

# **UNIVERSITY OF WISCONSIN - MADISON**

# RECORDS RETENTION AND DISPOSITION SCHEDULE FOR

# FACILITIES PLANNING AND MANAGEMENT ENVIRONMENTAL HEALTH AND SAFETY

2016

We the undersigned have reviewed the above records series and approve the outlined retention and disposition. Approval is contingent on restrictions on records destruction contained in Wis. Stat. § 19.35(5), Wisconsin Statutes, (Open Records Law) and that no records are destroyed if litigation or audit involving these records has commenced or is imminent.

7	2106/14/21
Dean/Department Chair/Administrative Officer	Date
Poul Umbeck Dean/Dept. Chair/Admin. Officer-PLEASE PRINT	
University Legal Counsel	1-7-16 Date
Margaret & Eusch	1-4-2016
University Records Officer	Date
University Archivist	<u>/- 4-/6</u> Date
Mase Blum	3/8/16
State Archivist	Date
Executive Secretary - PRB	3/17/2016
APPROVAL SUBJECT TO 10-YEAR	Buto
PRIOR TO March 2026	

# UNIVERSITY OF WISCONSIN - MADISON: GENERAL RECORDS AND DISPOSITION SCHEDULES

#### I. INTRODUCTION AND PURPOSE

This retention schedule represents the official University of Wisconsin-Madison policy with regard to the retention and disposition of all university and public records and information and has the approval of the University Records Management Advisory Group (URMAG) and the Wisconsin Public Records Board (PRB). The PRB is the statutory body with the responsibility to safeguard the financial, legal, administrative, and historical interests of the State in the disposition of records through the review of records schedules prepared by State agencies.

This retention schedule also provides guidance to University of Wisconsin-Madison employees regarding what does and does not comprise a public record. The UW-Madison campus must manage all records to ensure systematic control from creation or receipt through processing, distribution, maintenance, retrieval, retention and final disposal for records retention purposes.

#### II. SCOPE:

This schedule pertains to the records and information arising from currently understood UW-Madison record policies and procedures. It applies to all such records regardless of format or media. While an attempt has been made to describe the records in commonly used terms, there may be instances in which the schedule does not reflect the exact title or name used by a given department. If offices or departments cannot determine by the descriptive information provided on each item whether a given departmental record is covered or not, they should contact the University Records Officer. An attempt has been made to include all records commonly required or used within the University campus. However, as processes change, forms may be modified and new ones created, and documentation requirements may also change. This schedule will be reviewed periodically to insure that it is kept as up-to-date as possible. This schedule applies to all organizational units of the University of Wisconsin-Madison and any attached entities that are required to follow UW-Madison policies.

### III. SUSPENSION OF THE RECORDS RETENTION SCHEDULE

University and Public Records may be delayed from disposition / destruction only under the following conditions:

- 1. Particular records have been identified as needed for a financial or performance audit.
- 2. Records that are required for legal proceedings are held under a "litigation hold" for an actual or imminent legal proceeding. Imminent meaning legal action is anticipated or there is reasonable expectation thereof.
- 3. An open records request has been received and not completed. **Contact University Relations.** See Office of Legal Affairs Public Records <a href="http://legal.wisc.edu/public-records.htm">http://legal.wisc.edu/public-records.htm</a>

- 4. The Wisconsin Open Records Law, Wis. Stat. §19.35(5), forbids the destruction of any record after an inspection or copying request until the request is granted, or at least 60 days after the date that the request was denied. Court orders and litigation may extent this time period. The agency's legal custodian of records can provide advice. For the University of Wisconsin Madison the legal custodian is the University Relations in the Chancellor's Office.
- 5. "It is the responsibility of the office holding the record to determine if an audit or litigation is pending, anticipated or imminent, of if an open record request is pending or the time specified in Wis. Stat. §19.35(5) has not yet elapsed."

