I. PURPOSE

This policy provides guidance on receipt and management of local, state, or federal government agency representatives covering occupational safety and health and the environment.

II. SCOPE

This policy is applicable to inspection visits (announced and unannounced) from the following agencies:

- United States Environmental Protection Agency
- Pennsylvania Department of Environmental Protection
- United States Occupational Safety and Health Administration
- Other environmental agencies/authorities requesting access to University property (e.g. Radnor Township, etc.)

III. DEFINITIONS

a. Agency: United States Environmental Protection Agency (EPA), Pennsylvania Department of Environmental Protection (PADEP), United States Occupational Safety and Health Administration (OSHA), any other environmental or safety agency/authority requesting access to University property.

b. Area Supervisors: Villanova University employee responsible for operations in the area to be inspected/visited.

c. Closing Conference: At the conclusion of the inspection, a meeting with representatives of the regulatory agency, Villanova department(s) to be inspected and EHS to review any observations.

d. EH&S: Villanova University Department of Environmental Health and Safety

e. Opening Conference: When agency representatives arrive on campus, a meeting with representatives of the regulatory agency, and EHS before the actual inspection activity begins.

IV. POLICY STATEMENT

All Agency inspections, whether announced or unannounced, will be led by EH&S with assistance of Public Safety and Area Supervisors.
V. PROCEDURE
   a. Responsibilities

   **Environmental Health and Safety**
   - Act as primary liaison to the Agency representative(s)
   - Manage the inspection as detailed below
   - Request and receive credentials of Agency representative(s) and accompany Agency representative(s) at all times while on campus
   - Conduct an Opening Conference to determine the nature of the inspection and areas to be visited.
   - If appropriate, contact representative of the area(s) to be inspected
   - Ensure any required personal protective equipment is available to the inspector(s)
   - Maintain overall responsibility for the safety of Agency representative(s) while on campus.

   **Public Safety**
   - May receive an Agency representative at a campus gate or receive a call from a member of the University community regarding the presence of an Agency representative on campus.
   - Contact EH&S regarding the presence of Agency representative(s). See Section VI for the hierarchy of calls. This hierarchy must be followed until voice contact is made with a person on the list.

   **Area Supervisors**
   - Attend any meetings, tours, inspections, etc. at the request of EH&S
   - As necessary, provide required personal protective equipment to Agency representative(s)

   b. General Procedure

   1. Request presentation of proper identification of the Agency representative(s) and verify credentials.
   2. Escort Agency representative(s) at all times. If the representative wishes to inspect a specific area, take him/her directly there.
   3. Utilize the hierarchy of calls in Section VI to contact an EH&S representative. If none of these calls are answered, contact Public Safety at 610.519.5800 and request that EH&S be notified.
   4. EH&S conducts an Opening Conference with the Agency representative(s) to determine the nature of the inspection.
5. An authorized representative of the employees who work in the targeted area has the right to participate in the walk around.

6. During the walk around, the Agency representative may request to interview a reasonable number of employees. These employees have the right to refuse to be interviewed. If an employee agrees to the interview, it may be conducted with or without the presence of an authorized employee representative (shop steward, legal counsel, manager, etc.)

7. During the walk around, the Agency representative may note apparent violation(s) that can be corrected immediately. Assure that the Agency representative is made aware of all corrective actions that are completed prior to the end of the inspection.

8. Provide samples requested by the Agency and document the location and sampling parameters. As needed, take photographs of samples to document visual characteristics (clarity, etc.) Obtain duplicate or split samples (in appropriate containers). Document the analysis parameters specified by the Agency representatives.

9. Take duplicate photographs of any photographs taken by the Agency representatives.

10. When a request is made for access to records, ask the Agency representative to identify the specific records (s)he wants and provide only those.

11. Provide copies of operating records and logs requested by the Agency representative. Note the date on the copies and maintain a duplicate set of documents.

12. Agency representatives are not to be given unrestricted access to files nor may they search files. They do not have mandated access to any personnel records other than training records.

13. If there is any question as to whether or not records should be provided, contact the Office of General Counsel.

14. Keep a list of all documents provided to the Agency representative and obtain a signed receipt of that list.

15. Only sign inspection consent or documentation that inspection report was provided to Villanova University. Do not sign any document indicating agreement with observations, findings, or conclusions.

16. Do not offer to reimburse Agency representative(s) for transportation, accommodations, meals, etc.

17. Conduct a Closing Conference with Agency representative(s) to understand observations and next steps, if any.

18. At the conclusion of the inspection, University representatives review notes and compile a written summary of all participants, samples, etc.

19. Provide a verbal report to Associate Vice President FMO as soon as possible after the conclusion of the inspection. Provide a written follow up with copy to University Compliance Officer and General Counsel within 24 hours.

20. EH&S will coordinate all required follow up actions.
VI. HIERARCHY OF CALLS

Contact the below listed individuals, in the order listed, to advise of an EH&S Agency representative’s presence on campus. Continue with the calls until voice contact is made with at least one of the individuals listed:

1. Alice Lenthe, Director, Environmental Health and Safety
   - Office: 610.519.7838
   - Mobile: 610.316.2180
2. Patricia Haley, Environmental Health and Safety Specialist
   - Office: 610.519.6895
   - Mobile: 610.888.8860
3. Robert Bratcher, Safety Coordinator
   - Office: 610.519.7192
   - Mobile: 302.888.0750
4. Eric Welsh, EH&S Coordinator
   - Office: 610.519.8989
   - Mobile: 484.889.2376
5. Robert Morro, Vice President, FMO
   - Office: 610.519.4589
   - Mobile: 484.576.3089
6. Public Safety: 610.519.5800

VII. HISTORY

Created November 2014
Reviewed June 2017

VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT

Responsible Officer: Vice President for Facilities Managements
Responsible Office name: Facilities Management Organization
Address, City State: Villanova, PA
General Telephone Number: 610.519.4589

IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT

Responsible Officer: Director Environmental Health and Safety
Name of Oversight Office: Environmental Health and Safety
Address, City, State: Stone Hall, Villanova, PA
General Telephone Number: 610.519.3801