

### 3.2.21

#### **EMS Aspects: Auxiliary Enterprise – Recreational Activities**

##### **Aspect Ranking: 6**

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

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#### **Recreational Activities (Pool) – Hazardous Materials**

##### **Task/Activity Description:**

Auxiliary Enterprises Recreation Center utilizes a 300 gallon poly tank for the storage of 10 % sodium hypochlorite which is used for chlorinating the pool. Sodium hypochlorite is applied to the pool utilizing a pump system and timer. The storage tank is located in a separate storage building outside of the main recreation center building facility and also houses the pool's pumps, filters, tools for maintenance and muriatic acid.

The 300 gallon storage tank provides for the storage 240 pounds of sodium hypochlorite which exceeds the reportable quantity (RQ) for sodium hypochlorite which is 100 pounds. Hazardous materials release response and reporting procedures are listed in the Spill Prevention Control and Countermeasures, Hazardous Material, and Hazardous Waste Contingency Plan. Muriatic acid (37% HCl) is not stored in excess of the reportable quantity.

Recreation Center staff make every effort use all of the sodium hypochlorite purchased. In the event sodium hypochlorite solution is either expired or contaminated and is not possible to be used the Environmental Protection Program will manage the waste and arrange for offsite disposal by an approved contractor.

The UTHSC-H Auxiliary Enterprises Recreation Centers' unwanted chemicals are regulated under 30 TAC Chapter 335 Subchapter H §335.78, Conditionally Exempt Small Quantity Generator status.

##### **Key Control Points:**

- 300 gallon poly storage tank is inside an open top 500 gallon poly storage tank which provides secondary containment in the event of a spill caused by overfilling or a breach of the tank.
- Spill equipment is readily available to absorb or contain a release. During a catastrophic release, notification would be made to an UT System contracted cleanup contractor.

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**Related Forms, Records, SOPs:**

- EHSA
- Spill Prevention Control and Countermeasures Plan. Hazardous Material, and Hazardous Waste Contingency Plan
- 30 TAC Chapter 335 Subchapter H §335.78

**Personnel Responsible:**

Recreation Center Director

- Inform EHS of any environmental releases and ensure corrective actions are implemented
- Ensure UTHSC-H AE staff are present when ever tank is filled

Safety Specialists/Safety Manager, EPP

- Investigate environmental releases
- Coordinate training and maintain training records
- Update the SPCC, HM, HWC Plan as required
- Make emergency information available to the UTHSC-H community
- Provide guidance to responsible personnel

EH&S Director

- Provide management overview and liaison with the Vice President of Auxiliary Enterprises.
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**Environmental Compliance (Sodium Hypochlorite Storage) Program**

Grounds Survey, inclusive of sodium hypochlorite storage

Schedule: Semiannual

To assist Auxiliary Enterprises employees, who provide maintenance for the student faculty apartments and recreation center complex, in complying with the requirements for management of hazardous and universal wastes, and storage of hazardous materials, the Environmental Health & Safety Department's Environmental Protection Program (EPP) conducts semiannual inspections of the facility grounds for storm water pollution prevention practices, hazardous and universal waste management, and hazardous materials storage.

Inspections are performed by the EPP safety manager or safety specialist utilizing a checklist survey form. Currently, 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

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to the maintenance supervisor. 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 EHS Assistant. 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, impacts to public and personnel health
- Communicate environmental compliance requirements to personnel who generate hazardous and universal wastes, and store hazardous materials

**Related Forms, Records, SOPs:**

- SWPP & Environmental Grounds Survey

**Personnel Responsible:**

Recreation Center Director

- Correct any environmental deficiencies noted during the survey process

Safety Manager/Safety Specialists, EPP

- Initiate facility survey process with AE maintenance supervisor and recreation center director
- Perform facility survey
- Enter deficiencies into database and generate memo report
- Track appropriate response through deficiency database
- Monitor inspection schedule through the EPP compliance calendar
- Advise appropriate actions on the compliance process

EH&S Director

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

### **Task/Activity Description:**

To communicate environmental programs to responsible personnel, the Environmental Protection Program provides training on an annual basis. This training introduces and reinforces environmental management system principles, waste management practices specific to the AE business unit's operations, and environmental concerns and compliance requirements for storm water, air emissions, hazardous materials management, and a brief overview of the SPCC plan. The training is lead by an instructor, and the training materials are available on the EH&S web page.

### **Key Control Points:**

- Communicate environmental compliance requirements, environmental management system concepts
- Communicate emergency response procedures to personnel who manage the sodium hypochlorite tank.

### **Related Forms, Records, SOPs:**

- Environmental Awareness and Environmental Management Systems for Facility Personnel

### **Personnel Responsible:**

Recreation Center Director

- Ensure AE maintenance staff attend training

Manager/Safety Specialists, EPP

- Develop training materials and submit updates to for web page
- Schedule training time, place, and date (annually)
- Present training materials to facilities staff
- 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

EH&S Director

- Provide management review, liaison with AE vice president if necessary