

Portland Community College Health & Safety Manual

Dept: Environmental Health and Safety (EH&S)

Function: Facilities Management Services

Topic: Chapter 7 — Hazardous Material

Emergency Response Plan

Board Policy: Revised Date: B507 May 2022

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

Summary	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.
---------	---

Sections	I. Purpose
Jections	II. Authority
	III. Responsibility
	IV. Procedures
	A. Reporting Emergencies and Requesting Basic Response
	B. Hazardous Material Emergency Response
	Initial Response
	2. Hazardous Release Assessment
	3. Site Work Plan
	4. Clean-up Procedures
	5. Incident Review and Reporting
	6. Emergency Medical Treatment and First Aid
	C. Department Preparations and Countermeasures
	Spill Containment/Confinement
	2. Leak Detection
	3. Absorbents and Neutralizers
	V. Employee Training
	VI. Recordkeeping
Appendices	A: Definitions
	B: Spill Kit Contents and Locations
	C: Personal Protective Equipment
Forms	1: Hazardous Release/Spill Assessment
	2: Site Work Plan
	2. OILE WOLK I IGH
	1

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. A summary of campus wide Emergency Procedures can be found in the "Emergency Guide" which is also available on the DPS webpage as well as posted in common areas and classrooms across the district.

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:

Department of Public Safety (DPS):

- Develops the campus and district wide Emergency Operations Plan which includes evacuation procedures.
- Assists EH&S in developing the Hazardous Material Emergency Response Plan.
- Maintains an updated telephone list of all PCC emergency staff as well as a copy of the emergency vendor list from FMS.
- Notifies appropriate campus staff and responders of a campus emergency
- Ensures Hazardous Release/Spill Assessment forms are attached to all relevant DPS incident reports.

Environmental Health & Safety (EH&S):

- Develops the Hazardous Material Emergency Response Plan and facilitates the associated training
- Is trained in Hazardous Waste Operations and Emergency Response (HAZWOPER 40 hours) to enable the oversight for a hazardous materials response
- Maintains Hazardous Release/Spill Assessment and Site Work Plan documents for all PCC spill incidents
- Ensures that any required site specific Spill Prevention, Control, and Countermeasure (SPCC) Plans are reviewed annually and updated as needed

Facilities Management Services (FMS):

- Assists during emergencies, such as shutting down natural gas lines or de-energizing electrical service, to prevent further hazards
- Ensures that emergency equipment such as fire protection system are maintained and functional
- Ensures that annual inspections are completed according to SPCC requirements
- Ensures that SPCC facility maps are updated whenever there is significant changes at a campus
- Maintains 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

Supervisor/Manager/Deans:

- Provides backup for DPS and EH&S in responding to campus emergencies
- Assigns designated employees to be trained in Hazardous Material Emergency Response to serve on PCC HazMat Response Teams
- Ensures assessments are completed to determine what secondary containment and/or spill response materials are needed for each chemical use and storage areas in their department
- Maintains any leak detection equipment used in their department's work area

Designated Departments Employees and PCC HazMat Response Teams:

- Be trained in the Hazardous Material Emergency Response Plan
- Oversees hazardous material use and waste generated in either their instructional operations or specific facility/operation activities.
- Be up to date on basic hazard awareness so that they are able to handle incidental spills/releases with spill kits provided in the vicinity of the hazardous materials or waste storage sites.
- Maintains and inspects contents of Emergency Spill Kits in their designated work areas.

All Employees:

- Notifies DPS of an emergency and the nature of the emergency
- Be familiar with basic reporting and response as found on the DPS webpage

Contract Hazardous Materials Responders:

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. For quick reference, the DPS dispatcher has access to the online Safety Data Sheets (SDS) database. More information on the SDS database can be found in *Chapter 8 – Hazard Communication Plan*.

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 regular 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 a chemical release/spill:

Immediately notify DPS dispatch and your supervisor. If safe to do so, DPS will secure the area and notify FMS by contacting the Service Request Center (SRC) or the FMS On-Call Manager. If not safe, DPS will take steps to keep others from the area. Any release/spill of less than 1 gallon can be cleaned up by employees in that work area who are familiar with the chemical. Any release/spill greater than 1 gal will require Form 1: Hazardous Release/Spill Assessment be completed to determine the level of response needed for the release/spill.

If trained in the Hazardous Material Emergency Response Plan, immediately begin procedures to contain and confine the release. If there is significant material release immediately evacuate the area.

Emergency Spill Kits are located in laboratories, shops, and other chemical use locations. A list of these locations can be found in *Appendix B: Emergency Spill Kit Contents and Locations*.

2. Post emergency response:

If there has been a chemical release, DPS, EH&S, and FMS will determine when re-entry is safe. PCC staff will confer with local fire and law enforcement if they are on-site to ensure it is safe for re-entry. DPS and EH&S will complete an incident report and investigation.

