

 <b>Portland Community College</b> Portland Community College Health & Safety Manual	<b>Dept: Environmental Health and Safety</b>	
	<b>Topic: Chapter 7 — Hazardous Material Emergency Response Plan</b>	
	<b>Board Policy: B507</b>	<b>Revised Date: June 2025</b>

<b>Authority</b>	<b>PCC Board Policy—B507</b>
	Portland Community College is committed to providing a safe and healthy work and educational environment for our employees, students and visitors.

<b>Summary</b>	This document outlines PCC’s procedures in the event of a chemical release/spill including assessments, clean up procedures, and necessary actions to be taken for regulatory body reporting.
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## **I. PURPOSE**

Portland Community College's (PCC) Hazardous Material Emergency Response Plan is designed with three priorities in mind: to prevent harm to life, to prevent harm to the environment, and to prevent harm to property and equipment. This document outlines PCC's procedures in the event of a chemical release including assessments, clean up procedures, and necessary actions to be taken for regulatory reporting.

The college-wide Emergency Operations Plan can be found on the Department of Public Safety's (DPS) website and includes various emergency response and evacuation procedures.

## **II. AUTHORITY**

Includes but is not limited to:

- PCC Board Policy – B507
- OAR 437-002-1910.120 Hazardous Materials Emergency Response
- OAR 437-002-1910.1200 Hazard Communication
- OAR 437-002-1910.1450 Laboratory Standard
- 40 CFR 262.34 and 265.50 Contingency and Spill Prevention Plans
- 40 CFR 302.4 List of Hazardous Substances and Reportable Quantities
- 40 CFR 112 Oil Pollution Prevention

Other related Health & Safety Manual Chapters include:

- Chapter 8 – Hazard Communication Plan
- Chapter 14 – Powered Industrial Trucks, Material Handling Vehicles and Powered Mobile Equipment
- Chapter 17 – Respirator Protection Plan

## **III. RESPONSIBILITY**

Responsibility for Hazardous Material Emergency Response rests at all levels in the College and is described as follows:

### **Supervisor/Manager/Deans:**

- Provide support and assistance with department specific incidents for DPS and EH&S responding to campus emergencies.
- Assign designated employees to be trained in Hazardous Material Emergency Response and assist with release/spill clean up activities as needed.
- Develop/provide department specific training on spill prevention and response.
- Ensure that chemical inventories/SDS documents are maintained and updated as needed for department chemical use and storage areas.
- Ensure PPE assessments are completed and adequate supplies are on hand for their department's chemical use areas.
- Ensure assessments are completed and supplies sourced for secondary containment and/or spill response materials needed for each chemical use and storage areas in their department.
- Manage and maintain any leak detection equipment used in their department's work area.
- Develop and communicate Site Specific Communication plans for locations that require more detailed initial response steps.

### **Designated Department Employees**

- Be trained in the Hazardous Material Emergency Response Plan and assist with release/spill response as needed.
- Oversee hazardous material use and waste generated in either their instructional activities or specific facility/operation activities.
- Be knowledgeable in how to handle incidental release/spills with spill kits located in the vicinity of the hazardous materials or waste storage sites.
- Complete Hazardous Release/Spill Assessment forms for releases/spills that occur in their work areas.
- Inspect and maintain contents of Emergency Spill Kits in their designated work areas.

### **Environmental Health & Safety (EH&S):**

- Develop the Hazardous Material Emergency Response Plan and facilitate the associated training.
- Be trained in Hazardous Waste Operations and Emergency Response (HAZWOPER 40 hours) to perform oversight for hazardous material response.
- Assist departments with completing Hazardous Release/Spill Assessment forms.
- Assist departments with developing Site Work Plans for release/spill cleanup activities performed by PCC employees.
- Act as the EOC Safety Officer and provide oversight on release/spill cleanup activities performed by PCC employees.
- Ensure that any required site-specific Spill Prevention, Control, and Countermeasure (SPCC) Plans are reviewed annually and updated as needed. Provide copies of plans upon request.
- Determine if a release/spill meets reporting thresholds and provide notification to DEQ and any other agency that the release/spill must be reported to within the required timeframe.
- Maintain records for Hazardous Release/Spill Assessment forms, Site Work Plans, investigation records, and PCC's chemical SDS inventory.

