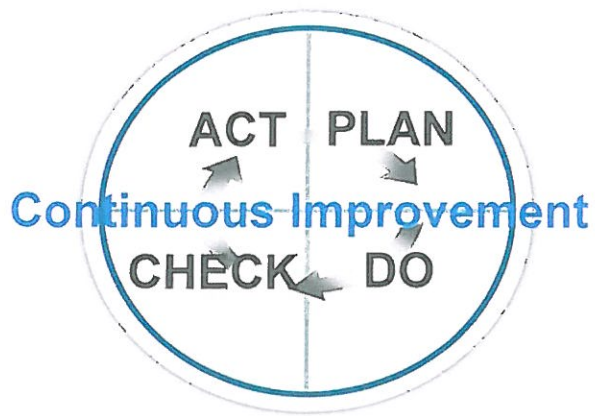




AUGUSTA
UNIVERSITY

Environmental Management System (EMS)
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Augusta University Environmental Management System Manual

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CHAPTER 1

EMS MANUAL INTRODUCTION AND OVERVIEW

Welcome to Augusta University’s Environmental Management System. This manual is designed to serve as a guide to the Environmental Management System (EMS) and all of its related components. The manual provides an overview of the EMS and a discussion of its components. The manual provides an understanding of Augusta University’s environmental requirements and the tools available to meet those requirements. Augusta University’s faculty, staff, and students should read the manual to assist them in complying with environmental requirements and good practices.

Overall EMS Framework

The EMS focuses on those institutional measures taken to eliminate adverse environmental impacts arising from Augusta University operations and ensure continuing compliance with environmental regulations. The basis of the EMS is a commitment to continuous improvement. This EMS is based on the “Plan, Do, Check, and Act” model. A visual representation of this model is shown below:



Goals and Objectives

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

EMS Documentation – Structure

Augusta University has built its EMS on existing policies, procedures and practices already in place to meet federal and state regulatory requirements, and on corresponding policies of the USG.

The documentation for the EMS includes environmental policies, EMS procedures, and task-specific documents such as plans, standard operating procedures and work instructions.

These documents provide for an organized method for managing and continually improving environmental performance. This manual incorporates those policies directly or by reference.

CHAPTER 2
ENVIRONMENTAL MANAGEMENT SYSTEM DEFINITIONS

- a. AU – Augusta University
- b. BOR – Board of Regents
- c. Controlled Documents – Documents that have an effective date, a document number, a review date, identify who has issued the document, and who has approved the document.
- d. EMS – Environmental Management System, which is the collection of policies, procedures and protocols that set how Augusta University manages its EHS issues.
- e. EMS Coordinator – The person designated by the AVP, EHS to coordinate and monitor EMS activities.
- f. EHS – Environmental Health and Safety.
- g. EHS Division – The group at Augusta University that manages Environmental Health and Safety programs.
- h. Faculty – Principal Investigators, Principal Authorized Users, Professors, Associate Professors, Assistant Professors, and Academic Instructors.
- i. Objectives – Broad goals that are consistent with Augusta University’s policies and priorities.
- j. Research Staff/Teaching Staff – Research Assistants, Research Associates, Clinical Research Coordinators, Teaching Assistants, etc.
- k. Targets – Detailed goals related to specific objectives that are generally quantifiable over a designated time frame.
- l. University Compliance Subcommittee – The University Subcommittee of the Compliance and Enterprise Risk Management Committee, a group of Faculty and administrators who focus on compliance concerns at Augusta University.
- m. USG - University System of Georgia.

CHAPTER 3

ENVIRONMENTAL POLICY PROCESS

1. Purpose: The purpose of this procedure is to identify how Augusta University develops, maintains, communicates, reviews and revises its Environmental Policy for its Environmental Management System (EMS).
2. Scope: This procedure covers all of Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The Augusta University EMS Coordinator, EHS Division staff, various faculty and administrative staff, and the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") will be responsible for reviewing and updating this procedure as needed. Representatives from the EHS Division and University Compliance Subcommittee will be responsible for communicating any changes or updates to Augusta University faculty, students, administration and staff.
4. Procedure: Set out below are the procedure(s) for adopting and reviewing the Environmental Policy:

a. Adopting Policy

- i. The University System of Georgia Board of Regents (BOR) has developed and adopted an Environmental and Occupational Safety Policy ("Environmental Policy").
- ii. Augusta University's EMS Coordinator, EHS Division staff, the University Subcommittee, and various faculty and administration staff involved with the EMS will review the BOR Environmental Policy, modify it as necessary, and adopt it as Augusta University's Environmental policy.
- iii. Augusta University may develop and adopt an additional environmental policy specific to Augusta University to supplement the BOR Environmental Policy.

b. Reviewing Environmental Policy

Annually or as needed, Augusta University's EMS Coordinator, EHS Division, University Compliance Subcommittee and various faculty and administrative staff involved with EMS will review the Environmental Policy to be sure it remains appropriate to the activities occurring at Augusta University, and will make any revisions as needed.

c. Communicating the Environmental Policy

Augusta University's EMS Coordinator, EHS Division and the University Compliance Subcommittee will make the Environmental Policy available to Augusta University faculty, students, administration and staff and communicate and disseminate information about the Environmental Policy in the following ways:

- i. A link to the Environmental Policy will be available on the Augusta University website.
- ii. Augusta University will use various electronic and other means of communication to transmit information about the Environmental Policy.

CHAPTER 4
EMS PROCESS FOR IDENTIFYING ENVIRONMENTAL REGULATORY AND
OTHER REQUIREMENTS

1. Purpose: The purpose of this procedure is to describe how Augusta University identifies environmental laws and regulations and other requirements applicable to EHS activities and operations that occur at Augusta University.
2. Policy: It is the policy of Augusta University to maintain compliance with all environmental laws and regulations, and to stay current with environmental best practices.
3. Scope: This procedure covers all of Augusta University. There is no unit or part of Augusta University that is exempt from this process.
4. Responsibilities: There are numerous environmental laws and regulations at the federal, state, and local levels. In addition, the University System of Georgia (USG) Board of Regents has adopted certain environmental health and safety processes for the USG institutions to follow. Further, Augusta University has adopted or in future may adopt certain environmental health and safety processes for Augusta University faculty, students, administration and staff to follow. It is essential that Augusta University faculty, students, administration and staff understand which laws and regulations, USG procedures, and Augusta University procedures apply to Augusta University's activities and also what these laws, regulations and procedures specifically require.