#### 1. UTILITY AND FUNCTION OF INFORMATION PROVIDED WITHIN THIS DOCUMENT

#### a. Minimum Retention Established and Permanent Retention Procedure

The records retention schedules included within this document establish minimum retention periods for each type of record. The disposition of each record is assumed to be destruction after its minimum retention period or transfer to the UW Archives.

### b. Materials That Comprise Public Records

Under Wisconsin law, many materials comprise public records performing the transaction of public business on behalf of the University Campus. Under Wis. Stat. §16.61, Public records are defined as "all books, papers, maps, photographs, films, recordings, optical disks, electronically formatted documents or other documentary materials, regardless of physical form or characteristics, made, or received by any state agency or its officers or employees in connection with the transaction of public business."

# c. Materials That **Do Not** Comprise Public Records

Under Wisconsin law, many materials do not comprise public records. Therefore, non-records should be retained only so long as they are useful as a resource for performing the transaction of public business on behalf of the University Campus. Thereafter, in the interest of efficiency and proper resource management, they should be destroyed. Under Wis. Stat. §16.61, the definition of "Record" does not include: duplicate copies of materials the original copies of which are in the custody of the University and which are maintained only for convenience or reference and for no other substantive purpose; materials in the possession of a library or museum made or acquired solely for reference or exhibition purposes); notices or invitations received by the University that were not solicited by the University and that are not related to any official action taken, proposed or considered by the University); drafts, notes, preliminary computations and like materials prepared for the originator's personal use or prepared by the originator in the name of a person for whom the originator is working; and routing slips and envelopes).

#### d. Preservation of Historical Documents

Historically, University records have been preserved in paper files. Presently, however, advances in technology are beginning to present a viable alternative to paper records: electronic data stored in many electronic systems. Because of the potential for electronically-

preserved information to be lost over time as electronic systems degrade or become obsolete, electronic systems should be used as the primary manner of preserving historical documents only if measures are implemented to ensure appropriate updates to the electronic storage systems are consistently purchased, installed, and maintained, and to ensure the appropriate migration of the electronically-stored information as electronic systems become obsolete and are replaced by new technologies.

Because of the consequences of failing to appropriately maintain electronic information technology systems, records storage within an electronic information system must comply with the legal requirements set forth in <u>Board of Regents Policy Document 3-2: University of Wisconsin System Public Records Management</u>; and <u>Wisconsin Administrative Rule 12</u>: Electronic Records Management-Standards and Requirements.

Please carefully review these documents prior to storing official copies of public records upon information systems and if you have questions or concerns, then please seek assistance from the University Records Officer.

# **Using the Schedule**

- Use the table to locate the record series item.
- Identify whether you are the holder of the official, department, or copy of the record.
- Implement the retention and disposition noted at the level of record you hold.
- If you are uncertain about the records series item or your responsibility for it, contact the Records Officer for clarification.
- Retention periods and disposition methods outlined in this document have been reviewed and approved by the University (University Records Management Advisory Group (URMAG) Consisting of signatures from University Archivist, Office of Legal Affairs and the University Records Officer).

#### UNIVERSITY OF WISCONSIN- MADISON

Facilities Planning & Management (FP&M) is a service organization reporting to the Associate Vice Chancellor. The division is responsible for the physical development, construction, maintenance and safe operation of the University of Wisconsin-Madison campus.

### **Environment, Health and Safety (EH&S)**

EHS provides guidance, technical consultations, and expertise to the campus community in the areas of biological, chemical, environmental, engineering, radiation, lake and fire safety.

As a major research institution, the UW-Madison provides assurances that its sponsored research activities are in compliance with state and federal regulations and guidelines. In this context, the Institutional Biosafety Committee (IBC) reviews research activities involving biologically hazardous materials and/or recombinant DNA molecules/organisms. The Office of Biological Safety and the IBC are in the process of transitioning paper Biosafety Protocols into Bio-ARROW, the online Biosafety Protocol Form to manage Protocol Registration Records

