water Authority when any issue arises regarding non-sanitary spillage into any storm water drainage, creek, or lake.

All chemistry and biology lab personnel are responsible for ensuring proper protocol is followed regarding biological staining specimens and for also not allowing any chemicals to be washed down the drains.

All art instructors are responsible for ensuring the Solvent Usage policy is properly followed.

Note: In 2015, the Dental switched to digital X-rays and no longer uses chemicals to process their film. Therefore, no lead foil or silver nitrates are generated to be captured by the recovery unit.

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Subject:	Operational controls

List of Operational Controls for Biological Waste

Listed below are possible operational controls that can be used to address situations to avoid or prevent a problem.

Biosafety and Biowaste Disposal Manual

State of Georgia Biomedical Waste Rules (391-3-4-15)

Secondary containment/spill kits

First Aid Kit policy

Mandatory and job specific procedures

Waste instruction and signage

Purchase controls on chemicals and/or biological agents

Standard laboratory procedures

Periodic inspections/checklists

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Subject:	Major Risks-Operational controls

List of Major Risks (Significant Aspects) and Operational Controls that help to manage Biological Waste

Listed below are significant risks that are at the university and the operation controls that are being used to prevent or minimize a problem.

Significant Risk (Aspect)	Operational Control
Biowaste management/storage Disposal	Biosafety and Biowaste Disposal manual Periodic inspections/checklist
Exposure/Sharps	State of Georgia Biomedical Waste regulations OSHA Bloodborne Pathogens Standards First Aid Kit policy
Spills	Spill kits Emergency Response Plan
Use of chemical	Safety training Hazardous Chemical training
Lab-PPE	Standard lab PPE procedures, training

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Subject:	Written Operational controls

Written Operational Controls for Biological Waste

Biohazardous materials used in teaching and research laboratories at the University fall under the State of Georgia Biomedical Waste Rules (391-3-4-.15).

Biomedical waste means:

- pathological waste;
- biological waste;
- sharps;
- chemotherapy waste;
- contaminated, discarded equipment that was in contact with infectious agents;
- contaminated animal carcasses, body parts, bedding or wastes from infected animals;
- cultures and stocks of infectious agents and associated biologicals from medical, pathological, research and industrial laboratories;
- waste from production of biologicals;
- discarded live and attenuated vaccines; or
- culture dishes and devices used to transfer, inoculate and mix cultures

Storage and containment of biomedical waste will be in a manner and location that protects materials from animals, rain and wind, does not provide a breeding place or a food source for insects and rodents, and minimizes exposure to the public.

Biomedical waste, except for sharps, must be placed in containers which are impervious to moisture and have sufficient strength to preclude ripping, tearing, or bursting under normal conditions of use. Sharps shall be contained for storage, transport, treatment and subsequent disposal in leak-proof, rigid, puncture-resistant containers which are taped closed or tightly lidded to prevent loss of contents. Containers will be securely closed so as to prevent leakage or expulsion of contents during storage, handling, or transport. All containers used for

contaminated biological waste will be red or orange or clearly identified with the universal biohazard symbol or clearly marked with the word "Biohazard".

Biomedical waste placed in storage for handing or transport must be placed in secondary containers as well, either disposable or reusable pails, cartons, boxes, drums, dumpsters, or portable bins. These secondary containers may be of any color and shall be conspicuously labeled with the universal biohazard symbol and the word "Biohazard" on the sides so as to be readily visible from any lateral direction when the container is upright.

All cultures, stocks, and other potentially infectious materials should be decontaminated before disposal using an effective method. If treated in accordance with methods as described within the State of Georgia biomedical waste regulations, the waste shall no longer be considered biomedical waste and may be combined and handled as regular solid waste.

Heating with Steam Under Pressure

Autoclaves provide decontamination by heating with steam under pressure so as to render the biomedical waste noninfectious. A recording thermometer must be used during each cycle to ensure the attainment of a temperature of 121°C (250°F) for 15 minutes or longer to achieve decontamination of the entire load.