Augusta University's Environmental Health and Safety (EHS) Division maintains a comprehensive listing of applicable laws and regulations. Augusta University's Legal Affairs Office may assist with this responsibility as needed. EHS Division staff will be responsible for informing the Augusta University community of new regulations and requirements that relate to Augusta University EMS. Augusta University's Legal Affairs Office may assist with this responsibility as needed.

4. Procedure: Set out below are the procedure(s) for developing and reviewing the EMS list of regulatory and other requirements:
 - a. Developing List of Regulatory and Other Requirements

The EHS Division will develop a list of regulatory and other requirements that are applicable to activities occurring at Augusta University.

b. Reviewing List of Regulatory and Other Requirements

- i. Every year, the EHS Division will review the list and update it as needed.
- ii. EHS Division staff will attend conferences, participate in web-based discussion, be involved in list serves, network with EHS staff at other USG institutions, network with EHS staff at institutions outside of USG, review EHS periodicals and publications, attend trainings, and participate in meetings of professional groups.
- iii. EHS Division staff may consult with Augusta University's Legal Affairs Office as needed concerning Regulatory and Other Requirements.

c. Communication of Regulatory and Other Requirements

The EHS Division will communicate information concerning regulatory and other requirements using the methods and tools set out in the Communication Process.

CHAPTER 5

PROCESS FOR IDENTIFYING ENVIRONMENTAL OBJECTIVES AND TARGETS

1. Purpose: The purpose of this procedure is to identify the objectives and targets relating to the Environment Management System (EMS).

Objectives are goals that are consistent with the University System of Georgia (USG's) environmental and occupational health policy, Augusta University's environmental policy, Augusta University's priorities, 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.

2. Scope: This procedure covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The EMS Coordinator, the EHS Division, the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") and various designated faculty and administration have responsibility for developing and reviewing objectives and goals.
4. Procedure: Set out below are the procedure(s) for developing objectives and targets:

- a. Reporting on Objectives and Targets

The AVP, EHS Division will prepare a report each year describing the progress made in achieving the objectives and targets. That report will be presented to the University Compliance Subcommittee. As appropriate, that report will include a discussion of any resource issues or other concerns related to achieving the objectives and targets.

- b. Record Keeping

Records related to the objectives and targets, copies of any minutes of the University Compliance Subcommittee meetings, and copies of the annual report to the President will be maintained at the EHS Division.

- c. Review of Process

The EMS Coordinator, EHS Division staff, University Compliance Subcommittee, and various designated faculty and administrative staff will review this procedure and make any revisions as needed.

CHAPTER 6

EMS ROLES AND RESPONSIBILITIES

1. Purpose: The purpose of this procedure is to identify the roles and responsibilities of the faculty, students, administration and staff at Augusta University relating to the Environmental Management System (EMS).
2. Scope: This procedure covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The EMS Coordinator, EHS Division and designated faculty and administrative representatives and the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") will be responsible for reviewing this process and updating this procedure as needed. Representatives from the EHS Division will be responsible for communicating any changes or updates to affected Augusta University faculty, students, administration and staff.
4. Procedure: Set out below are the roles and responsibilities of faculty, students, administration and staff at Augusta University regarding EHS matters and the EMS:

- a. Academic Departments

- i. *Research Staff/Teaching Staff (Research Assistant, Research Associate, Clinical Research Coordinator, Teaching Assistant, etc.)* - The role of each Research Staff/Teaching Staff member is to assist with assigned tasks in the laboratory or classroom. The responsibility of each Research Staff/Teaching Staff member is to conduct activities in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes to help ensure that the laboratory or classroom is in compliance with EHS regulations and Augusta University policies, procedures, and processes, and to assist the Principal Investigator ("PI")/ Principal Authorized User ("PAU")/ Professor/ Associate Professor/ Assistant Professor/ Academic Instructor (collectively "Faculty") or Laboratory Supervisor/Laboratory Coordinator with EHS matters.
- ii. *Graduate Students/Pre- or Post-Doctoral Fellows* - The role of each Graduate Student/Pre- or Post-Doctoral Fellow is to assist with assigned tasks in the laboratory, art studio or classroom. The responsibility of each Graduate Student/Pre- Post-Doctoral Fellow is to conduct activities in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes to help ensure that the laboratory, art studio or classroom is in compliance

with EHS regulations and Augusta University policies, procedures, and processes, and to assist the Faculty member or Laboratory Supervisor/ Laboratory Coordinator with EHS matters.

- iii. *Laboratory Supervisor/Laboratory Coordinator/Art Studio Supervisor* - The role of each Laboratory Supervisor/Laboratory Coordinator is to oversee activities in the laboratory or art studio under the direction of the Faculty member. The responsibility of each Laboratory Supervisor/Laboratory Coordinator/Art Studio Supervisor is to provide day-to-day supervision of research and activities in the laboratory or art studio to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes, to help ensure that the laboratory or art studio is in compliance with EHS regulations and Augusta University policies, procedures, and processes, and to assist the Faculty with EHS matters.
- iv. *Academic Department Manager* - The role of each Academic Department Manager is to oversee the administrative matters in the academic department. The responsibility of each Academic Department Manager is to manage and coordinate information and activities in the department to help ensure that the department is in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes. The Academic Department Manager is responsible for assisting the Academic Department Chair in ensuring that the department is in compliance with EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.
- v. *Principal Investigator ("PI")/ Principal Authorized User ("PAU")/ Professor/ Associate Professor/ Assistant Professor/ Academic Instructor (collectively "Faculty")* - The role of each member of the Faculty is to direct and supervise all activities in the laboratory, art studio or classroom. The responsibility of each member of the Faculty is to supervise and direct all research and activities in the laboratory, art studio or classroom to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes. Each member of the Faculty is responsible for ensuring that the laboratory, art studio or classroom is in compliance with EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.
- vi. *Academic Department Chair* - The role of each Academic Department Chair is to oversee all members of the Faculty and all activities in the department. The responsibility of each Academic Department Chair is to ensure that all research, teaching and activities in the academic department are in compliance with all

applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.