# This Schedule covers the following record series:

- Safety Data Sheets (SDS)
- Toxic Substance/Hazardous Material Information List
- EHS Internal Workplace Safety Inspections
- EHS Compliance Workplace Safety Inspections
- Industrial and Chemical Hygiene Plans and Supporting Documents and Reports
- EHS General Safety Reports, Issues, Complaints and Inquiries Received/Generated by Safety Staff
- EHS Safety Training Records
- EHS Air Compliance Records
- EHS Hazardous Waste Manifests with related Transportation and Disposal Records
- EHS Hazardous Materials Shipping Papers
- EHS PCB (Polychlorinated Biphenyl) Records
- EHS Hazardous Materials Regulations Training Records
- EHS Radioactive Materials/Radiation <u>Academic and Research</u>
- EHS Radioactive Materials/Radiation Records of Test for Leakage or Contamination
- EHS Radioactive Materials/Radiation <u>Medical Use</u>
- EHS Radioactive Materials/Radiation <u>Radiation Protection Program Changes</u>
- EHS Radioactive Materials/Radiation Radiation Training
- EHS Radioactive Materials/Radiation Radiators Review or Approval Changes
- EHS Radioactive Materials/Radiation <u>Radiators Survey and Tests Inspections</u>
- EHS Radioactive Materials/Radiation <u>Radiation Malfunction Reports</u>
- EHS Radioactive Materials/Radiation <u>Device Receipt and Disposition Records</u>
- EHS Dosimetry Records

- EHS Clean Water Act Compliance Records
- EHS Asbestos and Hazardous Material and Environmental Remediation Case File
- EHS Health, Safety or Fire Code Compliance Records including Variances
- EHS Biological Safety Documents Protocol Registration Records

## \*Access Requirements

Certain information pertaining to research activities, such as the security measures for specific research facilities and the locations of hazardous materials or controlled substances, are exempt from disclosure per federal law and Wis. Stat. §19.36(1), Wis. Stat. §19.36(9) and the balancing test.

# Appraisal Note(s)

These records are in compliance with OSHA requirements 29 CFR§ 1910.1200; OSHA 29CFR§ 1926.1101 and also Wis. Stat.§101.583; 40 CFR§ 262.20; 40 CFR§ 262.40; 40 CFR§ 262.57; 49 CFR§ 172.704; DHS 157.06(1); DHS 157.06(1)

# UW – Madison Division of Facilities Planning and Management – Department of Environment, Health & Safety

Record Series ID Number	Record Series Title	Record Series Description	Retention	Media Type	Disposition	Office of Record
EHS00001	Safety Data Sheets (SDS)	These records are kept in accordance with OSHA requirements to maintain Safety Data Sheets which are provided by manufacturers and importers of hazardous chemicals.	Retention: EVT + 30 years EVENT = Date upon which the employer last received the toxic substance in the workplace.  29 CFR§ 1910.1200 Wis. Stat.§ 101.583(1)(a)  Confidential: No PII: No Access Requirement: Open	Electronic  These are in electronic format. Most use a web based services online to access safety data sheets.	Destroy	Environment, Health and Safety  Campus Labs  NOTE: Individual labs are responsible for their own  NEW Superseding FPM0026
EHS00002	Toxic Substance/Hazardous Material Information List	This records series consist of surveys provided to employee or former employee with information regarding what chemicals they worked with in the past. This allows an employee and medical practitioner to assess the impact of chemical exposure in the past on an employee's current health. Includes the <i>Right to Know Survey</i> .	Retention: EVT + 30 years EVENT = Date upon which the employer last received the toxic substance in the workplace.  29 CFR§ 1910.1200 Wis. Stat.§ 101.583(1)(a)  Copies: Destroy when no longer needed, but do not keep longer than the Original.	Paper and Electronic	Destroy	Environment, Health and Safety EHS maintains these records for the EHS department and not for the campus.  Campus Individual campus offices are responsible for maintenance of these records.

