

**The University of Texas at San Antonio
Office of Environmental Health, Safety and Risk Management**

Environmental Monitoring Safety Plan

i. SIGNATURE PAGE

This Environmental Monitoring Safety Plan has been reviewed for regulatory compliance and best management practices by the undersigned individuals and is hereby adopted for use and compliance by all employees at The University of Texas at San Antonio.

PRINTED NAME	SIGNATURE	TITLE	DATE
J. Brian Moroney	Signature on file	Director, EHSRM	8/19/2011
Richard M. Garza	Signature on file	Environmental and Construction Safety Manager	8/19/2011

Original: 11/01/2007

This plan was reviewed/revised on 8/19/2011 and replaces the 11/03/2008 version. Changes to this plan have been highlighted in "gray" and are summarized below:

Revised: 8/19/2011

Emergency Notification: Change (ERP) Emergency Response Plan to Comprehensive Emergency Management Plan (CEMP)

Section iii. Emergency Contact Personnel;

Change David Hernandez to Steve Barrera;

New titles for Richard Garza, Environmental and Construction Safety Manager

New Title for Wendy McCoy, Laboratory Safety Manager

New title for Curtis Nesbit, Laser and Radiation Safety Coordinator

Section I add "Spill Prevention Response Plan"

Section IV A. 6 add "SPRP"

Section X advance "Storm Water Pollution Plan" to Section XI and add "Spill Prevention Response Plan" in Section X

Table Of Contents

i.	Signature Page	2
ii.	Table of Contents	3
iii.	Emergency Procedures & Contacts	4
I.	Overview and Purpose	5
II.	Scope.....	5
III.	Periodic Review	5
IV.	Responsibilities	5
V.	Confined Space	6
VI.	Air Monitoring	7
VII.	Drinking Water	7
VIII.	Swimming Pool Monitoring	7
IX.	Spill Prevention, Control and Countermeasure Plan	8
X.	Spill Prevention Response Plan.....	9
XI.	Storm Water Pollution Prevention Plan.....	10
	Attachment 1 – Drinking Water Test Schedule.....	11
	Attachment 2 – Environmental Compliance Certification.....	12

iii. Emergency Procedures & Contacts

INITIAL EMERGENCY NOTIFICATION

UTSA has the capability of allowing individuals witnessing or involved in an environmental emergency situation to access emergency services by dialing X4911, for on-campus assistance, or 458-4911 from off-campus telephones. If the campus emergency number is called, UTSA Police Department personnel are dispatched to the scene and appropriate emergency services personnel are notified. Additionally, on campus there are blue call boxes, which connect directly to the UTSA Police Dispatch office. When one of these blue call boxes is activated, the telecommunications center operator is automatically given the location of the box and UTSA Police Officers are dispatched. The **Comprehensive Emergency Management Plan (CEMP)** designates the UTSA Police Department as the initial contact for reporting all emergency situations to the Emergency Operations Center during response and for resolution of all emergencies to include environmental incidents. In the case where the UTSA Police Dispatch Office would not be considered secure due to its close proximity to the emergency, the Director of Public Safety-Chief of Police would designate another area.

Upon receiving the initial report, the Director of the Office of Public Safety – Chief of Police or designee, will make an initial judgment about the level of response required and communicate with appropriate personnel as outlined in the plan. This may include notifying Office of Environmental Health, Safety and Risk Management personnel and activation of specialized emergency response team.

If an emergency situation begins to escalate, appropriate institutional administrative personnel will be notified by the Chief of Police and necessary action will be initiated to respond to conditions as they unfold. Once outside emergency agencies arrive on the scene, i.e., fire department, emergency management, etc., the heads of these agencies will assume coordinated command of the scene.

Emergency Contact Personnel include:

Steven Barrera, Director of Public Safety/Chief of Police 458-4242

Brian Moroney, Director, Environmental Health, Safety and Risk Management 458-5250

Richard Garza, **Environmental and Construction Safety Manager**, EHSRM 458-5808

Wendy McCoy, Lab Safety **Manager**, EHSRM 458-6101

Curtis Nesbit, Laser and Radiation Safety Coordinator, EHSRM 458-6697

I. Overview and Purpose

This Environmental Monitoring Safety Plan has been written to contain the rational and criteria for the monitoring program, extent and frequency of monitoring and measurement, procedures for laboratory analysis, program implementation procedures, and reporting. This plan covers confined space monitoring, air sampling, drinking water testing, swimming pool testing, soil sampling, Spill Prevention Control & Countermeasures Plan (SPCCP) for oil based products, Spill Prevention and Response Plan and Storm Water Pollution Prevention Plan (SWPPP) for construction sites.

