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ENVIRONMENTAL MANAGEMENT SYSTEM ROLES AND RESPONSIBILITIES

POLICY

Personnel working for, or on behalf of, St. Elizabeth Medical Center that performs tasks that may involve a significant environmental aspect shall have defined roles and responsibilities in the Medical Center’s Environmental Management System.

PROCEDURE

1) PURPOSE

The purpose of this procedure is to define the Environmental Management System responsibilities for designated personnel working for, or on behalf of, St. Elizabeth Medical Center.

2) ABBREVIATIONS

- AEER Automated Employee Education Record
- CAR Corrective Action Request
- EHSO Environmental, Health & Safety Officer
- ILSM Interim Life Safety Measures
- ISO International Organization for Standardization

3) DEFINITIONS

None

4) PROCEDURE ELEMENTS - EHSO

Environmental Management System responsibilities are identified on the Environmental Management System Responsibility Matrix below. These responsibilities shall be reflected in the appropriate Medical Center position descriptions.

5) REFERENCES

None

6) RECORDS

Position descriptions shall be maintained by Human Resources.

7) AUTHORIZING DOCUMENT

SPP002, Organization

COORDINATED WITH: Environment of Care Team

APPROVED BY:

Tom Corp
Environmental, Health & Safety Officer

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ENVIRONMENTAL MANAGEMENT SYSTEM ROLES AND RESPONSIBILITIES

ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY MATRIX St. Elizabeth Medical Center	
POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
INTERNAL PERSONNEL	
CEO	<ul style="list-style-type: none"> • Provide resources to establish, implement, maintain and improve the Environmental Management System including human resources and specialized skills, organizational infrastructure, technology and financial resources • Designate an Environmental Management System management representative
V.P. over Environmental, Health & Safety	<ul style="list-style-type: none"> • Serve as top management representative responsible for ensuring that Environmental Management System is implemented and maintained in accordance with ISO 14001 requirements • Report to management (Administrative Team) on performance of the Environmental Management System for review, including recommendations for improvement. • Ensure that directed personnel are familiar with the Medical Center's Environmental Management System • Allow time for directed personnel to complete required training • Assign properly trained personnel to perform work activities that include a significant environmental aspect
VP over Nursing	<ul style="list-style-type: none"> • Serve as the Administrative Team representative on the Environment of Care Team • Ensure that directed personnel are familiar with the Medical Center's Environmental Management System • Ensure that nursing areas are adequately equipped with necessary facilities, equipment and supplies for relevant environmental aspects (e.g. eyewashes, compressed gas cylinder holders, appropriate waste containers) • Allow time for directed personnel to complete required environmental training • Assign properly trained personnel to perform work activities that include a significant environmental aspect
VP over Emergency Preparedness	<ul style="list-style-type: none"> • Serve as the Administrative Team representative on the Disaster Preparedness Team • Oversee emergency preparedness activities, including ensuring adequate planning; training; facilities; and equipment/supplies are in place. • Direct Disaster Preparedness Coordinator • Ensure that directed personnel are familiar with the Medical Center's Environmental Management System • Allow time for directed personnel to complete required



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
	environmental training <ul style="list-style-type: none"> • Assign properly trained personnel to perform work activities that include a significant environmental aspect
VP over Community Sites	<ul style="list-style-type: none"> • Serve on Environment of Care Team or assign a designee from the Medical Group • Ensure that community sites are adequately equipped with necessary facilities, equipment and supplies for relevant environmental aspects (e.g. appropriate medical waste storage areas, fire extinguishers) • Ensure that directed personnel are familiar with the Medical Center's Environmental Management System • Allow time for directed personnel to complete required environmental training • Assign properly trained personnel to perform work activities that include a significant environmental aspect
Administrative Team	<ul style="list-style-type: none"> • Approve Environmental Objectives and Targets • Review the Environmental Management System at planned intervals to ensure its continuing suitability, adequacy and effectiveness. • Assess the need for changes to the Environmental Management System including the Environmental Policy and Environmental Objectives and Targets
Environment of Care Team	<ul style="list-style-type: none"> • Develop Environmental Objectives and Targets for Administrative Team approval • Evaluate new Environmental Aspects • Review and evaluate Environmental Aspects List at least annually • Establish and maintain environmental programs for Significant Environmental Aspects and review regularly • Review environmental policies and procedures
Environmental, Health & Safety Officer	<ul style="list-style-type: none"> • Establish, implement and maintain an Environmental Management System in accordance with ISO 14000 requirements. • Lead the Environment of Care Team meetings and ensure that appropriate Environmental Management System items are included on the meeting agenda • Develop, maintain and update, as needed, the following documents and other appropriate Medical Center-wide environmental procedures or work instructions: <ul style="list-style-type: none"> - Waste Management Plan - Hazardous Materials Management Plan