			Confidential: No PII: No Access Requirement: Open			NEW Superseding FPM0030
EHS00003	EHS - Internal Workplace Safety Inspections	Includes safety inspections, audits, surveys or reviews of the workplace initiated or contracted by UW-Madison.	Retention: EVT + 7 years EVENT = Date of Report  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No Access		Destroy	Environment, Health and Safety  NEW
EHS00004	EHS - Compliance Workplace Safety Inspections	Safety inspections, audits, department orders, section violations, corrective action orders and surveys or reviews of the workplace performed by an outside compliance agency such as OSHA or the Department of Safety and Professional Services.  Includes citations and	Requirement: Open  Retention: EVT + 7 years EVENT = Date of Resolution or Compliance Plan  Copies: Destroy when no longer needed, but do not keep longer than the Original.	Paper or Electronic	Destroy	Environment, Health and Safety NEW
		notifications of penalties, results of investigations, Modification Abatement Plan requests, and final	Confidential: No PII: No Access			

University of Wisconsin -Madison Retention and Disposition Schedule for Facility Planning & Management – UW-Madison Environmental Health and Safety

		Abatement Plan documentation.	Requirement: Open			
EHS00005	Industrial and Chemical Hygiene Plans and Supporting Documents and Reports	Includes control measures that protect employees from chemical, physical and/or biological stressors, such as noise, chemical exposures, excessive temperatures, dusts, mists, and vapors, and air quality evaluations / results.	Retention: EVT + 30 years EVT = Date of Report  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No  Access Requirement: Open	Paper or Electronic	Destroy	Campus: Individual labs are responsible for their own  NEW Supersedes FPM027
EHS00006	EHS - General Safety Reports, Issues, Complaints and Inquiries Received/Generated by Safety Staff	Included in the file are responses to all inquiries and noted follow-up steps, if any, to correct any noted deficiencies.  Also includes periodic reports concerning agency safety activities, including minutes of monthly safety meetings. May include Safety Committee inquires.	Retention: EVT + 3 years EVENT = Date of Resolution  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: Yes PII: No  Access Requirement: Open	Paper or Electronic	Destroy	Environment, Health and Safety  NEW

EHS00007	EHS - Air Compliance Records	Records documenting compliance with air permits	Retention: EVT + 7 years	Paper or Electronic	Destroy	Environment, Health and Safety
		and area source regulations. May include permit documents, measurements and performance tests, monitoring data, calibration checks, emission test results, and supporting documents and data and other documents relating to air programs.	EVENT = Date Document is superseded  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No  Access Requirement: Open			NEW
EHS00008	EHS - Hazardous Waste Manifests with related Transportation and Disposal Records	Records series includes documents related to potential liability associated with sending waste for disposal.  Includes uniform hazardous waste and non-hazardous special waste manifests, land disposal restriction forms, medical waste manifests, non-hazardous manifests, non-hazardous bills-of-lading, and certificates of receipt/destruction, waste site audits Biennial Report and Exception Report and other related records supporting potential site liability issues for disposal sites.	Retention: EVT+3 EVENT=Date receipt of a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. 40 CFR § 262.40 40 CFR § 262.57  Copies: Destroy when no longer needed, but do not keep longer than the Original.	Paper or Electronic	Destroy	Environment, Health and Safety  Supersedes FPM0027

			Access Requirement: Open			
EHS00009	EHS - Hazardous Materials Shipping Papers	Records documenting compliance with shipping papers used to offer hazardous materials other than waste in accordance with 49 CFR§ 172.201(e) (USDOT).  Retention and Recordkeeping. Each person who provides a shipping paper must retain a copy of the shipping paper required by 49 CFR§ 172.200(a), or an electronic image thereof, that is accessible at or through its principal place of business and must make the shipping paper available, upon request, to an authorized official of a Federal, State, or local government agency at reasonable times and locations.  49CFR§ 172.202	Retention: EVT + 3 years EVENT = Date that Material was Accepted by the Carrier  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No Access Requirement: Open	Paper or Electronic	Destroy	Environment, Health and Safety  NEW
EHS00010	EHS - PCB (Polychlorinated Biphenyl) Records	Includes PCB annual logs, PCB concentration logs, annual records, on-site storage locations, inventory lists, test reports, analytical reports, one year exception reports, spill cleanup records, equipment inspection logs and other similar records.	Retention: EVT + 7 years EVENT = Date of Document Creation  Copies: Destroy when no longer needed, but do not keep longer than the Original.	Paper or Electronic	Destroy	Environment, Health and Safety  Superseding FPM0029

