EHS Compliance Management Plan

Purpose / Background

MIT's Environment, Health & Safety (EHS) Office manages environment, health, and safety programs and supports legal compliance through its activities. The EHS Office has developed this EHS Compliance Management Plan to assure the laws, regulations, and other requirements (referred to as "rules") that apply to MIT facilities and operations are identified and interpreted for the MIT Community. This plan describes the requirements of the regulations applicable to MIT, and establishes a mechanism for assuring an EHS staff member is assigned responsibility for oversight of compliance with specific requirements of each regulation. These procedures are applicable to, and included in MIT's Environment, Health and Safety Management System (EHS-MS).

The MIT Environment, Health, and Safety (EHS) Office uses the procedures described in this document to maintain the roles and responsibilities for EHS compliance. It is the responsibility of the Director of the EHS Office to manage MIT's EHS programs, including ensuring that adequate resources are available within the EHS Office to implement these programs.

Procedures

The components of the EHS Compliance Management Plan include Identification, Interpretation, Implementation and Monitoring of the EHS Regulations that apply to MIT. These are all either managed by the central EHS Office or in a small number of cases by EHS personnel within a Department, Lab or Center (DLC) with oversight provided by the central EHS Office.

Identification and Monitoring

The regulations that apply to MIT have been identified in several ways. The five programs within the EHS Office (Radiation, Safety, Biosafety, Industrial Hygiene and Environmental Management) are responsible for identifying those EHS regulations within their specific discipline that apply to MIT. Most of these programs have been in existence in some form for over 50 years and have been implementing the required compliance programs as well as best practices as they have been identified. In addition a comprehensive EHS survey of MIT was performed in 1997 by ERM-NE in order to identify the specific regulations that apply to MIT.

To identify any changes to existing regulations or promulgation of new regulations that may apply to MIT a lead contact with each regulatory agency has been appointed, who is accountable for monitoring regulatory changes that may occur within that agency's regulations. The EHS Director is responsible for keeping these assignments current.

Other sources of information on regulatory changes and best practices are professional associations and EHS publications. The EHS Director has assigned certain EHS personnel prime responsibility for actively participating in key professional

associations and EHS consortiums. Funds and time are made available for EHS personnel to attend professional association meetings and training courses to interact with EHS colleagues and obtain up to date information. The EHS Office also subscribes to appropriate EHS publications.
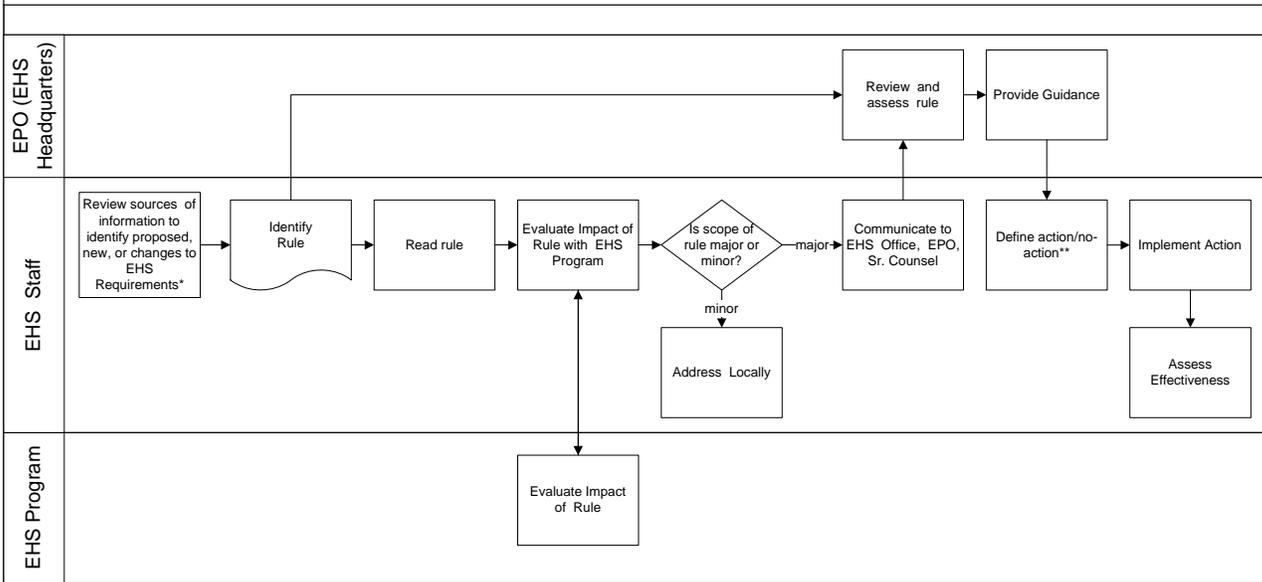
<u>Interpretation and Implementation</u>