Autoclaves must be properly used to effectively sterilize their contents. Autoclave use for microbiological media preparation requires various time and temperature settings for sterilization; therefore, individual trials should be done to determine the proper loading and time settings to determine adequate sterilization.
When autoclaving biohazardous waste, take into account the volume of waste and the ability of steam to penetrate the load. Vials of biological indicators can be placed inside of a load to determine if lab specific settings are appropriate. Minimum autoclave cycle time for a light load of biohazardous waste is 15 minutes at 121°C, 15psi. The following parameters contribute to autoclave effectiveness:

- *Temperature:* unless specifically instructed by media manufacturers' directions, autoclave chamber temperature should be at least 121°C (250°F). Prions require higher autoclave temperatures but alternate disposal methods for prions should be considered inthe risk assessment.
- *Time:* cycle time will vary according to the contents of the autoclave. If media is to be prepared, the manufacturers' instructions should be followed. An adequate autoclave time for biohazardous waste is a minimum of 30 minutes, measured after the temperature of the material being sterilized reaches 121°C and 15 psi pressure. The tighter the autoclave is packed, the longer it will take to reach 121°C in the center of theload.
- *Steam Contact:* steam saturation of the load is essential for effective decontamination. Air pockets or insufficient steam supply will prevent adequate saturation. To ensure adequate steam contact, leave autoclave bags partially open during autoclaving to allowsteam to penetrate into the bag. The addition

of a small amount of water inside the bag before autoclaving will help ensure heat transfer to the items being decontaminated (donot add water if it will cause biohazardous materials to splash out of the bag).

- *Containers:* use leak-proof autoclavable containers only. Always consider substitutes forglassware when selecting containers. Plastics such as polypropylene, polypropylene copolymer or fluoropolymer products are capable of being autoclaved repeatedly. Place non-borosilicate glass bottles in a tray of water to help prevent heat shock. Place plastic bags inside a secondary container in the autoclave in case liquids leak out. Autoclavable plastic or stainless steel containers are appropriate secondary containers. Make sure plastic bags and pans are autoclavable to avoid melting.

Validation of load is required through the use of an autoclave log and an indicator of some type. Various indicators can be used with loads or separately to indicate that various test parameters have been met. With each load, chemical indicators will be used that test for the presence of heat, pressure and the presence of steam. Chemical indicators are available through most scientific vendors. Biological indicators (i.e. *Geobacillus stearothermophilus)* and certain chemical indicators (i.e. Sterigage) verify that the autoclave reached adequate temperature for a long enough time to kill microorganisms. Biological indicators (BI) should be used annually at a minimum for performance verification. *Geobacillus stearothermophilus* spore strips or spore suspensions are the typical product of choice for BI challenges. The BI should be placed in one or more points within autoclave in a simulated load for quality assurances. Document the biological indicator results in a log book or other suitable form and maintain those records with the autoclave log in the lab. All autoclave records should be maintained for a minimum of five years.

Chemical Treatment

Items that cannot be autoclaved can generally be decontaminated using a chemical disinfectant. The choice of chemical disinfectant depends on the surface or item needing decontamination, as well as the particular organism requiring inactivation. When choosing a chemical disinfectant, refer to the agent summary sheet, if available, for information. The categories of disinfectants listed in this section and the disinfectant product label must be reviewed.

Types of Chemical Disinfectants

The following are outlines of the basic properties and examples of the most common categories of chemical disinfectants, including alcohols, chlorine compounds, liquid formaldehyde, glutaraldehyde, iodophors, peracetic acid, phenolic compounds, and quaternary ammonium compounds. Adequate contact time is very important to ensure complete disinfection. Contact time varies with the type of material being disinfected.

Alcohols
Most effective against lipophilic viruses, less effective against non-lipid viruses, and ineffective against bacterial spores. Effective concentration is 70% to 90%. Evaporates quickly, so sufficient contact time may be difficult to achieve. Concentrations above 90% are less effective because of increased evaporation rate.

Chlorine compounds
Solutions of 50 - 500 ppm available chlorine are effective against vegetative bacteria and most viruses. Bacterial spores require concentrations of 2,500 ppm with extended exposure time. A 5,000-ppm available chlorine solution is preferred for general use since excess organic materials inactivate chlorine compounds. This type of solution is made by diluting household bleach 1:10 with water. Shelf life for diluted bleach is approximately seven days. Air and light inactivate diluted solutions, so solutions must be freshly made in order to maintain adequate available chlorine concentrations. These solutions should be stored in an airtight, opaque container out of the light. Strong oxidizers are very corrosive to metal surfaces, as well as to skin, eyes and respiratory tract.