B. Hazardous Material Emergency Response

This section of the plan outlines PCC's response procedures, including clean-up and reporting responsibilities, for releases/spills greater than one gallon or that are particularly hazardous. Releases/spills of one gallon or less of a known chemical with minimal hazards may be cleaned up by the employees who work with the chemical and are trained in handling the chemical including how to take all necessary safety precautions. For all releases/spills greater than 50 gallons, the PCC procedure is to evacuate and call in a third party, trained Hazardous Material Response (HAZMAT) Team.

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

- Level of training of those employees who are called on 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. Initial Response

The following steps are to be taken by employees who discover a chemical release/spill:

- Evacuate: When a chemical release/spill 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 includes 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 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. Proper notification procedures are outlined in Section IV under "Reporting Emergencies".
- Isolate the area: If safe to do so and feasible, DPS Officers will isolate the area around a release/spill to ensure no one accidently 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.

 Hazardous Material Emergency Response Trained employees only: Select employees will be 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. The method of containment and confinement varies with the physical state of the hazardous material released. No employee will engage in clean-up operations until Form 1: Hazardous Release/Spill Assessment has been completed.

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

2. Hazardous Release/Spill Assessment

Once the control zone has been evacuated and closed off to prevent employee injury, an assessment is to be completed to determine the scope of clean up procedures. The assessment will be performed by a knowledgeable person from the work area where the release/spill occurred, EH&S, and/or other affected parties (DPS, FMS, ect.) and will be completed by using *Form 1: Hazardous Release/Spill Assessment*. 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.

The findings of the Hazardous Release/Spill Assessment will 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. Containment and confinement needs will also be addressed during the Hazardous Release/Spill Assessment.

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

3. 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 completed to detail the process and PPE requirements for the clean-up. Select PCC employees will receive training in how to complete and carry out a Site Work Plan. These trained employees may be called upon to serve on PCC's HazMat Response Team in the event of a release/spill.

To complete the Site Work Plan, a hazard review will be completed of the chemical as well as the release/spill location and individual clean up tasks 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. For a listing of PPE provided by PCC and the departments trained in that PPE, please see *Appendix C: Personal Protective Equipment*.

4. Clean Up Procedures

Chemical release/spill clean-up will be directed by EH&S staff following all safety and hazardous waste disposal requirements. PCC employees selected to be part of the PCC HazMat Response Team will don proper personal protective equipment and obtain the proper spill response material required for the chemical. 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 there will be.

Emergency Spill Kits are located in campus areas where hazardous materials or waste could be released/spilled. For a listing of spill clean-up kits and their contents, please see *Appendix B: Emergency Spill Kit Contents and Locations*. 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 absorbed. EH&S will 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 release/spill area 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 release/spill area. Decontamination procedures are specific to the nature of the chemical and will be outlined as part of the Site Work Plan. If extensive decontamination is needed, one member of the HazMat Response 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.

5. 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 select storage containers along with spill prevention and response procedures specific to those containers. PCC's SPCC Plans can be requested by request from EH&S.

The EH&S Manager will determine if a release/spill needs to be reported 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.

Incident 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 other primary spill response coordinator 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 incident should be precise, and contain sufficient information to satisfy further investigation.

The incident must be reported through DPS so that an official incident report can be generated. The incident report, 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
- Chemical name, description, source, 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 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 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.

6. 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, or spill response material.

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 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 surpresents

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.

V. EMPLOYEE TRAINING

Select PCC employees will be trained in chemical release/spill response and may be called on to be part of PCC HazMat Response Teams as needed. These employees will be from multiple departments across the district and can include Managers, Instructors, Instructional Support Technicians (IST), or various FMS employees. Employees selected to be trained in the Hazardous Material Emergency Response Plan will go through two phases of training.

1. Initial Training

Initial training for selected employees shall include the types of hazards they could encounter and the procedures they might be expected to perform. 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*.

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*.

PCC employees selected to receive Hazardous Material Emergency Response training will receive initial 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

2. Site Specific Training

Once a Site Work Plan has been completed and the PCC HazMat Response Team members have been selected, team members will get 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.

The initial training will be given by an EH&S staff. Site Work Plan training will be given by the Primary Spill Response Coordinator. The program and training must be designed to ensure that the selected employees are able to respond adequately during an emergency situation.

VI.RECORD KEEPING

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

Incident Reports will be maintained by Risk Services and DPS.

Investigation Reports 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 Human Resources for thirty years plus employment time.

Safety Data Sheets (SDS): SDS and chemical inventories are maintained by EH&S in the online computer software system. Each lab must have a back-up system of paper copies or a USB drive of that location's inventory. The SDS program or dated inventory is required to be maintained for at least thirty years.

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 by the employee's department. EH&S will maintain copies of the training records.