KENTUCKY-AMERICAN WATER COMPANY CASE NO. 2016-00394 RESPONSES TO COMMISSION STAFF'S POST-HEARING DATA REQUESTS

Witness: Linda C. Bridwell

1. Provide a copy of all Document Retention Policies and Procedures for KAWC.

Response:

Please refer to the attached American Water Records Retention Policy and Master Retention Schedule.



Title: RECORD RETENTION POLICY

Functional Area: Law Department

Policy Number: AW Policy Template.doc

SCOPE

This policy applies to any and all records that are created, received, or maintained by employees of American Water Works Company, Inc. and all of its controlled subsidiaries ("American Water" or the "Company"). The policy applies to records of both the regulated and unregulated subsidiaries.

POLICY STATEMENT

<u>Business Objective</u>: This policy establishes American Water's retention schedule as the sole authority and responsibility for retention and destruction of Company records. The primary objectives of the Policy are to:

- Identify, retain, protect, and properly dispose of all Company Records, including emails;
- Comply with corporate, governmental, and regulatory requirements for record retention, including but not limited to the National Association of Regulatory Utility Commissions ("NARUC") guidelines;
- Protect confidential and proprietary information by limiting access to such information and preventing its unintentional destruction;
- Identify and protect vital Records essential to the continuity of the Company or that are necessary to identify its assets, obligations or liabilities; and
- Retain Records relevant to a legal action until the Company's Law Department authorizes their destruction.

<u>Statement</u>: All Company records must be retained and disposed of in accordance with retention periods and guidelines specified in the Company's record retention schedule and in any related practices that American Water has issued or may issue in the future. Company records must be retained for the time periods specified in the retention schedule and discarded promptly when their retention periods elapse, subject to exceptions and exclusions specified herein.

All Company records must be retained and disposed of in accordance with the following standards:

<Record Retention Policy> <Law Department>

- The Company's record retention schedule specifies how long records are to be kept for legal reasons and to satisfy operational requirements.
- The Company's record retention schedule and practices comply fully with all applicable laws and regulations.
- American Water will retain records that must be kept for pending or ongoing litigation, government investigations (including regulatory and administrative audits), tax audits, or internal audits and internal investigations until those matters are resolved. When circumstances warrant, the Law Department will issue written directives that immediately and formally suspend the destruction of specific records until further notice. Such records must be retained until their destruction is authorized by the Law Department. The Litigation Hold practice establishes the parameters for complying with this requirement.
- Records should be destroyed promptly when the time periods specified in the Company's retention schedule elapse in order to reduce the cost of storing, indexing, and handling the large quantity of records that would otherwise accumulate.
- Company records must be destroyed in a manner that is safe and appropriate to the content of the records and to the media on which the records are made. The Destruction of Company Records Practice establishes the parameters for complying with this requirement.
- Duplicate records, drafts and documents of short-term or transitory value, created, received or maintained by the Company generally have little or no business value and they should be disposed of in accordance with the Duplicate Records, Drafts and Documents of Transitory Value Practice.
- The Company will take all reasonable precautions and prudent actions to identify, retain, and safeguard records that are vital to Company operations.
- Privacy and security of Company records must be appropriately assured.

MONITORING

The Law Department will:

 Periodically review and, as necessary, revise this Policy as well as it the associated schedule and practices to meet the Company's business needs, to

Sponsor: <Policy Sponsor>

Date Adopted: <05/29/2009>

comply with new laws and regulations, to include new Company records, and to eliminate any confusion about the interpretation or implementation of retention periods.

- Ensure the Policy, schedule and practices are published and/or distributed using formats, methods, and technologies appropriate to Company operations.
- Advise the Company about the interpretation and implementation of the Company's record retention policies, procedures, schedule, and guidelines.
- Provide employees with training required to understand and comply with the company's record retention Policy, schedule, and practices.
- Ensure that Company employees are promptly notified about records that must be retained for legal reasons.
- Monitor compliance with the Policy, schedule and practices, and with any directives that temporarily suspend the destruction of records for legal or other reasons.

The Owner of a Record is responsible for adhering to this policy for records in his/her custody or under his/her supervisory control and shall discard records when permitted by the Company's retention schedule, in accordance with the Company's Ownership of Records and Destruction Practices, except where destruction of specific records has been suspended for litigation, government investigation, audits, or other legal reasons, as provided above.

REPORTING/METRICS

The General Counsel, or his or her designee will report to the Board of Directors of American Water Works Service Company, Inc., when necessary, on the effectiveness of this Policy, any policy violations in the prior year and recommended revisions for the upcoming year.

CONSEQUENCE OF NON-COMPLIANCE

Employees who knowingly violate or circumvent this policy may be subject to disciplinary action up to and including termination of employment. Employees who are aware of or suspect any violations of this policy should immediately report such conduct to their supervisors, who will work with the Law Department to determine whether a problem exists and how it can be corrected.

WAIVER

Any deviation or waiver from or exception to this policy requires the prior approval of the General Counsel, or his or her designee. At the request of the operating unit where the records are maintained, the Company may authorize the extension of retention periods when circumstances warrant, including but not limited to:

- Where retention periods for the records are being reconsidered or revised.
- Where the records are needed for completion of audits, quality reviews, or other business operations that would normally have been completed within the designated retention period.
- Where the records are needed for exceptional and demonstrable business circumstances that were not foreseen at the time the retention periods were determined.

If an operating unit or employee disagrees with the prescribed retention period for a specific record series, a request for a revision to the retention schedule should be made to the Law Department. The request should include a brief description of the business operations that the records support and the reason why the prescribed retention period does not satisfy legal or operational requirements. Destruction of the records will be temporarily suspended while the need for a revision is considered.

REFERENCES

Record Retention Schedule

Duplicate Records, Drafts and Documents of Transitory Value Practice

Ownership of Records Practice

Destruction of Records Practice

Litigation Holds Practice

DEFINITIONS

"Company Records" means any and all recorded information that is created, received, or maintained by American Water in the course of Company business and that relate in any way to the Company's organization, functions, operations, or activities,. This

<Record Retention Policy>
<Law Department>

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FINALRECORDRETENTIONPOLICY.APPROVEDbyServiceCompany
Board.5-29-09.doc
Date Adopted: <05/29/2009>

definition of Company records encompasses recorded information in all formats and media, including but not necessarily limited to:

- Paper documents, including office records created in connection with Company business
- Emails
- Photographic films and prints, including photographic negatives, motion picture films, and microfilm
- Computer files and databases stored on magnetic or optical media
- Audio recordings, including recordings of phone calls
- Video recordings.

This definition of Company records encompasses notes, working papers, and drafts of documents that are created, received, or maintained by American Water's employees in the course of Company business. This definition of Company records encompasses copies as well as original records. The status of copies, drafts, and documents of transitory value as Company records is addressed in the Duplicate Records, Drafts and Documents of Transitory Value Practice.

<u>Exclusions</u>: The following information-bearing objects are considered non-records and, as such, are specifically excluded from this policy:

- Books, periodicals, catalogs, and other publications or library materials acquired solely for reference purposes.
- Unused or undistributed stocks of Company publications
- Blank business forms
- Unused copies of form letters
- Unsolicited brochures, flyers, advertisements, mass mailings, email messages, or other records that are unrelated to Company business
- Personal papers of American Water employees

"Personal Papers" are defined as information-bearing objects of a private nature that pertain solely to an employee's personal activities and interests and that have no relation to the employee's assigned duties or to American Water's mission, goals, objectives, or business operations. Examples of personal papers include:

- Documents or computer files that were created by an employee before joining the Company and that were not used subsequently for American Water business.
- Documents or computer files relating to professional affiliations.
- Diaries, journals, and calendars that relate exclusively to personal appointments, activities, or other personal matters.
- Notes and correspondence unrelated in any way to Company business.
- Papers or computer files relating to volunteer work or community service that an employee may undertake without Company involvement.
- Family photographs.

• Diplomas, training certificates, and citations unrelated to Company business.

Personal papers include electronic and photographic records as well as paper documents.

"Operating Unit" means each of the organizational groups within the Company including the regulated operations, the non-regulated operations, and the Corporate/Services group.

"Owner" means the American Water employee or operating unit that has the record in his/her/its custody or under his/her/its supervisory control.

"Record Series" refers to the classification and title of a record or group of records as listed in the Record Retention Schedule.

REVIEW/UPDATE

This Policy will be reviewed at least every three (3) years. American Water intends that its retention schedule be comprehensive and up-to-date. Operating units must notify the Law Department about records that are omitted from the Company's retention schedule. Until the retention schedule is revised to include such unscheduled records, organizational units will continue to observe their established business practices for retention and destruction of the records.

The Company's retention schedule will require periodic revisions to add or delete specific record series or to change retention periods. Employees should notify the Law Department when any of the following occurs:

- A new record series is created.
- A record series was overlooked when the Company's retention schedules were prepared or last revised.
- The Company obtains a record series through a merger or acquisition.
- The Company's retention schedules do not conclusively identify an existing record series.
- There is a change in the title for an existing record series.
- An existing record series has been divided into multiple series, each having different retention requirements.
- An existing record series has been combined with another record series that has a different retention period.
- A record series listed in the Company's retention schedules has been discontinued.
- The retention period prescribed for a given record series is not clear.

 Legal, regulatory or operational developments warrant reconsideration of retention periods.

All revisions to the Company's retention schedules will apply retroactively. If a revision decreases the retention period for a given record series, records that would have been kept under the old retention period should be destroyed at the earliest opportunity in conformity with the new retention rule.

Approved by: Ame	rican Water Works Service Company, Inc. Board of Directors	
Original Adopted: Revised Adopted: Date of Last Review:	May 29, 2009	
Effective Date: Prepared By:	January 1, 2010 Law Department	

Disclaimer

American Water reserves the right to change, revise or discontinue this Policy for any reason whatsoever. No employee, manager or other agent of American Water, other than the Service Company Board (and, if applicable, the executive having authority to approve this policy) has the authority to enter into any agreement contrary to this Policy.