Formaldehyde, liquid
Effective against vegetative bacteria, spores and viruses. Effective concentration is a 5-8% solution of formalin (formaldehyde in water; made by diluting a 37% solution). It is a suspected human carcinogen and can cause respiratory problems at very low concentrations. Inhalation limits are 2 ppm for 15 minutes, 0.75 ppm for 8 hours of exposure. It has an irritating odor and is a sensitizer, so a potential exists for developing allergic reactions.

Glutaraldehyde mixtures (for example, Cidex, Sporicidin and 3M Glutarex)
Effective against vegetative bacteria, spores and viruses (more so than formaldehyde). The effective concentration is 2%. Chemically related to formaldehyde, its vapors are irritating to the eyes, nasal passages and upper respiratory tract.

Jodophors (organically bound iodine compounds, for example, Wescodyne diluted 1:10 is a popular hand washing disinfectant)
Effective against vegetative bacteria and viruses, but not against bacterial spores. The effective concentration is 75-150 ppm. It is relatively nontoxic to humans, so it is often used as a general disinfectant in antiseptics and surgical soaps. It has a built-in indicator for activity. If the solution is brown or yellow, it is active. Sodium thiosulfate solution can be used to readily inactivate iodophors and remove iodophor stains.

Quaternary Ammonium compounds (cationic detergent (surfactant) with strong surface activity, commonly referred to as "Quats"33)
Effective against fungi, Gram-positive bacteria and lipophilic viruses, but less effective against Gram-negative bacteria. It is ineffective against hydrophilic viruses or bacterial spores. Quats mixed with phenolics are very effective disinfectants, as well as cleaners. The usual effective concentration is 1:750. It is relatively nontoxic and is acceptable as a general disinfectant for general cleaning or decontaminating food equipment. It is easily inactivated by organic materials, anionic detergents (soaps), or salts of metals found in hard water.

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Subject:	Communication

Procedure for Handling Communication

PURPOSE

This procedure documents how Clayton State University (CSU) handles communication of information relating to environmental issues at CSU.

This procedure is used to document and track how communication occurs.

PROCESS

Step 1: The EMS Coordinator and Environmental Compliance Advisory Committee will identify groups, including faculty, students, staff and contractors who are involved with operations that can impact the environment.

Step 2: The EMS Coordinator and Environmental Compliance Advisory Committee will determine the type of information that needs to be communicated including information regarding environmental policies, individual EMS responsibilities, specific targets and measurements, or other goals.

Step 3: Depending on the audience and information to be communicated, the EMS Coordinator and Environmental Compliance Advisory Committee will determine methods of internal communication. These forms of internal communication may include in-person training, meetings, emails, intranet, websites, newsletters, or bulletin board postings.

Step 4: The EMS Coordinator and Environmental Compliance Advisory Committee will determine the frequency of internal communication depending on the types of information being communicated.

Step 5: The EMS Coordinator and Environmental Compliance Advisory Committee will ensure that adequate internal communication occurs.

Step 6: A review of how communication occurs will take place at least once a year.

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Subject:	Communication

EMS Worksheet - Means of Communication and Groups to Reach

Means of Communication

- Social Media
- Telephone
- Face to face meetings
- Inside Clayton State
- Student Newspaper
- Direct email
- Websites
- Digital Radio
- Campus radio
- Mass Notification System
- Text messaging
- Business Communication Platform (Teams)

Groups to Reach

- Regulators
- Contractors
- Senior Administration
- Faculty and staff
- Students
- Chemical users
- EH&S
- Public Safety
- Legal Department
- Community
- Media Services
- Local law enforcement
- Auxiliary services
- Athletics
- Facilities Management

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EMS Form	2.3.3
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Subject:	Communication Plan

Planning Communication

Clayton State University (CSU) has identified the following groups and methods of communication for handling information concerning environmental matters at CSU.

