

UNIVERSITY OF ALASKA FAIRBANKS SAFETY SYSTEM POLICY AND PROCEDURE

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SUBJECT: Safety Inspection Procedures (Regulatory Agencies)

SAFETY INSPECTION PROCEDURES (REGULATORY AGENCIES)

PURPOSE: To provide guidelines to University of Alaska Fairbanks personnel when university facilities, sites, and operations are being inspected by a regulatory agency.

OBJECTIVE: To cooperate with all regulatory agencies, and to ensure compliance with all governing regulations.

SCOPE: All University of Alaska Fairbanks facilities, sites and operations.

I. REGULATORY AGENCIES

The most common regulatory agencies, which are likely to visit the campus, are:

A. Alaska Department of Labor, Division of Labor Standards & Safety, Occupational Safety & Health, (OSHA) - Jurisdiction over employee safety and health in Alaska.

B. Alaska Department of Transportation (DOT) - Jurisdiction over transportation, public roads and highways.

C. Alaska Department of Environmental Conservation (ADEC) - Jurisdiction over hazardous material users and waste generators, transporters, and treatment/storage/disposal facilities. Most UAF facilities use and generate some quantities of hazardous waste.

D. Environmental Protection Agency (EPA) - Same as ADEC; but at federal level.

E. Alaska State Fire Marshals - Jurisdiction over fire protection of UAF facilities located in Alaska.

F. Alaska Department of Fish & Game - Inspects facilities to ensure UAF is maintaining water flows and not harming wildlife.

G. Alaska State Troopers (AST) - Law enforcement.

H. Nuclear Regulatory Agency (NRC) - Use of any radioactive material.

I. Army Corps of Engineers - Wetlands.

II. RESPONSIBILITIES

A. Deans, Directors, or Department Heads

1. Contact UAF Environmental Health, Safety, and Risk Management (EHS&RM), 474-5413, immediately upon notice of pending inspection or arrival of inspector(s).

2. Designate appropriate management, or supervisory staff, to accompany inspection agency representative(s); preferably the Unit Safety Coordinator.

B. UAF Environmental Health, Safety, and Risk Management

1. Accompany inspector(s) when timely notification and access to the site permits.

2. Provide guidance to area representative(s) when notification is timely, if travel to the location is not possible.

3. Visit the location and contact Dean, Director or Department Head, and/or individual who accompanied the inspector(s).

4. Notify Vice Chancellor of Administrative Services, Statewide Risk Management, General Counsel's Office, and Public Affairs, as appropriate.

C. Statewide Risk Management

1. Determine if notification to the insurance broker/insurers is necessary when property damage, or UAF liability, is involved.

2. As requested, or necessary, assist UAF in responding to regulatory agency.

D. General Counsel

1. Analyze legal issues and provide advice as needed.

2. Determine when legal representation is necessary.

3. Access engagement of outside counsel as recommended by the Vice Chancellor for Administrative Services, or as necessary.

III. GUIDELINES

A. Inspections will be allowed without requiring a warrant to enter University facilities.

Inspections usually fall into three categories;

1. complaint,

2. compliance, or

3. fatality/accident resulting in severe injury(s).
- B. An opening conference is required to agree on the scope of the visit.
- C. A closing conference is required to review the findings.

IV. INSPECTION PROCEDURES

A. Inspected Departments

1. Notify UAF EHS&RM at 474-5413 immediately. During non-work hours call Dispatch at 474-7221. Request the participation of Codes and Safety personnel in the inspection.
2. Appoint a responsible management, or supervisory employee, to represent UAF and accompany inspection agency inspector(s).
3. Request to see identification/credentials of the regulatory agency inspector(s).
4. Inquire as to the reasons for the inspection and its scope.
5. Whoever accompanies the inspector(s) must take notes, and when possible, take photos of possible citable items.
6. Hold a closing conference with inspector(s) to discuss findings.
7. Write a report/memo to the Dean, Director or Department Head of your impressions and findings of the visit.
8. If EHS&RM personnel were not present, notify UAF EHS&RM about the findings and whether citations were, or will be issued.

B. UAF Environmental Health, Safety, and Risk Management

1. Assist Dean, Director or Department Head with their request, and if accompanying inspector(s), then follow items 3 through 8 above.
2. Notify Vice Chancellor of Administrative Services, Public Affairs, Statewide Risk Management, and General Counsel's Office; plus Dean, Director or Department (if not previously notified) about findings and whether citations were issued.
3. Ensure citation is posted, if received and required, at the specified location, and for the requested time period. Act as liaison to, and coordinate all responses to, regulatory agency.
4. Notify the regulatory agency, within their established time period, after receipt of findings/citation and advise them of UAF's intent to contest the findings and/or citation, if appropriate. Coordinate responses through the Statewide General Counsel's Office.

5. Follow up and assist departments to ensure compliance with all recommendations and citations issued.

C. Statewide Risk Management

1. Determine if notification to the insurance broker/insurers is necessary when property damage or UAF liability is involved.

2. As requested or necessary, assist UAF in responding to regulatory agency.

D. Statewide General Counsel's Office

1. Assist UAF in determination to accept or contest the citation, as necessary.

2. Provide for defense of appeal of the citation as appropriate.