Chemical Hygiene Program: Requirements for Record Keeping

Medical/Monitoring Records:

OSHA's Laboratory Standard (29 CFR 1910.20) requires school employees to establish and maintain accurate records of exposure monitoring results, medical consultation and examinations. Records of exposure and data analyses must be stored for 30 years. Employee medical records must also be kept for 30 years after the duration of employment. An exception to this requirement is if the employee has worked less than 1 year. In this case, the employer need not retain the records after employment, but must provide these records to the employee at the termination of employment.

Training Program Records:

Additional record keeping needs to be effected relative to training programs. Documentation is required in the following way:

- Employee participants must sign in on a roster listing their names. The name of the presenter, date, time and location should also be provided.

- A training workshop agenda must also be provided.

- Records of 1 & 2 must be kept on file for inspection by OSHA compliance officers if requested as proof of training.

Inspections:

If a chemical hygiene officer does inspections of school science laboratories, additional records should be kept noting dates, locations and items to be rectified.

Department Meetings:

Science departments often have safety items on their department meeting agendas. It would be prudent to have safety as a standing agenda item. A safety concern can be addressed at each meeting with the purpose of improving employee safety. This action would be looked upon as a good faith effort, should it be needed in the future at an OSHA inspection.

Chemical Hygiene Plan and Record Keeping:

An earnest attempt was made to list all states requiring Chemical Hygiene Plans in a Laboratory Standard. Check with state labor departments for confirmation.

States Requiring Chemical Hygiene Plans:

LIVE LONG AND PROSPER WITH SAFETY!

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