


SUNY OSWEGO

ENVIRONMENTAL HEALTH AND SAFETY MANUAL

Record Retention

Policy Number EHS-RR-2019	Revision Number 00	Effective Date 10/01/19
Approval Signature 		Approval Date 10/7/19

1.0 PURPOSE

The purpose of this program is to provide guidance to SUNY Oswego Environmental Health and Safety employees and comply with state and federal regulations.

2.0 APPLICABILITY

This program applies to all SUNY Oswego Environmental Health and Safety staff.

3.0 REFERENCES

1. 6 NYCRR
2. OSHA Standard
3. SUNY Record Retention Policy

4.0 RESPONSIBILITIES

4.1 Director Environmental Health and Safety is responsible for educating employees on record retention policy.

4.2 Employees are responsible to retain records for the minimum record retention time frame.

5.0 PROCEDURE

Record Retention Guidelines

Hazardous Waste		
Manifest (including LDRs and other docs; e-manifest can be use)	3 yrs from date was accepted by the initial transporter	6 NYCRR Part 372.2(c)(1)(i)
Annual Report	3 yrs from due date of the report	6 NYCRR Part 372.2(c)(1)(ii)
Exception Report	3 yrs from due date of the report	6 NYCRR Part 372.2(c)(1)(ii)
Test results, waste analysis, or other determinations	3 yrs from the date the waste was last sent to an on-site or off-site TSD	6 NYCRR Part 372.2(c)(1)(iii)
Any haz waste records associated with an unresolved enforcement activity or upon request of the Commissioner	Extended	6 NYCRR Part 372.2(c)(1)(v)
Universal Waste (LQH) records of shipment	3 yrs from shipment	6 NYCRR 374-3.3(j)
Petroleum Bulk Storage		
UST leak detection records	3 yrs	6 NYCRR Part 613-2.3(e)
UST periodic tightness testing	3 yrs	6 NYCRR Part 613-2.4
UST cathodic protection and leak detection systems	1 yr	6 NYCRR Part 613-2.2(b) or 2.3(b)

AST 10 yr inspections and monthly inspections	10 yrs; monthly records for 3 yrs	6 NYCRR Part 613-4.3
Air Emissions		
Monthly natural gas, et. al. consumption records for boilers subject to NSPS	5 yrs	40 CFR Part 60.48(c)(g)
Preconstruction/change notifications; Startup, shutdown, and malfunction records for natural gas, et. al. fired boilers subject to NSPS	2 yrs from the date of measurement, maintenance or record	40 CFR Part 60.7(a)(b)and (f)
Emissions cap by rule	5 yrs	6 NYCRR Part 201-4.5(c)
Fuel composition sulfur limitations	5 yrs	6 NYCRR Part 225-1.6
Proof of eligibility of exempt activities	5 yrs	6 NYCRR Part 201-3.2
Proof of eligibility of trivial activities	5 yrs	6 NYCRR Part 201-3.3
Each emission statement and supporting calculations, data, and estimates	5 yrs	6 NYCRR Part 202-2.5
SPCC		
Inspections, tests, and records with written procedures	3 yrs	40 CFR Part 112.7(e)
Medical Waste		
Tracking forms and exception reports	3 yrs	6 NYCRR Part 364.9(e)
Storm Water and Wastewater Discharges (SPDES)		
All reports, monitoring information and measurements required by a SPDES permit, and data used to complete SPDES permit applications.	5 yrs, unless extended by DEC written request, from date of sample measurement, report or application.	6 NYCRR Part 750-2.5(c)(1)
Pesticide Applications		
Date, place, method, type and dosage rate of pesticide applied, and target organism.	3 yrs	6 NYCRR Part 325.25(a)
Refrigerants		
Servicing records and reports for appliances containing ≥ 50 lbs of refrigerants (Substances containing whole or in part Class I or II ODS)	3 yrs	40 CFR Part 82.166 (k)(m)(n)(o)(p)(q)
PCBs		

Annual reports, manifests, and certificates of destruction, clean up and inspection records	3 years after the facility no longer triggers the requirements	40 CFR 761.180
Hazardous Materials		
Training records for each person who performs a hazmat packaging, labeling, or marking function or who otherwise offers a hazmat for transportation	3 yrs or at least 90 days after ending employment as a hazmat employee.	49 CFR Part 172.704(d)
Aerial Lifts and Bucket Trucks		
Training	5 yrs	29 CFR 1926.453
Air Monitoring - Any Hazardous material		
Industrial Hygiene	3 yrs.	OSHA
Asbestos - Bulk Sampling		
Environmental Management	3 yrs	EPA
Asbestos Awareness Training		
Training	1 year past the date of last employment	29 CFR 1910.1001 (m)(4)
Asbestos - Medical Monitoring		
Medical Monitoring	30 yrs	29 CFR 1910.1001 (m)(3)
Asbestos Inspector		
Training	3 years after next reinspection	29 CFR 1910.1001
Asbestos Project Manager		
Training	Not specified	29 CFR 1910.1000
Audiometric Testing - Baseline and Annual		

