

# **Hobart and William Smith Colleges**

**Geneva, New York**

## **Environmental, Health and Safety Program**

**Copies of the EHS Program:**

1. Human Resources Office
2. Electronic Version (HWS HR website)

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**ENVIRONMENTAL, SAFETY AND HEALTH PROGRAM  
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## **Section I – Environmental, Health and Safety Policy**

**Introduction:** Hobart and William Smith Colleges (further referred to as HWS or the Colleges) holds a vision of a campus where losses through accidents, fire, environmental incidents and similar problems do not occur. Through strict compliance with local New York State and federal environmental, health and safety (EHS) regulations (i.e., EPA, OSHA and DEC), the campus ensures regulatory compliance, the safety of its faculty, staff and students and the well-being of the environment. We believe that all of us share the responsibility for environmental and safety loss prevention and that, by working together, we can help each other attain this goal. HWS has developed this EHS Program to define our responsibilities for EHS, which through proper implementation will ensure our control and minimization of the Colleges EHS liabilities. Routine and appropriate EHS training is paramount to the education of faculty, staff and students.

The president of the Colleges' attitude toward EHS is reflected downward to each member of the HWS community. A successful EHS program requires the skills and knowledge of each faculty and staff and must be applied with vigor and enthusiasm in a clearly active and continuing manner. Routine EHS meetings will help keep key members of the campus apprised of EHS issues at the Colleges.

**Environmental, Safety and Health Policy:** The Colleges have committed to follow the established EHS Policy endorsed by the Office of the President (Provost).

## Section II – EHS Compliance Program

**EHS Practice:** HWS is committed to comply with all relevant laws pertaining to environmental, health and safety (EHS). EHS factors and legal requirements shall be taken into consideration when managing the College's operations and activities, as well as any substantial modification to its buildings, grounds and facilities.

It has been and will continue to be the practice of HWS to manage all environmental considerations in compliance with environmental regulations and good environmental practices, and provide a safe, healthy and regulatory-compliant work environment for all faculty, students and contractors working for the Colleges. All faculty, staff, students and contractors are expected to comply with the provisions of this EHS Program as well as regulatory requirements promulgated by the Occupational Safety and Health Administration (OSHA), Environmental Protection Agency, (EPA), and any other applicable regulatory agency

**Responsibility for Compliance:** The HWS management team (Office of the President, Human Resources, Chairpersons, etc.) is ultimately responsible for the implementation of the provisions of this EHS Program and accountable for the performance of the required tasks and activities. These responsibilities and accountability will be disseminated by the management team through the appropriate departments, as well as students and contractors. The management team will also be responsible for the periodic evaluation of compliance with the provisions of this EHS Program to verify the compliance status for the Colleges.

**Program Requirements:** HWS's EHS Program will, at a minimum, meet the following requirements for EHS compliance:

1. Designate an EHS Coordinator who will be responsible for development, implementation and oversight of the provisions of the EHS Program.
2. Ensure basic EHS regulatory requirements and risks are managed through the written EHS Program.
3. Maintain a working process that continually recognizes, evaluates and controls EHS risks to the Colleges.
4. Coordinate EHS expectations with HWS contractors and track their overall performance.
5. Provide all HWS personnel (i.e., faculty, staff, students, etc.) with the appropriate EHS information and training to ensure they understand the EHS policies and procedures.
6. Periodically evaluate the implementation and status of the EHS Program to allow for continuous improvement.

## **Section III – Roles, Responsibilities and Accountability**

**Roles and Responsibilities:** It is policy of HWS to establish roles and responsibilities for all management (Office of the President, Chairpersons, Human Resources, etc.), faculty, students and contractors for the Colleges.