The Deputy Director of the relevant program within EHS Office assigns a responsible person to each regulation. The EHS Office maintains a list of these roles and responsibilities in a database entitled EHS Programs**.** The responsible person reviews and monitors the regulation, interprets its applicability to MIT and its requirements and formulates a plan to implement the appropriate parts. outside legal or technical advice is sought when needed.

The EHS Compliance Management Plan relies on the local expert within the EHS Office identified as the responsible person to determine what is needed for MIT to comply with the regulation and to implement the necessary program. Implementation may include written Standard Operating Procedures (SOPs), Communication, training and/or inspections.

This flow chart documents MIT's process for identifying and evaluating proposed new, or changes to existing, environment, health & safety laws and regulations that may be applicable to the Institute [<u>chart – pdf</u>].

Process for Identifying and Interpreting EHS Requirements

EPO (EHS Headquarters)

Review and assess rule → Provide Guidance

EHS Staff

Review sources of information to identify proposed, new, or changes to EHS Requirements* → Identify Rule → Read rule → Evaluate Impact of Rule with EHS Program → Is scope of rule major or minor? → major → Communicate to EHS Office, EPO, Sr. Counsel → Define action/no-action** → Implement Action → Assess Effectiveness

minor → Address Locally

EHS Program

Evaluate Impact of Rule

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*Sources of information on new regulations and guidelines:
1) Federal Register
2) List serves
3) Professional Societies
4) On-line regulatory databases (e.g. ENFLEX)
5) Networking with other EHS professionals
6) Trade Journals
7) Internet web pages of regulators
8) Conferences
9) Regulator communications
10) Inspection/Audit results
11) Consultant communications
12) Agency outreach
13) Continuing Education/Certification
14) Senior Counsel communications
15) Permitting

EHS Programs:
1) Environmental Management
2) Biosafety
3) Industrial Hygiene
4) Radiation Protection
5) Safety

**Potential Actions:
1) Conduct a survey
2) Create/revise an SOP/SOG
3) Create a new program
4) Training
5) Develop a communications strategy
6) Change staff roles/responsibilities
7) Maintain records

A. EHS staff have multiple avenues to learn about potential regulatory changes, including among others:

> - Regulatory subscription services
> - Federal Register
> - Consultant's communications
> - Various list-serves' notifications
> - Professional organizations and societies
> - Regulatory agency outreach
> - Conferences, seminars, and roundtables
> - Networking with colleagues
> - News alerts
> - Professional publications
> - Internet sources;
> - Permit conditions.

B. The potential change is evaluated by the appropriate program expert(s) within the EHS Office.

C. If the EHS Program expert considers the potential change to be major in scope, the Environmental Programs Office is consulted for a budget and legal analysis and opinion.

D. Actions are defined and implemented to address the proposed change. Such actions may include conducting a survey, creating or revising an SOP or SOG, creating a new program, creating/revising/providing training, or modifying the EHS Roles and Responsibilities database.

E. The proposed change is logged into a regulatory changes tracking database.

F. The EHS Compliance Management Plan is updated if needed to include the new regulatory change.