

Facilities and EHS - Compliance Requirements

Compliance Requirement	Compliance Organization	Description of Requirement	Responsible Department	Responsible Party	Frequency
OSHA Training Requirements	US Department of Labor, OSHA (Occupational Safety & Health Administration)	Requires proper training courses to make employees aware of safety hazards around the following areas: <ul style="list-style-type: none"> - Asbestos Awareness - Back Safety - Blood borne Pathogens - Chemical Safety - Confined Spaces - Dusts, Wood, Silica - Electrical Safety - Emergency Showers/Eyewash - Energy Source Lockout/Tag out - Ergonomics - Eye Protection - Fall Protection, Stairs/Ladders - Fire Safety - Fleet Safety - Forklift Safety - Hand & Skin Protection - Hearing Protection - Hot Work - Machine Guarding - Machine Safety - MSDS Program - Personal Protective Equipment - Respiratory Protection - Safety Orientation - Tool Safety 	EHS	Environmental Health & Safety Manager	As programs and/or equipment change but most annually
Cranes & Hoists Inspection	US Department of Labor, OSHA (Occupational Safety & Health Administration)	Requires outside inspection of Cranes & Hoists to determine operating effectiveness.	EHS	Environmental Health & Safety Manager	Monthly intrnally - Annually 3rd party

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First Aid Kit Requirement	US Department of Labor, OSHA (Occupational Safety & Health Administration)	Make First Aid Kits readily available on campus for use in an emergency.	EHS	Departments, Department Techs and Environmental Health & Safety Manager	Annually
Fuel Tank Inspections	RI, Department of Labor & Training	Requires monthly internal inspections and annual third party inspection of underground fuel tanks to determine that they are operating effectively.	EHS	Environmental Health & Safety Manager	Annually
Underground Fuel Tank Registrations	RI Dept. of Environmental Management	Requires annual registration and fee.	EHS	Environmental Health & Safety Manager	Annually
Electric Generator Permit as part of API	RI, Department of Environmental Management	Requires by regulation to have electric generator, monitoring of hours used, and reporting on emissions.	EHS	Environmental Health & Safety Manager	Annually, April 14
Electric Generator (Chace Center and 55 Angell Street only) permitted under Reg. # 43	RI, Department of Environmental Management	Requires permit to have electric generator, monitoring of hours used and fuel analysis for each delivery	EHS	Environmental Health & Safety Manager	Internal record

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EPCRA Section 312 - Tier II Emergency and Hazardous Chemical Inventory form	RI, Department of Labor & Training Section 312 of Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986, also known as the Emergency Planning and Community Right-To-Know Act (EPCRA).	Provide state and local officials, as well as the public, with specific information on hazardous chemicals, including petroleum products, present at your facility during the previous calendar year. Form must be provided to DOL&T, Providence Fire Department, and Local Emergency Planning Commission.	EHS	Environmental Health & Safety Manager	Annually, due March 1
EPCRA Section 302 - Participate in Community Planning and Right-to-Know	RI, Department of Labor & Training Section 302 of Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986, also known as the Emergency Planning and Community Right-To-Know Act (EPCRA).	Participate in quarterly LEPC meetings - must attend at least two per year	EHS	Environmental Health & Safety Manager	Quarterly
Air Pollution Inventory	RI, Department of Environmental Management	Provide complete listing of Air Pollutants on Campus during year.	EHS	Environmental Health & Safety Manager	Annually, due 4/14