1. The **Office of the President (Provost)** will:

- Support the policies and procedures of the EHS Program.
- Periodically reinforce with the HWS community the College's commitment to management of EHS requirements.
- Designate appropriate resources (i.e., funds, personnel, etc.) for the implementation of the program.
- Coordinate and communicate the financial resources for the implementation of the EHS Program with the departments.
- Assign responsibilities and authority to designated personnel to implement and maintain the EHS Program.
- Periodically review EHS compliance status at HWS.

2. The **Vice President of Human Resources** will:

- Work with the Office of the President (Provost) to oversee the policies and procedures of the program.
- Procure and coordinate the activities of an EHS Coordinator for the Colleges.
- Coordinate the EHS Committee and the Chemical Hygiene Plan (CHP) Committees, as appropriate.
- Manage injury, illness and accident requirements for the Colleges.
- Implement provisions for roles and responsibilities, accountability and disciplinary policies.
- Maintain personnel recordkeeping requirements associated with training, accidents/injuries, etc.

3. The **EHS Coordinator (or representative)** will:

- Oversee the EHS Program and ensure compliance with all applicable federal, state and local EHS regulations.
- Establish and approve EHS policies and procedures.
- Provide knowledge and support to the Colleges on the EHS Program.
- Manage the other HWS EHS Programs (i.e., Hazard Communication, PPE, Bloodborne Pathogens, SPCC, Hazardous Waste, etc.).
- Establish annual EHS goals with HWS management.
- Coordinate the EHS Committee and the CHP Committee.
- Manage environmental inventories, registrations, inspections and universal/hazardous waste requirements.
- Participate in emergency response actions.
- Facilitate faculty, staff and student EHS training.
- Conduct periodic EHS inspection and annual EHS audits.

- Report EHS incidents or releases, as appropriate, to government agencies.
- Track accident and injury data/trends with Human Resources.
- Monitor the status of corrective actions resulting from safety inspections and accident investigations.
- Continually evaluate and improve overall compliance with the program.
- Coordinate an annual review of the EHS Program.

4. **Department Chairperson(s)** will:

- Understand the EHS requirements for their department.
- Assign department personnel with appropriate responsibilities and accountability for EHS requirements in their department.
- Provide availability for appropriate EHS training to department faculty, staff and students.
- Periodically inspect EHS compliance for the department.
- Communicate EHS issues directly with the Vice President, Campus Safety and/or the EHS Coordinator.

5. **Buildings and Grounds (B&G) and other contractors** will:

*(Note: B&G is an HWS contractor):*

- Implement their own EHS Program for their activities at HWS.
- Comply with the provisions of their EHS Program, the HWS EHS Program and OSHA, EPA and other applicable regulatory requirements.
- Provide appropriate EHS training to all employees.
- Participate on the EHS committee, as appropriate.
- Immediately report any accidents or injuries to the Vice President.
- Participate in emergency response actions, as appropriate.
- Periodically evaluate EHS compliance.
- Communicate EHS issues directly with the Vice President, Campus Safety and/or the EHS Coordinator.

6. **Campus Safety** will:

- Coordinate all emergency services (i.e., medical, fire, chemical, security, etc.) for the Colleges, as well as the provisions of the Emergency Management Plan.
- Provide appropriate safety and health training for HWS faculty, staff and students.
- Participate on the EHS committee.
- Designate an employee to act as the Chemical Hygiene Officer and/or participate on the Chemical Hygiene Plan (CHP) committee for the Chemistry, Biology and Geosciences departments.
- Participate in faculty, staff and student accident investigations.
- Investigate faculty, staff, student and contractor related accident/incidents.
- Conduct periodic safety inspections.
- Communicate EHS issues directly with the Vice President and/or the EHS Coordinator.



7. **Faculty, Staff and Students** will:

- Understand and follow the EHS requirements applicable to their activities.
- Participate in EHS training, as provided.
- Stop and ask questions if unsure of the safe or environmentally sound means to perform an activity.
- Actively participate in the EHS Program.
- Immediately report any accidents or injuries, chemical spills or releases or similar emergencies to Campus Safety, outside emergency services, department personnel (i.e., Chemical Hygiene Officer) and other applicable personnel.
- (*Faculty/Staff Only*) Immediately report any unsafe work conditions or inappropriate environmental practices to the Vice President and/or the EHS Coordinator.

