

University of Tennessee

Safety Policy

Policy Subject: Records Retention for Safety, Health and Environmental Protection	Approval Date: 12/15/2014
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Contact Information: Policy Owner: Environmental Health and Safety	

1.0 Purpose, Applicability, and Scope

- 1.1 Purpose (Include regulatory requirements) - The purpose of this procedure is to provide guidance for the proper management records related to safety, industrial hygiene and environmental protection
- 1.2 Applicability – This shall apply to all employees in all departments on the University of Tennessee Knoxville campus.
- 1.3 Scope – This standard applies to records that are required by OSHA, EPA, State Fire Marshal’s Office, NFPA, DOT and other state and federal agencies involved with safety, industrial hygiene and environmental protection.

2.0 Abbreviations, Acronyms, and Definitions

2.1 Abbreviations/Acronyms

- DOT - Department of Transportation
- EHS – Environmental Health and Safety
- EPA – Environmental Protection Agency
- NFPA – National Fire Protection Association
- OSHA – Occupational Safety and Health Administration (or Act depending on context)
- TSCA – Toxic Substances Control Act

2.2 Definitions

Disposition – Disposition refers to the final stage in the life cycle of records. Disposition may be defined as either the destruction or the transfer of records.

Electronic Record – Records communicated and maintained by means of

electronic equipment.

File – A collection of paper records and/or electronic records grouped together by a common subject.

Record - A record is recorded information, in any form, including data in computer systems, created or received and maintained by an organization or person in the transaction of business or the conduct of affairs and kept as evidence of such activity. A record can be:

- A document (for example, note of a telephone conversation, meetings, notes of discussion, annotation to a record, completed form, graph, chart, plan, drawing or computer printout);
- A type of correspondence (for example, facsimile, e-mail, voice mail, electronic data exchange, letter, memorandum, minute, message, agenda, contract, certificate, data, database, directory, index, register, or log);
- A form of media (for example, electronic organizers, facsimile, electronic mail, disk, erasable optical disc, video, audio tape, film, photograph, photographic negative, microfilm, microfiche, on-line database, a publication, booklet, newspaper, pamphlet, brochure, map, architectural or building plan, catalog, manuals, reproduction or duplicate of a record or part of a record).

3.0 Roles and Responsibility

Deans, Directors, and Department Heads shall:

- a. Maintain records that fall under their department's purview related to safety, industrial hygiene and environmental protection.

Environment, Health and Safety shall:

- a. Maintain a master list of those records that require retention and post on the EHS website.
- b. Identify the length of time a record must be kept. A retention time longer than is specified in the regulation may be recommended by EHS.
- c. Notify departments when a new recordkeeping requirement is identified or a deficiency is noted in the department's records.
- d. Assist departments with recordkeeping where feasible.
- e. Make records available to regulators and others upon request. Note that if litigation is likely, release of records shall be done in coordination with the UT Legal Counsel's office.
- f. Ensure that key records under their control are maintained in a duplicate form in a remote location.

- g. Maintain secure access to records that may have sensitive information
- h. Review, revise and disseminate this procedure as necessary.
- i. Assist other campuses in the UT system with recordkeeping to the extent feasible.

4.0 Procedure

5.0 Recordkeeping

Numerous

6.0 Training and Information

None specific to this standard

7.0 Attachments

Appendix A – Record Retention Guide for Environmental Health and Safety Records

8.0 Association Standards

Numerous

Appendix A

Record Retention Guide for Environmental Health and Safety Records

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Access to Medical Records	Training	29 CFR 1910.1020(g)(1)	Not specified	5 years	IRIS - Events Management or Department
Aerial Lifts and bucket Trucks	Training	29 CFR 1926.453	3 years	5 years	IRIS - Events Management or Department
Air Emissions Inventory	Environmental Compliance	EPA			Facilities Services
Air Monitoring - Any hazardous material	Industrial Hygiene	OSHA			EHS Office
Air Monitoring - Arsenic	Industrial Hygiene	29 CFR 1910.1018(q)	40 years to 20 years past the date of last employment for r the employee	50 years	EHS Office
Arsenic	Training	29 CFR 1910.1018	Not specified	3 years	IRIS - Events Management or Department
Arsenic X-rays	Medical Monitoring	29 CFR 1910.1018 (q)(2)	5 years	5 years	Employee Health
Asbestos - Bulk sampling	Environmental Management	EPA	3 years		Facilities Services
Asbestos - personal sampling	Industrial Hygiene	29 CFR 1910.1001 (m)	30 years	50 years	EHS Office
Asbestos Awareness Training	Training	29 CFR 1910.1001 (m)(4)	1 year past the date of last employment	50 years	IRIS - Events Management or Department
Asbestos - medical monitoring	Medical Monitoring	29 CFR 1910.1001 (m)(3)	30 years	50 years	Employee Health
Asbestos Containing Material - Objective Data	Industrial Hygiene	OSHA 1926.1101(n)(1)(i) also 29 CFR 1910.1001 (m)(2)	No specified	20 years	