			Confidential: No PII: No Access Requirement: Open			
EHS00011	EHS - Hazardous Materials Regulations Training Records	Records documenting compliance with training of hazmat employees in accordance with 49 CFR§ 172.704(4) (d) (USDOT). The training record must include the employee's name, the most recent training completion date of the employee's training, a description, copy, or the location of the training materials used to meet the requirements, the name and address of the person providing the training and certification that the hazmat employee has been trained and tested as required.	Retention: EVT + 90 days EVENT = Date of Employee Termination  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: Yes PII: Yes  *See Access Requirement's  PRB PII Registry: d.Yes- Employee	Paper or Electronic	Destroy	Environment, Health and Safety  NEW
EHS00012	EHS - Radioactive Materials/Radiation — Academic and Research	This Record series includes but is not limited to: Documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record. Other records included are audits/reviews, area/package	Retention: EVT + 3 Years EVT = Date of Document Creation  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No	Paper or Electronic	Destroy	Environment, Health and Safety New Supersedes FPM0034

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		surveys, tests on entry control devices for high radiation areas, Leak Test, Portable Gauge. Records of Tests for leakage or contamination of sealed sources. Also documents requests from Principle Investigators for use of radioactive materials.	Access Requirement: Open			
EHS00013	EHS - Radioactive Materials/Radiation — Records of Test for Leakage or Contamination	Includes documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record.  Records of Tests for leakage or contamination of sealed sources.	Retention: EVT + 5 Years EVT = Date of creation of the document.  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: Yes PII: Yes  *See Access Requirement's  PRB PII Registry: Yes-d. Employee		Destroy	Environmental Health and Safety New
EHS00014	EHS - Radioactive Materials/Radiation – Medical Use	Includes documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record.	Retention: EVT + 3 Years EVENT=Date of Document Creation  Copies: Destroy when no longer needed, but do not keep longer	Paper and Electronic	Destroy	Environmental Health and Safety New Supersedes #FPM0031

		-Results of surveys and calibrations, written directives, dosages of unsealed radioactive material for medical use, leak tests and inventory, release of individuals containing unsealed radioactive material or implants containing radioactive material.	than the Original.  Confidential: Yes PII: Yes  *See Access Requirement's  PRB PII Registry: No			
EHS00015	EHS - Radioactive Materials/Radiation – Radiation Protection Program Changes	Includes documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record.  Authority and responsibilities of radiation protection program, Radiation protection protection program, changes and process for disposing of radioactive waste.	Retention: EVT + 5 Years EVENT = Date of creation of the document  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No  Access Requirement: Open	Paper and Electronic	Destroy	Environmental Health and Safety  New Supersedes FPM0033
EHS00016	EHS - Radioactive Materials/Radiation – Radiation Training  University of Wisconsin - Madison Retention	Includes documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record.	Retention: EVT + 3 Years EVENT = Date of Employee Termination  Copies: Destroy when no longer needed, but do not keep	Paper and Electronic	Destroy	Environmental Health and Safety New

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		-Individual's trainings, tests and safety reviews	longer than the Original.			
			Confidential: Yes PII: Yes			
			*See Access Requirement's			
			PRB PII Registry: Yes – d Employee			
EHS00017	EHS - Radioactive Materials/Radiation — Radiation Review or Approval Changes	Includes documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record of any review or approval of changes in current procedure.	Retention: EVT + 3 Years EVENT = Date of Change  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No  Access Requirement: Open		Destroy	Environmental Health and Safety New
EHS00018	EHS - Radioactive Materials/Radiation – Radiation Survey and Tests Inspections	Includes documents and related records that support radioactive materials and or radiation management program that may be	Retention: EVT + 3 Years EVENT = Date of Document Creation	Paper or Electronic	Destroy	Environmental Health and Safety
		disposed prior to the termination of the license or program requiring the record.	Copies: Destroy when no longer needed, but do not keep longer			New Supersedes FPM032