Audience/ Stakeholders	Goal of Communication	What to communicate	Who Communicates	How (what method)	By when/How often	Results/Notes
Facilities Management	Required training	Annual safety and procedural training	Facilities Management	Service Now anddirect email	One month prior to training	100% participation on sign-in sheet
Academic Department -Labs	Required training	Annual safety training	Lab Manager(s)	Email and face to face	One week prior to training	100% participation on sign-in sheet

Health and Wellness Center	Required training	Annual safety, RTK training, and job specific training	Health Services Director	Email and face to face	One month prior to training	100% participation on sign in sheet and supporting certificates
Dental Hygiene	Required training	Annual safety, RTK training and job specific training	Dental Hygiene Director	Email and face to face	One month prior to training	100% participation on sign in sheet and supporting certificates
Art Department	Required training	Semester safety training	Art Instructor	Face to Face	Beginning of semester	100% participation on sign in sheet
Public Safety	Required training	Annual safety and procedural trainings	Public Safety management	Email and face to face	One month prior to training	100% participation on sign in sheet and supporting certificates

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EMS Form	2.4.1
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Subject:	Training

Procedure for Identifying Training Needs

PURPOSE

This procedure documents how Clayton State University (CSU) handles identifying training needs relating to environmental issues at CSU.

This procedure is used to develop and implement a training program that 1) promotes awareness; 2) provides task-specific training as part of operational controls; and 3) provides training required by regulations.

PROCESS

Step 1: The EMS Coordinator and Environmental Compliance Advisory Committee ,along with respective departments, will identify training needs for each employee by identifying training needs related to: 1) awareness training; 2) task-specific training to help meet operational controls and objectives/targets; and 3) training that is required by regulations.

Step 2: The EMS Coordinator and Environmental Compliance Advisory Committee will annually review training needs. Training plans will be developed, reviewed and revised when one of the following occurs: a person's role or responsibility changes, a new hire is made, a department or unit plans to use a new type of process, equipment or material,

or a new regulation goes into effect. Copies of the training will be kept in the department responsible for training for three years.

Step 3: The EMS Coordinator with applicable department will arrange for needed training according the schedule identified in the individual training plans.

Step 4: Department will document the training course, dates and attendees for training that has occurred. Training documentation will be kept in the department responsible for training for three years.

Step 5: The EMS Coordinator and Environmental Compliance Advisory Committee will evaluate the effectiveness of the training annually to ensure that the training is achieving the desired objectives; appropriate changes will be made based on the review.

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EMS Form 2.4.2

Effective Date: December 5, 2012
Reviewed/ Revised: May 15, 2025
November 18, 2021
October 23, 2017
October 18, 2016
October 26, 2015
October 20, 2014
October 17, 2013

Subject: List of Training

List of Training

Clayton State University (CSU) has identified the following training related to the EMS and environmental matters that occurs at CSU, along with the frequency of the training, the attendees receiving the training and the method of providing the training.

Training	Frequency	Attendees	Method of providing training	Notes/Review
Right-to-Know	Annual	All state employees	Online, classroom training	Completion is recorded through the University's Learning Management System (LMS)
SPCC Asbestos awareness Universal Waste Hazardous Waste Mgmt Vehicle use training Job specific and as needed training Safety training	Annual Annual Annual Annual Annual As needed Weekly	Facilities Management EH&S staff	Online, classroom training	Sign in roster, certificates

Lab safety training Hazardous waste management training	Beginning each semester and as needed Annual	Lab personnel Faculty	Online, classroom training	Sign-in roster, certificates
Blood borne pathogen training Other medical safety training	Annual As needed	Health services personnel	Online, classroom training	Sign in roster, certificates
Safety trainings	Annual, As needed	Public Safety	Online, classroom training, in the field	Sign in roster, certificates
DOT Hazardous Materials Training	Initial training within 30 days of hire Refresher course every 3 years	Hazardous waste handlers who sign manifests	Online, classroom training	Sign in roster, certificates

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EMS Form	2.4.3
Effective Date	December 5, 2012
Reviewed/Revised	November 18,2021
Subject:	Training

EMS - TRAINING

Training	EHS and Public Safety		Facilities and Building Maintenance			Academic Depts.					Outside Personnel	
	EHS Coordinator	Public Safety Officers	Department Managers	Facilities Supervisors	Facilities Staff	Department Heads/PIs	Laboratory Supervisors	Laboratory Personnel	Faculty	Students	Contractors	Visitors
Awareness Trainings												
Awareness of environmental matters (policy, overall EMS, general hazards)	x	x	x	x	x	x	x	x	x	x	x	x
General Life Safety	x	x	x	x	x		x	x	x	x	x	
Environmental sustainability efforts	x	x	x	x	x	x	x	x	x	x	x	x
Task-Specific / Regulatory Trainings												
Hazardous Waste Management	x	x	x	x	x		x	x	x			
Haz Waste Satellite Accumulation Areas	x			x	x		x	x	x	x		
Spill Prevention and Response	x	x	x	x	x		x	x	x	x	x	
Universal Waste Management	x		x	x	x						x	
Waste water	x		x	x			x	x				
Pesticide application			x	x	x						x	
Lead paint awareness/notifications			x	x	x						x	
Lead paint abatement											x	