**Accountability:** At HWS all departments, faculty, staff, students and contractors will be accountable for following their designated roles and responsibilities.

**Disciplinary Policy:** HWS has an established disciplinary policy to address non-conformance with EHS roles and responsibilities. The effectiveness of the EHS Program relies on this disciplinary policy backed by management (Office of the President, Chairpersons, Human Resources, etc.) and understood by all. EHS policies and procedures are in place to protect the environment and the safety and health of faculty, staff and students, as well as maintain regulatory requirements. The policy includes:

1. Departments, faculty, staff, students and contractors are expected to follow established EHS policies and procedures. Personnel that do not comply with these requirements place HWS at risk of accident/injury, environmental release, and/or regulatory non-compliance, which are risks that HWS are not willing to take.
2. Departments, faculty, staff, students and contractors not complying with EHS policies and procedures may face disciplinary actions, as specified in the Faculty, Staff and Student handbook.
3. The appropriate HWS official will handle any violations of the EHS Program.

## Section IV – Accident and Injury Prevention

**Safe Working Conditions:** Maintaining safe and healthy working conditions can prevent more accidents and injuries than any other element of the EHS Program. The ultimate goal is to design operations/activities, job procedures and the work environment so that accidents and injuries are eliminated.

**Accident Investigation:** An accident or incident is any unexpected occurrence that interrupts or interferes with the orderly progress of work. Accidents/incidents do not necessarily involve injuries, but always involve added costs and are an indication that something has gone wrong. HWS will investigate faculty, staff and student accidents/incidents or potential hazard that did or could cause a reasonable degree of personal injury (i.e., OSHA recordable) or property damage (i.e., exceeding \$500).

*Students – Accidents/incidents related to students will be investigated by Campus Safety and communicated to the Vice President of Human Resources and Vice President of Student Affairs.*

*Contractors (i.e., B&G) – Accidents/incidents related to contractors will be investigated by the contractor and communicated immediately to the Vice President and/or the EHS Coordinator.*

### **The Accident Investigation Process:**

1. Immediate Response at the Time of Accident (where injury occurred):
  - a. Request emergency help (i.e., Campus Safety, 911, etc.), as necessary.
  - b. Immediately identify all hazards and eliminate or control hazards or hazardous conditions, if safe, to prevent additional accidents. If the hazards cannot be eliminated or controlled, stop the operation and/or evacuate the area or building, if warranted. This may involve initiation of the appropriate Emergency Plans. Do not take actions reserved for emergency response personnel.
  - c. Ensure first aid/medical care has been provided, as necessary.
  - d. Isolate area, if needed.
  - e. Provide safety warnings to other personnel in the area that may be conducting the same activity that resulted in the accident.
  - f. Report all accidents to Campus Safety, Vice President and/or the EHS Coordinator and appropriate department personnel.
  
2. Accident Investigation and Follow Up:
  - a. Vice President will track all accidents resulting in faculty or staff injuries and illnesses. This will include:
    - i. OSHA 301 (Injury and Illness Injury Report) or equivalency – Human Resources will maintain copies of the HWS Accident Investigation Report. If the incident is deemed recordable under OSHA guidelines, the