- vii. *Deans* - The role of each Dean is to oversee all activities in his/her college. The responsibility of each Dean is to ensure that all research and activities in the college is in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.
- viii. *Provost and Senior Vice President for Research* - The role of each of the Provost and the Senior Vice President for Research is to oversee all academic activities at Augusta University. The responsibility of each of the Provost and the Senior Vice President for Research is to ensure that all research and academic activities at Augusta University are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.
- ix. *President* - The role of the President is to oversee all activities at Augusta University. The responsibility of the President is to ensure that all academic and administrative activities at Augusta University are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.

b. Administrative Unit

- i. *Administrative Staff* - The role of each Administrative Staff person is to assist with designated tasks in his/her administrative unit. The responsibility of each Administrative Staff person is to conduct activities in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes, to help ensure that the administrative unit is in compliance with EHS regulations and Augusta University policies, procedures, and processes, and to assist the Administrative Unit Head/Director with EHS matters.
- ii. *Administrative Supervisor* - The role of each Administrative Supervisor is to oversee activities in his/her area of the administrative unit. The responsibility of each Administrative Supervisor is to provide day-to-day supervision of activities in his/her designated area to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes, to help ensure that his/her area is in compliance with EHS federal, state, and local regulations and Augusta University policies, procedures, and processes, and to assist the Administrative Unit Director with EHS matters.

- iii. *Administrative Unit Director* - The role of each Administrative Unit Director is to direct and supervise all activities in the administrative unit. The responsibility of each Director is to supervise and direct all activities in the administrative unit to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes. The Administrative Unit Director is responsible for ensuring that the administrative unit is in compliance with EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.

- iv. *Associate Vice President* - The role of each Associate Vice President is to direct and supervise all activities in his/her division. The responsibility of each Associate Vice President is to supervise and direct all activities in the division to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes. The Associate Vice President is responsible for ensuring that the division is in compliance with EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.

- v. *Vice President* - The role of each Vice President is to direct and supervise all activities in his/her divisions. The responsibility of each Vice President is to supervise and direct all activities in the divisions to ensure that they are in compliance with all applicable EHS federal, state, and local regulations and Augusta University policies, procedures, and processes. The Vice President is responsible for ensuring that the divisions are in compliance with EHS federal, state, and local regulations and Augusta University policies, procedures, and processes.

c. EHS Division

- i. *EHS Division Staff* - The role of each staff person in the EHS Division is to provide assistance and maintain a level of expertise in designated EHS regulatory and program areas. The responsibility of each EHS Division staff person is to maintain his/her certifications or training needed to perform his/her role, communicating with various academic and administrative units across the campus, developing and reviewing policies, procedures and guidelines, providing EHS training , responding to requests for assistance, addressing incidents, and maintaining EHS training and compliance records.
- ii. *EHS Division Associate Vice President* - The role of the EHS Division Associate Vice President is to oversee and supervise the EHS Division, and to be the primary contact for EHS matters, both within Augusta University and with the external community. The responsibility of the EHS Associate Vice President is to ensure that the EHS Division is providing assistance and support to Augusta University regarding EHS matters, to handle administrative and personnel matters, and to communicate to the Augusta University Administration as needed regarding EHS matters.

d. Committees

University Subcommittee of the Compliance and Enterprise Risk Management Committee - The University Subcommittee of the Compliance and Enterprise Risk Management Committee will meet periodically to review and provide oversight and guidance on the ongoing operation of the EMS.

CHAPTER 7
EMS PROCESS FOR IDENTIFYING MANAGEMENT PROGRAMS AND
OPERATIONAL CONTROLS

1. Purpose: The purpose of this process is to identify management programs needed to address the risks posed to the environment from Augusta University activities. Part of this includes having appropriate operational controls to address risks in particular locations.
2. Scope: This process covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this process.
3. Responsibilities:
 - a. Academic departments and administrative units have responsibility for informing the EHS Division when they are considering engaging in a new activity that could pose a significant risk to human health or the environment. This needs to occur early in the planning stages to ensure that there is appropriate time to arrange for necessary procedures and resources to support this new activity, and to be sure that the new procedures are in place and followed when the new activity starts.
 - b. The EHS Division has responsibility for developing, communicating, and providing training for the new programs and procedures needed to ensure that the new activity is conducted in a manner that minimizes any risk to human health and the environment.
 - c. The academic department and administrative unit supervisors have responsibility for ensuring that the new programs and procedures are properly followed by faculty, students, administration and staff in their departments or units.

4. Process: Set out below are the process(es) used to identify and develop management programs and operational controls to address environmental risks

a. Identify Significant Risks

- i. Academic departments and administrative units, in collaboration with the EHS Division, will identify activities that may pose significant risks to human health and the environment. When considering engaging in a new activity that could pose a significant risk to human health or the environment, the head of the academic department or administrative unit, or a person designated by them, will inform the EHS Division early in the planning stages to ensure that there is appropriate time to arrange for necessary procedures and resources to support this new activity, and to be sure that the new procedures are in place and followed when the new activity starts.
- ii. As appropriate, the EHS Division will meet with the academic department or administrative unit personnel who will be involved in the new activity, to ensure that everyone has a full understanding of the issues and concerns.

b. Management Programs

- i. Augusta University has various programs for addressing significant risks and concerns. Whenever a new activity is identified, the EHS Division will determine if an existing program will address those risks, or if needed, will modify a program or develop a new program to address those risks. The EHS Division will maintain a list of the programs, which will be available on the Augusta University website.
- ii. SOPs, procedures, and protocols for most of these programs can be found on the EHS website.

c. Develop Operational Controls, Communicate and Provide Training

- i. The EHS Division will develop appropriate procedures, protocols and operational controls to minimize the risk that the new activities may pose to human health and the environment. Depending on the particular issue or activity, the EHS Division may establish Standard Operating Procedures (SOPs) and apply for necessary permits or approvals from regulatory agencies. These SOPs will be made available on the Augusta University website.

