

# **WNC Policies and Procedures Manual**

Procedure: **EH&S RECORD KEEPING**

Policy No.: 11-10-1

Department: Environmental Health and Safety (EH&S)

Contact: Environmental Health and Safety Officer

Policy: Certain Environmental Health and Safety records must be secured and maintained by regulation. The policy establishes those requirements at Western Nevada College.

Key Words:

Employee Training Records

Material Safety Data Sheets Waste Manifests

Worker's Employee Compensation Records

## **Section 1. Scope**

- A. Both OSHA and EPA regulations as regulated by the State of Nevada require that certain Environmental Health and Safety records be maintained and reports be filed. It is the responsibility of all employees and their supervisors to provide the information as described below to the appropriate department for the proper maintenance. Please contact EH&S for guidance.
- B. At WNC, several departments, divisions, Nevada System of Higher Education offices, and other state entities are responsible for maintaining these critical EH&S records. These entities include:
- WNC Environmental Health and Safety Department
  - WNC Facilities and Planning Department
  - Business Center North (NSHE)
  - WNC Human Relations Department
  - State Attorney General's Office
  - Appropriate WNC Divisions and Departments

## **Section 2. Procedure**

### **A. Training Records**

1. Supervisors and department or division managers shall assure that copies of their employee's safety training records are forwarded to the Environmental Health and Safety Department. This includes training records and safety or environmental certifications received.
2. Environmental Health and Safety shall have a record system where by employee training records are stored and can be retrieved.

### **B. Hazardous Materials**

1. Hazardous Waste Generators (such as WNC) are required under 40 CFR, the Nevada Administrative Code and the Nevada Revised Statutes to perform several duties with respect to record keeping and reporting. That reporting includes:
  - Biennial Reporting (for each required location)
  - Exception Reporting (relating to manifests)
  - Records Retention (relating to manifests and other documentation)
  - Test Results, Waste Analysis and other Determinations

Notes:

1. It should be noted that for hazardous materials shipped out of state, a copy of the completed manifest must be sent to the Nevada Division of Environmental Protection Las Vegas office.
2. Requirements for retention durations can be extended automatically (see the detailed regulations).
3. All employees involved in hazardous waste generation must familiarize themselves with these record keeping requirements.

C. Other Waste Materials (common waste, industrial waste, and universal waste)

1. Records shall be maintained for wastes that are not manifested including but not limited to:
  - Batteries
  - Light Ballasts
  - Used Oil
  - Used Anti Freeze
  - Used Fluorescent Lamps
  - E-Wastes
2. The records should indicate the amount, date, and company that accepted the waste. All other waste material disposal records shall be forwarded to Environmental Health and Safety. The Environmental Health and Safety Department will maintain these records for the required durations.
3. If hazardous materials are stored at a campus, a Hazardous Material Storage Permit(s) is required for each campus. This permit must be maintained on file. In addition the application for this permit must be kept on file.
4. WNC has discharge permits for the Carson auto shop and photography lab. These active permits must be maintained on file as must the test results that supplement the permits.

D. Material Safety Data Sheets

1. Product Material Safety Data Sheets are to be filed in the workplace. A copy of all new MSDS's in addition to being filed shall be sent to Environmental Health and Safety. Old or out-of-date MSDS's must be maintained. Old and out-of-date MSDS's shall be so marked and sent to EH&S for filing and maintenance. These records must be maintained for 30 years.

#### E. Workers Compensation Documentation

1. Supervisors and department or division managers shall send copies of workers compensation documentation or potential workers compensation cases to EH&S. EH&S shall send this documentation to NSHE Business Center North. This shall include the records related to medical treatment or prescription drugs if those costs are intended to be recovered from workers compensation. BCN shall be the entity that maintains these records.

#### F. Accident Reports

1. Supervisors and department or division managers shall send copies of documentation relating to an accident involving the injury of an employee, student, or campus visitor shall be forwarded to EH&S. In addition, they should request that EH&S perform an accident investigation if an OSHA or EPA violation. Student and campus visitor injury reports and accident investigation shall be sent through EH&S, to Business Center North or the State Attorney General office for record maintenance.
2. EH&S shall maintain accident reports relating to employee, student, and visitor accidents that do not result in accidents that precipitate workers compensation, student insurance claims, or potential claims with the State Attorney General.

#### G. Fire Alarm and Extinguishing System, Other Building Maintenance and Construction/Renovation Records

1. Facilities and Planning shall maintain all documentation relating to building and system maintenance, and construction/renovation operation, including all records relating to fire extinguishers and fire systems, cranes, tanks, equipment (including elevators) certifications, and calibrations. They shall also retain records related to operating and occupancy permits.

#### H. Other Environmental and Safety Documentation.

1. Facilities, EH&S, divisions and departments shall work jointly in many areas to maintain necessary records relating to the records required

below. In all cases the group with primary responsibility for record retention is listed below.

- Asbestos Survey-EH&S
- Asbestos Remediation-Facilities
- Asbestos Free New Construction-Facilities
- Biological Inventory-Responsible division(s)
- Chemical Inventory-Responsible department /division
- Air Quality Permits-Facilities
- Storm Water/Sewer Permits-Facilities
- Spill prevention control and countermeasures-Facilities
- Insecticide, fungicide, rodenticide exposure records-Facilities
- OSHA medical records-EH&S or Human Resources
- Fit test records-EH&S
- Confined space permits-EH&S
- Board of Health permits-the department or division
- Operational permits typically required for:
  - 1.) Carnivals and fairs
  - 2.) Any activity involving an open flame in a building,
  - 3.) Any large hazardous or flammable process or
  - 4.) A tent over 200 square feet and/or a canopy over 400 square feet. These permits should be obtained from the division or departments