- information will be entered into the OSHA 301, C2 form and/or equivalency form within seven (7) days of the recordable determination.
- ii. OSHA 300 (Log of Work Related Injuries and Illnesses) – Human Resources will enter all recordable injuries and illnesses on the OSHA 300 form within seven (7) days of the recordable determination.
  - iii. OSHA 300A (Summary of Work Related Injuries and Illnesses) – Human Resources will complete the OSHA 300A form on an annual basis and post the form for the previous year from February 1 to April 30.
  - iv. C-2 Form – Human Resources will maintain NYS Worker’s Compensation Board forms, as required for employee injuries and illnesses.
  - v. All OSHA records will be maintained for a minimum of five (5) years. C-2 forms will be maintained according to NYS Worker’s Compensation Board requirements.
- b. The department, Campus Safety and/or the EHS Coordinator will investigate all work-related injuries and illnesses within 24 hours (next business day, as feasible) of the incident or determination of OSHA recordability.
    - i. Potential long term corrective actions will be investigated to address the root cause(s).
    - ii. Findings and corrective actions from the accident investigation will be implemented, as feasible and appropriate, by the department, B&G and/or other parties, as appropriate.
    - iii. All accident investigations (and findings/corrective actions) will be further reviewed/discussed in monthly EHS Committee meetings.
  - c. The department and EHS Coordinator will be responsible for tracking the status of all approved corrective actions resulting from accident investigations.
  - d. Any work-related death must be reported to OSHA within 8 hours upon receiving information of the occurrence. Any work-related in-patient hospitalizations, amputations or losses of an eye must be reported to OSHA within 24 hours. *Note: Employers do not have to report an in-patient hospitalization if it was for diagnostic testing or observation only. In-patient hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment. Reporting is not required from a motor vehicle accident on a public street or highway (except in a construction zone) or from a commercial or public transportation system (airplane, subway, bus, etc.).*

**Inspection of Work Areas:** An essential element of any accident and injury prevention program is an effective inspection system. Inspections help identify facilities, conditions and work practices that may cause accidents so corrective action can be taken before the accident occurs.

1. Campus Safety and the EHS Coordinator will perform safety inspections for various components (i.e., fire safety, lab safety, etc.) at least annually.

2. The departments and Campus Safety will be responsible to complete the corrective actions associated with the findings, as required.
3. Safety inspections will be kept on file for at least one year after the dated inspection and outstanding issues will be tracked until completion. Inspections will be maintained by the group (i.e., department, Campus Safety, EHS Coordinator/Human Resources, etc.) conducting the inspection.
4. B&Gs and Campus Safety will coordinate or conduct routine inspections of fire protection and emergency systems, as required.
5. The EHS Coordinator will perform routine Spill Prevention, Control and Countermeasure (SPCC) inspections of all tank containment areas and all spill records will be kept with the plan. They will also conduct weekly inspections of all hazardous waste areas and satellite accumulation areas. Deficiencies will be noted and reported to B&G for corrective action.

**EHS Audits:** In order to maintain an effective EHS Program over time, the policies and procedures must be reviewed to ensure they reflect current EHS requirements and effective implementation at the Colleges.

1. Conducted on an annual basis by the EHS Coordinator, with support from the departments, Campus Safety and B&G.
2. Review all written EHS policies and procedures comprising the EHS Programs. These policies and procedures are reviewed against current HWS practices and regulatory requirements.
3. Update the EHS Program to reflect any necessary changes to the program and provide appropriate notification to management (Office of the President, Vice President, etc.), departments, faculty, staff, students and contractors affected by these changes.
4. A review of new chemical procurements and hazardous materials waste streams will be evaluated on an annual basis by the EHS Coordinator with support from the departments, Campus Safety and B&G in an effort to assess the Colleges ability to handle, store and dispose of such materials.
5. Review all chemicals on the campus annually to assess applicability with EPCRA requirements.

## Section V – OSHA Programs

The Occupational Safety and Health Administration (OSHA) mandates that a written program and/or plan be developed to implement certain standards contained in Title 29 of the Code of Federal Regulations (CFR), Part 1910 (29 CFR 1910).

Below is a listing and brief description of all HWS written OSHA programs and plans.

1. **Emergency Preparedness Program – 29 CFR 1910.38:** Provides safe procedures to follow in the event of an emergency such as a fire, chemical spill, medical emergency, etc.