- ii. As part of the planning process, the EHS Division will consult with the academic department or administrative unit regarding any equipment, signage or other resources that may be needed to implement the operational controls.
- iii. When appropriate, individual department or unit personnel will develop specific procedures, protocols, and operational controls for particular activities in consultation with the EHS Division. All procedures, protocols and operational controls will be developed using an Augusta University EHS procedure template.
- iv. The EHS Division will communicate information concerning any programs, procedures, and protocols to the faculty, students, administration and staff involved in an activity. For senior administration, this communication may be in a report or briefing. For department or unit personnel, the EHS Division will inform them of the programs, procedures and protocols prior to the start of the activity.
- v. Along with the communication, the EHS Division will provide training to all persons involved in an activity who need such training. The academic department or administration unit, in consultation with the EHS Division, will designate which persons will need training, based upon the exposure and risk they may face as part of their role and/or responsibility in the activity.
- vi. The EHS Division will determine if refresher training is required, and the frequency of that refresher training.
- vii. Both the initial training and any refresher training may be in person, on-line or by DVD or other means. Anyone who needs the training will need to complete the training prior to starting work in the activity. The EHS Division will maintain a copy of all training records for training provided by EHS Division.
- viii. The AVP, EHS Division will determine if he/she has sufficient resources to support the program activities, and if additional resources are needed, will request them from senior administration .

d. Assessment and Review

- i. The EHS Division will conduct an assessment, at least annually, of the management programs and operational controls to evaluate if there are any modifications or changes that need to be made to ensure their effectiveness. As needed, the EHS Division will modify programs and procedures, and will communicate those changes to the academic departments and administrative units.

- ii. At least once each year, the AVP, EHS Division will submit a report or make a presentation to the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") concerning management programs and operational controls and any related issues. The University Compliance Subcommittee will discuss the issues and provide comments and recommendations as appropriate.

CHAPTER 8
EMS PROCESS FOR HANDLING COMMUNICATION RELATED TO EMS

1. Purpose: The purpose of this process is to identify the methods for handling communication of information relating to the Environmental Management System (EMS).
2. Scope: This process covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The EMS Coordinator and the EHS Division staff have responsibility for communicating information from the EHS Division to the rest of the campus. Each academic department and administrative unit has responsibility for communicating information relating to EHS matters to the EHS Division and the EMS Coordinator.

The EMS Coordinator, EHS Division staff, the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") and various designated faculty and administrative staff are responsible for reviewing this process and for making any revisions as needed.

4. Process: Set out below are the process(es) that will be used at Augusta University for communicating information regarding the EMS and EHS matters.

a. Communication from the EHS Division

- i. The EHS Division has a website where information is posted. Faculty, students, administration and staff all have access to the EHS Division website. In addition, the EHS Division prepares and posts placards, signs, and posters to communicate information.
- ii. The EHS Division uses email messages to send out information in a prompt manner to all faculty, administration and staff.
- iii. The EHS Division will make presentations to the Augusta University departments and administrative units on particular EHS matters, and also meet with individual committees or groups within departments or units as necessary. EHS Division staff will meet in person, talk by telephone and communicate by email with individual faculty, students, administration and staff as needed.

b. Communication from Academic Departments and Administrative Units to the EHS Division and the EMS Coordinator

- i. Academic departments and administrative units invite EHS Division staff to attend various planning meetings.

- ii. Individual faculty, students, administration and staff will meet in person, talk by telephone and communicate by email with EHS Division staff as needed. If a person is not sure of who to contact within the EHS Division, the EHS Division website lists each EHS Division staff and their areas of responsibility, as well as the contact information for the Associate Vice President, EHS Division.

c. Review of Procedure

The EMS Coordinator, EHS Division staff, University Compliance Subcommittee and various designated faculty and administrative staff are responsible for reviewing this process and for making any revisions as needed.

CHAPTER 9
EMS PROCESS FOR IDENTIFYING TRAINING NEEDS AND DELIVERING TRAINING

1. Purpose: The purpose of this process is to identify the training needs of the faculty, students, administration and staff at Augusta University relating to EHS matters.
2. Scope: This process covers all faculty, students, administration and staff at Augusta University. Student employees are considered to be staff for the purposes of this procedure. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The EHS Division has responsibility for coordinating, arranging and delivering the training related to EHS matters. Academic departments and administrative units have responsibility for identifying which faculty, students, administration, and staff need to take training related to EHS matters, based on the activities that they are involved in and the types of materials they may be using or exposed to.
 - Human Resources is responsible for providing basic new hire training for all faculty, administration and staff.
 - Academic department and administrative unit supervisors are responsible for providing department level training for all faculty, students, administration and staff.
 - The EHS Division is responsible for providing specialized training based on the activities the faculty, students, administration and staff may be involved in and the types of materials they may be using or exposed to at Augusta University.

The EMS Coordinator, EHS Division staff, the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") and various designated faculty and administrative staff are responsible for reviewing this procedure and for making any revisions as needed.

4. Process: Set out below are the process(es) that academic departments and administrative units and the EHS Division will use for identifying and delivering training related to EHS matters.
 - a. Introductory Orientation Training
 - i. All new Augusta University faculty, administration and staff shall attend "new hire orientation" that is provided by Augusta University Human Resources.