		Records of Surveys, Leak tests and contamination checks, Inspections, including documents that meter readings of radioactivity form sampling and wipe samples in research labs.	than the Original.  Confidential: No PII: No Access Requirement: Open			
EHS00019	EHS - Radioactive Materials/Radiation — Radiation — Malfunction Reports for items of Increased Control	Includes documents and related records that support radioactive materials and or radiation management program that may be disposed prior to the termination of the license or program requiring the record of major malfunction.	Retention: EVT + 3 Years EVENT = Date of Repair Completion  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: Yes PII: No  Access Requirement: Open		Destroy	Environmental Health and Safety  New
EHS00020	EHS - Radioactive Materials/ Radiation  — Device Receipt and Disposition Records for Items of Increased Control	Licensee or registrant's records showing the receipt, transfer and disposal of all sources of radiation per DHS 157.06(1).  DHS 157.06(1) RECORDS. A licensee or registrant shall maintain records showing the receipt, transfer and disposal of all sources of radiation until the department terminates the license or registration	Retention: EVT + 3 years EVENT = Date of Termination of the License/ Registration Authorizing Possession of the Materials or Radiation Device  Copies: Destroy when no longer needed, but do not keep longer than the Original.	Paper or Electronic	Destroy	Environment, Health and Safety  NEW

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		authorizing possession of the device or material, and for 3 years following transfer or disposal of the device or material.	Confidential: No PII: No Access Requirement: Open			
EHS00021	EHS - Dosimetry Records	This series consist of the radiation dosimeter request card and the reports of dosimeter readings.	Retention: EVT+0 EVENT= Date of Termination of the License/ Registration  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: Yes PII: Yes  *See Access Requirement's  PRB PII Registry: Yes- d. Employee		Destroy	Environment, Health and Safety  New Supersedes FPM0035
EHS00022	EHS - Clean Water Act Compliance Records	Records documenting compliance with Clean Water Act and other water regulations.  Includes records related to Spill Prevention Control and Countermeasure (SPCC), Wisconsin Pollution Discharge Elimination System (WPDES), storm water management and other records relating to	Retention: EVT + 7 years EVENT = Date Document was Superseded  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No	Paper or Electronic	Destroy	Environment, Health and Safety NEW

		environmental compliance with water regulations.	PII: No Access Requirement: Open			
EHS00023	EHS - Asbestos and Hazardous Material and Environmental Remediation Case File	Asbestos abatement and hazardous material and environmental remediation at UW-Madison.  OSHA 29CFR§ 1926.1101	Retention: EVT + 5 years EVENT = Date Document was Superseded  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No  Access Requirement: Open	Paper or Electronic	Destroy	Environment, Health and Safety  New Supersedes FPM0024
EHS00024	EHS - Health, Safety or Fire Code Compliance Records including Variances	Documents fire safety inspections, complaints, violation correction plans, fire drill records and reports that document compliance with applicable fire prevention and building codes.	Retention: EVT + 7 years EVENT = Date Document was Superseded.  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: No PII: No  Access Requirement: Open	Paper or Electronic	Destroy	Environment, Health and Safety  New Supersedes FPM0023

EHS00025	EHS - Biological Safaty Documents	Documents associated with	Datastias	Destruction	
ENSUUCES	EHS - Biological Safety Documents Protocol Registration Records	Biological Research process for registration of protocols. There may be a dependency on Institution of Animal Care and Use Committee (IACUC) protocol depending on the Biosafety Protocol.	Retention: EVT + 7 years EVENT = Date of Completion or Research Activities.  Copies: Destroy when no longer needed, but do not keep longer than the Original.  Confidential: Yes PII: Yes  *See Access Requirement's  PRB PII Registry: No	Destroy Confidential	Environment, Health and Safety  New Supersedes FPM002