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Training	EHS and Public Safety		Facilities and Building Maintenance			Academic Depts.					Outside Personnel	
	EHS Coordinator	Public Safety Officers	Department Managers	Facilities Supervisors	Facilities Staff	Department Heads/PIs	Laboratory Supervisors	Laboratory Personnel	Faculty	Students	Contractors	Visitors
Air permit/emergency generators			x	x	x							
Asbestos awareness	x		x	x	x						x	
Asbestos abatement											x	
Chemical Handling	x		x	x	x		x	x	x	x	x	
Emergency Response	x	x	x	x	x	x	x	x	x	x	x	x
Personal Protective Equipment		x	x	x	x		x	x	x	x		
Laboratory Safety							x	x	x	x		
Hazard Communication	x		x	x	x		x	x				
40- hour OSHA training												
Fire Safety		x	x	x			x	x				
Electrical Safety			x	x			x	x				
Equipment training (job specfic)				x	x		x	x				
Radiation Safety								x	x			
Biological Safety								x	x			
Lasers								x	x			

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EMS Form	2.5.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Controlled Documents

Procedure for Managing Controlled Documents

PURPOSE

This procedure documents how Clayton State University (CSU) manages controlled documents relating to environmental issues at CSU.

This procedure is used to ensure that faculty, students and staff know and have access to current guidance, procedures, and documents.

PROCESS

Step 1: The EMS Coordinator and the Environmental Compliance Advisory Committee are responsible for EMS document control.

Step 2: The EMS controlled documents will be designated by headers and/or footers with the following:

- Effective date
- Approval/review/revision signature and date
- Other features to help track documents

Step 3: The EMS Coordinator will maintain a list of EMS controlled documents with the EMS manual.

Step 4: The EMS Coordinator and Environmental Compliance Advisory Committee will review the controlled documents at least annually, unless specified otherwise elsewhere in the EMS documents, and will revise the controlled documents as needed.

Step 5: The EMS Coordinator and Environmental Compliance Advisory Committee will update the list of EMS controlled documents whenever one is revised.

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EMS Form	2.5.2
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	List of Documents

List of EMS Documents

Clayton State University (CSU) has identified the following types of documents related to the EMS and environmental matters that occurs at CSU.

Documents·

Federal, State and Board of Regents regulations/websites

CSU Environmental policy

Required permits

Standard operating procedures

Equipment and operation manuals

EH&S procedures

Safety signage

Contractor contracts

Standard forms

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EMS Form	2.5.3
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	List of Controlled Documents

List of EMS Controlled Documents

Clayton State University (CSU) has identified the following controlled documents related to the EMS and environmental matters that occurs at CSU.

Controlled Documents	Location Kept	Effective Date	Date Reviewed
CSU Lab Safety Chemistry Manual	CSU-Labs	September 2005	October 2016
CSU Environmental Management System Manual	CSU- EH&S Office Copy- VP Business and Operations	December 2012	October 2017
Hazardous Waste Manual	Lab Managers	December 201:3"'	December 2013
Spill Prevention Control and Countermeasures (SPCC)	Original-Facilities Management Copy-EH&S office	February 2010	June 2021
Clayton State EPA Audit	EH&S office	April 2011	June 2012
Lab Audit	EH&S office-Lab Mgr	June 2014	June 2014
CSU Chemical Hygiene Plan	EH&S office-Lab Mgr	January 2014	April 2016
CSU Biosafety and Biowaste Manual	EH&S office-Lab Mgr	December 2013	October 2016
Wastewater Audit	CSU-EH&S Office	October 2017	

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EMS Form	2.6.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Records

Procedure for Managing Records

PURPOSE

This procedure documents how Clayton State University (CSU) manages records relating to environmental issues at CSU.

PROCESS

Step 1: The EMS Coordinator and Environmental Compliance Advisory Committee are responsible for EMS records management.

Step 2: The EMS Coordinator and Environmental Compliance Advisory Committee will maintain a list of EMS records. See Table 2.6.3 EMS Records Management.