- ii. All new Augusta University students attend "new student orientation" that is provided by Augusta University Student Affairs Office. As a part of that "new student orientation" students are advised of very basic EHS matters and that Augusta University has an EMS.

b. Basic Department/Unit Orientation Training

Each new hire to an academic department or administrative unit receives "new department/unit orientation" by their department or unit. Part of that orientation will address EHS matters specific to the department/unit. In some circumstances, EHS Division staff may provide the EHS portion of this "new academic department/administrative unit orientation" training. This is in addition to the "new hire orientation" provided by Augusta University Human Resources and is specific to the academic department or administrative unit.

c. Student Training

Each new student in an academic department/administrative unit receives training through his/her academic department/administrative unit. This is in addition to the "new student orientation" provided by Augusta University Student Affairs Office and is specific to the department or unit. As part of that training, the academic department/administrative unit will address EHS matters specific to the activities in which they will be engaged.

d. Project/Protocol Specific EHS Training

In addition to the basic academic department/administrative unit training, the faculty member or supervisor provides detailed training to laboratory, classroom or project staff concerning environmental, health and safety concerns related to the project or protocol. The particular training will depend on the person's particular role, responsibility, and activities.

e. Job Specific EHS Training

- i. In addition to the basic academic department/administrative unit training, the EHS Division provides detailed on-line training in particular EHS matters to certain faculty, administration and staff. The particular training will depend on the person's particular role, responsibility, and activities. The academic department/administrative unit informs the EHS Division of new hires who require training or of a person who takes on a new role, responsibility or activities.
- ii. This specific training is provided by the EHS Division staff, and can be delivered in person, electronically, or on-line. The EHS Division will maintain an online training system where appropriate as a method of providing training.

f. Refresher Training

- i. Academic departments/administrative units are responsible for ensuring that employees receive periodic refresher training. Academic departments/ administrative units are responsible for providing the EHS Division with a list of those faculty, administration and staff who need periodic refresher training. Based on that list, the EHS Division will arrange for those persons to receive training.
- ii. This refresher training can be delivered in person, electronically, or on-line. The EHS Division will maintain an online training system where appropriate as a method of providing training.

g. Record Keeping

- i. For the new hire orientation training handled by Human Resources, the EHS Division has access to the database that maintains the training records.
- ii. For the department/unit new orientation training, each department/unit maintains its training records.
- iii. For the training that the EHS Division delivers, in person, online or by an outside consultant or vendor, the EHS Division maintains training records.

h. EHS Division

EHS Division staff takes required initial and periodic refresher training as needed to maintain all needed certifications and qualifications. Copies of training records are maintained in the EHS Division.

g. Review of Process

The EMS Coordinator, EHS Division staff, University Compliance Subcommittee, and various designated faculty and administrative staff are responsible for reviewing this procedure and for making any revisions as needed.

CHAPTER 10
EMS PROCEDURE FOR DOCUMENTING INFORMATION, IDENTIFYING AND
HANDLING CONTROLLED DOCUMENTS, AND MAINTAINING RECORDS

1. Purpose: This procedure sets out how Augusta University documents information relating to EHS matters, which documents are controlled and how those controlled documents are handled, and how records are maintained.

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

2. Scope: This procedure covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities:
 - a. Academic departments and administrative units have a responsibility to document any EHS related accidents or incidents, and to document any EHS related training that someone takes. Departments and units have a responsibility to provide copies of any EHS related documents or records to the EHS Division.
 - b. The Facilities Services Division has a responsibility to document any EHS related repairs, maintenance or inspections (including but not limited to, underground storage tanks, spill prevention control and countermeasures plan inspections elevators, refrigerants, fume hoods, emergency showers or any other environmental/safety issue) that they conduct, oversee or contract out to a third party. The Facilities Services Division has a responsibility to maintain any EHS related documents and records (including but not limited to, refrigerant work, elevator inspections, emergency generators, training records) and make them available to the EHS Division for periodic audits.
 - c. Auxiliary Services has a responsibility to document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Auxiliary Services has a responsibility to maintain any EHS related documents and records and to make them available to the EHS Division for periodic audits.
 - d. Student Housing has a responsibility to document any EHS -related issues or activities that they conduct, oversee or contract out to a third party. Student Housing has a responsibility to maintain any EHS related documents and records and to make them available to the EHS Division for periodic audits.
 - e. Athletics has a responsibility to document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Athletics has a responsibility to maintain any EHS related documents and records and to make them available to the EHS Division for periodic audits.

- f. Georgia War Veterans Nursing Home has a responsibility to document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Georgia War Veterans Nursing Home has a responsibility to maintain any EHS related documents and records and to make them available to the EHS Division for periodic audits.
 - g. The EHS Division has a responsibility to maintain and update documents, and to provide documents to departments and units as appropriate. The EHS Division has a responsibility to maintain EHS related records that it generates or receives.
4. Procedure: Set out below are the procedures used to document EHS related information, identify and handle controlled documents related to EHS matters, and maintain records:
- a. Document EHS Related Information
 - i. Academic departments and administrative units will document EHS related information such as accidents and incidents, inspections, repairs and training.
 - ii. The Facilities Services Division will document any EHS related repairs, maintenance or inspections (including but not limited to, underground storage tanks, spill prevention control and countermeasures plan inspections, elevators, refrigerants, fume hoods, emergency showers or any other environmental/safety issue) that they conduct, oversee or contract out to a third party. The Facilities Services Division will maintain any EHS related documents and records (including but not limited to, refrigerant work, elevator inspections, emergency generators, training records) and make them available to the EHS Division for periodic audits.
 - iii. Auxiliary Services will document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Auxiliary Services will maintain EHS related documents and records and make them available to the EHS Division for periodic audits.
 - iv. Student Housing will document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Student Housing will maintain EHS related documents and records and make them available to the EHS Division for periodic audits.
 - v. Athletics will document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Athletic will maintain EHS related documents and records and make them available to the EHS Division for periodic audits.
 - vi. Georgia War Veterans Nursing Home will document any EHS related issues or activities that they conduct, oversee or contract out to a third party. Georgia War Veterans Nursing Home will maintain EHS related documents and records and make them available to the EHS Division for periodic audits.

