

INTERNAL CONTROL GUIDANCE: HEALTH & SAFETY

I. Safety of Workplace

Area of Risk: Safety of Workplace

Description of Risk: Occupational injury, illness, or death, as well as significant property damage can result from improper training or failure of the Institute to provide a safe working environment. A violation of the State of Georgia's "Public Employee Hazardous Chemical Protection and Right to Know Act of 1988" could result in future liabilities and adverse publicity for the Institute.

Criteria: It is the policy of Georgia Institute of Technology for each unit to develop a safety program per the Institute Safety Policy memorandum issued by the Office of the President dated February 1, 1995. Each department is responsible for working with the Environmental Science, Health and Safety Office, in assessing safety needs and developing a safety program unique to their organization. The Institute's policy in this area is available at <http://www.policylibrary.gatech.edu/campus-use-facilities/environmental-health-and-safety>

Furthermore, it is the policy of the Institute that an ongoing Right to Know Program for hazardous chemicals shall be instituted and maintained in order to comply with the State of Georgia's "Public Employee Hazardous Chemical Protection and Right to Know Act of 1988". The "Right to Know" training courses are available on the Institute's Training website at <http://trains.gatech.edu/>

Campus units should ensure that employees receive all required training and comply with the various rules and regulations pertaining to each of these areas.

Auditor's Overview: The purpose of reviewing this area is to promote awareness on the importance of safety in the workplace and compliance with the State of Georgia's "Public Employee Hazardous Chemical Protection and Right to Know Act of 1988".

Best Practices:

1. Designate an individual within the unit with the responsibility for ensuring compliance with unit, Institute and state policies
2. Ensure that your unit has an explicit plan for training employees
3. Ensure that your unit has a written training program
4. Ensure that all faculty, staff, and students are informed and periodically reminded of workplace safety

Process:

RESPONSIBILITY AND DELEGATION

The first basic step is for at least one person, usually a supervisor or manager, to have a reasonable understanding of how Institute and state policy affect the unit's operation. It is this person who is responsible for preparing internal policies and procedures that satisfy all the criteria required by these entities. This person should develop a training program to ensure appropriate training of unit

personnel (e.g., faculty, staff, and student workers). Finally, it is this person who will generally enforce policy and procedure adherence among all employees.

Documentation and Compliance, It's The Law

A written training program should be developed and updated as necessary to maintain currency to ensure consistency in the communication of information provided to employees. The unit may contact the Institutes Environmental Health and Safety Compliance Officer at (404) 894-4635, for identifying safety needs, assistance in developing a safety program, and guidance on safety of workplace compliance. The Environmental Health and Safety Department has developed a general laboratory safety manual (<http://www.ehs.gatech.edu/chemical/AAA Lab Safety Manual April 29 2013.pdf>) to provide guidance in the area of laboratory safety

Regarding the Georgia Right to Know law, all hazardous chemicals used by the unit should be identified and material safety data sheets (MSDS) maintained on each hazardous chemical. The unit must ensure they meet the minimum information standards set forth in the law regarding MSDS. The specific details on acceptable methods for MSDS may be at found at <http://www.usg.edu/facilities/rtk-ghs/P40>. A central location for maintaining the MSDS within the unit should be identified and a process developed to ensure requests for information are readily available to employees.

Communication

Employees should receive job specific training. The training should include these minimum information standards per the Georgia Right to Know Act:

1. The requirements of Georgia Right To Know section 45-22-8
2. What a material safety data sheet is and the contents of the material safety data sheet for any hazardous chemical to which he is exposed, or equivalent information, either in written form or through training programs
3. Any operations in his work area where hazardous chemical are present
4. The location and availability of training programs
5. His right to receive information regarding hazardous chemicals to which he may be exposed
6. His right for his physician to receive information regarding hazardous chemicals to which the employee may be exposed
7. His right against discharge or other discrimination due to the employee's exercise of the rights provided by this chapter

A process for identifying and certifying all employees have received training should be developed and records maintained within the unit.

A best practice is to communicate this information at employee orientations your unit may have, periodically during faculty and staff meetings, and in the internal faculty/staff handbook. Various communication methods such as email, hard copy memo, posted on the unit's web page or on physical bulletin boards, may provide alternative methods for effectively refreshing the topic to employees based on your mode of operation. An online basic awareness Right to Know Training Module provided by the University System of Georgia is a resource tool that may be incorporated into your unit's initial and/or refresher training. It can be found at:

<http://www.usg.edu/facilities/resources/training/>

Further, providing general principles of recognition of hazards and injuries, procedures for reporting hazardous conditions and methods and procedures for early reporting of injuries may further inform employees of concepts to reduce risk of workplace hazards and injuries. The University System of Georgia maintains an Environmental Health and Safety Video library, which provides numerous training materials on various subjects free of charge. The videotapes may be requested by members of the University system and would be a great addition to your units Safety in the Workplace Training Program.