Medical Monitoring	40 years to 20 years past the date of last employment for the employee	29 CFR 1910.95
Bloodborne Pathogens		
Training	3 yrs	29 CFR 1910.1030
Bloodborne Pathogens - Declination of Immunization		
Medical Records	40 years to 20 years past the date of last employment for the employee	29 CFR 1910.1030
Bloodborne Pathogens HEP B Vaccination		
Medical Records	40 years to 20 years past the date of last employment for the employee	29 CFR 1910.1030
Chemical Fume Hood Tests		
Laboratory Safety	Not specified	EHS
Chemical Inventories		
Laboratory Safety	30 yrs	29 CFR 19.10.1020 (d)
Confined Space - Completed Permits		
General Safety	3 yrs	29 CFR 1910.146 (e)(6)
Confined Space Entry		
Training	3 yrs	29 CFR 1910.146 (g)
Correspondence with EPA		
Environmental Compliance	Not specified	EPA
DOT - Shippers of Hazardous Materials		
Training	3 yrs	DOT
Electrical Safety Work Practices		
Training	3 yrs	29 CFR 1910.332

Emergency Action Plan		
Training	Not specified	29 CFR 1910.38
Employee Accident Reports		
General Safety	5 yrs	State Claims
Employee Exposure Records		
Industrial Hygiene	30 yrs	29 CFR 1910.1020 (d)
EPRCA Medical Records		
Environmental Compliance	Not specified	EPA
Ergonomics/Safe Lifting/Material Handling		
Training	1 yr	29 CFR 1910.900
Fall Protection		
Training	Not specified	29 CFR 1926.503
Fire Prevention Plan		
Training	Not specified	29 CFR 1910.39
Fire Extinguisher Inventory		
Fire Safety	10 yrs	Fire Code 901.6.2
Fire Extinguishers - Monthly Record of Inspections		
Fire Safety	10 yrs	Fire Code 901.6.2
Fire Protection System Impairments		
Fire Safety	10 yrs	OSHA
Fire Protection System Testing		
Fire Safety	10 yrs	Fire Code
Fire Suppression Systems		
Training	10 yrs	29 CFR 1910.160
Forklift Operator		
Training	3 yrs	29 CFR 1910.178
Hand and Power Tools		
Training	5 yrs	29 CFR 1910.266
Hazard Communications		
Training	30 years	29 CFR 1910.1200
Hearing Conservation		
Training	Duration of employment plus 30 yrs	29 CFR 1910.95
Hot Work Permit		

General Safety	3 yrs	OSHA
Ladder Safety		
Training	5 yrs	29 CFR 1910.1053
Lift Operator		
Training	5 yrs	29 CFR 1926.453
Lockout/Tagout		
Training	3 yrs	29 CFR 1910.147
Lockout/Tagout - Annual Audit		
General Safety	Not specified	OSHA
Material Safety Data Sheets (MSDS)		
Hazardous Materials Management	40 years to 20 years past the date of last employment for the employee	29 CFR 1910.1200
Medical Evaluation for Respirator Use		
Medical Monitoring	40 years to 20 years past the date of last employment for the employee	29 CFR 1910.134
Noise Meter Calibration		
Industrial Hygiene	Not specified	29 CFR 1910.95
Permit Required Confined Space		
Training	5 yrs	29 CFR 1910.146
Personal Protective Equipment		
Training	5 yrs	29 CFR 1910.132
Portable Fire Extinguishers		
Training	5 yrs	29 CFR 1910.157
Power Industrial Trucks		
Training	5 yrs	29 CFR 1910.178
Respirator Fit Testing		

Industrial Hygiene	Until the next fit testing is conducted	29 CFR 1910.134
Respiratory Protection		
Training	Duration of employment plus 30 yrs	29 CFR 1910.139
Silica		
Training	Regulation: 1 yr past date of employment. Best practice: 50 yrs	29 CFR 1926.1153
Scaffold		
Training	5 yrs	29 CFR 1926.454
Trenching and Excavations		
Training	Duration of employment	29 CFR 1926.651
Welding		
Training	Duration of employment	29 CFR 1910.252
Work Zone Safety		
Training	3 yrs	EHS

6.0 DEFINITIONS

7.0 ATTACHMENTS

None