- vii. The EHS Division has a responsibility to document any EHS related issues, including, but not limited to, inspections, generation of waste, standard operating procedures, training, and incident reports.

b. Identify and Handle Controlled Documents Related to EHS Matters

- i. Within the scope of the EMS, all "controlled documents" have an effective date, a document number, a review date, identify who has issued the document, and who has approved the document.
- ii. Within the scope of the EMS, the EHS Division is involved with the review and approval of the EHS Policy, and with the development, review and approval of the EMS procedures.
- iii. Academic departments, the Facilities Services Division and other groups periodically work together with the EHS Division to issue policies, protocols, and procedures related to EHS matters that are controlled documents.
- iv. The controlled documents are maintained by the department or unit that issued the document. Access/links to these policies and procedures are available on the EHS Division webpage.

c. Maintenance of Records

- i. The EHS Division generates most of the EHS related records at Augusta University. All records generated by the EHS Division are maintained at the EHS Division, either in electronic form or in paper form.
- ii. Activities that are subject to EHS regulations occur in various locations across Augusta University. These activities include but are not limited to training, compliance inspections, and equipment maintenance and repairs. Many of the department or units involved in activities that are subject to EHS regulations generate or receive records related to those activities. Records generated by other departments (Facilities Services Division, Auxiliary Services, Student Housing, etc.) are maintained in the respective departments in either electronic form or paper form.
- iii. Those records will to be maintained at the department or unit that created or compiled the records.

d. Assessment and Review

- i. The EHS Division will conduct an assessment of the procedures for handling documents, controlled documents and records to evaluate if there are any modifications or changes that need to be made to ensure their effectiveness.

- ii. At least once each year, the AVP, EHS Division will submit a report or make a presentation to the University Compliance Subcommittee concerning documents, controlled documents and records and any related issues. University Compliance Subcommittee will discuss the issues and provide comments and recommendations as appropriate.

CHAPTER 11
EMS PROCEDURE FOR ADDRESSING ACTUAL AND POTENTIAL ACCIDENTS
AND INCIDENTS AND TAKING CORRECTIVE AND PREVENTIVE ACTIONS

1. Purpose: The purpose of this procedure is to identify actual and potential accidents and incidents related to EHS activities, how corrective actions are taken to address those accidents and incidents, and how preventive actions are taken to avoid the occurrence of accidents and incidents.
2. Scope: This procedure covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: Set out below are the responsibilities for the activities related to actual and potential accidents and incidents:
 - a. Identify Actual and Potential Accidents and Incidents
 - i. The individual(s) involved in the actual or potential accident or incident has/have responsibility to immediately inform his/her/their supervisor(s) of the event and what occurred.
 - ii. The academic department or administrative unit supervisor has responsibility to immediately notify the Public Safety Division and the EHS Division as appropriate that an actual or potential accident or incident has occurred. In the event that someone is injured, the supervisor will also notify Employee Health and Wellness.
 - iii. Public Safety Division has responsibility to respond to requests for assistance, to document the information concerning an incident or accident, and to provide a copy of any incident/accident report that relates to EHS matters to the EHS Division. The EHS Division also responds when an EHS- related hazard or issue is involved and to document relevant information.
 - iv. Employee Health and Wellness has responsibility to respond and evaluate anyone brought to them, and either treat the person or arrange for treatment at another health care facility. Employee Health and Wellness will provide a copy of any incident/accident report that relates to EHS matters to the EHS Division.
 - b. Take Corrective Action and Mitigate Any Harm That May Have Occurred
 - i. The Principal Investigator ("PI")/Principal Authorized User ("PAU")/ Professor/ Associate Professor/ Assistant Professor/ Academic Instructor (collectively "Faculty") or Laboratory Supervisor/Laboratory Coordinator or administrative unit supervisor of the area where the accident or incident occurred has responsibility to seek assistance from EHS and other relevant Augusta University divisions to take

corrective action to address the situation and mitigate any harm that may have occurred.

- ii. For any EHS related situation, the EHS Division and others have a responsibility to provide support and assistance as appropriate.

c. Investigate Actual or Potential Accident or Incident and Determine the Root Cause(s)

The head of the academic department or administrative unit or his/her designee has responsibility for ensuring that an investigation is conducted to determine the root cause(s) of the actual or potential accident or incident, and for communicating those findings to the EHS Division, Public Safety Division, and others as appropriate .

The EHS Division and other groups have responsibility to provide support and assistance as appropriate in conducting the investigations.

d. Take Action to Avoid Any Recurrence

- i. The member of the faculty or administrative unit supervisor of the area where the accident or incident occurred has responsibility to seek assistance from EHS and other relevant Augusta University divisions to take corrective action to prevent any recurrence of a situation.
- ii. The EHS Division and other groups have responsibility to provide support and assistance as appropriate.

e. Evaluate How To Prevent Actual or Potential Accidents or Incidents and Take Action To Prevent Them From Occurring

- i. The EHS Division has responsibility for evaluating the risks that are present in various areas across Augusta University and identifying the appropriate measures needed to avoid actual or potential accidents and incidents from occurring.
- ii. The academic departments and administrative units have responsibility to participate in this effort with the EHS Division, both in sharing any information about conditions in their areas that might be useful, and in implementing any measures to prevent non-conformances (accidents or incidents) from occurring.
- iii. As appropriate, Public Safety Division has responsibility for participating in these efforts.

f. Record the Results of Corrective Actions and Preventive Actions

- i. The EHS Division has responsibility to maintain records concerning an actual or potential accident or incident that the EHS Division prepares or receives.

- ii. For situations involving EHS matters, Public Safety Division has responsibility to provide a copy of any incident report to the EHS Division.
 - iii. For situations involving EHS-related hazards or issues, each academic department or administrative unit has responsibility to provide a copy of any incident report to the EHS Division.
- g. Periodically Review the Effectiveness of Corrective Actions and Preventive Actions that Have Been Taken.
- i. The EHS Division has responsibility for conducting periodic analysis of parts of the campus to evaluate the effectiveness of corrective actions and preventive actions, and to determine what, if any, additional corrective or preventive action measures should be implemented.
 - ii. At least once each year, the AVP, EHS Division will submit a report or make a presentation to the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") concerning actual or potential accidents and incidents, corrective actions and preventive actions. The University Compliance Subcommittee will discuss the issues and provide comments and recommendations as appropriate.
- h. Review of Procedure

The EHS Coordinator, EHS Division staff, University Compliance Subcommittee and various designated faculty and administrative staff are responsible for reviewing this procedure and making any required revisions.