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Hazardous Substances Right-to-Know Act, Site Chemical List	RI, Department of Labor & Training	An employer who uses, transports, stores, or otherwise exposes its employees to toxic or hazardous substances shall obtain, maintain, and make available in each workplace a list of all hazardous substances to which employees are or may be exposed.	EHS	Environmental Health & Safety Manager	Annually, February
Hazardous Substances Right-to-Know Act, Material Safety Data Sheets	RI, Department of Labor & Training	Employer shall obtain a material safety data sheet for each designated substance or mixture containing the designated substance that must conform to the federal occupational safety and health administration regulations. The EHS Department manages the MSDS program - the actual system is provided by MSDS OnLine a third party website.	EHS	Environmental Health & Safety Manager	Required for all chemicals prior to delivery on-site and for all chemicals on-site already
Hazardous and non-Hazardous Waste Disposal	Resource Conservation & Recovery Act, EPA and RIDEM	Requires proper labeling and disposal of hazardous waste. Once disposal container becomes full, 72 hours to properly label, and 90 days to properly dispose of.	EHS	Environmental Health & Safety Manager	As needed
Hazardous Waste Contingency Plan	US Environmental Protection Agency	Requires waste contingency plan for each EPA ID number to be submitted to RI Department of Environmental Management, Local Fire Department & Hospital. EPA ID numbers are assigned based on waste location. RISD has 9 EPA ID numbers.	EHS	Environmental Health & Safety Manager	File as amended.
Control of VOC's (Volatile Organic Compound emissions APC Reg 19 (surface coatings)	RI Department of Environmental Management	Control of VOC's - documentation <1,666 pounds / monthC Reg 19 (surface coatings)	EHS	Environmental Health & Safety Manager	File as amended.

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NBC Pretreatment Forms	Narragansett Bay Commission	The pretreatment program requires monthly sampling of wastewater, with report submissions of results. The following reports must be submitted: - Continuous discharge Ph Report - Zero process wastewater discharge Report - Self monitoring compliance Report - Grease Removal Units (GRU's) clean and inspect daily	EHS / Dining	Environmental Health & Safety Manager	Daily, Monthly and Semi-Annually
NBC Wastewater discharge Permit	Narragansett Bay Commission	Pretreatment Program permits, monitors and regulates a variety of industries in order to protect NBC treatment facilities and Narragansett Bay from the discharge of harmful contaminants. RISD has 25 independent permits.	EHS	Environmental Health & Safety Manager	Permit Renewal every 5 years.
NPC Reg 29 Emissions Cap	RI Department of Environmental Management	NPC Reg 29 Emissions Cap	EHS	Environmental Health & Safety Manager	Was every five years, now it is as ammended
DOT Annual Registration	USDOT	USDOT 49cfr Part 107, Subpart G - Registration for shippers of hazardous materials / hazardous wastes	EHS	Environmental Health & Safety Manager	Annually
Environmental Land Use Restriction Inspection and Reporting	RI Department of Environmental Management	Land use restriction inspection for Plat 16 Lots 67 and Lot 217 SoMo and 189 Canal Street.	EHS	Environmental Health & Safety Manager	Annually
Elevator Unit Inspections	RI, Department of Labor & Training	Elevators, escalators, dumbwaiters, moving walks, wheelchair lifts, material lifts, conveyors, and all other related devices must be inspected on an annual basis.	Facilities	Mechanical Supervisor	Annually
Boiler Unit & Pressure Vessels Inspections	RI, Department of Labor & Training	High and low pressure boilers and unfired pressure vessels, storage tanks, expansion tanks, steam kettles and deairators, within commercial establishments and public buildings of assembly must be inspected annually.	Facilities	Mechanical Supervisor	Annually
Fire Alarm & Sprinkler System Testing	Fire & Life Safety	Requires quarterly testing of a sampling of Fire Alarms & Sprinkler Systems. Complete population to be tested by end of year.	Facilities	Electrical/Plumbing Supervisor	Quarterly
Vehicle State Inspection	RI Department of Motor Vehicles	Vehicle safety inspection	Facilities	Maintenance Supervisor	Ongoing

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Disclosure of Fire Safety Standards and Measures (part of the Higher Education Opportunity Act of 2008)	The Secretary of Education	Must report on the number of fire related deaths and injuries fire drills, fire related property damage, and the type of fire detection systems in each building.	Public Safety, Risk, EHS, Facilities	Director of Public Safety, Risk Manager, EHS Manager, Electrical/Plumbing Supervisor for fire detection systems	First report due: October 1, 2010