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# Scheduling Environmental Health and Safety Records

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*Records Scheduling Guide 7*

National Archives and Records Administration  
March 2024

## About this Guide

This guide is for agency records managers and NARA appraisal archivists. Use it when scheduling and appraising environmental health and safety (EH&S) records. Use of this guide is not required. Always consult [NARA's appraisal criteria](#) when proposing the disposition of records.

### What are environmental health and safety records?

Environmental health is a branch of public health. It focuses on how the natural and built environment affect human health. Some federal agencies take actions related to hazardous substances and their potential harmful effects on humans and the environment. Environmental health and safety (EH&S) records document these activities.

Hazardous substances include:

- Radioactive substances
- Asbestos
- Certain metals such as lead and mercury
- Synthetic chemicals (such as PCBs)
- Petroleum products
- Munitions

This guide does not cover records relating to other public health and safety hazards. These include communicable disease agents, fires, natural disasters, and hazards from use of tools and equipment.

### What government functions create environmental health and safety records?

Federal agencies have several functions that generate EH&S records, including:

- Production, use, storage, transportation, and disposal of hazardous substances.
- Planning for the potential release of hazardous materials into the environment and exposure of people to them.
- Monitoring release and exposure to hazardous substances.
- Emergency response and remediation of spills and other inadvertent or unauthorized releases.

- Litigation and responding to claims about potential harm caused by hazardous substances.

## **Considerations when scheduling environmental health and safety records**

Laws about hazardous materials often include recordkeeping requirements.

- Some laws require agencies to create records. The **National Environmental Policy Act (NEPA)** requires agencies to prepare environmental impact statements (EISs). These statements analyze the environmental consequences of proposed major actions and consider possible alternatives.
- Some laws give certain agencies authority over certain actions. In these cases, the authorized agency is likely the primary recordkeeper. For example:
  - The **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)** and the **Superfund Amendments and Reauthorization Act (SARA)**. These acts give the Environmental Protection Agency (EPA) authority for most major environmental remediation. They also establish the Superfund to support this remediation. This and other laws give national defense agencies authority to clean up former military sites.
  - The **Oil Pollution Act (OPA)**. This act gives certain agencies, such as the National Oceanic and Atmospheric Administration (NOAA), authority for response and remediation for major oil spills.
- Some laws establish timeframes for keeping records. This is often because the records could relate to possible claims or litigation. This is especially common with records that document exposure to hazardous substances.
  - Agencies must use at least the minimum retention specified by law. Agencies may propose a longer retention if needed. In rare circumstances, the records may even be permanent.

## Environmental health and safety records covered by the GRS

The General Records Schedules (GRS) provide disposition for records created by most federal agencies.

[GRS 2.7](#), Employee Health and Safety Records, cover some EH&S records. Specific items include:

- Items 040-043, Workplace environmental monitoring and exposure records
- Item 050, Safety Data Sheets (SDS)

Agencies must schedule EH&S records that are not covered by the GRS.

## Scheduling common environmental health and safety records

The following types of EH&S records are not included in the GRS. Although common, the value or retention needs vary depending on the agency creating the records. In some cases the records have permanent value.

**Environmental Impact Statements (EIS).** As stated above, NEPA requires agencies to prepare environmental impact statements (EISs). These statements analyze the environmental consequences of proposed major actions. The EPA collects and maintains a record set of all agency EISs. EPA has scheduled their copies as permanent. These records provide important evidence of agency decision-making. They also document the condition of the environment before actions are taken. Copies of EISs held by the creating agencies are usually scheduled as temporary.

- **Other agency environmental planning records, such as environmental assessments and categorical exclusions.** These records tend to be temporary. They document environmental decisions of lesser impact than those covered by EISs.
- EISs and related planning records may have legal significance for documenting environmental changes. In these cases, agencies may want long-term temporary retention for these records.

**Administrative Records (AR) of remediation.** An AR is the complete body of documents considered or relied upon in selecting a response to an environmental situation. It documents the decisions and public participation in remediation actions.