This policy is not intended to create any contractual rights or duties and will be applied at the Company's sole discretion.

Employment with the Company is "at-will". That means that either you or the Company can terminate employment at any time, for any reason or no reason at all, with or without cause or notice.

Neither this policy nor any oral statement will create a right of continued employment. Any employment contract must be in writing and must be signed by the President of American Water, or his or her designee.

This Policy supersedes and voids all previous policies and practices, which may be inconsistent in any way with that stated herein.



Records Retention Schedule

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DUSINESS.	PIUCESS A	/ Sub-Process	•

Record Series Name Record Series Description Retention Period

Administration

Common Records

E-mail of Extended-term Retention Value

All e-mail messages the content of which is directly related to and of material importance to any category of records appearing in this retention schedule. E-mail messages possessing such value should be maintained as is the documentation to which they relate and retained for the retention period assigned to that record category as specified herein. Employees are individually responsible for taking action to ensure that this occurs

Retain for the period specified herein

Production Application:

Legal Citations:

E-mail of Transitory Value

E-mail of short-term retention value as determined by users. This includes any and all e-mail messages the content of which is not required to support the company's position on matters of business importance. Further, such messages are not of material importance to ensure complete documentation of any category of records appearing in this retention schedule. Employees are individually responsible for deleting such e-mail daily

Destroy daily; retain maximum of 90 days

Production Application:

Legal Citations:

Standard Operating Procedures

Published and approved documentation of standard operating procedures and instructions prescribing methods to be followed for research, development, testing, processes, and various tasks including job related, etc.

Until Superseded + 1

Production Application: SharePoint

Legal Citations:

Common Records Administration

Public Relations / Government Affairs

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Environmental Grant Records - Successful

These records document grants funded by the company for state / community-based environmental projects. The projects are related to watersheds, surface water and / or ground water supplies, and other environmental projects. The records consist of successful grant applications, reviews and approvals, and documentation of grant funding.

Life of Grant +6

Production Application:

Legal Citations: Maryland: COMAR 26.03.06.12

Environmental Grant Records - Unsuccessful

These are records documenting unsuccessful grant applications for grants funded by the company for state / community-based environmental projects.

Date of Application +2

Production Application:

Legal Citations: : Maryland: COMAR 26.03.06.12

Internal Communications

Production Application:

Materials associated with formal communications to employees. Note: This record series does Until Superseded + 10 not include Splash newsletters

Legal Citations: NARUC 29; Illinois: 83 III. Adm. Code 615 Appendix A(51),(52),(72); New York: 16 NYCRR 733.15(29); Virginia: 20 VAC 5-300-40(29);

Legislation Reference Materials

Documentation, analysis, and tracking of proposed, pending and final laws, rules and regulations in federal and state legislative bodies which affect the company's operations or business goals

Until Superseded

Production Application:

Legal Citations:

Media Clippings External media articles published about the company deemed to be of historical reference value

Permanent

Production Application:

Business Process / Sub-Process		
Record Series Name	Record Series Description	Page 11 of 114 Retention Period
Political Action Committee Records	Records related to donations made by state level political action committees to various campaigns	Current Year + 3
Production Application:		
Legal Citations: U.S. Federa	I: 11 CFR 102.9; 11 CFR 104.14; New Mexico: 17.3.350.11 NMAC;	
Press Kits	These kits are distributed to public news organizations describing the company and its business activities. The records may include copies of press releases, white papers, and other related records	Until Superseded +1
Production Application:		
Legal Citations: U.S. Federa	I: 18 CFR 125.3(42);	
Splash Newsletters	Newsletters chronicling major events and initiatives in the company, as well as employee news	Permanent
Production Application:		
Legal Citations:		
Talking Points	Documentation of answers to be used by interviewees or for frequently asked questions to ensure consistent answers are provided by the company	Current Year + 5
Production Application:		

Customer Relations

Legal Citations:

Call Centers - Non-Regulated

KAW_R_HDR_NUM001_1		
Business Process / Sub-		Page 13 of 114
Record Series Name	Record Series Description	Retention Period
Customer Relationship Management (CRM) System	Referred to as the "Current System," this is a customer relationship management system used to manage customer accounts over their active life. The data includes all orders received, annual program of services; prior orders, customer contacts/communications, cancellations, account/payment data, claims data, and other related records	Life of Account + 7
Production Application:		
Legal Citations:		
Customer Service Scripts	Records consisting of scripted information used to execute telemarketing phone calls	Until Superseded + 5
Production Application:		
Legal Citations: U.S. Fed	eral: 16 CFR 310.5; Missouri: 407.1079 R.S.Mo.; West Virginia: W. Va. Code 46A-6F-304;	
Customer Services / Claims Reports	Show any operational data, i.e. costs, etc. The information is generated from the CRM system. Used for forecasting and trend analysis	Current Year + 5
Production Application:		
Legal Citations:		
Customer Services Records	Recorded phone calls, enrollment forms, sales/cancellations, enrollment confirmations, customer correspondence, reconciliation reports, accounting items (deposit slips) and supporting documentation	Life of Account + 7
Production Application:		
Legal Citations:		

Record Series Name

Record Series Description

Retention Period

Consecutive Zero Readings / **Estimates**

Records generated from monthly readings of meters to ensure accuracy of water usage. Readings of zero serve as a baseline for the validation of the usage and the resulting billings Current Year + 2

Production Application:

Legal Citations:

Credit Refund Batch Records

DCPR sheets that are worked from credit refund batches. Any transfer information or paper issues that are received from customers (i.e. misapplied payments, disputing a bill). Batch reconciliation sheets that are SOX compliant. Also includes credit refund prints of batches (beginning and ending)

Current Year + 1

Production Application:

Legal Citations:

Customer Billing Records

Records pertaining to all information necessary to compute bills for residential, commercial, large industrial users; including customer payment documentation, lockbox payments

Current Year + 10

Production Application: ECIS, IBM Baby 36

Legal Citations: NARUC 50,52,55; Illinois: 220 ILCS 5/5-206; 220 ILCS 5/5-207; 83 III. Adm. Code 280.50; 83 III. Adm. Code 330.50; 83 III. Adm. Code 615 Appendix A(32-34),(37),(38), (40-42); 86 III. Adm. Code 510.135; Kentucky: 807 KAR 5:090; Maryland: COMAR 20.70.04.05; COMAR 20.75.04.05; Michigan: Michigan: MCL 205.67; MCL 205.104; MCL 205.104a; Mich. Admin. Code R 205.23; Missouri: 4 CSR 240-13.020; 10 CSR 60-15.010; New Jersey: N.J.A.C. 14:3-6.1; New Mexico: 17.5.410.25 NMAC; 17.12.720.20 NMAC; New York: 16 NYCRR Accounts (460),(461),(463-465),(467),(602),(621),(924); 16 NYCRR 733.15(50-52),(60); 20 NYCRR 47.3; Ohio: OAC Ann. 4901:1-15-14; OAC Ann. 4901:1-15-17; Pennsylvania: 52 Pa. Code 56.202; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-.05; Tenn. Comp. R. & Regs. R. 1220-4-3-.05 .17; Texas: 30 TAC 35.202; 30 TAC 291.89; Virginia: 20 VAC 5-300-40(50),(51),(55),(60);

Customer Complaints

Complaints regarding water quality; records include field visit documentation, test results, resolutions and weekly and yearly summaries

Current Year + 6

Production Application:

Legal Citations:

NARUC 24; Arizona: A.A.C. R14-2-411; A.A.C. R14-2-610; Illinois: 83 Ill. Adm. Code 600.170; 83 Ill. Adm. Code 615 Appendix A(61); Indiana: 170 IAC 6-1-17; 170 IAC 8.5-2-5; Iowa: 199 IAC 21.4 (476); Kentucky: 807 KAR 5:006; Maryland: COMAR 20.70.04.13; 4 CSR 240-13.040; 4 CSR 240-60.010; 10 CSR 60-3.030; New Jersey: N.J.A.C. 14:3-6.2; New Mexico: 17.9.594.13 NMAC; New York: 16 NYCRR 733.15(24),(25); Ohio: OAC Ann. 4901:1-15-33; Pennsylvania: 25 Pa. Code 109.701; 52 Pa. Code 65.3; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.17; Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Texas: 30 TAC 291.81; Virginia: 20 VAC 5-300-40(24-26); West Virginia: W. Va. CSR 150-5-4 4.2.1,4.8.1,4.9.2; W. Va. CSR 150-7-4 4.1.d; 4.2.a,4.5.b,4.12.a;

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Record Series Name

Record Series Description

Retention Period

Customer Service Applications

Applications received from customer for initiation of service

Current Year + 2

Current Year + 3

Life of Account + 7

Production Application:

Legal Citations: NARUC 45; Illinois: 83 III. Adm. Code 615 Appendix A(35); Indiana: 170 IAC 6-1-15; 170 IAC 8.5-2-3; New York: 16 NYCRR 733.15(45);

Virginia: 20 VAC 5-300-40(45);

Daily Billing Packets Evidence of work that has been processed for a specific day and serves as an integrity report 1 Year

for billing

Production Application:

Legal Citations:

Daily Work Orders - Duplicate

Copies

Copies of field service work orders documenting installations performed for customers. The work orders themselves are duplicate copies, but the supporting documentation consists of

materials used (i.e. parts) as well as well as quality feedback submitted to the call centers by

customers

Production Application: Advantex

Legal Citations: NARUC 50; Illinois: 83 III. Adm. Code 615 Appendix A(40),(41),(42); New York: 16 NYCRR 733.15(50),(51); Ohio: OAC Ann. 4901:1-15-14;

Virginia: 20 VAC 5-300-40(50),(51);

ECIS - Customer Master Records Records used to establish and manage customer accounts in the Enterprise Customer

Information System (ECIS) through their life cycle. Includes customer master files, deposits

to initiate service, meter inventory data (installing, maintaining meters), and other related

records

Production Application:

Legal Citations: NARUC 24,47; Illinois: 220 ILCS 35/6; 83 III. Adm. Code 280.70; 83 III. Adm. Code 615 Appendix A(36-38),(61); Indiana: 170 IAC 6-1-15; 170

IAC 8.5-2-3; Iowa: 199 IAC 21.4 (476); Kentucky: KRS 96.265; Maryland: COMAR 20.30.01.04; Missouri: 4 CSR 240-10.030 (1-8); 4 CSR 240-13.030; 4 CSR 240-13.040; New Jersey: N.J.A.C. 14:3-6.2; New Mexico: 17.5.410.25 NMAC; New York: 16 NYCRR 14.8; 16 NYCRR 510.1; 16 NYCRR 510.2; 16 NYCRR 733.15(24),(25),(46-49); Ohio: OAC Ann. 4901:1-17-03; OAC Ann. 4901:1-17-07; Pennsylvania: 52 Pa. Code 56.202; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-.15; Texas: 30 TAC 291.84; Virginia: 20 VAC 5-300-40(24-26),(46),(47); West

Virginia: W. Va. CSR 150-2-13; W. Va. CSR 150-5-4 4.2.1,4.8.1,4.9.2; W. Va. CSR 150-7-4 4.1.d;4.2.a,4.5.b,4.12.a;

Legal Citations:

Medical Certifications Doctor signed certifications provided by customers stating they have a medical need requiring Current Year + 1

water service. Records also include verifications of validity

Production Application:

Legal Citations: New Mexico: 17.5.410.25 NMAC;

Legal Citations: Missouri: 4 CSR 240-60.010; Ohio: OAC Ann. 4901:1-15-33; West Virginia: W. Va. CSR 150-5-4 4.2.1,4.8.1,4.9.2;

Production Application:

2 Years

Record Series Name

Record Series Description

Retention Period

Life of Tank + 5

Service Termination Records

Records of customer service terminations with and without notice; including evidence of mailing of notices

Production Application:

Legal Citations: NARUC 48: Arizona: A.A.C. R14-2-410: A.A.C. R14-2-609: Illinois: 83 Ill. Adm. Code 280.138: 83 Ill. Adm. Code 615 Appendix A(36-38): Indiana: 170 IAC 6-1-16: 170 IAC 8.5-2-4: Missouri: 4 CSR 240-13.040: 4 CSR 240-13.050: New Mexico: 17.5.410.25 NMAC: New York: 16 NYCRR 733.15(48),(49); Pennsylvania: 52 Pa. Code 56.202; Virginia: 20 VAC 5-300-40(48),(49);

Environmental

Above Ground Storage Tanks

Records related to the facilities and equipment for the storage of oil and other fuel products in above ground storage tanks; includes design and installation records, modifications, maintenance, inspections and monitoring of the tanks, reports and testing, and records

related to their closure or removal from service

Production Application:

Legal Citations:

Maryland: COMAR 26.10.01.12; Michigan: Mich. Admin. Code R 29.5230; Missouri: 10 CSR 10-2.260; 10 CSR 10-5.220 (3); New Jersey: N.J.A.C. 7:1E-2.15; N.J.A.C. 7:1E-2.16; New Mexico: 20.5.9.921 NMAC; 20.5.4.401 NMAC; 20.5.5.15 NMAC; 20.5.5.17 NMAC; 20.5.5.19 NMAC; 20.5.5.401 NMAC; 20.5.5.501 NMAC; 20.5.5.503 NMAC; 20.5.5.504 NMAC; 20.5.5.9 NMAC; 20.5.6.25 NMAC; 20.5.6.603 NMAC; 20.5.6.604 NMAC; 20.5.6.606 NMAC; 20.5.8.14 NMAC; 20.5.9.911 NMAC; 20.5.9.921 NMAC; 20.5.9.971 NMAC; New York: 6 NYCRR 598.8; 6 NYCRR 598.10; 6 NYCRR 599.11; 6 NYCRR 599.16; 6 NYCRR 613.6; 6 NYCRR 614.12; Pennsylvania: 25 Pa. Code 245.516; 25 Pa. Code 245.552; 25 Pa. Code 245.554; 25 Pa. Code 245.561; 25 Pa. Code 245.615; Texas; 30 TAC 334.127; 30 TAC 334.130; Virginia: 9 VAC 25-91-40: 9 VAC 25-91-120: 9 VAC 25-91-130: 9 VAC 25-91-150: 9 VAC 25-91-200: 9 VAC 25-640-50: 9 VAC 25-640-170: Canada Federal: Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations, SOR/2008-197 s. 27,33,37,40,43,44; New Brunswick: Petroleum Product Storage and Handling Regulation, N.B. Reg. 87-97, Part XIV s 234; Yukon Territory: Storage Tank Regulations, Y.O.I.C. 1996/194 s. 11; Storage Tank Regulations, Y.O.I.C. 1996/194 s. 14;

Certificates of Approval - Sitespecific

Certificates are issued by the Ontario Ministry of the Environment. They show legal descriptions of properties, methods of performing the application of the municipal biosolids. The records also include: site volume data; details concerning trucks handling biosolids at the site, and other related information

Expiration + 5

Production Application:

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Record Series Name

Record Series Description

Retention Period

Certificates of Approval – Systemwide Global (non-site specific) certificates of approval issued by the Ontario Ministry of the Environment. They are annual program reports and contain summaries of work, volumes, soil analysis and testing, and other aspects of biosolids management

Current Year + 10

Current Year + 5

7 Years

Production Application:

Legal Citations:

Climatology Records Records showing rainfall and other climate related occurrences that may impact company

operations

Production Application:

Legal Citations:

Consumer Confidence Reports

(CCR)

Generated every year showing the analyses, results from particular plants for the entire year,

arsenic level, contaminant levels for every water treatment plant

Production Application:

Legal Citations: U.S. Federal: 40 CFR 141.155; Arizona: A.A.C. R18-4-710; California: 22 CCR 64483; 26 CCR 22-64483; Illinois: 35 Ill. Adm. Code 611.885;

Indiana: 327 IAC 8-2.1-5; Kentucky: 401 KAR 8:075; Michigan: Mich. Admin. Code R 325.10415; Ohio: OAC Ann. 3745-96-04; Pennsylvania: 52 Pa. Code 56.202; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-.05; Tenn. Comp. R. & Regs. R. 1220-4-3-.17; Texas: 30 TAC 290.46;

30 TAC 290.274;

paint, solvents and air quality

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1910.1001(j)(2)(ii); California: 8 CCR 5208; Michigan: Mich. Admin. Code R 408.40121; New Jersey: N.J. Stat. 34:5A-12;

Canada Federal: Canada Occupational Safety and Health Regulations s 10.19; Quebec: Occupational Health and Safety, O.C. 885-2001, 2001

G.O. 2, 3888, Div. VI s 48; Yukon Territory: Employment Standards Act, R.S.Y. 2002 s.62;

Record Series Name

Record Series Description

Retention Period

Environmental Compliance Records

Compliance records relating to warning notices, notices of violations, consent orders, consent decrees, consent final judgments, administrative orders, citizen complaints. Generally includes agency correspondence, correction reports, status and completion reports, monitoring reports related to enforcement actions, agency inspections and audits, selfreporting of issues of concern

Current Year + 10

Production Application:

Legal Citations: U.S. Federal: 40 CFR 68.200; 40 CFR 122.44; 40 CFR 141.33; 40 CFR 141.405; 40 CFR 372.10(a); 40 CFR 372.10(b), (d); 40 CFR 372.27; Arizona: A.A.C. R18-4-103; California: 22 CCR 64453; 22 CCR 64470; 26 CCR 22-64470; Illinois: 35 Ill. Adm. Code 391.203; 35 Ill. Adm. Code 391.204; 35 III. Adm. Code 611.805; 35 III. Adm. Code 611.860; 327 IAC 8-2-20; Iowa: Iowa: 567 IAC 42.5 (455B); Kentucky: 401 KAR 5:065; Maryland: COMAR 26.04.01.21; Michigan: Mich. Admin. Code R 323.2190; Mich. Admin. Code R 325.11506; Missouri: 4 CSR 240-60.020; 10 CSR 60-4.055; 10 CSR 60-9.010; New Jersey: N.J.A.C. 7:1E-2.10; Ohio: OAC Ann. 3745-81-33; Pennsylvania: 25 Pa. Code 105.53; 25 Pa. Code 299.112; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Tenn. Comp. R. & Regs. R. 1200-5-1-.40; Texas: 30 TAC 290.46; Virginia: 4 VAC 50-60-460; 9 VAC 25-31-220; Canada Federal: Canadian Environmental Protection Act, 1999 s. 23; Canadian Environmental Protection Act, 1999 s. 170(7); Canadian Environmental Protection Act, 1999 s. 180(7); Ontario: Ontario Water Resources Act, R.S.O. 1990 s.