2.

The Emergency Preparedness Plan is available at the Campus Safety Office and on line at HWS/Student Life/Campus Safety/Emergency Planning and Preparedness ([www.hws.edu/studentlife/planning](http://www.hws.edu/studentlife/planning)).

3. **Hygiene Plans – 29 CFR 1910.1450:** Provides safe procedures for working with chemical hazards in the laboratory. Individual Chemical Hygiene Plans (CHPs) have been developed for the Chemistry, Biology, Geoscience and FLI Departments.

The Chemical Hygiene Plans for each department are located within the department and on the HWS HR website.

4. **Hazard Communication Program – 29 CFR 1910.1200:** Provides safe procedures for working with chemical hazards, as well as information on safety data sheets (SDSs) and container labeling. The Hazard Communication Program applies to all faculty and staff that do not apply to the Chemical Hygiene Plans for the Chemistry, Biology, Geoscience and FLI Departments.
5. **Personal Protective Equipment Program – 29 CFR 1910.132:** Provides information on appropriate personal protective equipment (PPE) required to protect exposure to chemical and physical hazards.
6. **Respiratory Protection – 29 CFR 1910.134:** Provides information on appropriate respiratory protection required to protect employees from exposure to airborne contaminants.
7. **Bloodborne Pathogens Program – 29 CFR 1910.1030:** Provides safety procedures for those personnel providing first aid/CPR and medical services (as part of their job) to control exposure to bloodborne pathogens.

The Hazard Communication, Personal Protective Equipment and Bloodborne Pathogens Programs are available at the Campus Safety Office, Human Resources Office and on the HWS HR website.

The following additional plans apply to operations at the Colleges, but not performed by faculty or staff of the Colleges. These operations are conducted, as applicable, by Buildings and Grounds (B&G) and incorporated as part of their EHS programs (this list is not inclusive).

1. Hearing Conservation Program
2. Lockout/Tagout Program
3. Confined Space Entry Program
4. Powered Industrial Truck Program
5. Fall Protection Program
6. Asbestos Management Plan
7. Lead Safety Program

## Section VI – Environmental Programs

Below is a listing and brief description of all HWS written EPA programs and plans.

- 1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) – 40 CFR PART 32:** Establishes reporting requirements for unpermitted releases of hazardous substances. In addition, CERCLA establishes liability for cleanup of improperly disposed hazardous substances or releases of hazardous substances.
- 2. Emergency Planning and Community Right-to-know Act (EPCRA) – 40 CFR PARTS 355 and 370:** Also known as SARA Title III (Superfund Amendments and Reauthorization Act), requires facilities that use extremely hazardous substances or hazardous chemicals to provide information to local county and state emergency planning committees. The intent of this regulation is to encourage and support community planning efforts and to provide citizens and local governments with information concerning potential chemical hazards in the community.
- 3. Hazardous Waste Management – 40 CFR PARTS 260-270:** These regulations establish a hazardous waste management program consistent with the requirements of the Resource Conservation and Recovery Act (RCRA). RCRA regulates on-going hazardous waste handling and disposal. See the Hazardous Waste Management Plan for additional details.
- 4. Spill Prevention Control and Countermeasures (SPCC) – 40 CFR Part 112:** The general purpose of the SPCC rule is to identify and eliminate the unlikely potential for any oil spill to reach surface waters in and around the HWS campus. In order to comply with the rule, facilities storing more than 1,320 gallons of oil must prepare an SPCC plan. This plan pertains to all oil vessels greater than 55 gallons and includes storage tanks, emergency generators, electrical transformers and hydraulic elevators.
- 5. Transportation of Hazardous Wastes – 49 CFR PARTS 171 – 180:** These regulations specify the requirements for the transportation of hazardous materials. HWS prepares and ships hazardous materials and is subject to these regulations.
- 6. Petroleum Bulk Storage Tanks – 6 NYCRR Parts 612 – 614:** Tanks storing petroleum must meet minimum standards established by the New York State Department of Environmental Conservation (DEC). The DEC develops and enforces standards for storage and handling of petroleum products and regulates the aboveground fuel and generator tanks on the HWS campus.