### **Department of Public Safety (DPS):**

- Maintain an updated telephone list of all PCC emergency staff as well as a copy of the emergency vendor list from FMS.
- Notify appropriate campus staff and responders of a campus emergency release/spill.
- Provide materials to secure the scene, isolate the release/spill area, and ensure access control for release/spill control zones.
- Ensure Hazardous Release/Spill Assessment forms are attached to associated reports generated by DPS reports.

### **College Emergency Preparedness:**

- Develop the campus and district wide Emergency Operations Plan which includes evacuation procedures.
- Assist EH&S in developing the Hazardous Material Emergency Response Plan.

### **Facilities Management Services (FMS):**

- Assist during emergencies, such as shutting down natural gas lines or de-energizing electrical service, to prevent further hazards.
- Ensure that emergency equipment such as fire protection systems are maintained

and functional.

- Ensure that annual inspections are completed according to SPCC requirements.
- Ensure that SPCC facility maps are updated whenever there are significant changes at a facility.
- Maintain a list of current outside vendors who can provide a variety of services to assist with emergency chemical clean up and update DPS any time there is a change.

#### **All Employees:**

- Notify DPS of an emergency and the nature of the emergency.
- Be familiar with basic incident reporting as found on the DPS webpage.

## **IV. PROCEDURES**

### **A. Reporting Emergencies and Requesting Basic Response**

Any employee that needs to report an emergency or request basic response should call the Department of Public Safety (DPS). Centers with no on-site Public Safety should call 911 immediately in an emergency. From a campus landline phone, employees should dial ext. 4444 for emergencies or ext. 4902 for non-emergencies. If calling from a cell phone, employees should dial 971-722-4444 for emergencies or 971-722-4902 for non-emergencies.

If an employee needs to report an emergency or request basic response after hours or when the campus is closed, they should dial 911.

DPS will contact appropriate First Responders through the 911 system and PCC's call list.

It is important that all employees become aware of the specific location of the telephones in their work area. There are telephones in each building that can be used to contact the Public Safety Emergency dispatch (dial 4444). There are also "Code Blue" phones at locations across the district that can be used to report an emergency.

Other employees in the vicinity of the emergency shall be notified of hazards and what steps they should take to protect themselves. This will be done by:

- On Campus Emergency Notification System (OCEANS),
- PCC Alert, or
- Person-to-person notification

#### **1. Upon discovering an incidental chemical release/spill:**

Incidental spills are releases/spills of one gallon or less of a known chemical with minimal hazards. Incidental spills may be cleaned up by employees who work with the chemical and are trained in handling the chemical including all necessary safety precautions and release/spill response. Employees should ensure the release/spill area is secured until they are able to fully clean up the release/spill.

#### **2. Upon discovering a large/hazardous chemical release/spill:**

The following steps are to be taken by employees when a large or hazardous chemical release/spill occurs or is discovered:

- Evacuate: When a chemical release/spill occurs or is discovered, employees should evacuate the area, move away to a safe distance, and turn off any ignition sources if possible. (Ignition sources include open flame, exposed electrical wires,

and some heat sources) If the chemical is unknown or it is unknown how to properly deal with it, then employees should stay away and wait for DPS or other emergency response staff.

- Identify the chemical: Employees should try and recall as many details as possible to identify the chemical that was released. Information that can be used to help identify the chemical include labels, color, smell, location in the work area, and container size, shape, and color.
- Report the Emergency: Once the area around the release/spill is evacuated, employees must contact DPS to request assistance. DPS will contact EH&S, other PCC departments, and other emergency responders if needed. Employees should not attempt to clean up a release/spill until the location has been evaluated by DPS and EH&S.
- Isolate the area: If safe to do so and feasible, DPS Officers will isolate the area around a release/spill to ensure no one accidentally enters the area and comes in contact with the release/spill. This can be done either by closing the room or by setting up a barrier of cones and caution tape. Depending on the size and nature of the release/spill, other employees in neighboring areas should be notified to ensure they stay clear of the area. (Terrain, wind conditions, and other factors could affect the extent of evacuation and notification.) This area will be known as the control zone.
- Assist any injured persons: If an employee was injured or exposed during the chemical release/spill, they should be moved to fresh air as soon as safely possible. DPS, possibly with assistance of others, will take the lead with any injured employee and determine if further assistance is needed. If the victim is not breathing and someone nearby is trained, Hands Only CPR can be provided.