4. Procedure: Set out below are the procedure(s) used to:

- a. Identify Actual and Potential Accidents and Incidents, and Take Immediate Actions
- i. In the event that an accident or incident occurs in a department or unit involving EHS-related hazards or issues, the individual department or unit will seek medical treatment to address any injury and take other immediate measures to contain the hazards and address the situation. They will also contact "first responders" (Public Safety Division, etc.) to provide assistance as needed.
 - ii. The academic department or administrative unit supervisor will immediately notify the Public Safety Division and the EHS Division as appropriate that an actual or potential accident or incident has occurred. In the event that someone is injured, the supervisor will also notify Employee Health and Wellness.

b. Correct Situations that Can Cause an Actual or Potential Accidents or Incidents

- i. The Faculty member/Lab Manager or administrative unit supervisor of the area where the accident or incident occurred will seek appropriate assistance and then take corrective action(s) to address the situation and mitigate any harm that may have occurred.
- ii. For any accident or incident involving biological, chemical, radiological or hazardous materials, the department or unit will follow the appropriate procedures in the Augusta University Emergency Response Flip Chart.
- iii. The EHS Division staff will provide assistance and support as needed to address the situation.

c. Investigate Actual or Potential Accidents or Incidents and Determine the Root Cause(s)

- i. Public Safety Division will prepare an incident report that is distributed to appropriate Augusta University personnel.
- ii. For incidents/accidents involving biological, chemical, radiological or hazardous materials, EHS Division will investigate and determine the root cause(s), and prepare an incident report that is distributed to appropriate Augusta University personnel.
- iii. The EHS Division will document the findings and communicate the findings to the department or unit. The EHS Division will keep a copy of the documentation and communication in EHS Division records.

d. Take Action to Avoid Any Recurrence

- i. For any matters involving biological, chemical, radiological or hazardous materials, based on the findings of the assessment(s) and meetings(s), the EHS Division will prepare a set of actions needed to avoid any recurrence of the non-conformance (accident or incident).
- ii. The academic department or administrative unit involved with the accident or incident will implement those actions, with assistance from the EHS Division as needed.
- iii. As appropriate and as needed, the EHS Division will conduct a timely follow-up inspection to assess how the actions have been implemented.

- e. Evaluate How to Prevent Non-conformances and Take Action to Prevent Them From Occurring
 - i. The EHS Division will conduct periodic assessments/assistance visits of academic departments and administrative units to evaluate the risks that are present and the appropriate measures needed to avoid non-conformances (accidents and incidents) from occurring. As part of that effort, the EHS Division will review prior accidents and incidents to help determine what measures will be effective in preventing future non-conformances.
 - ii. The academic departments and administrative units will participate in this effort with the EHS Division, both in sharing any information about conditions in their areas that might be useful, and in implementing any measures recommended by EHS Division to prevent non-conformances (accidents or incidents) from occurring.
 - iii. As appropriate, Public Safety Division will participate in these efforts.
 - iv. Senior Administration will communicate the importance of taking corrective and preventive actions to prevent accidents and incidents at Augusta University.
- f. Record the Results of Corrective Actions and Preventive Actions
 - i. The EHS Division will maintain a record of each report prepared by the EHS Division concerning a non-conformance (accident or incident)
 - ii. For situations involving EHS-related hazards or incidents, Public Safety Division will provide a copy of any incident report to the EHS Division, and the EHS Division will maintain copies of those incident reports.
 - iii. For situations involving EHS matters, each academic department or administrative unit will provide a copy of any incident report to the EHS Division, and the EHS Division will maintain copies of those incident reports.
 - iv. As appropriate and necessary, the EHS Division will document follow-up visits to assess how academic departments and administrative units have implemented any corrective action or preventive action measures.
- g. Periodic Review of the Effectiveness of Corrective Actions and Preventive Actions That Have Been Taken.
 - i. Periodically, the EHS Division will conduct an analysis of parts of Augusta University to assess trends or indications of EHS related accidents or incidents to evaluate the effectiveness of corrective actions and preventive actions, and to determine what, if any, additional corrective or preventive action measures should be implemented.

- ii. As needed, the EHS Division will review the effectiveness of corrective actions and preventive actions as part of staff meetings. As needed, EHS Division staff will meet with individuals, academic departments, or administrative units to discuss concerns or issues.

- iii. At least once each year, the AVP, EHS Division will submit a report or make a presentation to the University Compliance Subcommittee concerning non-conformances (accidents and incidents), corrective actions and preventive actions. The University Compliance Subcommittee will discuss the issues and provide comments and recommendations as appropriate.

CHAPTER 12

EMS PROCEDURE FOR CALCULATING, MONITORING AND MEASURING

1. Purpose: The purpose of this procedure is to conduct monitoring and measuring needed to address the risks posed to the environment from Augusta University activities and to achieve the goals set out by Augusta University.
2. Scope: This procedure covers all faculty, students, administration and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities:
 - a. Academic departments and administrative units have responsibility for informing the EHS Division when they are engaged in, or are considering engaging in, an activity that could pose a significant risk to human health or the environment. For any ongoing activity, this needs to be as promptly as possible. For any new activity, this needs to be early in the planning stages to ensure that there is appropriate time to arrange for necessary protocols and resources to support this activity, and to be sure that any needed monitoring and measuring are in place and followed when the activity starts.
 - b. The EHS Division has responsibility for developing procedures to monitor and measure activities related to programs and protocols needed to ensure that the activity is conducted in a manner that minimizes any risk to human health and the environment, or is helping to achieve the goals set out by Augusta University. The EHS Division has responsibility for ensuring that monitoring and measuring procedures are properly followed by EHS Division staff. When required, the EHS Division has responsibility to submit monitoring and measuring data to the appropriate regulatory agency, Board of Regents, or other entity.
 - c. The academic department and administrative unit supervisors have responsibility for ensuring that the monitoring and measuring procedures are properly followed by faculty, students, administration and staff in their departments or units. When required, the academic department or administrative unit has responsibility to submit monitoring and measuring data to the EHS Division.
4. Procedure: Set out below are the procedures used to identify and develop monitoring and measuring to address environmental risks and to achieve goals set out by Augusta University:
 - a. Identify Need to Monitor and Measure
 - i. Based on the environmental risks that have been identified or the goals that have been set, the EHS Division will determine what activities require monitoring and measuring and identify key performance indicators in order to track their performance.