Environmental Compliance Reporting

Records used to report the status of compliance with environmental laws, regulations, and permits to U.S. federal, state, and local environmental regulatory authorities; generally includes correspondence, annual test reports, and Energy Information Administration reports, conservation activity reports, monthly operating reports (MOR), withdrawal reports, NDPES permit reports, water quality reports, chemical reports, right-to-know reports, Safe Drinking Water Act compliance reports, community surveys, hazardous materials, water allocation, diversion reports, treatment plant reports and all supporting documentation

Current Year + 10

Production Application:

Legal Citations: U.S. Federal: 40 CFR 68.58; 40 CFR 68.79; 40 CFR 70.6; 40 CFR 122.41; 40 CFR 141.603; 40 CFR 403.12; 40 CFR 501.15; 40 CFR 704.11; Arizona: A.R.S. 45-343; A.R.S. 45-566.01; A.R.S. 45-568.01; A.R.S. 45-632; A.R.S. 45-879.01; A.A.C. R18-9-D302; Illinois: 35 III. Adm. Code 201.246; 35 III. Adm. Code 201.407; 35 III. Adm. Code 225.410; 35 III. Adm. Code 225.510; 35 III. Adm. Code 611.923; Iowa: 567 IAC 42.4 (455B); Iowa: 567 IAC 42.5 (455B); Kentucky: 401 KAR 5:065; 401 KAR 8:020; 401 KAR 8:070; Maryland: COMAR 26.04.01.21; Missouri: 10 CSR 60-9.010; New Jersey: N.J.A.C. 7:1G-5.1; N.J.A.C. 7:1K-3.11; N.J.A.C. 7:1K-4.10; N.J.A.C. 7:14A-6.6; N.J.A.C. 7:11-3.21; N.J.A.C. 7:11-5.17; N.J.A.C. 7:27-22.19; N.J.A.C. 7:31-3.5; New York: 6 NYCRR 750-2.5; 6 NYCRR 750-2.8; Ohio: OAC Ann. 3745-50-48; OAC Ann. 3745-50-58; Pennsylvania: 27 Pa.C.S. 3118; 25 Pa. Code 109.701; 25 Pa. Code 109.1107; 25 Pa. Code 110.401; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-8-.10; Texas: 30 TAC 290.46; 30 TAC 290.115; Virginia: 4 VAC 50-60-430; 4 VAC 50-60-460; 9 VAC 25-31-190; 9 VAC 25-31-220; 9 VAC 25-32-80: 9 VAC 25-32-440: 9 VAC 25-110-80: 9 VAC 25-151-70: 9 VAC 25-151-80: 9 VAC 25-180-70: 9 VAC 25-196-170: 9 VAC 25-200-50: 9 VAC 25-210-90: 9 VAC 25-220-80: 9 VAC 25-610-130: 9 VAC 25-660-100: 9 VAC 25-670-100: 9 VAC 25-820-70: West Virginia: W. Va. CSR 47-10-5; Canada Federal: Environmental Emergency Regulations, SOR/2003-307 s.6; Ontario: Drinking Water Systems, O. Reg. 170/03 s 13(2);

Business Process / Sub-Process Page 24 of 114			
Record Series Name	Record Series Description	Retention Period	
Environmental Inspection and Audit Records - Internal	Records of internal audits and inspections of systems, equipment, site assessment testing or other matters related to compliance with environmental policies and procedures	Current Year + 10	
roduction Application:			
Legal Citations:			
Environmental Inspection Records - Regulatory	Inspections of federal and state environmental regulatory agencies. The inspections may be periodic or ad hoc, and are conducted for the purpose of determining compliance with regulatory requirements	Active + 10	
roduction Application:			
Legal Citations:			

Record Series Name

Record Series Description

Retention Period

Environmental Monitoring Records

Records showing data collected from environmental testing and monitoring devices from any pollution source (discharge into water, air, etc.), or the presence of potentially harmful substances in the workplace. Includes logs, measurements, calculations, performance tests, calibration/maintenance records and all strip chart recordings for continuous monitoring instrumentation, emissions monitoring, fugitive emissions and environmental excursion times collected from periodic and continuous monitoring devices and systems covering any permitted pollution source; records of occurrences and duration of any start-up, shutdown or malfunction in the operations of any source, etc., copies of required reports

Current Year + 10

Production Application:

Legal Citations: U.S. Federal: 40 CFR 60.7(b); 40 CFR 60.7(f)(1); 40 CFR 60.7(f)(2); 40 CFR 60.13; 40 CFR 61.13; 40 CFR 61.14; 40 CFR 63.1589; 40 CFR 70.4; 40 CFR 70.6; 40 CFR 122.41; 40 CFR 125.88; 40 CFR 141.601; 40 CFR 141.602; 40 CFR 141.722; 40 CFR 403.12; 40 CFR 501.15; Arizona: A.A.C. R18-9-A206; A.A.C. R18-9-D302; California: 8 CCR 5158; 22 CCR 66270.14; 22 CCR 66270.30; 23 CCR 2550.7; 23 CCR 2591; 27 CCR 20415; Illinois: 35 III. Adm. Code 201.263; 35 III. Adm. Code 201.301; 35 III. Adm. Code 201.407; 35 III. Adm. Code 225.410; 35 III. Adm. Code 225.510; 35 III. Adm. Code 225.550; 35 III. Adm. Code 232.450; 35 III. Adm. Code 611.921; 35 III. Adm. Code 611.922; 35 III. Adm. Code 611.1022; Indiana: 327 IAC 5-2-14; Iowa: 567 IAC 42.5 (455B); Kentucky: 401 KAR 5:057; 401 KAR 5:065; Maryland: COMAR 26.08.04.03; Michigan: Mich. Admin. Code R 323.2155; Mich. Admin. Code R 323.2161a; Mich. Admin. Code R 323.2190; Mich. Admin. Code R 323.2310; New Jersey: N.J.A.C. 7:14A-6.6; N.J.A.C. 7:14A-6.6; N.J.A.C. 7:14C-1.4; N.J.A.C. 7:27-16.16; N.J.A.C. 7:27-19.17; N.J.A.C. 7:27-21.7; N.J.A.C. 7:27-22.19; New York: NY CLS ECL 17-0815-a; 6 NYCRR 750-1.12; 6 NYCRR 750-2.5; 6 NYCRR 750-2.8; 16 NYCRR 503.4; Ohio: OAC Ann. 3745-3-03; OAC Ann. 3745-3-06; OAC Ann. 3745-50-48; OAC Ann. 3745-50-58; OAC Ann. 3745-81-23; OAC Ann. 3745-81-24; Pennsylvania: 25 Pa. Code 92.41; Tennessee: Tenn. Comp. R. & Regs. 1200-4-5-.07; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.38; Tenn. Comp. R. & Regs. R. 1200-5-1-.39; Texas: 30 TAC 290.46; 30 TAC 319.7; Virginia: 4 VAC 50-60-430; 9 VAC 25-31-190; 9 VAC 25-31-840; 9 VAC 25-32-80; 9 VAC 25-110-80; 9 VAC 25-151-70; 9 VAC 25-180-70; 9 VAC 25-196-170; 9 VAC 25-210-90; 9 VAC 25-220-80; 9 VAC 25-610-130; 9 VAC 25-660-100; 9 VAC 25-670-100; 9 VAC 25-790-270; 9 VAC 25-820-70; 12 VAC 5-585-300; 12 VAC 5-585-370; West Virginia: W. Va. CSR 47-10-5; Canada Federal: Canadian Environmental Protection Act, 1999 s. 170(7); Canadian Environmental Protection Act, 1999 s. 180(7); Ontario: Confined Spaces, O. Reg. 632/05 s 21; Quebec: Regulation respecting mandatory reporting of certain emissions of contaminants into the atmosphere, R.Q. c. Q-2, r.3.3 s. 7; New Brunswick: Water Quality Regulation, N.B. Reg. 82-126 s 17; Quebec: Environment Quality Act, R.S.Q. c. Q-2, Ch. I, Div. IV.2 s 31.23; Occupational Health and Safety, O.C. 885-2001, 2001 G.O. 2, 3888, Div. XXVI s 30;

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Environmental Permits

Permits issued by environmental regulatory bodies permitting the discharge of wastes, pollutants or other regulated substances into the environment; may include the permit application, amendments and standard exemptions, calculation data used to prepare levels of emissions allowed for the duration of the permit, working papers, and correspondence. Permits may include NDPES permits, wastewater permits, discharge authorizations

Life of the Facility

Production Application:

Legal Citations: U.S. Federal: 40 CFR 122.21; 40 CFR 122.41; 40 CFR 125.88; 40 CFR 144.31; 40 CFR 501.15; Arizona: A.A.C. R18-9-A309; California: 22 CCR 66270.10; Illinois: 35 III. Adm. Code 225.410; 35 III. Adm. Code 225.510; 35 III. Adm. Code 702.124; Indiana: 327 IAC 5-2-3; 327 IAC 15-6-12; Kentucky: 401 KAR 5:060; 401 KAR 5:065; Michigan: MCL 324.3303; MCL 324.3308; Mich. Admin. Code R 323.2161a; Mich. Admin. Code R 323.3104; New Jersey: N.J.A.C. 7:14A-6.6; N.J.A.C. 7:13-8.2; N.J.A.C. 7:13-15.1; N.J.A.C. 7:14A-6.6; N.J.A.C. 7:14A-25.6; N.J.A.C. 7:14A-25.8; N.J.A.C. 7:27-8.20; N.J.A.C. 7:27-8.21; New York: NY CLS ECL 17-0815-a; Ohio: OAC Ann. 3745-50-39; OAC Ann. 3745-50-41; OAC Ann. 3745-50-48; OAC Ann. 3745-50-58; Pennsylvania: 25 Pa. Code 94.21; 25 Pa. Code 109.1107; Tennessee: Tenn. Comp. R. & Regs. 1200-4-5-.07; Virginia: 4 VAC 50-60-360; Virginia: 4 VAC 50-60-430; 9 VAC 25-31-100; 9 VAC 25-32-80; 9 VAC 25-201-75; 9 VAC 25-210-90; 9 VAC 25-220-80; 9 VAC 25-610-130; 9 VAC 25-660-100; 9 VAC 25-670-100; 9 VAC 25-820-70; West Virginia: W. Va. Code 36-8-21; W. Va. CSR 47-10-4; W. Va. CSR 47-10-5;

Environmental Plans and Policies

Documentation of the organization's plans and policies relating to environmental management and compliance; may include manuals, corporate compliance plan, corporate environmental compliance plan, spill prevention and countermeasures plan, hazardous communications, environmental management plans, etc.