Contaminated clothing and shoes should be removed as soon as possible to prevent further exposure or contamination. If necessary and possible, the contaminated person should use an emergency shower and/or eye wash for at least 15 minutes. Employees should not attempt to retrieve another person from a release/spill area or control zone.

- Containment/Confinement: Employees who have been trained in basic containment and confinement of hazardous materials and can begin those procedures if they are aware of the hazards of the release/spill, are wearing proper personal protective equipment (PPE), and feel comfortable doing so.

Containment is the process of stopping the flow of a release/spill at its source. Confinement is the process of controlling where a released/spilled material is flowing. The method of containment and confinement varies with the physical state of the hazardous material released/spilled.

Note: In the event of a release/spill at a PCC fueling station, all employees trained as DEQ Class C Operators are trained in confinement procedures and should begin confining the spill immediately. For more information on vehicle fueling and spill response at fueling stations see *Chapter 14, Section IV, Sub-section H*.

For all releases/spills greater than 50 gallons, PCC will evacuate the area and call in a third-party, trained Hazardous Material Response (HAZMAT) Team.

## B. Hazardous Material Emergency Response

The scope of PCC response to a chemical release/spill is dependent upon several key factors:

- Level of training of those employees available to respond to the release/spill.
- Type of chemical(s) involved, and hazards associated with the chemical(s).
- The volume of material released.
- The area or facility where the chemical/substance was released.
- Type of personal protective equipment required for clean-up operations.

Department employees who handle potentially hazardous chemicals and wastes that can be released/spilled must know how to employ techniques to minimize or prevent harm to life, environment, or property. Certain chemicals or hazard classifications have specific response requirements. Any department using chemicals that will need special response steps, such as compressed gasses, highly reactive or water reactive substances, or very volatile chemicals, must have the appropriate response equipment on hand to contain or confine the release/spill. Information about the specific response equipment needed can be found in the chemical's SDS.

### 1. Hazardous Release/Spill Assessment

Once initial response steps have begun and the control zone has been evacuated and closed off to prevent employee injury, *Form 1: Hazardous Release/Spill Assessment* is to be completed to determine the scope of clean up procedures. The assessment will be completed by a knowledgeable person from the work area where the release/spill occurred with assistance from EH&S and/or other affected parties (DPS, FMS, etc) as needed. The assessment will include determining the magnitude of the release/spill, a review of the chemical's Safety Data Sheet (SDS) to determine specific hazard characteristics, and identification of other hazards such as broken glass or fire risk. Containment and confinement needs will also be addressed during the Hazardous Release/Spill Assessment.

Information Detailed in *Form 1: Hazardous Release/Spill Assessment* will be used to determine if the release/spill can be cleaned up by PCC employees or if a third-party HAZMAT Team shall be called. There are many factors that will affect this determination:

- If the chemical identity is known or unknown
- The volume of the release/spill
- The hazards associated with the chemical
- The level of PPE required
- Other contributing conditions

PCC will not perform any clean-up operations if the identity and hazards of the chemical are unknown. In those situations, PCC employees must call for a trained, third party, HAZMAT Team. PCC has contracted services for handling hazardous material releases/spills and cleanup, as well as hazardous materials waste disposal. The contractor's telephone numbers are maintained by FMS and DPS.

Information about chemical hazards can be found in the chemical's SDS. Any chemical that is highly toxic, highly flammable, reactive, a compressed gas, or very corrosive will be contained and confined by trained PCC employees and cleaned up by a third-party HAZMAT Team. SDSs can be accessed through PCC's online database by following the desktop icon on PCC computers or link on the EH&S webpage. For more

information about SDSs, see *Ch 8 - Hazard Communication Plan*.

## **2. Site Work Plan**

If it is determined that an outside contractor will perform the clean-up, the contractor will complete a Site Work Plan according to their company's procedures.

If it is determined that PCC employees will perform the clean-up, *Form 2: Site Work Plan* will be used to detail the process and PPE requirements. PCC employees trained in Hazardous Material Emergency Response will receive training in how to complete and carry out a Site Work Plan. EH&S will act as the EOC Safety Officer for these Site Work Plans and assist the department where the release/spill originated in developing the steps of the Plan.

To develop the Site Work Plan, a review of *Form 1* along with an assessment of individual clean up tasks will be used to ensure the proper PPE is chosen and there is enough spill response material available. PCC will only provide PPE up to Level C which includes body protection and air purified respiratory protection. Any release/spill response requiring Level A or B PPE (air supplied respiratory protection) must be performed by a third-party, HAZMAT Team.