Step 3: The EMS Coordinator and Environmental Compliance Advisory Committee will maintain a list of EMS controlled documents.

Step 4: The EMS Coordinator and Environmental Compliance Advisory Committee will identify and note on the records list any restrictions on records necessary for security.

Step 5: The EMS Coordinator and Environmental Compliance Advisory Committee will annually review the EH&S records, and in compliance with the state and the Board of Regents Records Retention Schedules, will purge as necessary.

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EMS Form	2.6.2
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	List of Records

List of EMS Records

Clayton State University (CSU) has identified the following types of documents related to the EMS and environmental matters that occurs at CSU.

EMS Records

EH&S manifests
Inspections (to include eyewash, showers, fire extinguisher)
Audits
Fume hood certification
PMs
Maintenance logs
Invoices
Waste determinations
Abatement records
Incident reports
Training certificates/certifications
Emails
Closing documents
Meeting minutes
Training rosters
Permits
Annual Boiler inspections
Annual Tank inspections

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EMS Form	2.6.3
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	EMS Records Management

EMS Records Management

Records	Location Kept	Person Responsible	Retention
Hazardous Waste Manifests	EH&S Office	EH&S Coordinator	30 years
Site Inspections	Lab Safety office Facilities Mgmt Art Studio EH&S Office	Lab Manager Facilities personnel Art Director EH&S Coordinator	10 years
EPA Audits Lab Audit Wastewater Audit	EH&S Office Vice President of Business and Operations	EH&S Coordinator	Permanent
Fume Hood certification	Lab Manager office	Lab Manager	3 years
PMs	Facilities Management	Facilities PM Coordinator	5 years
Maintenance logs	Facilities Management	Facilities Director	3 years
Invoices	Departments	Departments	7 years
Waste determinations	Lab Safety office Facilities Mgmt	Lab Manager(s) Facilities personnel	3 years

	Art Studio EH&S Office	Art Director Dental Clinic Mgr EH&S Coordinator	
Abatement Records	Facilities Management	Director of Facilities	Permanent
Incident Reports	Public Safety EH&S Office	Public Safety EH&S Coordinator	5 years
Training Certifications	Departments	Department Supervisor	10 year
Emails/general correspondence	Individual computer	Individual computer	5 years
Closing documents	Facilities Management	Director of Facilities	11 years after project completion
Meeting minutes	Departments holding the meeting	Department Supervisor	Permanent
Training Rosters	Departments conducting the training	Department Supervisors Human Resources	1 year
Permits	Facilities Management	Director of Facilities	10 years
Boiler and Tank inspections	Facilities Management	Director of Facilities	3 years
Clean Air Record	Public Safety	Public Safety	7 years
Emergency Response Plan	Public Safety	Public Safety	Until superseded
Safety Data Sheets	All Labs Public Safety Art Studio Dental Clinic Health and Wellness Center Facilities Mgmt	Lab Manager(s) Public Safety Art Director Clinic Manager Health Services Director Facilities Director	30 years

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EMS Form	2.7.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Emergency Preparedness

Procedure for Emergency Preparedness Planning and Response

PURPOSE

This procedure documents how Clayton State University documents, communicates and reviews emergency plans and responds to emergency events that may occur.

PROCESS

Step 1: The Department of Public Safety is responsible for campus emergency preparedness planning and response.

Step 2: The Department of Public Safety has developed an Emergency Management Plan that contains all the emergency response procedures and information required by federal, state and local regulatory agencies.

Step 3: The Department of Public Safety and other campus personnel involved with emergency preparedness will communicate with and train designated faculty, students, and staff on the procedures contained in emergency response plans and procedures.

Step 4: At least annually, the Environmental Compliance Advisory Committee and the Department of Public Safety, with other campus personnel involved with emergency

preparedness and response, will evaluate the effectiveness of the emergency response procedures and all emergency incidents that occurred since the last review.

Step 5: The Emergency Management Plan and other documentation related to emergency response and preparedness and emergency incidents will be kept in the Department of Public Safety for at least 5 years.

University emergency procedures are located in the Department of Public Safety.

Emergency signage and evacuation plans are located throughout all the buildings on campus.