Until Superseded + 10

Production Application:

Legal Citations: Arizona: A.A.C. R18-9-A204; Illinois: 35 III. Adm. Code 750.470; Indiana: 327 IAC 5-9-2; 327 IAC 15-6-7; Iowa: 567 IAC 41.2 (455B); Kentucky: 401 KAR 5:037; New Jersey: N.J.A.C. 7:1K-3.11; N.J.A.C. 7:1K-4.8; N.J.A.C. 7:1K-4.10; N.J.A.C. 7:14C-1.6; Tennessee: Tenn. Code Ann. 68-212-304; Tenn. Comp. R. & Regs. R. 1200-5-1-.37; Tenn. Comp. R. & Regs. R. 1200-5-1-.38; Texas: 30 TAC 290.121; 30 TAC 335.474; 30 TAC 335.480; Virginia: 4 VAC 50-60-460; Canada Federal: Environmental Emergency Regulations, SOR/2003-307 s.6; Canadian Environmental Protection Act, 1999 s. 59; Ontario: General - Waste Management, R.R.O. 1990, Reg. 347 s. 85(3); General - Waste Management, R.R.O. 1990, Reg. 347 s. 85(6);

Environmental Remediation

Records related to environmental/waste clean-up and other remediation projects performed at single or multiple sites; typically includes judgments imposed by regulatory bodies concerning clean-up goals and objectives and targets for meeting them, and records showing analytical laboratory results of environmental monitoring and sampling

Permanent

Production Application:

Record Series Name

Record Series Description

Retention Period

Ground Water Monitoring Records

Ground water monitoring records of the analyses, evaluations, discharges. Also include inspection and test records, well registrations, well logs, annual reports, well maintenance and closure records, ground water appropriation permits

Permanent

Production Application:

Legal Citations: NARUC 31; U.S. Federal: 40 CFR 141.601; 40 CFR 141.602; 40 CFR 141.722; Arizona: A.R.S. 45-600; A.R.S. 45-632; California: Cal Wat Code 13263.2; 22 CCR 66270.30; 22 CCR 67450.13; 23 CCR 2550.7; 23 CCR 2591; 27 CCR 20415; 27 CCR 20420; 27 CCR 20425; 27 CCR 21720; Illinois: 35 Ill. Adm. Code 310.634; 35 Ill. Adm. Code 611.921; 35 Ill. Adm. Code 611.922; 35 Ill. Adm. Code 611.1022; 83 Ill. Adm. Code 615 Appendix A(22),(23); Indiana: 327 IAC 5-2.1-7; 327 IAC 5-16-5; 327 IAC 15-6-7.3; 327 IAC 15-11-7; 327 IAC 15-13-22; Iowa: 567 IAC 42.5 (455B); Kentucky: 401 KAR 5:037; 401 KAR 5:057; 401 KAR 5:065; Maryland: COMAR 26.08.04.03; COMAR 26.08.08.03; Michigan: Mich. Admin. Code R 323.2155; Mich. Admin. Code R 323.2161a; Mich. Admin. Code R 323.2190; Mich. Admin. Code R 323.2310; Mich. Admin R 325.1768; Mich. Admin. Code R 325.10719e; Missouri: 10 CSR 20-6.100; New Jersey: N.J. Stat. 58:10-23.11d13; N.J.A.C. 7:14A-6.6; N.J.A.C. 7:14A-6.6; N.J.A.C. 7:14C-1.4; New Mexico: 20.6.2.3107 NMAC; New York: 6 NYCRR 750-1.12; 6 NYCRR 750-2.5; 6 NYCRR 750-2.8; 16 NYCRR 503.4; 16 NYCRR 733.15(31); Ohio: ORC Ann. 1521.05; OAC Ann. 3745-3-03; OAC Ann. 3745-3-06; OAC Ann. 3745-50-48; OAC Ann. 3745-50-58; OAC Ann. 3745-81-23; OAC Ann. 3745-81-24; Pennsylvania: 25 Pa. Code 92.41; 25 Pa. Code 289.268; Tennessee: Tenn. Comp. R. & Regs. 1200-4-5-.07; Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Tenn. Comp. R. & Regs. R. 1200-5-1-.38; Tenn. Comp. R. & Regs. R. 1200-5-1-.39; Texas: 30 TAC 290.46; 30 TAC 319.7; Virginia: 4 VAC 50-60-430; 9 VAC 25-31-190; 9 VAC 25-31-840; 9 VAC 25-32-80; 9 VAC 25-110-80; 9 VAC 25-151-70; 9 VAC 25-180-70; 9 VAC 25-196-170; 9 VAC 25-210-90; 9 VAC 25-220-80; 9 VAC 25-610-130; 9 VAC 25-660-100; 9 VAC 25-670-100; 9 VAC 25-790-270; 9 VAC 25-820-70; 12 VAC 5-585-300; 12 VAC 5-585-370; West Virginia: W. Va. CSR 47-10-5; Quebec: Groundwater Catchment Regulation, R.Q.c. Q-2, r.1.3 s.44; New Brunswick: Water Quality Regulation, N.B. Reg. 82-126 s 17; Water Well Regulation, N.B. Reg. 90-79 s 34; Yukon Territory: Solid Waste Regulations, Y.O.I.C. 2000/11 s. 10;

Hazardous Superfund Releases

Notifications to EPA of the identity, characteristics, quantity and origin of hazardous chemical release: includes RQ notifications under CERCLA 103

50 Years

Production Application:

Legal Citations: U.S. Federal: 40 CFR 302.8;

Business Process / Sub-Process

Record Series Name

Record Series Description

Retention Period

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Hazardous Waste Treatment / Storage / Disposal Records

Records related to company compliance with environmental regulations pertaining to the discharge or other handling and disposal of hazardous wastes. Records may include manifests, inspection logs, test results, waste analysis, disposal passes, dumpster logs, drum and solid waste disposal, waste location records, landfill records, third party agreements, certifications, exceptions granted by regulatory authorities, 8700-12 reporting, empty container shipping records, hazardous materials transportation registration and certifications of registrations and other reports, monitoring and compliance records

Permanent

Production Application:

Legal Citations: NARUC 43; U.S. Federal: 40 CFR 262.20; 40 CFR 262.23; 40 CFR 262.34; 40 CFR 262.40; 40 CFR 268.7; 40 CFR 372.10(a); 40 CFR 372.10(b),(d);40 CFR 372.27; 49 CFR 107.620; 49 CFR 172.201; 49 CFR 172.205; Arizona: A.A.C. R18-8-262; California: Cal Health & Saf Code 25160.2; Cal Health & Saf Code 25244.21; 13 CCR 1161; 18 CCR 3020; 22 CCR 66262.23; 22 CCR 66262.40; 22 CCR 67100.3; 22 CCR 67450.11; 26 CCR 13-1161; Illinois: 35 III. Adm. Code 721.104(e); 35 III. Adm. Code 721.132(d); 35 III. Adm. Code 722.120; 35 III. Adm. Code 722.123; 35 III. Adm. Code 722.140; 35 III. Adm. Code 728.107; 35 III. Adm. Code 808.123; 35 III. Adm. Code 809.501; Indiana: 329 IAC 3.1-7-2; 327 IAC 7.1-3-3; Iowa: 567 IAC 149.7 (455B); Kentucky: KRS 224.46-510; 401 KAR 31:010; 401 KAR 32:040; 401 KAR 37:010; Maryland: COMAR 26.13.03.04; COMAR 26.13.03.05; COMAR 26.13.03.06; COMAR 26.27.01.08; Michigan: MCL 324.11135; MCL 324.11138; MCL 324.12103; MCL 324.12111; MCL 333.13726; Mich. Admin. Code R. 299.4114; Mich. Admin. Code R. 299.9304; Mich. Admin. Code R. 299.9306; Mich. Admin. Code R 299.9307; Missouri: 260.380 R.S.Mo.; 10 CSR 25-5.262; New Mexico: 20.7.3.809 NMAC; New York: NY CLS ECL 27-0905; 6 NYCRR 372.2; Ohio: OAC Ann. 3745-27-33; OAC Ann. 3745-51-04; OAC Ann. 3745-51-31; OAC Ann. 3745-52-20; OAC Ann. 3745-52-23; OAC Ann. 3745-52-34; OAC Ann. 3745-52-40; OAC Ann. 3745-270-07; Pennsylvania: 35 P.S. 6018.403; 25 Pa. Code 287.55; Tennessee: Tenn. Code Ann. 68-212-304; Texas: 30 TAC 334.496; 30 TAC 334.497; 30 TAC 335.9; 30 TAC 335.10; 30 TAC 335.13; 30 TAC 335.70; 30 TAC 335.326; 30 TAC 335.329; 30 TAC 335.510; 30 TAC 335.511; 30 TAC 335.513; Virginia: 9 VAC 25-32-550; Canada Federal: Interprovincial Movement of Hazardous Waste Regulations, SOR/2002-301 s. 4(7); Ontario: General - Waste Management, R.R.O. 1990, Reg. 347 s. 16(14)(5); General - Waste Management, R.R.O. 1990, Reg. 347 s. 17.2; General - Waste Management, R.R.O. 1990, Reg. 347 s. 18(6.1); General - Waste Management, R.R.O. 1990, Reg. 347 s.18(8),(9); General - Waste Management, R.R.O. 1990, Reg. 347 s.23(1); General - Waste Management, R.R.O. 1990, Reg. 347 s. 23(6); General - Waste Management, R.R.O. 1990, Reg. 347 s. 25(7),(8); General -Waste Management, R.R.O. 1990, Reg. 347 s. 27(5),(6); General - Waste Management, R.R.O. 1990, Reg. 347 s. 84(6); General - Waste Management, R.R.O. 1990, Reg. 347 s. 85(3); General - Waste Management, R.R.O. 1990, Reg. 347 s. 85(6); Quebec: Hazardous Materials, R.Q. c. g-2, r.15.2, Sect. 1 to Schedule, Ch. II s 21; Yukon Territory: Contaminated Sites Regulation, Y.O.I.C. 2002, s.19;

Instrument Maintenance and Calibration

Records of maintenance and calibration of monitoring devices, stack testing equipment, lab equipment

Until Superseded + 10

Production Application:

Legal Citations: Arizona: A.A.C. R9-14-616; California: 22 CCR 66270.30; Indiana: 327 IAC 15-6-7.3; 327 IAC 15-11-7; Kentucky: 401 KAR 5:065; Maryland: COMAR 26.08.04.03; New Jersey: N.J.A.C. 7:14A-6.6; N.J.A.C. 7:18-5.5; N.J.A.C. 7:27-22.19; N.J.A.C. 8:44-2.8; New York: 6 NYCRR 750-2.5; Ohio: OAC Ann. 3745-50-48; OAC Ann. 3745-50-58; Pennsylvania: 25 Pa. Code 92.41; 25 Pa. Code 252.306; Tennessee: Tenn. Comp. R. & Regs. 1200-4-5-.07; Tenn. Comp. R. & Regs. R. 1220-4-3-.27; Texas: 30 TAC 290.46; 30 TAC 291.89; 30 TAC 319.7; Virginia: 4 VAC 50-60-430; 9 VAC 25-31-190; 9 VAC 25-32-80; 9 VAC 25-110-80; 9 VAC 25-151-70; 9 VAC 25-180-70; 9 VAC 25-196-170; 9 VAC 25-210-90; 9 VAC 25-220-80; 9 VAC 25-610-130; 9 VAC 25-660-100; 9 VAC 25-670-100; 9 VAC 25-790-270; 9 VAC 25-820-70; West Virginia: W. Va. CSR 47-10-5:

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Legal Citations: U.S. Federal: 40 CFR 144.28; 40 CFR 144.51; Illinois: 35 Ill. Adm. Code 702.150; 35 Ill. Adm. Code 704.150;

Production Application:

Record Series Name

Record Series Description

Retention Period

Underground Injection Wells -Operating Records

Records related to the operation of underground injection wells. Includes the nature and composition of all injected fluids (retention note: for EPA administered programs, the owner or operator shall continue to retain the records on composition of injected fluids after the three year retention period unless he delivers the records to the Regional Administrator or obtains written approval from the Regional Administrator to discard the records)

Life of Well + 3

Production Application:

Legal Citations: U.S. Federal: 40 CFR 144.28; 40 CFR 144.51; Illinois: 35 III. Adm. Code 704.150;

Underground Storage Tanks

Documentation of underground storage tanks including testing, monitoring, calibration, maintenance and repair, release detection performance claims to calibration and maintenance schedules, operation and inspection records of cathodic protection, evidence of financial assurance mechanisms and sampling results

Permanent

Production Application:

Legal Citations: U.S. Federal: 40 CFR 280.11; 40 CFR 280.20; 40 CFR 280.31; 40 CFR 280.33; 40 CFR 280.34; 40 CFR 280.45; 40 CFR 281.111; Arizona: A.R.S. 49-1003; A.A.C. R18-12-211; A.A.C. R18-12-220; A.A.C. R18-12-231; A.A.C. R18-12-233; A.A.C. R18-12-234; A.A.C. R18-12-245; A.A.C. R18-12-301; California: Cal Health & Saf Code 25283.5; Cal Health & Saf Code 25292; Cal Health & Saf Code 25293; 18 CCR 1271; 23 CCR 2642; 23 CCR 2649; 23 CCR 2660; 23 CCR 2712; 23 CCR 2715; 23 CCR 2809.1; Illinois: 35 III. Adm. Code 732.308; 35 III. Adm. Code 734.425; 35 III. Adm. Code 732.614; 35 III. Adm. Code 734.665; 41 III. Adm. Code 170.460; 41 III. Adm. Code 170.480; 41 III. Adm. Code 170.490; 41 III. Adm. Code 170.530; 41 III. Adm. Code 170.540; 41 III. Adm. Code 170.550; 41 III. Adm. Code 170.660; 41 III. Adm. Code 170.780; Indiana: Ind. Code Ann. 13-23-12-5; 328 IAC 1-7-1; 329 IAC 9-1-1.1; 329 IAC 9-2-1; 329 IAC 9-3-1; 329 IAC 9-3.1-2; 329 IAC 9-3-1-2; 3 3.1-4; 329 IAC 9-7-6; 329 IAC 9-8-21; 675 IAC 22-2.3-206; Iowa: 567 IAC 135.1 (455B); 567 IAC 135.3 (455B); 567 IAC 135.4 (455B); 567 IAC 135.5 (455B): 567 IAC 135.7 (455B): 567 IAC 135.12 (455B): 567 IAC 136.20 (455B): Kentucky: KRS 224.60-120: Maryland: COMAR 26.10.02.03-6; COMAR 26.10.03.08; COMAR 26.10.03.10; COMAR 26.10.04.01; COMAR 26.10.04.02; COMAR 26.10.04.04; COMAR 26.10.04.05; COMAR 26.10.05.06; COMAR 26.10.07.01; Michigan: Mich. Admin. Code R. 29.2115; Mich. Admin. Code R 29.2117; Mich. Admin. Code R 29.2119; Mich. Admin. Code R 29.2127; Mich. Admin. Code R 29.2168d; Mich. Admin. Code R 29.5230; Missouri: 10 CSR 10-2.260; 10 CSR 10-5.220 (3); 10 CSR 20-10.011; 10 CSR 20-10.020; 10 CSR 20-10.031; 10 CSR 20-10.033; 10 CSR 20-10.034; 10 CSR 20-10.045; 10 CSR 20-11.107; New Jersey: N.J. Stat. 58:10A-27; N.J.A.C. 7:1E-2.16; N.J.A.C. 7:14B-4.1; N.J.A.C. 7:14B-5.2; N.J.A.C. 7:14B-5.4; N.J.A.C. 7:14B-5.6; N.J.A.C. 7:14B-6.7; New Mexico: 20.5.9.921 NMAC; 20.5.14.10 NMAC; 20.5.14.11 NMAC; 20.5.4.400 NMAC; 20.5.5.15 NMAC; 20.5.5.17 NMAC; 20.5.5.19 NMAC; 20.5.5.401 NMAC; 20.5.5.501 NMAC; 20.5.5.503 NMAC; 20.5.5.504 NMAC; 20.5.5.9 NMAC; 20.5.6.606 NMAC; 20.5.9.911 NMAC; 20.5.9.921 NMAC; 20.5.9.971 NMAC; New York: 6 NYCRR 598.8; 6 NYCRR 599.6; 6 NYCRR 599.16; 6 NYCRR 613.4; 6 NYCRR 613.5; Ohio: OAC Ann. 1301:7-9-04; OAC Ann. 1301:7-9-05; OAC Ann. 1301:7-9-06; OAC Ann. 1301:7-9-07; OAC Ann. 1301:7-9-08; OAC Ann. 1301:7-9-16; Pennsylvania: 58 P.S. 456; 25 Pa. Code 245.421; 25 Pa. Code 245.422; 25 Pa. Code 245.432; 25 Pa. Code 245.434; 25 Pa. Code 245.435; 25 Pa. Code 245.441; 25 Pa. Code 245.446; 25 Pa. Code 977.23; Tennessee: Tenn. Comp. R. & Regs. R. 1200-1-15-.01; Tenn. Comp. R. & Regs. R. 1200-1-15-.02; Tenn. Comp. R. & Regs. R. 1200-1-15-.03; Tenn. Comp. R. & Regs. R. 1200-1-15-.04; Tenn. Comp. R. & Regs. R. 1200-1-15-.08; Tenn. Comp. R. & Regs. R. 1200-1-15-.09; Texas: 30 TAC 37.875; 30 TAC 334.8; 30 TAC 334.10; 30 TAC 334.43; 30 TAC 334.45; 30 TAC 334.46; 30 TAC 334.47; 30 TAC 334.48; 30 TAC 334.49; 30 TAC 334.50; 30 TAC 334.51; 30 TAC 334.52; 30 TAC 334.53; 30 TAC 334.54; 30 TAC 334.56; Virginia: 9 VAC 25-580-90; 9 VAC 25-580-100; 9 VAC 25-580-120; 9 VAC 25-580-180; 9 VAC 25-590-40; 9 VAC 25-590-160; Canada Federal: Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations, SOR/2008-197 s. 27,33,37,40,43,44; New Brunswick: Petroleum Product Storage and Handling Regulation, N.B. Reg. 87-97, Part XIV s 231,233; Yukon Territory: Storage Tank Regulations, Y.O.I.C. 1996/194 s. 11; Storage Tank Regulations, Y.O.I.C. 1996/194 s. 14;

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Underground Storage Tanks -Closure Records

Underground storage tank permanent closure/change-in-service compliance records, closure site investigations

Permanent

Production Application:

Legal Citations: U.S. Federal: 40 CFR 280.34; 40 CFR 280.74; California: Cal Health & Saf Code 25293; 22 CCR 67450.13; Illinois: 41 Ill. Adm. Code 170.490; 41 III. Adm. Code 170.660: 41 III. Adm. Code 170.670: Indiana: 329 IAC 9-6-4: Iowa: 567 IAC 135.4 (455B): 567 IAC 135.15 (455B): Maryland: COMAR 26.10.10.05; Michigan: Mich. Admin. Code R 29.2119; Mich. Admin. Code R 29.2159; Mich. Admin. Code R 29.5229; Missouri: 10 CSR 20-10.034; 10 CSR 20-10.074; New Jersey: N.J.A.C. 7:14B-5.6; N.J.A.C. 7:14B-9.5; New Mexico: 20.5.5.19 NMAC; 20.5.8.14 NMAC; 20.5.8.804 NMAC; New York: 6 NYCRR 598.10; Pennsylvania: 25 Pa. Code 245.435; 25 Pa. Code 245.455; Tennessee: Tenn. Comp. R. & Regs. R. 1200-1-15-.07; Tenn. Comp. R. & Regs. R. 1200-1-15-.09; Texas: 30 TAC 334.54; 30 TAC 334.55; Virginia: 9 VAC 25-580-120; 9 VAC 25-580-350; Canada Federal: Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations, SOR/2008-197 s. 44:

Waste - Non-Hazardous

Records related to company compliance with environmental regulations pertaining to the discharge or other handling and disposal of non-hazardous wastes. The records many consist of service agreements with third parties, reports showing the status of discharge, handling or

disposal, landfill records, and other related records

Current Year + 3

Production Application:

Legal Citations:

Illinois: 415 ILCS 5/21; 415 ILCS 5/22.01; 35 Ill. Adm. Code 733.139; Ontario: General - Waste Management, R.R.O. 1990, Reg. 347 s. 16(14)(5); General - Waste Management, R.R.O. 1990, Reg. 347 s. 17.2; General - Waste Management, R.R.O. 1990, Reg. 347 s. 18(6.1); General - Waste Management, R.R.O. 1990, Reg. 347 s.18(8),(9); General - Waste Management, R.R.O. 1990, Reg. 347 s.23(1); General -Waste Management, R.R.O. 1990, Reg. 347 s. 23(6); General - Waste Management, R.R.O. 1990, Reg. 347 s. 25(7),(8); General - Waste Management, R.R.O. 1990, Reg. 347 s.27(5),(6)

Federal Contracts

Annual Capital Plans - By Site

Records consisting of five-year capital plans, which are required by federal contracts. The plans are submitted annually during the life of the contract

Prime Contract Completion + 6

Production Application:

Production Application:

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Production Application:

Legal Citations: U.S. Federal: 48 CFR 4.705-1; 48 CFR 52.246-2;

Production Application:

Production Application:

Legal Citations: U.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25

Record Series Name

Record Series Description

Retention Period

Charitable Contributions

These records document contributions of corporate funds for charitable causes as requested by employees or by the company's management. The records consist of requests for funding, evidence of tax status, reviews and approvals / denials, and documentation related to the disbursement and expenditure of the funds. These records also document information regarding employee contributions to charitable organizations (i.e. to United Way or Water for People).

