

3.1.19

EMS Aspects: Grounds Keeping, Auxiliary Enterprises, Water

Aspect Ranking: 6

Auxiliary Enterprises (AE) is a division within University of Texas Health Science Center at Houston comprised of business entities which specialize in services for the student, faculty, employee and often the Texas Medical Center community.

Environmental Compliance Program

Task/Activity Description:

Grounds Survey

Schedule: Semiannual

To assist Auxiliary Enterprises' employees in complying with storm water best management practices and City of Houston requirements, The Environmental Health & Safety (EHS) Department's Environmental Protection Program (EPP) conducts semiannual inspections of the facility grounds for storm water pollution prevention practices.

Inspections are performed by the EPP safety manager or safety specialist utilizing a checklist survey form. Deficiencies are noted on the form by checking the "yes, no, or not applicable" boxes or by adding items to an additional comments section on the survey form. Once the survey is complete, a memo listing any noted deficiencies and corrective actions is sent to the building maintenance manager. The memo is also copied to the vice president of Auxiliary Enterprises, as well as filed by the EPP for future reference.

Deficiencies noted during the survey are tracked for resolution utilizing Environmental Health & Safety Assistant (EHSA). As part of the deficiency tracking process, at least thirty days are given to correct any deficiencies, before potentially escalating enforcement actions.

Key Control Points:

- Identify potential mismanagement of hazardous and universal wastes, improper storage and disposal, impacts to storm and waste water, erosion to landscaped areas, condition of storm water conveyances, impacts to public and personnel health
- Identify herbicides and pesticides applied to grounds of Auxiliary Enterprise facilities
- Communicate environmental compliance requirements to personnel who generate hazardous and universal wastes

Related Forms, Records, SOPs:

- SWPP & Environmental Grounds Survey

Personnel Responsible:

Maintenance Manager, AE

- Ensure wastes, pesticides, and herbicides are labeled and stored properly
- Maintain exterior of facilities to prevent sediment and other pollutants from being discharged to the storm sewer system
- Utilized mulching mowers for general areas, bag mowers for storm water detention area

Safety Manager/Safety Specialists, EPP

- Perform facility survey
- Enter deficiencies into EHSA database and generate memo report
- Track appropriate response through EHSA.
- Monitor inspection schedule through the EPP compliance calendar
- Advise appropriate actions on the compliance process

Director, EHS

- Provides oversight and appropriate actions on the compliance process
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Annual Training – Environmental Management Systems and Environmental Awareness

Task/Activity Description:

For the communication of environmental programs and environmental management systems, the EPP provides training on an annual basis for AE maintenance staff. This training introduces and reinforces environmental management system principles, waste

management practices specific to maintenance, and environmental concerns and compliance requirements for storm water, air emissions, hazardous materials management, and spill prevention and countermeasures. The training is lead by an instructor on an annual basis, and the training materials are available on the EHS web page.

Key Control Points:

- Communicate environmental compliance requirements and environmental management concepts to personnel who provide preventative maintenance for UTHSC-H buildings.

Related Forms, Records, SOPs:

- [Environmental Awareness and Environmental Management Systems for Facility Personnel](#)

Personnel Responsible:

Maintenance Manager, AE

- Ensure AE maintenance staff attend training

Manager/Safety Specialists, EPP

- Develop training materials and submit updates to for web page
- Present training materials
- Document training by obtaining a sign in sheet with all participants listed, deliver sign in sheet to EH&S administrative assistant who will enter names of personnel trained into a training data base

Director, EHS

- Provide management review and liaison with VP of Auxiliary Enterprises