## **3. Clean Up Procedures**

Chemical release/spill clean-up will be supervised by the Safety Officer (a member of EH&S staff) and follow all safety and hazardous waste disposal requirements. PCC employees selected to be part of the clean-up team will don proper PPE and obtain the proper spill response material specified in *Form 2: Site Work Plan*. If the chemical is not already contained and/or confined, the team will begin by confining the release/spill to keep the chemical from spreading. The faster the release can be confined; the less damage will occur.

Spill Kits are located in campus areas where hazardous materials or waste could be released/spilled. It is the responsibility of the Department where the spill kit resides to see that the kits are maintained and available for emergency response.

Once the chemical is confined, then it can be neutralized, if appropriate, and cleaned up. EH&S will recommend or provide waste containers as needed for the used spill response material to ensure it is managed properly. Care will be taken to keep the clean-up activities as close to the control zone as possible to reduce the chances of contaminating other areas or exposing other employees.

Once clean-up activities are complete, employees performing the clean-up will decontaminate or dispose of their PPE and equipment to prevent the hazardous substance from spreading outside the control zone. Decontamination procedures are specific to the chemical and will be outlined as part of *Form 2: Site Work Plan*. If extensive decontamination is needed, one member of the clean-up team will be responsible for assembling the equipment and supervising the process. Testing may be done to ensure that employees and students can safely return to the area.

## **4. Release/Spill Incident Review and Reporting**

It is difficult to give a general rule as to what is a "reportable spill" because the volumes vary based on the hazards of the chemical. Department of Environmental Quality (DEQ) reporting varies based on type of material and amount. Some PCC facilities may be required to maintain Spill Prevention, Control, and Countermeasure (SPCC) Plans which have their own reporting requirements. Any facility that meets certain thresholds

of aboveground or underground chemical storage is required by the EPA to develop and maintain a SPCC Plan which contains information on the locations and volumes of chemical storage containers along with spill prevention and response procedures specific to those containers. PCC's SPCC Plans can be obtained by request from EH&S.

The EH&S Manager will determine if a release/spill meets reporting thresholds and will handle the regulatory notification to DEQ and any other agency that the release/spill must be reported to within the required timeframe. A reportable release/spill includes any amount of oil into state waterways, oil or fuel spills on land that exceed 42 gallons, and any release/spill amount that exceeds the EPA Reportable Quantity for that chemical. The listing of EPA Reportable Quantities can be found in 40 CFR 302.4.

Investigations of chemical release/spill incidents must be conducted in order to identify areas of improvement for PCC work practices as well as the Hazardous Material Emergency Response Plan. It will be the responsibility of the EH&S Manager or the Safety Officer to take notes throughout the response process. These notes shall be used to critique the response activities and for any future reference while documenting the investigation. The details of the sequence of operations prior to the release/spill incident should be precise and contain sufficient information to satisfy further investigation.

The release/spill incident must be reported through DPS so that an official report can be generated. *Form 1: Hazardous Release/Spill Assessment*, *Form 2: Site Work Plan*, and response notes will all be used to assist in the investigation.

The investigation should document the following details:

- Location of the release/spill
- Date the release/spill occurred or was discovered
- Chemical name, quantity, and cause of release
- Weather information (if an outdoor spill/release)
- Names and job assignments for all employees participating in the emergency response process
- Any injuries/exposures to employees and/or public
- Corrective actions taken
- Chronological record of events
- Entry and exit times of emergency response team members
- Air monitoring results (if any were taken)
- Personnel data for Non-PCC Emergency Responders
- Changes in procedures needed to preclude the release/spill incident and any procedures that would have assisted the response.

This information may also be required if a release exceeds the reportable quantities of the chemical or is large enough to require reporting according to the site's SPCC Plan.

The investigation will also serve to determine where the financial responsibility of the release/spill response will land. It will be the responsibility of the department where the release/spill originated to cover any expenses incurred due to the clean-up operations.

## **5. Emergency Medical Treatment and First Aid**

There may be a time when employees or supervisors suspect that an employee has been exposed to a hazardous chemical to a degree and in a manner that might have caused harm to the employee. If circumstances suggest a reasonable suspicion of



exposure, the exposed employee is entitled to a medical consultation and, if so determined in the consultation, also to a medical examination at no cost to the exposed employee.