The Contingency Plan for hazardous materials is located at the Office of Environmental Health and Safety and at https://www.clayton.edu/EH&S/

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EMS Form	2.7.2
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Evaluation of Incidents

Evaluation of Potential Emergency Incidents

Clayton State University has identified several emergency situations that may possibly occur. Emergency situations and procedures are included in the Emergency Management Plan.

Potential Incident or Emergency Event	Relative Risk (H,M,L}	Types of Harm to People, Property, or Environment	Preventive Actions
Power Outage	L	Possible equipment damage, loss of food, and lab projects	Mobile and other back-up generators, infrastructure upgrades, repeaters, analog lines for communications
Chemical spill in labs	L	Skin irritation, burns	Chemical safety Procedures
Oil leaks or spillage	L	Property damage	SPCC
Flooding	L	Property damage	Periodic building inspections
Train derailment	L	Property damage, possible chemical exposure, only entrance and exit shut down	Emergency Management Plan
Tornado	L	Property damage, possible personal harm due to damaging winds	Emergency Management Plan
Bomb threat	L	Property damage, possible chemical	Emergency

		exposure and explosives	Management Plan
Suspicious mail/package	L	Possible chemical exposure and explosives	Emergency Management Plan
Pandemic	L	Exposure to fatal pathogens	Emergency Management Plan
Active shooter	L	Exposure to possible fatal environment	Emergency Management Plan

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EMS Form	3.1.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Procedure-Monitoring and Measuring

Procedure for Conducting Monitoring and Measuring

PURPOSE

This procedure documents how Clayton State University implements and conducts a monitoring and measurement program to support the EMS.

PROCESS

Step 1: The EMS Coordinator and the Environmental Compliance Advisory Committee, with assistance from other designated personnel, will track certain information and activities by monitoring and measuring relevant data. In determining what information and activities to monitor and measure, the Environmental Compliance Advisory Committee will consider the objectives and targets and operational controls set as part of the EMS.

Step 2: The Environmental Compliance Advisory Committee will review monitoring and measurement information annually to assess trends and evaluate progress toward meeting objectives and targets and to consider environmental performance.

Step 3: The EMS Coordinator will communicate and coordinate with other campus personnel involved with measuring and monitoring and will ensure that all personnel are trained in how to conduct monitoring and measurement.

Step 4: At least annually, the Environmental Compliance Advisory Committee, with other campus personnel involved with monitoring and measurement will evaluate the effectiveness of the monitoring and measurement, and make any needed revisions.

Step 5: Documentation and information related to monitoring and measurement will be kept in the department responsible for monitoring for at least three years.

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EMS Form	3.1.2
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	List-Monitoring and Measuring

List of Information and Activities to be Measured / Monitored

Clayton State University has identified the following information or activities that need to be monitored or measured as well as the department/individual responsible and the frequency.

Information/ Activities	Responsibility	Frequency
Hazardous Waste determinations	Lab Manager(s)	As needed
Inspections/Labs/SPCC/Universal Waste/Art Studio	Lab Manager, Facilities personnel, Art instructor, EH&S Coordinator	Weekly, monthly, quarterly
Training	Department supervisors	Annual training and as needed job specific
Records/Hazardous/Asbestos	Facilities Management	As needed, maintained in Facilities library
Monitor Manifest/LDRs	EH&S Coordinator	Per waste pickups
Incident reports	Department of Public Safety	Per incident/NCIS
Hazardous waste pick up logs	EH&S Coordinator	Per pick up
Fuel usage logs	Facilities Coordinator	Weekly
SDS compliance	Department Managers, EH&S Public Safety	As needed

Refrigerant logs	Building Operations	As needed
Chemical inventory list	EH&S Coordinator	Bi-Annually

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EMS Form	3.2.2
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Non-Compliance Corrections List

List of Examples of Non-compliance Issues, How Identified and Corrected and Actions to Prevent Recurrence

Clayton State University has identified the following examples of compliance issues that have occurred, how the issues were identified, how they were corrected, and what was done to try to prevent the issues from recurring.

