

CHAPTER 8 - PROGRAM REPORTING AND RECORDKEEPING PROCEDURES

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CHAPTER 8 - PROGRAM REPORTING AND RECORDKEEPING PROCEDURES

A. INTRODUCTION

1. There are various reporting, recordkeeping, and retention requirements specific to each element of an organization's Safety, Health, and Environmental Program. This data, properly managed, is used for required submissions to appropriate authorities to fulfill federal and state regulatory requirements. It also provides the bases for early and effective evaluation of program trends, such as injury and illness prevention efforts; hazardous waste minimization and expenditures; inspection, testing, and maintenance reports; radiation safety program compliance, etc. Program data will also enable early identification of undesirable trends.
2. Specific records, retention periods, and the office or organization responsible for maintenance are detailed in this Chapter. General recordkeeping and recording requirements are also presented. Where necessary, more specific reporting and recordkeeping information is detailed in the referenced operational chapters of this *Manual*.

B. REPORTING REQUIREMENTS

1. SI Organizational Safety Program Report. Each year, upon notification by OSHEM, each organizational director shall forward to the Director, OSHEM, a report summarizing the previous fiscal year's occupational safety and health program activities. The report shall address:
 - a. Management and leadership of the safety committee.
 - b. Activities of the safety committee.
 - c. Annual safety training summary report.
 - d. Special program initiatives and promotional activities accomplished.
 - e. Summary of inspection activities.
 - f. Safety program goals for new fiscal year.
 - g. Other information as required for the Annual SI Report to OSHA.

- h. A list of the safety committee members and a schedule of committee meetings for the next fiscal year.
2. Occupational Health and Environmental Management. [Attachment 1](#) lists the recurring reports required by various federal and state agencies. When other recurring or ad hoc reports may be required, the appropriate organization and facility directors will be advised as needed.

C. RECORDS RETENTION

1. As a minimum, all records required by this *Manual* must be retained for a period of 5 years (unless otherwise specified in [Attachment 2](#)).
2. All records with a listed retention period must be retained for the specified period at the museum or facility or origin, as specified in [Attachment 2](#). A 5-year retention means that all such documents for a given fiscal year (FY) are to be retained through the end of the fiscal year five years hence. Thus, a record for FY 2006 would be available until the end of FY 2011.
3. Throughout this *Manual*, specific retention periods may be cited for various occupational safety and health-related reports and records. Most are listed in [Attachment 2](#) for easy reference.

D. ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS

1. Within the parameters of OSHA 1910.1020, employees and their designated representatives have the right of access to relevant exposure and medical records. As defined, “access” means the right and opportunity to examine and copy. “Designated representative” includes any individual or organization to whom an employee gives written authorization to exercise a right of access.
2. Requests for access to employee medical records shall be forwarded to the Associate Director for Occupational Health Services, OSHEM.

Attachment 1

Occupational Health and Environmental Management Reporting Requirements

REPORTING REQUIREMENT	APPLIES TO:	DEADLINE	GENERATED BY:	REPORT SENT TO:	CHAPTER & STANDARDS
UST Registration	Tank operators	January 1(DC) As required by State	Facility/Tank Operator	State	Chapter 30 State Regulations
RCRA- Hazardous Waste Report	Federal LQG (States may require Annual)	March 1 (Even numbered years)	Facility Hazardous Waste Coordinator	State	Chapter 29 40 CFR 262.41
DC/HWMA-Self Certification	DC CESQG and SQG	March 1	Facility Hazardous Waste Coordinator	DC	Chapter 29 20 DCMR 4262.6
EPCRA-Tier One or Tier Two Report	Facilities subject to EPCRA/SARA Title III	March 1	Facility	SERC/LEPC/Local Fire Dept	Chapter 28 40 CFR 355
CAA-Point Source Air Emissions Inventory	Major sources of HAPs	March 31	Facility	State	Chapter 28 40 CFR 63
SPCC plan amendment	Oil storage greater than 1320 gallons	2009	Facility	Maintained at Facility	Chapter 28 40 CFR 112
WSSC – Low Level Radioactive Waste Survey Report	Maryland facilities that generate Low Level Rad Waste for sewer disposal	March 1	OSHEM	MD Dept of the Environment	Chapter 32 State regulations
MA – Low level Radioactive Waste Disposal	Massachusetts Rad Waste Generators	March 1	OSHEM	Mass. Dept. of Health	Chapter 32 State regulations