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
	<ul style="list-style-type: none"> - Fire Safety Management Plan - Safety Management Plan • Develop and provide or coordinate appropriate environmental training to appropriate personnel as identified on the Environmental Training Matrix • Work with Quality Manager to provide relevant Environmental Management System information to the Administrative Team, including recommendations for improvement. • Develop, maintain and update a current list of Significant Environmental Aspects • Coordinate review of significance determination of Environmental Aspects • Provide environmental regulatory review of Significant Environmental Aspects • Implement and maintain programs to achieve and track progress toward Environmental Targets and Objectives • Maintain a log of environmental CARs and track completion of corrective actions identified on environmental CARs. • Review New Project Requests for environmental impact • Develop, maintain and update Environmental Management System Responsibility Matrix (this matrix) • Stay current with identified environmental legal and other requirements • Periodically evaluate the Medical Center’s compliance with applicable environmental legal and other requirements. Maintain records of the results and present to top management. • Develop, maintain and update Environmental Legal and Other Requirements Matrix • Develop, maintain and update Environmental Training Matrix • Develop, maintain and update Environmental Record Retention Matrix • Develop and present designated training programs • Maintain required environmental records (e.g. hazardous waste manifests) • Coordinate environmental activities performed by Contractors • Serve as the Emergency Response Coordinator for hazardous material spills and releases (see ECI007, <i>Hazardous Substance and Waste Emergency Response</i>) • Serve as the Fire Safety Officer, including coordination of fire drills



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	and fire extinguisher maintenance and testing (see ECP002, <i>Fire Safety Management Plan</i>)
Quality Manager	<ul style="list-style-type: none"> • Oversee CAR System • Coordinate Project Request System • Coordinate Environmental Management System Internal Audits including: <ul style="list-style-type: none"> - Training auditors - Scheduling audits - Determining scope of audits - Assigning auditors - Reporting results to management - Retaining records of audits • Coordinate Management Reviews of Environmental Management System including: <ul style="list-style-type: none"> - Ensuring reviews address all required elements - Documenting and maintaining records of reviews
Human Resources Manager	<ul style="list-style-type: none"> • Coordinate designated training of new employees and recurrent training of existing employees • Maintain the Automated Employee Education Record (AEER) • Provide training completion status reports to Department Managers, as appropriate • Ensure Agency Nurses provide documentation of proper training prior to work start.
Legal Affairs	<ul style="list-style-type: none"> • Assist in legal and interested parties reviews of significant environmental aspects
Public Relations	<ul style="list-style-type: none"> • Communicate information about St. Elizabeth Medical Center's Environmental Management System to the community through inclusion of relevant information in the Annual Community Services Report
Facilities Manager	<ul style="list-style-type: none"> • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect • Allow time for department personnel to complete required training • Track training of personnel to ensure timely completion • Assign properly trained personnel to work activities that include a significant environmental aspect • Ensure contractors performing work activities that include a significant environmental aspect are properly trained • Generate, maintain and submit records and reports required by State Facility Air Permit



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
	<ul style="list-style-type: none"> • Perform and document testing of designated environmental protection systems (fire safety systems, ethylene oxide alarm and exhaust) • Complete ILSM Risk Assessment prior to construction activities, when appropriate • Complete Post-Construction ILSM Closeout for construction projects that included ILSMs • Ensure that ILSM inspections are performed and documented regularly during construction projects where ILSMs are implemented
Infection Control Coordinator	<ul style="list-style-type: none"> • Complete Infection Control Risk Assessments before construction projects, when appropriate.
Disaster Preparedness Coordinator	<ul style="list-style-type: none"> • Develop, maintain and update, as needed, the Medical Center Emergency Preparedness Plan and associated documentation • Coordinate emergency preparedness drills and drill critiques that meet all required regulations and standards • Develop and provide or coordinate appropriate environmental training to appropriate personnel • Coordinate procurement of appropriate emergency preparedness equipment and supplies • Serve as the Medical Center's liaison for emergency preparedness activities with community organizations (Oneida County, Regional Resource Center, Utica Fire Department, etc.)
Disaster Preparedness Team	<ul style="list-style-type: none"> • Review Medical Center Disaster Preparedness capabilities and implement improvements, as appropriate. • Plan, execute and critique disaster preparedness drills. • Procure appropriate disaster preparedness equipment and train personnel on use of the equipment.
BioMed Department	<ul style="list-style-type: none"> • Assign properly trained personnel to work activities that include a significant environmental aspect • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. disposal of spent batteries as Universal Waste) and ensure that they are followed. • Allow time for department personnel to complete required training • Track training of personnel to ensure timely completion • Perform/coordinate and maintain records of testing of designated environmental protection systems (gas scavenging equipment, ethylene oxide sterilizer)