If the suspected exposure occurs during emergency response procedures, the employee will be removed from the release/spill area and DPS will be contacted to request First Responder assistance. DPS may provide first aid as needed until First Responders arrive.

#### **a. Medical Consultation and Examination**

The details of medical consultations and examinations are determined by the physician. The purpose of a medical consultation is to determine whether a medical examination is warranted.

When warranted, an employee should receive a medical examination from or under the direct supervision of a licensed physician who is experienced in treating individuals of chemical overexposure. The medical professional should also be knowledgeable about which tests or procedures are appropriate to determine if there has been an over-exposure; these diagnostic techniques are called "differential diagnoses."

In the event of a medical consultation, the employee or employee's supervisor will provide the physician with:

- The identity of the hazardous chemical or chemicals to which the employee may have been exposed.
- The exposure conditions.
- The signs and symptoms of exposure the exposed employee is experiencing, if any.
- Safety Data Sheets (SDS) for hazardous chemicals.

Ordinarily, a physician will furnish to the employer in written form:

- Recommendations for a follow-up, if determined to be pertinent.
- A record of the results of the consultation and, if applicable, of the examination and any tests that were conducted.
- Conclusions concerning any other medical condition noted that could put the employee at increased risk.
- A statement that the employee has been informed both of the results of the consultation or examination, and of any medical condition that may require further examination or treatment.

These written statements and records should not reveal specific findings that are not related to the occupational exposure.

#### **b. Documentation**

All memos, notes and reports related to a complaint of actual or possible exposure to a hazardous chemical are to be maintained by the employee's department as part of the employee's record for thirty years after their employment ends.

#### **c. Notification**

An employee shall be notified by the physician of the results of any medical consultation or examination with regard to any medical conditions that exist or might exist as a result of over-exposure to a hazardous chemical.

## **C. Department Preparations and Countermeasures**

Each department using chemicals must have preparations and countermeasures in place to prevent releases/spills or to respond in the event of a release/spill. This can be in the form of release/spill containment equipment, release detection meters, spill response material, or site-specific communication plans.

### **1. Spill Containment/Confinement**

Departments should implement spill containment or confinement equipment in chemical storage and use areas. This can be secondary containment in the form of buckets or trays under the chemical's primary container, or other engineering controls designed to prevent a release/spill from spreading to other areas. Depending on the chemical's primary container, there are some secondary spill containment devices designed to fit specific container dimensions and volumes, such as carboy trays or drum racks.

Departments should review their chemical inventories and select secondary containment large enough to catch/hold the full volume of the largest container stored within and placed so that incompatible chemicals will be separate in the event of a spill or release.

If a department is using compressed gasses or chemicals that can release high concentrations of hazardous vapors indoors, a review of the building exhaust system should be completed with FMS to identify what steps should be taken to vent the room in the event of a release. The review should include the chemicals hazards, the conditions that would contribute to the release (punctured container, contact with moisture or air, etc.), the exhaust route within the system, and which, if any, additional work areas could be impacted. If it is possible to isolate the release area from the rest of the building while exhausting the chemicals, steps for notification and initiating the system isolation should be established between the department and FMS.

### **2. Leak Detection**

Leak detection equipment can provide early warning in the event of a release for some chemical use situations. They are particularly helpful when the chemical system has components that are difficult to access, such as some storage tanks, or when the chemical is a compressed gas. Any department using leak detection equipment should maintain the equipment according to manufacturer guidance or regulatory requirements. The equipment should be serviced regularly to ensure it is working as intended and calibrated appropriately.

Departments should establish response steps for the event that a leak detector is triggered. These steps should include who to notify of the potential leak, what systems or equipment should be used to isolate the leak, and what steps should be taken to determine the extent of the leak.

### **3. Absorbents and Neutralizers**

Departments should have appropriate spill response material on hand for confining a spill. This should include absorbent material to clean up liquid spills, broom and dustpan to clean up solid spills or loose absorbent, and chemical neutralization appropriate to the chemical hazards present in the space.

Departments should base the contents of their spill kits on an assessment of the various

chemical hazards present as well as the quantity of each chemical stored. A chemical's SDS will often have information on accidental release measures which can inform some of the equipment needed. Spill kits should include enough absorbent material to respond to a release/spill from the highest volume container in the work area.