II. Environmental Protection

Area of Risk: Environmental Protection

Description of Risk: Georgia Tech is obligated to protect the general and Institute environments by properly managing and disposing of hazardous chemical wastes, and by implementing appropriate construction procedures to prevent visible and asbestos emissions. Furthermore, the Institute could be subject to fines from regulatory enforcement action and negative publicity that could adversely affect research activity and student populations.

Criteria: It is the policy of Georgia Tech that hazardous waste be managed and disposed of appropriately in accordance with federal Hazardous Waste Management regulations (40 CFR 260-272) and rules of Georgia's Department of Environmental Resources and Environmental Protection Division. Furthermore, construction projects must be accomplished in a manner that prevents visible emissions (National Emission Standards for Hazardous Air Pollutants or NESHAP, 40 CFR 70) including compliance with NESHAP and Georgia (1986 Georgia Asbestos Safety Act, Chapter 391) asbestos rules. The Institute policy for managing and disposing hazardous waste can be found at: <http://www.ehs.gatech.edu/hazardous/>

Auditor's Overview: The purpose of reviewing this area is to determine: (1) Whether the unit has established reasonable policies and procedures for ensuring environmental protection safety and compliance; (2) Whether the unit has ensured that all employees have received required training in the area of environmental protection and hazardous materials; and (3) Whether the unit has in place a monitoring process through which to ensure that all employees comply with rules and regulations regarding environmental protection and hazardous materials.

Best Practices:

1. Designate an individual within the unit with the responsibility for ensuring compliance with hazardous waste polices
2. Develop internal policies and procedures
3. Ensure that your unit has an explicit plan for training employees

Process:

RESPONSIBILITY AND DELEGATION

The first basic step is for at least one person, usually a supervisor or manager, to have a reasonable understanding of how Institute, state and federal policy affect the unit's operation. The Environmental Health and Safety Department (EHS) have developed a general laboratory safety manual at <http://www.ehs.gatech.edu/chemical/AAA Lab Safety Manual April 29 2013.pdf>, which contains the hazardous waste policy, hazardous materials storage and disposal policy, and the policy and procedures for bio-hazardous waste. It is this person who is responsible for preparing internal policies and procedures that satisfy all the criteria required by these entities.

This person should develop a training program to ensure appropriate training of unit personnel (e.g., faculty, staff, and student workers). Finally, it is this person who will generally enforce policy and procedure adherence among all employees. This can be accomplished by establishing an internal monitoring program of facilities where hazardous materials are used to determine adherence with policy. Management should establish the frequency of conducting monitoring. A simple checklist containing policy criteria can be used to record compliance or noncompliance. The results should be communicated to management and other appropriate individuals for resolution of noncompliance issues. The unit should maintain the document and responses.

For direct questions regarding hazardous waste, contact the Hazardous Waste Officer at (404) 894-4635.

DOCUMENTATION CLARITY

First and foremost approved internal policies and procedures should be well documented and provided to faculty, staff and students. A more cost effective and efficient means of distributing policies and procedures may be via the unit's internal web site. However, the unit should make the necessary provisions for individuals who may not have access to the internal web site.

The unit should develop a written training program that provides faculty, staff and students chemical-specific training to ensure consistency in the communication of pertinent information. The training should be updated as necessary to maintain currency. The unit may seek guidance from the EHS manual at <http://www.ehs.gatech.edu/>, which contains the hazardous waste policy, hazardous materials storage and disposal policy, and the policy and procedures for bio hazardous waste. Additionally, the unit may contact the Institutes' Environmental Health and Safety Compliance Officer or the Hazardous Materials Officer at (404) 894-4635 for assistance and guidance.

A process for certifying that appropriate individuals have received required training should be developed and records maintained within the unit. This may be accomplished by identifying individuals who work with hazardous materials by area, and require participants to sign a training attendance sheet or certification statement. A certification statement may include acknowledgement and understanding of policies and procedures, as well as agreement to adhere to accepted workplace practices established by the unit.

COMMUNICATION

Employees should receive job-specific training regarding specific chemicals he will come into contact with prior to commencing work. Along with development of the unit's training program, a training plan should be developed to ensure that all faculty, staff, and students are informed and periodically reminded of environmental protection. The initial training and frequency of refresher training should be in compliance with policy.