Current year + 6

Production Application:

Legal Citations: U.S. Federal: 26 CFR 1.170A-13(a)(1); 26 CFR 1.170A-13(b)(1),(2); 26 CFR 1.170A-13(b)(3); Arizona: A.R.S. 42-1105; California: 18 CCR 1698; 18 CCR 4901; Illinois: 35 ILCS 5/501; 35 ILCS 5/913; 35 ILCS 620/7; Michigan: MCL 205.28; Mich. Admin. Code R 205.4103; Missouri: 144.640 R.S.Mo.; New Jersey: N.J. Stat. 54:10A-5.12; N.J. Stat. 54:10A-5.20; N.J. Stat. 54:10A-14.1; N.J.A.C. 18:2-7.3; New Mexico: N.M. Stat. Ann. 7-1-10; 3.1.5.8 NMAC; 3.1.5.15 NMAC; New York: 20 NYCRR 39.1; Ohio: ORC Ann. 324.05; ORC Ann. 5747.17; Texas: Tex. Tax Code 111.0041; Virginia: 23 VAC 10-20-90; Va. Code Ann. 58.1-102; 20 VAC 5-300-40; West Virginia: W. Va. Code 11-23-19; Germany: Tax Code, Sec. 33; Canada Federal: Income Tax Act s 230; Northwest Territories: Income Tax Act, R.S.N.W.T. 1988, c. I-1, Part II, s 44; Ontario: Corporations Tax Act, 1990, Part VI, s 94(1) and 97; Income Tax Act, 1990 Part III, s 39(1); Corporations Tax Act, 1990, Part VI, s 94(1) and 97; Quebec: Act Respecting the Minister of Revenue, Section 35

Employee Expense Records

Records generated by employees in order to claim reimbursement for travel and other petty expenses they incur during the course of their work; includes p-card statements, copies of receipts and other supporting documentation

Current Year + 7

Production Application:

Legal Citations: U.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25

Escheatable Property Records

Records documenting unclaimed monies or other assets and their disposition, based on the requirements of state escheat laws

Date of Filing + 10

Production Application:

Legal Citations: U.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25; State Requirements

General Ledger

General and subsidiary ledgers, journals and books of account documenting the company's assets and liabilities

Current Year + 7

Production Application: JD Edwards

Legal Citations: U.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25

	_NUM001_111517_Attachment	
Business Process / Sub-Process Page 38		
Record Series Nam	Record Series Description	Retention Period
Journal Entries	Records showing adjustments to entries in the general ledger and other subsidiary books of account; includes all supporting documentation	Current Year + 7
Production Application:		
Legal Citations: U	.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25	
Revenue Backup	Part of journal entries, part of the system that creates revenue entries. It is similar to a subsystem of the accounting system	Current Year + 7
Production Application:		
Legal Citations:		
Trial Balances	Statements of the debit and credit balances of the organization's financial accounts, created for the purpose of ascertaining their equality	Current Year + 7
Production Application:		
Legal Citations: U	.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25	
N-9s	IRS tax identification form filled out by vendors/contractors identifying type of organization, identification number and withholding information	Until Superseded
Production Application:		
Legal Citations:		

Audit / SOX

Business Process / Sub-Process

Page 39 of 114

Record Series Name

Record Series Description

Retention Period

Audit Reports - Internal

Reports containing findings and recommendations resulting from audits of internal company departments and business units. Also includes post-audit evaluations as to compliance with the audit findings and recommendations

Audit Completion + 7

Production Application:

Legal Citations: U.S. Federal: 18 CFR 125.3(4)(b); Arizona: A.A.C. R14-2-411; Illinois: 83 III. Adm. Code 615 Appendix A(20)(b); Iowa: 199 IAC 18.7(476);

Michigan: Mich. Admin. Code R 460.2530(b); Missouri: 4 CSR 240-50.020; New Jersey: N.J.A.C. 14:9-5.1; New Mexico: 17.12.1.9 NMAC; New

York: 16 NYCRR 733.15(8)(b); Pennsylvania: 52 Pa. Code 65.4; Virginia: 20 VAC 5-300-40 (8)(b); West Virginia: W. Va. CSR 150-3-2;

Audit Work Papers - Internal

Work papers and other supporting documentation pertaining to audits of internal company

Audit Completion + 7

departments and business units

Production Application:

Legal Citations: U.S. Federal: 18 CFR 125.3(4)(b); Arizona: A.A.C. R14-2-411; Illinois: 83 III. Adm. Code 615 Appendix A(20)(b); Iowa: 199 IAC 18.7(476);

Michigan: Mich. Admin. Code R 460.2530(b); Missouri: 4 CSR 240-50.020; New Jersey: N.J.A.C. 14:9-5.1; New Mexico: 17.12.1.9 NMAC; New

York: 16 NYCRR 733.15(8)(b); Pennsylvania: 52 Pa. Code 65.4; Virginia: 20 VAC 5-300-40 (8)(b); West Virginia: W. Va. CSR 150-3-2

Audits - External Public Accounting Firm

These records document audit reports conducted by certified public accounting firms (i.e.

Permanent

Audit Completion +7

Price Waterhouse); also includes supporting documentation

Production Application:

Legal Citations: U.S. Federal: 18 CFR 125.3(4)(a); Arizona: A.A.C. R14-2-411; Illinois: 83 Ill. Adm. Code 615 Appendix A(20)(a); Iowa: 199 IAC 18.7(476);

Michigan: Mich. Admin. Code R 460.2530(a); Missouri: 4 CSR 240-50.020; New Jersey: N.J.A.C. 14:9-5.1; New Mexico: 17.12.1.9 NMAC; New

York: 16 NYCRR 733.15(8)(a); Pennsylvania: 52 Pa. Code 65.4; Virginia: 20 VAC 5-300-40 (8)(a); West Virginia: W. Va. CSR 150-3-2;

Government Regulatory Audits Records generated during company audits conducted by federal and state regulatory bodies

including Utilities Commissions, the Department of Labor (DOL), the Office of Federal Contracts Compliance (OFCCP), and other government agencies. The records consist of requests for information, documentation in response to the Audit, submissions by the company in response to the Audit, audit findings, company exceptions or other

communications, and resolution of the required actions.

Production Application:

Legal Citations: U.S. Federal: 18 CFR 125.3(4); Arizona: A.A.C. R14-2-411; Illinois: 83 Ill. Adm. Code 615 Appendix A; (13); 83 Ill. Adm. Code 615 Appendix

A(20) [25 YEARS]; Iowa: 199 IAC 18.7(476); Michigan: Mich. Admin. Code R 460.2530; Missouri: 4 CSR 240-50.020; New Jersey: N.J.A.C. 14:9-5.1; New Mexico: 17.12.1.9 NMAC; New York: 16 NYCRR 733.15(8),(9); Pennsylvania: 52 Pa. Code 65.4; Virginia: 20 VAC 5-300-40

(8),(9); West Virginia: W. Va. CSR 150-3-2

Production Application:

Finance / Controller

Business Process / Sub-Process		_NUM001_111517_Attachment
Record Series Name		Page 42 of 114 Retention Period
Bad Debts and Collections	Records related to past-due accounts showing monies owed the company but in arrears by the parties. Records consist of aged receivable reports, correspondence with the accounts and with collection agencies, bankruptcy filings, dunning or past due notices and other records documenting efforts to collect monies owed. Bad debt charge off information is system-entered via Data Center Processing Requests (DCPR). Also includes batch reconciliation sheets that are SOX compliant	Current Year + 7
Production Application: EC	CIS	
Legal Citations: U.S	S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25	
Bank Account Records	Original bank account set up forms, signature cards, service requests, Certificates of Incumbency, and all supporting documentation	Until Superseded + 7
Production Application:		
Legal Citations:		
Budgets - Departmental	Departmental budgets showing projected / approved expenditures and / or revenue projections by fiscal year.	Current Year + 1
Production Application:		
Legal Citations:		
Budgets - Master Set	Consolidated master set of the organization's budgets, showing proposed / approved expenditure and / or revenue projections from all departmetns or cost centers.	Current Year + 3
Production Application:		
Legal Citations:		

Production Application:

Legal Citations:

confirmations

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Record Series Name

Record Series Description

Retention Period

Consolidated Financial Statements and Subsidiary Financial Statements Year-end annual statements showing the financial condition of the organization at various intervals and statements prepared by external public accounting firms. The external public accounting firm attest to the fact that the findings were derived in accordance with generally accepted accounting procedures

Permanent

Production Application:

Legal Citations: U.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25; NARUC 65(a);