II. Scope

This Environmental Management Safety Plan applies to all UTSA owned, leased or operated properties and facilities. All personnel involved in work or projects which could have a detrimental affect on the environment are required to become familiar with all applicable federal, state and local rules.

III. Periodic Review

This Plan will be reviewed periodically, but at least every 3 years for compliance with the most recent applicable federal, state and local rules and regulations.

IV. Responsibilities

A. Office of Environmental Health, Safety and Risk Management (EHSRM)

1. Maintaining the safety manual, distributing the plan to Office of Facilities and OFPC and conducting training to Office of Facilities personnel.
2. Ensuring that all confined spaces have been identified and listed on current database. Ensuring that equipment which is required for any confined space entry is available, that personnel making the entry have been properly trained to include monitoring, equipment use, and emergency evacuation.
3. Performing air monitoring on as needed basis for indoor air quality, chemical exposure, and/or during emergency responses.
4. Monitoring the drinking water for possible coliform bacteria contamination throughout campus. Each facility will be tested once per year (see attachment 1).
5. Inspecting swimming pools and spas weekly and testing the water for pH and chlorine levels to comply with established pool standards.

6. Maintaining the SPCCP and the **SPRP** and ensuring that all emergency response equipment and supplies are in-place. Performing weekly inspection of the emergency supply storage drums and documentation of the inspections.
7. Monitoring all construction sites to ensure compliance with the SWPPP. Ensure all forms required at the construction site are up to date, properly filled-in and signed.

B. Facilities/OFFPC

1. Responsible to ensure any entry into a permitted confined space is only done by qualified personnel who have been properly trained, have the equipment required, follow protocol for monitoring, fill out the permit before entry, and have an emergency plan. This responsibility extends to private contractors who would have a need to enter any permitted confined spaces.
2. Responsible for notifying EHSRM of any maintenance on water mains or water main breakage. Super chlorination must be performed on any water main breakage after repair with a chlorine solution, making sure to perform the 24-hour contact period before placing that line back in service.
3. Responsible for having personnel who are involved in the operation and maintenance of oil filled tanks or containers trained for emergency response and comply with the SPCCP requirements. All personnel involved in maintenance and operation must receive annual training through EHSRM on the contents of the SPCCP.
4. Responsible for complying with the SWPPP.
5. Office of Facilities Services (FS) and Office of Facilities Planning & Construction (OFFPC) must sign off on the compliance form of this management plan (*see attachment 2*).

V. Confined Space

When Environmental Health, Safety and Risk Management (EHSRM) receives notice that UTSA personnel intend on entering a confined space, it is EHSRM responsibility to ensure that 1) it is a confined space, 2) that it has been identified as either permitted or non-permitted, 3) that no one enters the confined space until it has been identified as either permitted or non-permitted, and 4) it has been tested for oxygen content and toxic gases. An Oxygen and Lower Explosive Meter (O2/LEL) must be used to ensure that the quality of air in the confined space will not pose a health and safety risk to the person. Normal readings acceptable for entry into a confined space are not less than 19.5% or greater than 23.5% oxygen content. LEL for gas, vapor or mist must not be above 10% of its lower explosive level. For complete information on confined space see OSHA's web site at: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9797

OSHA uses the term "confined space" to describe what a confined space is. "Confined space" means a space that:

(1) Is large enough and so configured that an employee can bodily enter and perform assigned work; and

(2) Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and

(3) Is not designed for continuous employee occupancy.

In addition, there are many instances where employees who work in confined spaces face increased risk of exposure to serious hazards. In some cases, confinement itself poses entrapment hazards. In other cases, confined space work keeps employees closer to hazards, such as asphyxiating atmospheres or the moving parts of machinery. OSHA uses the term "permit-required confined space" (permit space) to describe those spaces that both meet the definition of "confined space" and pose health or safety hazards. Many workplaces contain spaces that are considered "confined" because their configurations hinder the activities of any employees who must enter, work in, and exit them.

It is the responsibility of all UTSA employees who are required to enter into a confined space that they become familiar with and understand the OSHA rules. Annual training is provided by EHSRM on confined space.

