

RIVERSIDE: AUDIT & ADVISORY SERVICES

June 1, 2011

To: Russell Vernon, Director
Office of Environmental Health & Safety

Subject: Internal Audit of EH&S Waste Management

Ref: R2011-01

We have completed our audit of the EH&S Waste Management program in accordance with the UC Riverside Audit Plan. Our report is attached for your review.

We appreciate the cooperation and assistance provided by your staff. Should you have any questions concerning the report, please do not hesitate to contact me.

Michael R. Jenson
Director

cc: Audit Committee Members
Associate Vice Chancellor Miller
Assistant Vice Chancellor Carlson

UNIVERSITY OF CALIFORNIA AT RIVERSIDE
AUDIT & ADVISORY SERVICES
MEMBER OF ASSOCIATION OF COLLEGE & UNIVERSITY AUDITORS

INTERNAL AUDIT REPORT R2011-01
EH&S WASTE MANAGEMENT

JUNE 2011

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**UC RIVERSIDE
EH&S WASTE MANAGEMENT
INTERNAL AUDIT REPORT R2011-01
JUNE 2011**

I. MANAGEMENT SUMMARY

Based upon the results of work performed within the scope of the audit, it is our opinion that, overall, the system of internal controls over the Office of Environmental Health & Safety (EH&S) Waste Management program is operating satisfactorily and is generally in compliance with University policies and procedures.

Positive observations included:

- * In October 2010, representatives of the U.S. Environmental Protection Agency (EPA) and the Riverside County Department of Environmental Health (RCDEH) conducted unannounced site inspections of campus facilities to evaluate UCR compliance with federal and state regulations concerning the proper management of hazardous as well as universal waste. The EPA and RCDEH inspection reports each cited four (4) items of noncompliance with applicable regulation. During and shortly after the inspections, all noncompliance items were corrected to the regulatory agencies' satisfaction and documented to record UCR's return to compliance.
- * Despite diminishing financial resources and unanticipated turnover of key staff in recent years, EH&S management has maintained and improved waste management program services provided to campus departments. Further financial and operating constraints, however, may increase the risks of a decline in service quality and potential noncompliance with policy and applicable regulation.

Minor items that were not of a magnitude to warrant inclusion in the report were discussed verbally with management.

II. INTRODUCTION

A. PURPOSE

UC Riverside Audit & Advisory Services (A&AS), as part of its Audit Plan, performed an audit of the EH&S Waste Management program to evaluate compliance with certain University policies and procedures, efficiency and effectiveness of selected operations, and adequacy of certain internal controls.

B. BACKGROUND

The University of California is committed to achieving excellence in providing a healthy and safe working environment, and to supporting environmentally sound practices in the conduct of University activities. It is University policy to comply with all applicable health, safety, and environmental protection laws, regulations, and requirements.

Waste management is the collection, transport, processing, recycling or disposal of waste materials.

Through the Integrated Safety and Environmental Management (ISEM) system, the University's tool for implementing local operating policies, programs and procedures to meet the requirements of the California Environmental Protection Agency (Cal-EPA) and the California Occupational Safety and Health Administration (Cal/OSHA), EH&S guides and supports campus departments in managing hazardous chemical, radioactive, biohazardous, medical, and other wastes safely and legally.

Campus Policy No. 425-48 Hazardous Materials and Waste Management establishes guidelines for the proper management of hazardous materials and waste including use, handling, labeling, storage, and ultimate disposal. It also covers source reduction and waste minimization. Specifics can be found in the Chemical Hygiene Plans (CHPs) of each UCR department which carries on laboratory work utilizing such materials.

Employees and students are responsible for complying with hazardous materials and waste management regulations, policies and procedures, continuously practicing safety while performing their activities and duties, using prescribed personal protective equipment, and promptly reporting accidents or conditions that could result in improper use, release and/or disposal of hazardous materials or waste.

EH&S assists in the establishment of a campus and of departmental CHPs, provides training to campus personnel, consults with campus departments on hazardous materials and waste management, responds to and coordinates resolution of hazardous materials emergency incidents, collects hazardous wastes from campus departments, and prepares them for proper off-site disposal.

The "Online Waste Tag Program" (OTP) is a web application available to campus waste generators as a tool to help meet waste container labeling and waste storage, treatment, and disposal requirements. Waste generators also use the OTP to submit waste pickup requests to EH&S. When tags (labels) are created by campus users, the application creates individual records of the waste products for which the tags are intended. The application database subsequently allows EH&S management to generate

reports useful in tracking waste containers and monitoring waste generating activities of campus departments.

C. SCOPE

Audit procedures were performed to evaluate whether EH&S Waste Management practices and program procedures are adequate and appropriate, operating as intended, and effective and efficient to provide reasonable assurance that campus hazardous and other wastes are handled, labeled, stored, treated, and discarded in compliance with University policy and federal, state, and other applicable regulation.

The scope of the audit was limited to EH&S Waste Management activities during the period July 1, 2009 through December 31, 2010 and focused on the following program areas:

1. Policy and Regulation
2. Standards and Procedures
3. Program Services and Operating Resources
4. Training and Support Activities
5. Performance and Compliance

We performed the following procedures:

- Reviewed University policy and procedures pertaining to waste and hazardous waste management as well as applicable regulation including the Resource Conservation and Recovery Act (RCRA), Title 40 of the Code of Federal Regulations, the California Hazardous Waste Control Law, and Title 22 of the California Code of Regulations;
- Discussed details of Waste Management program operations with EH&S management and staff and selected campus/department personnel;
- Reviewed reports and records related to EH&S Waste Management program activities, including the Online Waste Tag Program database and reports, training materials and documents, EH&S management reports, operating results summaries, schedules, and other records;
- Reviewed EPA and RCDEH site inspection reports, pertinent EH&S records, and related correspondence; Evaluated adequacy of EH&S responses to address potential noncompliance with regulation;
- Observed selected waste generating locations/facilities and EH&S Waste Management program activities.

III. INTERNAL CONTROLS AND COMPLIANCE

As part of the review, internal controls were examined within the scope of the audit.

Internal control is a process designed to provide reasonable, but not absolute, assurance regarding the achievement of objectives in the following categories:

- * effectiveness and efficiency of operations
- * reliability of financial reporting
- * compliance with applicable laws and regulations

Substantive audit procedures were performed during February through May 2011. Accordingly, this evaluation of internal controls is based on our knowledge as of that time and should be read with that understanding.