Absorbent material may be purchased in many forms, including:

- absorbent sheets
- socks or booms
- loose absorbents (clay or cellulose based)
- vapor suppressants

Product information for each absorbent material includes information about what chemical classes the absorbent is appropriate for as well as the volume the material can absorb.

Some chemical classes can be neutralized during the release response process to aid in clean-up. Departments choosing to keep chemical neutralization options on hand should confirm with the product information what chemical classes they are compatible with and how much product is needed for neutralization.

#### **4. Site-Specific Communication Plans**

Some departments might require a more detailed initial response due to the hazards associated with the chemicals stored in their area.

Any department that requires a more detailed initial response should work with EH&S to establish site-specific communication plans and ensure DPS and FMS are aware of the specific steps for responding to that work area. The department should be sure to identify specific employees and provide their information so they can be contacted in the event of an emergency. Additionally, any special considerations for entering the space should be listed, including PPE requirements, sensor/alarm panel instructions, or other hazards that may be present in the space. It is recommended that all site-specific communication plans be posted near the entrance to chemical use and storage areas so that other PCC employees are aware of the precautions and contact information.

For the EH&S managed campus waste accumulation locations, no PCC employees should enter waste rooms or sheds unless EH&S is present. Contents of the waste accumulation locations vary depending on the time of year and can require specific levels of PPE to enter.

## **V. EMPLOYEE TRAINING**

Select PCC employees will be trained in chemical release/spill response and may be called on to be part of PCC clean up teams as needed. These employees will be from multiple departments across the district and can include, but are not limited to, Managers, Instructors, Instructional Support Technicians (IST), or various operational employees. Employees selected to be trained in the Hazardous Material Emergency Response Plan will go through two levels of training to ensure they are able to respond adequately during an emergency situation.

### **1. General Training**

EH&S has developed general training for selected employees which includes the types of hazards they could encounter and the procedures they might be expected to perform. Additionally, Chemical hazard training will be part of the Hazard Communication training

all new employees receive from EH&S and their individual departments as outlined in *Chapter 8 – Hazard Communication Plan*.

PCC employees selected to receive Hazardous Material Emergency Response training will receive general training on the following:

- Elements of the Emergency Response Plan
- Performing Hazardous Release/Spill Assessments
- Completing Site Work Plans
- Containment and confinement procedures
- Basic spill clean-up materials and their use
- Levels of PPE and PPE assessments
- Overview of decontamination procedures

Some employees selected for release/spill response training may also be part of PCC's Respiratory Protection Plan. Any employee that is covered by the Respirator Protection Plan must be medically qualified to use a respirator and be annually trained and fit tested. For more information on respirator use, see *Chapter 17 - Respiratory Protection Plan*.

## **2. Department Specific Training**

Departments are responsible for providing their employees training on chemical specific prevention and clean-up procedures. This should include:

- Types of spill response material used
- Location of spill response material
- Absorbents and/or neutralizers to be used
- Secondary containment and confinement equipment
- Release monitoring devices and maintenance
- Department specific communication plans

Once *Form 2: Site Work Plan* has been completed and the PCC clean up team members have been selected, team members will get additional site-specific training on the following:

- Specifics of the Site Work Plan
- Specific hazards of the chemical and release/spill site
- PPE requirements for all tasks
- Specific clean-up procedures
- Decontamination procedures for each task

Clean-up activities in laboratory areas may have specific training requirements if employees have the potential of being exposed to certain chemicals.

## **VI.RECORD KEEPING**

**Hazardous Release/Spill Assessment forms** including copies of the chemical's SDS will be maintained by EH&S for three years.

**Injury/Illness/Near Miss and Property Damage/Theft Incident Reports** will be managed according to procedures established by Risk Services and/or DPS.

**Supervisor Investigation Reports** resulting from employee injuries, illnesses, or near misses will be maintained by EH&S.

**Medical consultation and examination results** will be maintained by the health care provider and a summary statement will be provided to the individual employee with a copy maintained in the employee's confidential medical file by PSEC for thirty years plus employment time.

**Safety Data Sheets (SDS):** SDS and chemical inventories are maintained by EH&S in an online inventory system. Each department using chemicals should have a back-up system of paper copies or a USB drive of that location's inventory.

**Site Work Plans** and their corresponding notes will be maintained by EH&S for three years.

**SPCC Plans** and their associated inspection records will be maintained by EH&S and FMS and are available upon request.

**Training records** shall be retained in PCC's learning management software or by the employee's department.