VI. Air Monitoring

Air monitoring for toxic airborne chemicals or airborne particulates requires that air sampling pumps or passive badges be used which are capable of capturing a volume of air in the contaminated area and be submitted for analysis. This normally requires that EHSRM get to the scene during the actual exposure. If a complaint is after the fact, then EHSRM will set up a time when work can be mimicked that can generate a similar exposure in order to get the required air volume with contaminant. Results of any exposure to hazardous chemicals will be compared to OSHA regulated chemicals and the "American Conference of Industrial Hygienist" for maximum exposure levels allowed over the work period.

VII. Drinking Water

EHSRM has established a drinking water monitoring program to periodically monitor the potable water supplied by San Antonio Water System. Each facility on campus will be tested on a yearly basis for bacteriological analysis. In order to capture all facilities on campus for monitoring, EHSRM has established a monthly water sample collection process throughout each campus. Procedures for drinking water collection, monitoring and reporting can be found on EHSRM web site (<http://www.utsa.edu/safety/>). A listing of all facilities monitored and the monthly schedule list is in attachment 1 to this plan.

VIII. Swimming Pool Monitoring

EHSRM monitors all swimming pools, spas and hot tubs at UTSA to help ensure a clean, safe swimming and bathing environment. Policy, procedures, and requirements associated with swimming pools can be found on the EHSRM web site (<http://www.utsa.edu/safety/>).

IX. Spill Prevention, Control and Countermeasure Plan (SPCCP)

As required by the federal Oil Pollution Act, the Spill Prevention Control and Countermeasure Plan documents the compliance of The University of Texas at San Antonio and Downtown Campus (ITC does not require an SPCCP) with the Oil Pollution Prevention regulation [Title 40, Code of Federal Regulations, Part 112 (40 CFR §112)]. It outlines the procedures, methods and equipment for UTSA personnel to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States. The regulation requires the SPCCP to address all oil storage containers with a capacity of 55 gallons or greater.

A. SPCCP General Requirements

The SPCCP establishes procedures for the prevention, detection, and response to spills or releases of oils on or outside the campus properties. The SPCCP provides guidance on key actions that UTSA Staff will undertake.

1. Complete monthly and annual site inspections, using appropriate checklist.
2. Perform preventative maintenance of equipment, secondary containment systems and discharge prevention systems as needed to keep them in proper operating condition.
3. EHSRM will conduct annual employee training on contents of the SPCCP. This training will be documented.
4. EHSRM is the only department authorized to notify the Environmental Protection Agency (EPA) Regional Administrator if either of the following occurs:
 - a. The facility discharges more than 1,000 gallons of oil into navigable waters of the U.S. in a single spill event; or
 - b. The facility discharges more than 42 gallons in each of two spill events within a 12-month period.
5. Review the SPCCP at least once every five years
6. Amend the SPCCP within six months of a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential.
7. Review the plan annually for administrative changes, such as revisions to contact information. Administrative changes will be documented in the Plan review log.

B. SPCC Plan Location

1. Master Copy: Located in the EHSRM Office on the 1604 Campus for both the 1604 and DTC campuses and available for review.

2. Additional Copies of the SPCCP for both the 1604 campus and DTC campus have been provided to Facilities, DT Facilities, UTPD, Operations and Maintenance, Planning and Development, Compliance, Emergency Preparedness, and Traffic and Parking Offices.

X. Spill Prevention Response Plan

The Spill Prevention and Response Plan (SPRP) serves as UTSA's emergency response plan as required by the Edwards Aquifer Authority (EAA) Rules Chapter 713, Subchapter F Hazardous Substance Registration, Storage and Planning and Subchapter E Spill Reporting. This plan documents that The University of Texas at San Antonio – Main Campus, complies with the EAA requirements and demonstrates that procedures, methods and equipment are in place to prevent discharge of hazardous substances into the environment.

A. Applicability of Subchapter – F Registration, Storage and Planning

The EAA Rules in Subchapter F apply to any facility storing or for resale or other non-residential use an aggregate quantity of more than 10,000 pounds or 1,000 gallons of regulated substances:

- Within the recharge zone of the Aquifer
- The contributing zone of the Aquifer five miles up-gradient of the recharge zone, or to the limit of the five-mile water quality buffer zone, whichever is less, excluding the portion of Cibolo Creek up-gradient of the recharge zone, as indicated on the official maps of the Authority;
- A regulated substance that is mixed with any unregulated substance(s) shall be considered a regulated substance.