## Section VII – EHS Committee

**General:** HWS has established a formal EHS committee to assist in the management of the EHS Program at the Colleges.

**EHS Committee:** Involvement from various parties and personnel is an integral aspect to the success of the EHS Program. The EHS committee allows for open discussion with resources from around the Colleges on EHS issues and active participation in the decision-making process.

The EHS Committee will be established according to these guidelines:

1. The committee will be comprised of a representative(s) from Human Resources, Campus Safety, Buildings and Grounds, Laboratory (e.g., Chemistry) and/or Chemical Hygiene Officer, Medical Services and the EHS Coordinator. Guests will also be asked to attend, as deemed appropriate.
2. The committee will meet on a monthly basis.
3. The committee will be chaired by the EHS Coordinator, who will also prepare an agenda for each meeting.
4. Minutes will be taken at all meetings, filed and distributed to all committee members.

Goals of the EHS Committee will be to:

1. Encourage open discussion on EHS issues.
2. Discuss means to reduce campus accidents/chemical releases.
3. Educate members on HWS EHS policies and procedures.
4. Allow members to serve as an external EHS resource for the Colleges.

The EHS Committee will participate in the following activities, but not limited to:

1. Interactive EHS committee meetings discussing current EHS issues.
2. Accident investigation and follow-up.
3. EHS inspections.
4. EHS training and awareness.
5. Focused EHS sub-committee topics, as appropriate.

The EHS Committee will have the authority to make decisions and get things done. Activities from the committee will be developed into action plans for review and authorization, as appropriate.



## Section VIII – EHS Training

**General:** It is HWS policy to provide training on EHS policies and procedures to all faculty and staff. EHS training will also be provided to students, as appropriate and defined within their individual EHS program.

### **EHS Training and Information:**

1. Training and information are an integral part of a successful EHS Program. Faculty and staff must be knowledgeable on the EHS policies and procedures in order to perform work properly and maintain regulatory compliance.
2. Certain job tasks and locations at the Colleges have requirements for specific EHS training, however, all faculty and staff have the potential for exposure to EHS issues in their work environment. Therefore, all employees will participate in some degree of EHS training.
3. Based on the applicable EHS training needs for HWS, the following areas have been identified for potential EHS training programs:
  - a. Emergency Preparedness (29 CFR 1910.38) – All faculty and staff.
  - b. Fire Extinguisher Use (29 CFR 1910.157) – All Campus Safety and Scandling Boat personnel will be provided with fire extinguisher training. Other HWS personnel, such as laboratory faculty/staff, resident assistants, etc., may be offered the training, as appropriate and necessary. *Note: All other employees will be trained not to use a fire extinguisher and report the fire and evacuate the building.*
  - c. Chemical Hygiene Plan (29 CFR 1910.1450) – Faculty and staff working with chemicals in laboratories of the Chemistry, Biology, Geoscience and FLI departments.
  - d. Hazard Communication (29 CFR 1910.1200) - All faculty and staff working with chemicals.
  - e. Personal Protective Equipment (29 CFR 1910.132) - All faculty and staff required to wear PPE.
  - f. Respiratory Protection (29 CFR 1910.134) - All faculty and staff required to wear respiratory protection. *Note: Currently only HWS personnel on the Scandling Boat.*
  - g. Bloodborne Pathogens (29 CFR 1910.1030) – All Campus Safety and medical personnel, as well as all members of the Emergency Medical Team and those providing first aid/CPR.
  - h. SPCC Plan (40 CFR Part 112) – Selected Campus Safety and B&G personnel.
  - i. Hazardous Materials – Shipping (49 CFR Part 172) – Selected Campus Safety and B&G personnel.
4. Additional EHS training programs will be provided, as needed, to educate the workforce on the EHS Program.