- ii. As appropriate, the EHS Division will meet with the academic department or administrative unit personnel who will be involved in the activities, to ensure that everyone has a full understanding of the issues and concerns and what role personnel in the department or unit have in conducting monitoring and measuring.

b. Conducting Monitoring and Measuring

- i. The EHS Division will develop procedures for conducting monitoring and measuring of certain activities.
- ii. Based on the procedures that are developed, the EHS Division staff will conduct monitoring and measuring, or as appropriate, Augusta University personnel in academic departments and administrative units will conduct monitoring and measuring with oversight and assistance from the EHS Division.
- iii. The EHS Division will communicate information concerning monitoring and measuring to the faculty, students, administration and staff involved in an activity to be monitored and measured.
- iv. The EHS Division will provide training to all persons involved in monitoring and measuring who need such training.

c. Assessment and Review of Monitoring and Measuring Procedure

- i. The EHS Division will conduct an assessment, as necessary, of the monitoring and measuring procedures to evaluate if there are any modifications or changes that need to be made to ensure the effectiveness of the programs and the achievement of goals set out by Augusta University.
- ii. At least once each year, the AVP, EHS Division will submit a report or make a presentation to the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") concerning monitoring and measuring of management programs and operational controls and any related issues. The University Compliance Subcommittee will discuss the issues and provide comments and recommendations as appropriate.

CHAPTER 13
EMS PROCEDURE FOR INSPECTIONS AND AUDITS OF EMS

1. Purpose: The purpose of this procedure is to conduct inspections and audits needed to assist in evaluating and checking on conditions at parts of Augusta University to achieve the goals set out by Augusta University.
2. Scope: This procedure covers all faculty, students, administration, and staff at Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The EMS Coordinator, the EHS Division, University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") and various designated faculty and administration have responsibility for coordinating and arranging inspections and audits of the EMS.
4. Procedure: Set out below are the procedure(s) for the inspections and audits of the EMS:
 - a. Inspections
 - i. Each academic department and administrative unit will conduct self-inspections. These will be done on a frequency determined by the academic department or administrative unit, in consultation with the EHS Division. The EHS Division will provide support and assistance to each academic department or administrative unit in determining what to cover in the self- inspection, how to conduct the self-inspection, and how frequently to conduct the self-inspection
 - ii. Periodically, EHS Division staff will conduct inspections of particular areas of Augusta University, focusing on particular EHS programs. The EHS Division staff will share inspection checklists and communicate the results to the particular academic departments or administrative units covered in the inspection, reporting any issues in writing that need to be addressed by the faculty, students, administration and staff in those areas.
 - iii. Each academic department or administrative unit is required to address and correct the issues identified by the inspection promptly and needs to confirm in writing to the EHS Division that each issue has been corrected. If the issue requires a significant period of time to be addressed, the academic department or administrative unit needs to provide a status update on the progress of the actions being taken. The EHS Division will provide support and assistance as needed to the academic department or administrative unit.
 - iv. After the issue has been addressed and corrected by the academic department or administrative unit, the EHS Division staff will conduct a re- inspection of the area to confirm that the area is in compliance with regulatory and other requirements.

- v. Results of the inspections and corrective actions taken to address issues identified in the inspections will be included in reports or presentations submitted to the University Compliance Subcommittee, and may be included in a report or presentation to the President as part of a review of the EMS by Senior Administration.

b. Assessment and Review

- i. The EHS Division will conduct an assessment, at least annually, of the procedures for conducting inspections and audits to evaluate if there are any modifications or changes that need to be made to ensure their effectiveness.
- ii. At least once each year, the AVP, EHS Division will submit a report or make a presentation to the University Compliance Subcommittee concerning inspections and audits and any related issues. The University Compliance Subcommittee will discuss the issues and provide comments and recommendations as appropriate.

CHAPTER 14
EMS PROCEDURE FOR SENIOR ADMINISTRATION REVIEW OF EMS

1. Purpose: The purpose of this procedure is to conduct a review by Augusta University Senior Administration of the Environmental Management System (EMS) to achieve the goals set out by Augusta University.
2. Scope: This procedure covers all of Augusta University. There is no unit or part of Augusta University that is exempt from this procedure.
3. Responsibilities: The EMS Coordinator, the EHS Division, the University Subcommittee of the Compliance and Enterprise Risk Management Committee ("University Compliance Subcommittee") and various designated faculty and administration have responsibility for the Senior Administration review of the EMS.
4. Procedure: Set out below are the procedure(s) for the review of the EMS by the Senior Administration :
 - a. University Compliance Subcommittee
 - i. At least once a year, the AVP, EHS Division will prepare a presentation or report to the University Compliance Subcommittee describing the status of the EMS and any issues or recommendations that require attention regarding the EMS and EHS matters.
 - ii. The University Compliance Subcommittee will review and comment on the information provided to it.
 - b. President
 - i. At least once a year, the AVP, EHS Division and/or a member of the University Compliance Subcommittee will submit a report to the President describing the status of the EMS and any issues or recommendations that require attention regarding the EMS and EHS matters.
 - ii. The President will review and as necessary comment on the information provided to him/her.

c. Additional Review

In addition to the University Compliance Subcommittee and the President, there are various other groups that assist in the administration of Augusta University. Although there will not be a formal regular review of the EMS by these groups, as needed, the EMS Coordinator and EHS Division staff will meet with any of these groups to discuss and review issues concerning the EMS and EHS matters.

Approved: _____

Walter S. Loring, DABHP
Associate Vice President
Environmental Health and Safety
Radiation Safety Officer

Date: _____