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
Laboratory Manager	<ul style="list-style-type: none"> • Ensure staff completes all required environmental training • Assign properly trained personnel to perform work activities that include a significant environmental aspect. • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. formalin neutralization) and ensure that they are followed. • Generate, maintain and submit required environmental records (reports required by county sewer discharge approval) • Coordinate appropriate hazardous material monitoring (e.g. formaldehyde) and maintain records
Pharmacy Manager	<ul style="list-style-type: none"> • Ensure staff completes all required environmental training • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. chemotherapy waste management) and ensure that they are followed. • Assign properly trained personnel to perform work activities that include a significant environmental aspect. • Ensure that department is equipped with appropriate, functional environmental protection equipment (e.g. waste containers, hoods)
Oncology Manager	<ul style="list-style-type: none"> • Ensure staff completes all required environmental training • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. chemotherapy waste management) and ensure that they are followed. • Assign properly trained personnel to perform work activities that include a significant environmental aspect. • Ensure that department is equipped with appropriate, functional environmental protection equipment (e.g. waste containers, hoods)
Central Services Director	<ul style="list-style-type: none"> • Ensure staff completes all required environmental training • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. ethylene oxide (EtO) sterilizer operation) and ensure that they are followed • Assign properly trained personnel to work activities that include a significant environmental aspect • Maintain required environmental records (e.g. EtO monitoring) • Ensure area is equipped with appropriate environmental protection systems (e.g. EtO abator, negative pressure room) • Maintain documentation of maintenance, testing and calibration of environmental protection equipment • Conduct verification testing of environmental equipment (spore tests from regulated medical waste autoclave)



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
Radiology Manager	<ul style="list-style-type: none"> • Ensure staff completes all required environmental training • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. radiological waste degradation) and ensure that they are followed • Assign properly trained personnel to work activities that include a significant environmental aspect (radioactive waste handling, fixer/developer handling) • Complete and maintain environmental records (waste shipping documentation for silver-containing waste) • Ensure proper operation and maintenance of equipment involved in environmental aspects (e.g. film processors, radioactive waste containers).
Infection Control Nurse	<ul style="list-style-type: none"> • Develop and maintain appropriate environmental documentation (e.g. Bloodborne Pathogens Plan) • Develop and provide or coordinate appropriate environmental training to appropriate personnel as identified on the Environmental Training Matrix • Coordinate with Employee Health on maintenance of required documentation (e.g. employee exposure records) • Ensure personnel completes all required environmental training
Hospital Services Director	<ul style="list-style-type: none"> • Track training of personnel to ensure timely completion • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. autoclave operation) and ensure that they are followed • Assign properly trained personnel to work activities that include a significant environmental aspect (regulated medical waste handling) • Maintain required environmental records (e.g. Medical Waste Tracking Forms, recycling documentation) • Work with the EHSO on response to hazardous material spills • Serve as the alternate Fire Safety Officer
Security Director	<ul style="list-style-type: none"> • Serve on Environment of Care Team • Serve on Disaster Preparedness Team • Direct security contract staff during emergencies • Coordinate response of community services to the Medical Center in the event of an emergency (Police Department, Fire Department, etc.) • Ensure that directed personnel are familiar with the Medical Center's Environmental Management System • Allow time for directed personnel to complete required training



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
	<ul style="list-style-type: none"> • Track training of directed personnel to ensure timely completion • Develop department-specific work instructions, as needed, for work that involves a significant environmental aspect (e.g. receipt of radiological materials) and ensure that they are followed • Assign properly trained personnel to work activities that include a significant environmental aspect
Department Managers	<ul style="list-style-type: none"> • Notify EHSO of any changes in process, material or equipment that affects an existing environmental aspect or potentially creates a new environmental aspect • Sign off on department-specific Environmental Aspect Summaries • Coordinate department-specific environmental training, as appropriate (hazard communication/chemical handling, waste management, etc.) • Ensure that department position descriptions include required environmental management system requirements • Allow time for department personnel to complete required environmental training • Track training of personnel to ensure timely completion • Assign properly trained personnel to work activities that include a significant environmental aspect • Develop and maintain applicable department policies and work instructions for activities with an environmental aspect • Ensure department personnel are aware of Medical Center's Environmental Management System including: <ul style="list-style-type: none"> - Environmental Policy - Significant Environmental Aspects - Environmental Objectives and Targets - Internal Audits - Corrective Action Program • Ensure that any contractors hired to perform work for the department (other than those coordinated by the Human Resources Department) provide documentation of appropriate environmental training prior to start of work. • Complete required training programs
Medical Group Nurse Managers/Office Coordinators	<ul style="list-style-type: none"> • Ensure staff completes all required environmental training • Assign properly trained personnel to work activities that include a significant environmental aspect (radioactive waste handling, fixer/developer handling) • Maintain required environmental records (e.g. Medical Waste