Agencies are often required to maintain these records. They are usually permanent. They help document both significant environmental damage and proposed restoration activities. They also tend to have value for local history. The records describe and measure the consequences of damage to communities, their economy, and their environment.

**Cleanup and restoration records.** These are the fiscal and administrative records related to cleanup and restoration. They may include contracts, accounting, and financial records. They tend to have long-term temporary retentions. The process of assessing damage and implementing restoration can take years. The associated costs charged to parties responsible for the damage can be considerable. Retention periods of 30 years beyond final action are common for these types of records.

**Real property disposal records.** These records document the federal government's disposal of individual pieces of real property. They may document the condition of the site before change of ownership. They often have permanent value. Use GRS 5.4, item 020, for real property ownership records for property acquired after December 31, 1920.

## Data

**Epidemiological and exposure data.** This data relates to studies of disease or analyses of exposure of humans and the environment to hazardous materials. The value of this data depends on its breadth and scope, its reusability, and whether it can be reproduced.

**Waste site or release of hazardous waste exposure data.** This data tracks or models long-term exposure and responses at waste sites and the releases of hazardous wastes. Whether it has permanent value depends on why the agency collected the data. It also depends on public or research interest in the site or release. Records of the program with responsibility for the site are more likely to be permanent than the records of programs that are less involved.

**Health and safety claims.** These types of claims files are generally temporary, although agencies may need them for a long time. Information systems for managing claims files, however, may be permanent. The aggregation of and ability to manipulate data may add to value to the system. Claims may also document the number and types of cases, as well as their handling and disposition. Use GRS 1.1, item 080, for monetary or property claims against the federal government.

**Photographs, films, videos, and other audio-visual records.** Records relating to the production, use, and disposal of hazardous substances often have permanent value. This is especially so if they document work processes, working conditions, and layout of hazardous waste sites.

**Records about production, use and proper disposal of hazardous substances.**

These records are usually temporary. Examples include but are not limited to:

- Manufacturing or construction project files
- Safety Data Sheets
- Calibration records
- Inventory and inspection records
- Shipping manifests
- Chain of custody documents
- Certificates of disposal

The GRS covers some of these records:

- Safety Data Sheets (GRS 2.7, item 050)
- Facility design, engineering, and construction records - final and as-built drawings, plans, and designs; and all other records (GRS 5.4, item 051)
- Records related to the tracking of shipments (GRS 5.5, item 020).

Sometimes these records will document the potential long-term harm caused by hazardous materials. Agencies may need to keep these records for a long time to protect rights and interests of individuals, organizations, and the government.

**Records related to radioactive materials.** These records tend to have the longest retention. This is because radioactive materials have ongoing potential for harm over long periods of time.

**Records and data related to exposure to hazardous substances.** Agencies generally need to keep these records for a long time to protect the rights and interests of individuals. Use GRS 2.7, items 040-043, for records related to workplace environmental monitoring and exposure records for federal employees.

## **Retention Guidelines**

### **Transfer of permanent records**

NARA typically approves records for transfer to NARA between 15 and 30 years. For longer or shorter transfer periods, see [NARA Bulletin 2020-02: Guidance on Scheduling the Early and Late Transfer of Permanent Records](#).

### **Retention of temporary records**

Agencies should base the retention of temporary records on the agency's administrative, fiscal and legal needs for the records. Agencies often need to keep EH&S records to track the effects of hazardous substances on the environment or humans. Agencies may need to keep these records for decades or for the lifetime of exposed individuals.

## **Related NARA Resources**

Code of Federal Regulations: [36 CFR Chapter XII, Part 1235](#) (Transfer of Records to the National Archives of the United States)

[Strategic Directions: Appraisal Policy](#) (excerpted from NARA Directive 1441)

[NARA Bulletin 2018-01](#): Updating [NARA Bulletin 2014-04](#), Format Guidance for the Transfer of Permanent Electronic Records