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Asbestos Containing Materials -Preventive Measures or Response Action	Environmental Compliance	EPA 763.94 Recordkeeping.	3 years		
Asbestos Containing Materials -Removal Location	Environmental Compliance	EPA 763.94 Recordkeeping.	3 years after next reinspection		Facilities Services, TN Fitts
Asbestos Inspector	Training	29 CFR 1910.1001	Not specified	3 years	IRIS - Events Management or Department
Asbestos Project Manager	Training	29 CFR 1910.1000	Not specified	3 years	IRIS - Events Management or Department
Asbestos Containing Materials - Periodic Surveillance	Environmental Compliance	EPA 763.94 Recordkeeping.	3 Years		Facilities Services or EHS
Audiometer calibration (annual)	Medical Monitoring	29 CFR 1910.95 - Appendix C and E	Not specified	3 years	Employee Health
Audiometric Testing - Baseline and Annual	Medical Monitoring	29 CFR 1910.95	40 years to 20 years past the date of last employment for the employee	50 years	Employee Health
Audiometry - functional test (daily)	Medical Monitoring	29 CFR 1910.95	Not specified		Employee Health
Audiometry calibration - Every 2 years - Exhaustive	Medical Monitoring	29 CFR 1910.95	Not specified		Employee Health
Biosafety Cabinet Certification	Biosafety	ANSI NSF 49	Current		On outside of cabinet
Bloodborne Pathogens	Training	29 CFR 1910.1030	Not specified	3 years	IRIS - Events Management or Department
Bloodborne Pathogens - declination of immunization	Medical Records	29 CFR 1910.1030	40 years to 20 years past the date of last employment for the employee	50 years	Employee Health

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Bloodborne Pathogens - post exposure medical treatment and follow up	Medical Records	29 CFR 1910.1030	40 years to 20 years past the date of last employment for r the employee	50 years	Employee Health
Bloodborne Pathogens HEP B vaccination	Medical Records	29 CFR 1910.1030	40 years to 20 years past the date of last employment for r the employee	50 years	Employee Health
Building Inspection Reports	General Safety	Not specified	Not specified	10 years	EHS Office
Chemical Fume Hood Tests	Laboratory Safety	Not specified	Not specified	10 years	EHS Office and Radiation Safety
Chemical Hygiene Plan	Training	29 CFR 1910.1450	Not specified	3 years	Department Files
Chemical Inventories	Laboratory Safety	29 CFR 1910.1020(d)	30 years	50 years	Facilities Services Server
Clearance Air Monitoring - Asbestos	Environmental Management	EPA	30 years past date of last employment		Facilities Services
Compressed Gas Cylinders	Training	OSHA	Not specified	3 years	IRIS - Events Management or Department
Confined space - completed permits	General Safety	29 CFR 1910.146 (e)(6)	3 years	3 years	Department Files
Confined Space Entry	Training	29 CFR 1910.146 (g)	Not specified	3 years	IRIS - Events Management or Department
Correspondence with EPA	Environmental Compliance	EPA	Not specified	20 years	EHS Office
Correspondence with TOSHA	General Safety	OSHA	Not specified	20 years	EHS Office
DOT - Shippers of Hazardous Materials	Training	DOT	3 years	3 years	IRIS - Events Management or Department
DOT Security Plan	Environmental Compliance	DOT	Annually	Annually	EHS Office

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Electrical Safety Work Practices	Training	29 CFR 1910.332	Not specified	3 years	IRIS - Events Management or Department
Emergency Action Plan	Training	29 CFR 1910.38	Not specified	3 years	IRIS - Events Management or Department
Employee Accident Reports	General Safety	State Claims	5 years		Workers Compensation Office
Employee Alarm Systems	Training	29 CFR 1910.165	Not specified	3 years	IRIS - Events Management or Department
Employee Exposure Records	Industrial Hygiene	29 CFR 1910.1020(d)	30 years	50 years	EHS Office
Employee Medical Records	Medical Monitoring	29 CFR 1910.1020(d)	Duration of Employment plus 30 years	50 years	Employee Health
EPCRA Annual Report	Environmental Compliance	EPA	Not specified	30 years	EHS Office
Fall Protection	Training	29 CFR 1926.503	Not specified	3 years	IRIS - Events Management or Department
Fire					
Fire Prevention Plan	Training	29 CFR 1910.39	Not specified	3 years	IRIS - Events Management or Department
Fire Alarm System Testing	Fire Safety	Fire Code	Not specified	3 years	Fire
Fire Drills	Fire Safety	Fire Code	Not specified	3 years	EHS Office
Fire Extinguisher Firm - Authorized Firm	Fire Safety	Fire Code	Not specified	3 years	EHS Office
Fire Extinguisher Inventory	Fire Safety	Fire Code	Not specified	3 years	EHS Office
Fire Extinguishers - Monthly Record of Inspections	Fire Safety	Fire Code	Not specified	3 years	EHS Office
Fire Inspector - Licensed Technician	Fire Safety	State Licensing	Not specified	3 years	EHS Office
Fire Protection System Impairments	Fire Safety	OSHA	Not specified	3 years	EHS Office
Fire Protection System Testing	Fire Safety	Fire Code	Not specified	3 years	Facilities Services