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Non-Compliance Issue	Root Cause and How Identified	Corrective Action Taken	Steps to Prevent Recurrence
Lack of accumulation date on label, not sealing used bulb containers	Lack of adhering to policies and procedures and lack of accountability and responsibilities Identified by inspections	Additional training program established Instructional signage posted, proper containers and labels provided	Weekly Inspections
Improper labeling, storing and handling of hazardous material-SAA issues	Lack of adhering to policy and procedures and training Identified by inspection	Formal policies, procedures and training implemented	Weekly Inspections
Not maintaining current -SDS on file	Lack of awareness and unclear of regulations Identified by inspection and bi-annual chemistry lists	Communication to each responsible Department and to the Dept of Public Safety to maintain current -SDS	Inspections
Not wearing proper Personal Protective Equipment (PPE)	Lack of awareness and accountability Identified during each lab	All students are required to acknowledge and sign a safety form regarding PPE and other safety regulations: Recommend all lab personnel, faculty, instructor be required to acknowledge and sign a safety form regarding PPE and other safety regulations.	Inspections

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EMS Form	3.3.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Procedure-Conducting Audits

Procedure for Conducting Audits

PURPOSE

This procedure documents how Clayton State University schedules, conducts and reports periodic internal and external audits related to its EMS and to environmental and safety matters.

PROCESS

Step 1: The Environmental Compliance Advisory Committee will recommend an audit team to the Vice President of Business and Operations to conduct an audit. The Lead Auditor will be responsible for orienting the audit team, for coordinating the audit process and coordinating the preparation of the audit report.

Step 2: The auditors will not work in or oversee the activities they audit, and will be objective and unbiased to ensure objectivity. Each auditor will have appropriate audit training, work experience, knowledge and audit skills.

Step 3: The Lead Auditor will ensure that the team is adequately prepared to initiate the audit. The EMS Coordinator will provide relevant policies, procedures, standards, regulatory requirements and previous audit reports to the audit team.

Step 4: The Lead Auditor will prepare a written audit plan for the audit. The EMS Coordinator will notify the departments to be audited a reasonable time prior to the audit.

Step 5: Personnel in the departments being audited are responsible for any follow-up corrective actions needed as a result of the audit.

Step 6: The audit team will submit the audit report to the Vice President of Business and Operations and the Environmental Compliance Advisory Committee. Copies of the audit report will be kept in the EH&S Office for at least 3 years after completion of the

audit. The Environmental Compliance Advisory Committee will annually review the audits to evaluate any trends and to check on any outstanding required corrective actions or needed procedural revisions.

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EMS Form	3.3.2
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Conducting Audits

Audit

PURPOSE

2014 In accordance with Clayton State's Environmental Management System audit procedures, the System Office evaluated the laboratory areas regarding environmental and occupational safety compliance.

2017 In accordance with Clayton State's Environmental Management System audit procedures, the Clayton County Water Authority conducted a Wastewater analysis for a Wastewater profile and compliance.

https://www.clayton.edu/EH&S/

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EMS Form	3.4.1
Effective Date:	December 5, 2012
Reviewed/ Revised:	November 18, 2021 October 23, 2017 October 18, 2016 October 26, 2015 October 20, 2014 October 17, 2013
Subject:	Procedure-Administration Review

Procedure for Conducting Administration Review

PURPOSE

This procedure documents how Clayton State University schedules and conducts periodic administrative review meetings to evaluate its EMS and related environmental and safety matters.

PROCESS

Step 1: The EMS Coordinator is responsible for scheduling and conducting a minimum of one Administration Review meeting during each 12 month period. The EMS Coordinator is also responsible for collecting the needed data and other information prior to the meeting.

Step 2: The EMS Coordinator and the Environmental Compliance Advisory Committee will propose an agenda for the meeting. Each meeting will consider the following topics:

- the adequacy and effectiveness of the environmental policy
- the adequacy and effectiveness of the environmental objectives
- the adequacy and effectiveness of the EMS
- the status of corrective and preventive actions, and the results of any EMS audit conducted since the last Administration Review
- the results of any action items from the previous Administration Review meeting
- the results of any procedural changes be recommended to the Vice President of Business and Operations.

Step 3: The EMS Coordinator (or the person chairing the meeting) will arrange for someone to take minutes of the Administration Review meeting. The minutes will include a list of attendees, a summary of key issues discussed, and any action items arising from the discussion.

Step 4: The EMS Coordinator (or the person chairing the meeting) will arrange for someone to distribute meeting minutes to attendees and any individual assigned an action item. A copy of the meeting minutes will be kept in the EH&S Office.

Step 5: At least annually, the Environmental Compliance Advisory Committee will evaluate the effectiveness of procedures and will recommend to the Vice President of Business and Operations any necessary procedural changes to improve effectiveness.