The EAA rules in Subchapter F do not apply to:

- USTs or ASTs regulated under other EAA Rules (e.g., Subchapter G)
- containers greater than 55 gallons in size.

B. Applicability of Subchapter E – Spill Reporting

The EAA Rules in Subchapter E apply to discharges or spills that result in a release to the environment occurring within the;

- recharge zone of the Aquifer

the contributing zone of the Aquifer five miles up-gradient of the recharge zone, or to the limit of the five-mile water quality buffer zone, whichever is less, excluding the portion of Cibolo Creek up-gradient of the recharge zone, as indicated on the official maps of the Authority.

C. The EAA Rules in Subchapter E do not apply to;

- Releases only to air
- The lawful placement of waste or accidental discharge of material into a solid waste management unit registered or permitted under 30 TEX. Admin.Code Chapter 335, SubchapterA;
- The lawful application of materials, including but not limited to fertilizers, and pesticides, to land and water;

- Discharges that are authorized by a permit, order, or rule issued under federal law or any other law of the State of Texas;
- Discharges or spills that are continuous and stable in nature, and are reported to the United States Environmental Protection Agency under 40 CFR §302.8
- Discharges or spills from motor vehicles, rolling stock or airplanes;
- Sources otherwise regulated by the Railroad Commission of Texas

XI. Storm Water Pollution Prevention Plan

A storm water pollution prevention plan (SWPPP) is a fundamental requirement of storm water permits. The national pollutant discharge elimination system (**NPDES**) was established by the EPA. When the responsibility for administration of the program was turned over to the State of Texas, the program became known as the Texas pollutant discharge elimination system (**TPDES**). Most construction sites are required to obtain a storm water permit and have a storm water pollution plan in place and available at the job site. Coverage under an EPA Construction General Permit must be sought by the operator of a construction activity that:

- Will disturb five acres or greater, or
 - Will disturb less than five acres but is part of a larger common plan of development or sale whose total land disturbing activities total five acres or greater (or is designated by the NPDES permitting authority);
- AND
- Will discharge storm water runoff from the construction site into a municipal separate storm sewer system (MS4) or waters of the United States.

SWPPP:

- a. Identifies all potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges from the construction site.
- b. Describes practices to be used to reduce pollutants in storm water discharges from the construction site, and
- c. Helps assure compliance with the terms and conditions of the permit (when the plan is designed for the individual site, and is fully implemented).

Each SWPPP must be designed to handle the specific needs of a particular construction site. The following site gives you the web link to the Texas Commission on Environmental Quality (TCEQ) on SWPPP:

http://www.tceq.state.tx.us/permitting/water_quality/stormwater/TXR15_rules.html

ATTACHMENT 1

The drinking water for the following buildings will be monitored annually by EHSRM for safe drinking. Collect a 100 ml container for bacteriological analysis. Test and record the pH, Chlorine, and Fluoride levels. Document results in the water log book. Use the schedule below as a guide as to the frequency and location for collection and testing.

January	Bioscience Technology and Engineering		MEMS
	Main Building		EHSRM
	Engineering Building		SRL
	Bioscience Building	July	Sculpture and Ceramics
February	Science Building		Business Services Annex
	Multidisciplinary Building		Science Engineering Lab
	Arts Building		Power Dynamic Systems Lab
	McKinney Humanities Building	August	Central Receiving
March	Business Building		Archaeology
	John Peace Library		Facilities Service Annex
	University enter		Baseball Field
	Chartwell's Cafeteria at UC	September	University Oaks Apts
April	Convocation Center		Laurel Village
	Athletic Building	October	University Heights (HR)
	Student Health Clinic		University Heights (Legal)
	Recreational Wellness Center		Downtown - Durango
May	Child Care Center		Downtown – Frio
	Chaparral Village		Downtown - Buena Vista
	Roadrunner Cafe		Downtown - Monterrey
	Chisholm Hall	November	Institute of Texan Cultures
June	MBT Lab	December	Open
	Small Animal Lab		

ATTACHMENT 2

Environmental Compliance Certification

The University of Texas at San Antonio

One UTSA Circle

San Antonio, Texas 78249

I acknowledge review of this management plan and will ensure all personnel whose actions could affect compliance with all federal, state and local environmental rules and regulations to protect The University of Texas at San Antonio from liability are aware/trained.

Environmental Health, Safety and Risk Management

NAME: _____ DATE: _____

Facilities Services

NAME: _____ DATE: _____

Office of Facilities, Planning and Construction

NAME: _____ DATE: _____