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ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY MATRIX St. Elizabeth Medical Center	
POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
	Tracking Forms)
Environmental Management System Internal Auditors	<ul style="list-style-type: none"> • Complete audits of Environmental Management System components in accordance with Medical Center policy.
Decontamination Team	<ul style="list-style-type: none"> • Complete required First Receiver training program • Perform decontamination activities when contaminated patients are received. • Participate in drills involving decontamination activities.
All Employees, Physicians, Volunteers	<ul style="list-style-type: none"> • Complete required training programs in a timely manner • Notify Department Manager of any environmental aspects not documented • Perform designated work activities in accordance with training and procedures/work instructions • Have knowledge of the Medical Center's Environmental Management System including: <ul style="list-style-type: none"> - Environmental Policy - Significant Environmental Aspects - Environmental Objectives and Targets - Internal Audits - Corrective Action Program
EXTERNAL PERSONNEL	
Security Department	<ul style="list-style-type: none"> • Oversee inspections of designated environmental equipment (fire extinguisher monthly inspections) • Assist in response to environmental emergencies (fire, hazardous material emergencies)
Materials Management Director	<ul style="list-style-type: none"> • Assign properly trained personnel to work activities that include a significant environmental aspect (e.g. DOT HazMat training for personnel that load/unload hazardous materials).
Agency Nurses	<ul style="list-style-type: none"> • Provide documentation of required environmental training prior to start of work • Perform work activities in accordance with training and contract specifications • Follow all appropriate Medical Center rules.
Environmental Emergency Response Contractor	<ul style="list-style-type: none"> • Be available to respond to a hazardous material incident at the Medical Center at all times. • Assign properly trained personnel to work activities that include a significant environmental aspect. Provide training records upon request. • Coordinate environmental response activities with EHSO
General Contractors	<ul style="list-style-type: none"> • Provide documentation of required environmental training prior to



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POSITION	ENVIRONMENTAL MANAGEMENT SYSTEM RESPONSIBILITY
	start of work <ul style="list-style-type: none"> • Perform work activities in accordance with training and contract specifications • Follow all appropriate Medical Center rules.
Private couriers	<ul style="list-style-type: none"> • Transport various items, including hazardous materials, between Medical Center hospital and Medical Group sites.
Medical waste transporter	<ul style="list-style-type: none"> • Transport regulated medical waste from Medical Group sites to Medical Center
Medical waste incinerator	<ul style="list-style-type: none"> • Incinerate medical waste from Medical Center that was not appropriate for autoclave treatment.
Hazardous waste transporter	<ul style="list-style-type: none"> • Transport hazardous waste from Medical Center to designated hazardous waste treatment or disposal facility
Hazardous waste treatment, storage, or disposal facility	<ul style="list-style-type: none"> • Treat or dispose of hazardous waste from Medical Center
Ethylene oxide sterilizer and emissions treatment maintenance contractor	<ul style="list-style-type: none"> • Perform routine and special maintenance and calibration of ethylene oxide sterilizer and emissions treatment unit
Hazardous material (e.g. formaldehyde, ethylene oxide, glutaraldehyde) monitoring contractor	<ul style="list-style-type: none"> • Provide monitoring of designated personnel and areas for specified hazardous material • Provide records of monitoring results and equipment calibration, as appropriate
Film processor maintenance contractor	<ul style="list-style-type: none"> • Maintenance of x-ray film processors, including filter changes and removal and transport of silver-containing waste
Ventilation Hood contractor	<ul style="list-style-type: none"> • Maintenance and testing of designated fume hoods
Asbestos abatement contractor	<ul style="list-style-type: none"> • Provide personnel training documentation • Provide copies of notifications, reports, correspondence submitted to regulatory agencies • Provide documented results of sampling activities • Provide waste disposal documentation