



Records, Records and More Records

By Carol Keyes, CRC, CSP, CHESS, Inc.

Whether you are paperless or not, you need to decide what records to keep and for how long. What is the best way to organize those records so you can find them easily when needed?

Who requires records? What records are needed? An OSHA inspector will want to see your safety programs, training records, respirator medical records, safety committee minutes (if you have twenty-five or more employees), OSHA 300 logs and, of course, Safety Data Sheets. A hazardous waste inspector is going to look at hazardous waste manifests, weekly waste inspection logs, and annual reports. If you have to do annual waste or air reporting, you'll find those reports easier to complete if the records are in one designated spot.

If you can keep all of your safety records together and your hazardous waste records together, they will be easier to find when an inspector shows up. Some safety records, such as medical surveillance or injury reports, are confidential and should be kept with Human Resource files. But keep the others in one designated location, such as a file drawer.

Safety programs: Keep the most current version. You should be reviewing these on a regular basis (every year or so), and updating them as needed – for instance, if the people responsible for specific parts change. Mark the review date on the program and note any changes. Programs may include A Workplace Accident and Injury Reduction (AWAIR) program, Right to Know program, your respirator program, general safety program, emergency plan, and personal protective equipment program.



Safety and environmental training: Every shop should have Right to Know training records. These should list who did the training, when it was done, what it covered and who attended. If employees are required to use respirators, you also need to have respirator training and fit testing records. If people received training on hazardous waste handling, either at your shop or from an outside source (e.g., the training put on by metro county hazardous waste enforcers), keep records of that. If your painters went to a seminar on efficient painting methods (6H training), maintain those records. Keep records for at least three years or until the next training session, whichever is longer.

Respirator fit test records: You must keep the most current records. We generally recommend you keep at least three years. If there are any problems with a fit test, it helps to see what was done in prior years (if the employee could detect the test agent, what size respirator was worn).

Building inspections: While there is no specific requirement to keep these, we recommend saving them for at least two years: one full year and one year in progress (so, all of your 2014 inspection records and 2015).

Safety data sheets: You need to have safety data sheets available for nearly all hazardous products used by your employees (the exception: consumer products used the way you'd use the product at home). Those can be available electronically or as paper copies. You also need to keep a list of chemicals (products) used, where and when used, for at least 30 years beyond when you stopped using the product. You can keep that as the safety data sheets (either on paper or electronically), if you want. The purpose of this requirement: if we learn that mechanics have a higher risk of developing a disease that doesn't show up until years after exposure, we want to be able to figure out what could have caused that.

OSHA 300 logs and injury information: If you have more than ten employees at any time during the year, you must keep a log of all injuries or illnesses that occur in your workplace and that require medical treatment. You must keep that OSHA injury log for five years, and it must be kept up to date. OSHA has a specific definition of medical treatment (generally, work restrictions, medication, stitches, treatment that could only be given by a medical provider). If you have an employee who had an injury in 2013 and now requires surgery in 2015, you must update your 2013 OSHA 300 log.

Audiometric testing: If your employees can be exposed to an average of 85 dBA or more, you should be offering them hearing tests. Once they've had the hearing tests, you must keep those records for the duration of the employee's employment.

Medical evaluations, such as for wearing respirators: Keep for duration of employment, plus 30 years.

Industrial hygiene monitoring results: If you've had noise or air monitoring done, you should keep those records to demonstrate employee exposures. Because these are a record of what employees were exposed to, they need to be kept for duration of employment plus thirty years. Some specific monitoring (such as for lead or chromium) require record retention of 40 years or 20 years beyond the last date of employment (basically, forever).

Safety committee minutes and agendas: There is no time requirement. You probably want to keep at least three years of minutes, to know what issues have been discussed and what progress has been made. More than five to seven years and the information becomes less relevant.

It may take some time to set up your records, but once you do, they are usually easy to maintain. If you have a place to put information, it is less likely to get lost or misplaced when it is needed.

If you have questions about this or any other safety and health related questions, contact CHESS at 651-481-9787; toll free at 877-482-4377, or carkey@chess-safety.com

<p>This article is intended to provide general information (not advice) about current safety topics. To discuss your specific concerns and how CHESS may help, please contact CHESS at 651-481-9787 or chess@chess-safety.com</p>

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