### **Training Program Responsibility and Financial/Resource Support Roles:**

1. EHS training conducted for faculty and staff shall be provided by the EHS coordinator (or designated representative) and/or the individual departments.
2. The financial responsibility for EHS training shall be coordinated through the Office of the President/Human Resources and the individual departments.
3. EHS training for student researchers and student employees/independent study employees shall be the responsibility of the individual departments.

### **Training Program Content and Schedule:**

1. EHS training programs presented at HWS are designed to comply with regulatory requirements as detailed in the OSHA, EPA other applicable regulatory requirements and to provide specific information regarding the application of this training to operations. Details on the content of each EHS training program are provided in the individual EHS program developed specifically for that topic.
2. EHS training will be provided at the following frequency, as required:
  - a. At the time of their initial exposure to the hazard.
  - b. As needed, to ensure individuals maintain an effective level of knowledge and skill.
  - c. As required by regulatory requirements, such as annually.
3. The specific training schedule will be dictated by the Colleges need for training.

### **Training Records:**

1. Records will be maintained for all regulatory-related EHS training. Training records will be provided to and maintained by:
  - a. Individual Departments;
  - b. Human Resources; and/or
  - c. Campus Safety (as needed).
2. EHS training records will be documented on an EHS training sign-in sheet and include:
  - d. Attendee Name and Signature.
  - e. Department Name.
  - f. Date of Training.
  - g. Subject of Training.
  - h. Name and Signature of Trainer.
3. EHS training records will be maintained for two (2) years unless otherwise noted by the specific EHS program or regulatory requirements.

## Section IX - Recordkeeping

**General:** Recordkeeping is an integral part of the HWS EHS program. Accurate records must be maintained to meet regulatory recordkeeping requirements.

### **Recordkeeping:**

1. The following records will be maintained for HWS:
  - a. EHS Programs.
  - b. Medical and worker's compensation records.
  - c. OSHA injury and illness records (OSHA 301, 300 and 300A).
  - d. Exposure monitoring.
  - e. Material safety data sheets and chemical inventory.
  - f. SPCC spill record log and facility changes.
  - g. Hazardous and universal waste inspection forms.
  - h. Tank registrations.
  - i. EPCRA documentation.
  - j. All EHS training.
  
2. All personnel records must contain at least the following information:

<u>Records</u>	<u>Date</u>	<u>Employee's Name</u>	<u>Social Security #</u>	<u>Department or Job</u>
Medical/Worker's Comp	X	X	X	X
Exposure Monitoring	X	X		X
Training	X	X		X

3. Records will be retained for the following duration:

<u>Records</u>	<u>Retention Time</u>
EHS Programs	Current EHS Program.
Medical/Worker's Comp	Employee's duration of employment plus 30 years.
Exposure Monitoring	Employee's duration of employment plus 30 years.
SDSs/Chemical Inventory	At least thirty (30) years.
OSHA 301/300/300A	Five (5) years following the year on the records.
SPCC Plan	Three (3) years, update every five (5) years.
PBS Tank Registration Renewals	Every five (5) years.
EPCRA	Updated annually.
EHS Training	Two (2) years following the training.

4. Faculty and staff will be informed of their access to medical, exposure and training records at their initial time of employment and annually thereafter. This information contains an explanation of the:
  - a. Employees right to records access.
  - b. Existence, location and availability of records.

- c. Person responsible for maintaining and providing access to records.
- 5. Upon request, employee medical, exposure and training records will be made available to employees, employee representatives (authorized in writing by the employee) or government agencies. Records will be provided in a reasonable time frame and location.
- 6. EHS records will be stored in a safe location to maintain confidentiality and prevent physical damage to these documents.