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Fire Suppression Systems	Training	29 CFR 1910.160	Not specified	3 years	IRIS - Events Management or Department
First Aid	Training	29 CFR 1910.151	Not specified	3 years	IRIS - Events Management or Department
Forklift Operation	Training	29 CFR 1910.178	Not specified	3 years	IRIS - Events Management or Department
Formaldehyde	Training	29 CFR 1910.1048 (o)	Not specified	3 years	IRIS - Events Management or Department
Formaldehyde - person air monitoring	Industrial Hygiene	29 CFR 1910.1048 (o)(5)(i)	30 years	40 years	EHS
Formaldehyde - medical monitoring	Occupational Health	29 CFR 1910.1048 (o)(5)	Duration of Employment plus 30 years	40 years	Employee Health
Hazard Communication	Training	29 CFR 1910.1200	Not specified	3 years	IRIS - Events Management or Department
Hazardous Waste - Annual Reports	Environmental Compliance	40 CFR 372 c	3 years	50 years	EHS Office
Hazardous Waste - Annual Reports, Offsite Shipping	Environmental Compliance	40 CFR 372 c	3 years	50 years	EHS Office
Hazardous Waste Contingency Plan	Environmental Compliance	40 CFR 373-4	Keep current	5 years for past copies	EHS Office
Hazardous Waste Determinations	Environmental Compliance	40 CFR 372 c	3 years	50 years	EHS Office
Hazardous Waste Management	Training	40 CFR 373-3.3	3 years beyond the date of last employment		IRIS - Events Management or Department
Hazardous Waste Manifests	Environmental Compliance	40 CFR 262	3 years	50 years	EHS Office
Hazardous Waste Reduction Plan	Environmental Compliance	TN Hazardous Waste Act 1990	3 years	5 years for past copies	EHS Office
Hazardous Waste Release	Environmental Compliance	EPA			EHS Office, Facilities Services

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
HAZWOPER	Training	29CFR 1910.120	Not specified	3 years	IRIS - Events Management or Department
Hearing Conservation	Training	29 CFR 1910.95	Not specified	3 years	IRIS - Events Management or Department
Hot Work Permit	General Safety	OSHA	3 years		
IATA - Shippers of Hazardous Materials	Training	DOT	3 years	3 years	IRIS - Events Management or Department
IBC Required Documents	Biosafety	IBC	3 years after expiration or termination		IBC Office
Interim Life Safety Plans	Fire Safety	Fire Code	Not specified		EHS
Laser safety	Training	OSHA	Not specified	3 years	IRIS - Events Management or Department
Lead Paint Firm	Environmental Compliance	EPA			
Lead Paint Inspector - Certification	Training	EPA	3 years	3 years	IRIS - Events Management or Department
Lead Paint notice for child occupied residential facilities - acknowledgement of receipt	Environmental Compliance	EPA	Not specified	10 years	Department Files
Lead Paint Risk Assessor - Certification	Training	EPA	3 years	3 years	IRIS - Events Management or Department
Lead Paint Sampling Results for Day cares and child occupied facilities	Environmental Compliance	EPA	Not specified	10 years	EHS Office
Local Exhaust Ventilation System Testing	General Safety	Not specified	Not specified	3 years	EHS Office
Lockout/Tagout	Training	29 CFR 1910.147	3 years	3 years	IRIS - Events Management or Department
Lockout/Tagout - Annual Audit	General Safety	OSHA	Not specified	3 years	Department Files

