

Interoffice Communication

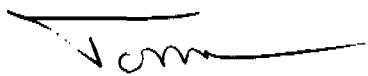
To: Safety Directors
 From: Tom Grumbles
 Date: January 13, 1981
 Subject: PRESERVATION OF SAMPLING RECORDS

The recently implemented OSHA Medical and Exposure Records Access Standard requires that exposure records be preserved and maintained for at least 30 years, except that background data need only be retained for one year, so long as sampling results and methodology are maintained for 30 years. The specific section of the standard dealing with this requirement is attached.

This requirement applies unless a specific OSHA standard provides a different retention time. Under the new standard, any background data is requestable if we maintain it even though we are only required to keep such information for one year. This could create an unnecessary administrative burden in the future. In view of this standard I recommend the following:

1. For all chemicals measured, verify that your laboratory procedures for determining personal exposures are documented and complete. If the methodology changed at sometime record the date and reasons for the change.
2. Laboratory background data (GC tracings, calculation sheets, etc.) need only be retained for one year. Such records that are older than this should be destroyed if no other useful purpose exists for them.

Please discuss this with the persons involved in the sample analytical work at your plant, or any others involved in records retention affected by the standard.


 Thomas G. Grumbles

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Enclosure

cc Michele Malloy
 Plant Managers