Attachment 2

Records Retention

RECORDS	RETENTION PERIOD	RETAINED BY:	CHAPTER & STANDARD
Safety Committee Minutes	5 years	Organization	Chapter 2
OSHEM Inspection Reports (METR)	5 years	Organization	Chapter 4
Facility Self Inspections & Program Reviews	5 years	Organization	Chapter 4
Safety, Health, Environmental Training Rosters	5 years minimum, unless superseded by a longer retention requirement listed below.	Organization, OSHEM (for OSHEM provided training.)	Chapter 6
Employee Injury/Illness Reports	5 years	Organization	Chapter 7
OSHA Form 300 and Summary	5 years	Organization	Chapter 7
Fire Incident Reports	Permanent Retention	Organization, FSD	Chapter 7
Hot Work Permits	Permanent	Organization (Zone Manager)	Chapter 14
Asbestos Inspection Samples	Life of building (Duration of building ownership + transfer to subsequent owners)	Organization	Chapter 22 1910.1001
Asbestos Notifications to Building Occupants	Life of building (Duration of building ownership + transfer to subsequent owners)	Organization	Chapter 22 1926.1001
Asbestos Awareness Training & Certifications	Duration of employment + 1 year, or 5 years, whichever is longer	Organization	Chapter 22 1910.1001, 1926.1101
Lead Inspection Samples	Life of building (Duration of building ownership + transfer to subsequent owners)	OSHEM & Organization	Chapter 23 1926.62, 1910.1025
Hazardous Material/Chemical Inventory	At least 30 years. (Standard specifies copies to be retained; e-version archives suggested.)	Organization	Chapter 25 1910.1020

Attachment 2

MSDSs	Retained for chemicals in current use. MSDSs for chemicals no longer used may be discarded as long as the chemical is identified in historic chemical inventories.	Organization	Chapter 25 1910.1020
Ventilation Evaluations	5 years	OSHEM	Ch. 27
CWA-SPCC (Insp & Test)	3 yrs	Facility	Chapter 28 40 CFR 112
RCRA- HW Generator Training	Permanent Retention	HW Coordinator @ Generator Facility	Chapter 29 40 CFR 265.16
RCRA –Manifests	Permanent Retention w/ last 3 years available for inspection	HW Coordinator @ Generator Facility	Chapter 29 40 CFR 262.40
RCRA Biennial Report	Permanent Retention w/ last 3 years available for inspection	HW Coordinator @ Generator Facility, EMD	Chapter 29 40 CFR 262.40
RCRA-Universal Waste	Permanent Retention w/ last 3 years available for inspection	HW Coordinator @ Generator Facility	Chapter 29 40 CFR 273.13 40 CFR 273.39
RCRA-Used Oil	Permanent Retention w/ last 3 years available for inspection	Generator Facility	Chapter 29 40 CFR 279
DC HW Compliance Self Certification	Permanent Retention w/ last 3 years available for inspection	Generator Facility, EMD	Chapter 29 20 DCMR 4262.6
UST Registration	Permanent	Facility, EMD	Chapter 30 40 CFR 280.
UST O&M	Permanent	Facility	Chapter 30 40 CFR 280.34
UST Closure	Permanent	Facility, EMD	Chapter 30 40 CFR 280.74
FIFRA- Pesticide Application Documentation	Generally 2 yrs, may vary by State	Facility	Chapter 31 State Regulations
Radioactive Materials Storage and Use	As long as in possession + 3 years.	Organization	Chapter 32 10 CFR 20
Radiation Training	5 years	Organization	Chapter 32 10 CFR 20

Attachment 2

Inspection, Testing, and Maintenance (ITM) reports	For the operational life of the fire protection/alarm system.	Organization (Zone Manager)	Chapter 35
Fire System Impairment Permits	Permanent Retention	Organization (Zone Manager)	Chapter 36
Employee Exposure Measurements	Duration of employment + 30 years	OSHEM & Organization	Chapter 38 1910.1020
Employee Medical Monitoring & Surveillance	Duration of employment + 30 years	OSHEM	Chapter 38 1910.1020
Noise Survey (area) Measurements	5 years	OSHEM & Organization	Chapter 40 1910.95
Audiometric test records	Duration of employment + 30 years	OSHEM	Chapter 40 1910.1020 supersedes 1910.95
Noise exposure training records	Duration of employment + 30 years	OSHEM	Chapter 40 1910.1020 supersedes 1910.95