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Material Safety Data Sheets (MSDS)	Hazardous Materials Management	29 CFR 1910.1200	40 years to 20 years past the date of last employment for r the employee	50 years	EHS Office
Medical Evaluation for Respirator Use	Medical Monitoring	29 CFR 1910.134	40 years to 20 years past the date of last employment for r the employee	50 years	EHS Office
Medical Records for Pesticide Applicators	Medical Records	DOA	40 years to 20 years past the date of last employment for r the employee	50 years	Employee Health
Medical Screening Forms - Respirator Use	Medical Monitoring	29 CFR 1910.134	40 years to 20 years past the date of last employment for r the employee	50 years	EHS Office
Medical Surveillance - Pre-employment, Annual, Termination for Hazwoper	Medical Monitoring	OSHA	40 years to 20 years past the date of last employment for r the employee	50 years	Employee Health
Medical Surveillance Following Exposure-	Medical Monitoring	EPA	40 years to 20 years past the date of last employment for r the employee	50 years	Employee Health
Motor Oil Spill Exceeding 25 gallons	Environmental Compliance	EPA			EHS Office
Noise Meter calibration	Industrial Hygiene	29 CFR 1910.95	Not specified	3 years	EHS Office
Noise Monitoring	Industrial Hygiene	29 CFR 1910.95(m)(3)	2 years	10 years	EHS Office

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Offsite shipment of universal waste	Environmental Compliance	EPA	3 years		Facilities Services
OSHA 300 End of Year	General Safety	OSHA	7 years		Workers Compensation Office
Oxygen-fuel gas welding and cutting	Training	29 CFR 1910.253(a)(4)	Not specified	3 years	IRIS - Events Management or Department
Personal Protective Equipment	Training	29 CFR 1910.132	Not specified	3 years	IRIS - Events Management or Department
Personal Protective Equipment - Assessment	General Safety	29 CFR 1910.132	Not specified	10 years	Department Files
Pesticide Application Records	Environmental Management	DOA			Facilities Services, Athletic Department
Pesticide Application Records - pesticide used, target pest, name of applicator, date, dilution, property owner, application rate	Environmental Compliance	TCA 0080-06-14-.12	2 years	5 years	Facilities Services, Athletic Dept.
Physician's Opinion - Audiometric testing	Medical Monitoring	29 CFR 1910.95	40 years to 20 years past the date of last employment for r the employee		Employee Health
Portable Fire Extinguishers	Training	29 CFR 1910.157	Not specified	3 years	IRIS - Events Management or Department
Respirator Fit Testing	Industrial Hygiene	29 CFR 1910.134	Until the next fit testing is conducted	3 years	EHS Office
Respirators	Training	29 CFR 1910.134	Not specified	3 years	IRIS - Events Management or Department
Respirators Used for Emergency Purposes - Monthly Inspection	General Safety	OSHA			EHS Office
Safety and health complaint reports	General Safety	Not specified	Not specified	10 years	EHS Office

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
SPCC - Periodic Tank Inspection	Environmental Compliance	40 CFR 112	3 years		EHS Office, Facilities Services
Spill Prevention Control and Countermeasures	Training	40 CFR 112	Not specified	3 years	IRIS - Events Management or Department
Steam Plant - Monthly Inspection	Environmental Compliance	EPA			Facilities Services
Steam Plant - Annual Storm Water - Site Assessment	Environmental Compliance	EPA	3 years		Facilities Services
Steam Plant - Annual Storm Water Analysis	Environmental Management	EPA	3 years		Facilities Services
Steam Plant - Quarterly Storm Water Visual Examination	Environmental Management	40 CFR			EHS
Storm Water - Oil/Water Separator - periodic inspection and maintenance	Environmental Compliance	EPA			Facilities Services
Storm Water Pollution Prevention - Steam Plant	Training	EPA	Not specified	3 years	IRIS - Events Management or Department
TDEC Site Visits	Environmental Compliance	EPA			EHS Office
TOSHA Site Visits	General Safety	OSHA			EHS Office
Underground Storage Tanks - Closed Clean	Environmental Compliance	EPA		50 years	
Underground Storage Tanks - Discharges Reports	Environmental Compliance	EPA			
Underground Storage Tanks - Leak Detection	Environmental Compliance	EPA			Motor Pool
Underground Storage Tanks - Permits	Environmental Compliance	EPA	3 years	50 years	Facilities Services
Underground Storage Tanks - Spill Bucket Inspection	Environmental Compliance	EPA	3 years	50 years	Motor Pool
Underground Storage Tanks - Tightness Integrity Testing	Environmental Compliance	EPA	3 years	50 years	Motor Pool

Area	Record Type	Required by	Length of Retention (regulatory)	Length of Retention (good practice)	Location of Record
Universal Waste	Training	40 CFR	Not specified	3 years	IRIS - Events Management or Department
Visitor Accident/Incident Reports	General Safety	State Claims	7 years		Risk Management
Waste Oil Burner - Oil Composition Testing	EPA	EPA			Motor Pool
Waste Oil Burner - Permits	EPA	EPA			Motor Pool
Waste Water Annual Sampling for Discharge	Environmental Compliance	EPA			
Arc Welding, Cutting	Training	29 CFR 1910.254 (d)(1)	Not specified	3 years	IRIS - Events Management or Department