Debt Agreements / Payment Letters

Records containing information about the debt amount, lending terms, maturity and other aspects of a debt agreement

Maturity of Debt + 6

Production Application:

Legal Citations: NARUC 4;

Electronic Transfers

Outgoing wires and debit/credit electronic transfers, includes electronic disbursement requests, confirmation reports, and all supporting documentation

Current Year + 7

Production Application:

Legal Citations:

Equity Investment Financial Information

Copies of financial statements to aid in analyzing business operations and the company's share of the earnings or loss of equity

Current Year + 10

Production Application:

Legal Citations:

Executive Team / Board Reports

Reports to the company's executive team and board of directors of the status of issues related to business/financial planning and performance

Current Year + 7

Production Application:

Investment Reports - Internal

Reports summarizing investor contacts for each weekly reporting period. The reports are submitted to the company's senior management

Current Year + 1

Production Application:

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Legal Citations: U.S. Federal: 26 CFR 1.6001-1; Revenue Procedure 98-25; 26 CFR 31.6001-5; 29 CFR 1627.3(a)

Production Application: JD Edwards

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Record Series Name

Record Series Description

Retention Period

Payroll Registers

Reports generated by the general ledger system showing receipts and disbursements for the organization's payroll accounts by pay period

Current Year + 7

Current Year + 7

Production Application:

Legal Citations:

Time Keeping and Attendance

Records

Time cards, attendance records and time control tracking used to record the daily attendance

of employees for purposes of payroll administration; may also include vacation requests and

tracking

Production Application: JD Edwards

Legal Citations: Federal: 29 CFR 516.6; 29 USCS 1027; California: 8 CCR 11010; 18 CCR 3020; 22 CCR 1085-2; Cal Lab Code 1174; Cal Unemp Ins Code

1085; Georgia: GA. Code Ann. 34-2-11; GA. Code Ann. 34-4-5; Ga. Comp. R. & Regs. r. 300-2-6-.01; Illinois: 820 III. Comp. Stat. Ann. 105/8; 56 III. Adm. Code 280.140; 56 III. Adm. Code 300.630; Indiana: Ind. Code Ann. 22-1-1-15; Maryland: Md. Labor and Employment Code Ann. 3-424; Massachusetts: 455 CMR 2.06; Michigan: MCL 408.479; Minnesota: Minn. Stat. 177.30; Minn. Stat. 268.186; Missouri: 290.520 R.S.Mo.; New Hampshire: RSA 279:27; N.H. Admin. Rules, Lab 803.04; New Jersey: N.J. Stat. 34:11-4.6; N.J.A.C. 12:56-4.1; New York: 12 NYCRR 142-2.6; 20 NYCRR 2380.12; N.Y. Labor Law 195; North Carolina: 13 N.C.A.C. 12.0801; NCGS 95-25.15; Ohio: Ohio Rev. Code Ann. 4111.08; Ohio Rev. Code Ann. 4141.18; Oklahoma: O.A.C. 240:10-5-90; O.A.C. 710:90-1-11; Oregon: ORS 653.045; ORS 656.758; ORS 657.660; Or. Admin. R. 436-070-0040; Or. Admin. R. 839-020-0080; Tennessee: Tenn. Comp. R. & Regs. R. 0560-2-3-.10; Texas: 40 TAC 815.106; Washington: Rev. Code Wash. (ARCW) 49.46.040; WAC 296-17-35201; WAC 296-126-050; WAC 296-126-214; WAC 296-128-010;

Wisconsin: Wis. Stat. 104.09; Wis. Adm. Code DWD 270.14; Wis. Adm. Code DWD 272.11; Wis. Adm. Code DWD 274.06;

W-2s Records of annual employee income and withholdings

Current Year + 7

Production Application:

Legal Citations:

W-4s Forms filled out by employees for withholding purposes Acti

Active + 6

Production Application:

Legal Citations:

Plant Accounting

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Employee Exposure Records

Information documenting the exposure of employees to various hazardous materials, chemicals, lead, asbestos or other substances in the workplace. Generally includes employee health related allegations arising from employment related exposure, medical monitoring records, medical surveillance data, and workplace monitoring records Note: These records may be referred to as Industrial Hygiene records

Life of Corporation

Production Application:

Legal Citations: NARUC 27; U.S. Federal: 29 CFR 1910.120(f)(8)(i); 29 CFR 1910.1001(m); 29 CFR 1910.1020(d); 29 CFR 1910.1048(o); 29 CFR 1910.1025(n); 29 CFR 1910.1450; California: 8 CCR 3204; 8 CCR 5198; 8 CCR 5208; Indiana: Ind. Code Ann. 22-8-1.1-17.1; 620 IAC 1-1-16; Kentucky: 803 KAR 2:062; Maryland: Md. Labor and Empl Code Ann. 5-701; Michigan: Mich. Admin. Code R 325.3457; Mich. Admin. Code R 325.3458; Mich. Admin. Code R 325.51951; Mich. Admin. Code R 325.51952; Mich. Admin. Code R 325.51953; Mich. Admin. Code R 325.70111; New Mexico: N.M. Stat. Ann. 50-9-11; New York: NY CLS Labor 879; Ohio: OAC Ann. 3701-32-02 Appx 3701 Chapter 9; Pennsylvania: 34 Pa. Code 315.2; Virginia: 16 VAC 25-80-10; Ontario: Occupational Health and Safety Act, R.S.O. 1990, c.O.1 s 26;

Employee Medical Records

Records documenting the condition/status of employees' health during their tenure with the company. Records typically include employee health status determined by medical personnel. medical and employment questionnaires/histories, results of medical exams and lab tests, medical opinions, diagnoses, descriptions of treatment and prescriptions and employee medical complaints

Duration of Employment + 40

Production Application:

Legal Citations: NARUC 27; U.S. Federal: 29 CFR 1910.120(f)(8)(I); 29 CFR 1910.1020(d); 29 CFR 1910.1030(h), 29 CFR 1910.1450; California: 8 CCR 3204; Indiana: 620 IAC 1-1-16; Kentucky: 803 KAR 2:320; Michigan: Mich. Admin. Code R 325.3456; Mich. Admin. Code R 325.3458; Mich. Admin. Code R 325.70015; New York: 16 NYCRR 733.15(27),(28); Ohio: OAC Ann. 3701-32-02 Appx 3701 Chapter 9; Virginia: 16 VAC 25-80-10; 20 VAC 5-300-40(27),(28);

Hot Work Permits

Permits for riveting, welding, flame cutting or other fire or spark-producing operations

Expiration + 1

Production Application:

Legal Citations: U.S. Federal: 40 CFR 68.85; California: 8 CCR 5189;

Incident Response and Reporting Records

Records documenting responses to environmental or health and safety incidents or issues, or other reportable incidents

Current Year + 5

Production Application:

Legal Citations: U.S. Federal: 40 CFR 68.60; 40 CFR 68.81; California: 8 CCR 5189; Canada Federal: Canadian Environmental Protection Act, 1999 s. 203(7);

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Record Series Name

Record Series Description

Retention Period

Incident Response and Reporting Records - Contract Operations

Records documenting responses to environmental or health and safety incidents or issues, or other client reportable incidents

Life of Contract or 5 Years, whichever is later

Production Application:

Legal Citations:

Material Safety Data Sheets Material safety data shee

Material safety data sheets (MSDS) showing the presence and use of substances that may be related to employee health and safety

Until Superseded + 30

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1910.1020(d); 29 CFR 1910.1200; California: Cal Lab Code 6386; 8 CCR 3204; 8 CCR 5194; Illinois: 820 ILCS 255/9;

Iowa: 875 IAC 110.1 (88, 89B); Kentucky: 803 KAR 2:320; Maryland: Md. Labor and Empl Code Ann. 5-405; Michigan: MCL 408.1014a; Mich. Admin. Code R 325.3457; Mich. Admin. Code R 325.70109; New Jersey: N.J. Stat. 34:5A-12; N.J.A.C. 7:1E-4.2; N.J.A.C. 8:59-5.1; N.J.A.C. 12:100-7.2; New Mexico: N.M. Stat. Ann. 50-9-5.1; Pennsylvania: 34 Pa. Code 307.10a; Tennessee: Tenn. Code Ann. 50-3-2008; Tenn. Code Ann. 50-3-2015; Tenn. Comp. R. & Regs. R. 0800-1-9-.05; Tenn. Comp. R. & Regs. R. 0800-1-9-.11; Tenn. Comp. R. & Regs. R. 0800-1-9-.12; Texas: Tex. Health & Safety Code 502.005; Tex. Health & Safety Code 502.006; 25 TAC 295.5; Canada Federal: Canada Occupational Safety

and Health Regulations s 10.3;

Noise Exposure Records Records related to the organization's noise abatement program. May include exposure Active + 10

measurement records, noise reduction initiatives, education and training and related records

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1910.95; California: 8 CCR 5100; Michigan: Mich. Admin. Code R 325.60125; Canada Federal: Canada Occupational

Safety and Health Regulations s 7.3; Quebec: Occupational Health and Safety, O.C. 885-2001, 2001 G.O. 2, 3888, Div. XV s 141;

Noise Exposure Records –

Audiometric Tests

Employee audiometric test results and related records

Duration of Employment

Production Application: ESS Database

Legal Citations: U.S. Federal: 29 CFR 1910.95; California: 8 CCR 5100; Michigan: Mich. Admin. Code R 325.60125; Yukon Territory: General Safety

Regulations, Y.O.I.C. 1986 s38;

Record Series Name

Record Series Description

Retention Period

Occupational Injuries and Illnesses Records

Records and reports of accidents and illnesses related to employment in the workplace, OSHA 300 Logs, privacy case lists, annual summaries, OSHA 301 Incident Report forms, sharps injury logs, as required by the U.S. Occupational Safety and Health Administration. Documentation includes employee information, dates of injury or onset or illness, dates unable to work, description of how the injury or illness occurred

Current Year + 10

Production Application:

Legal Citations: NARUC 65; U.S. Federal: 29 CFR 1904.4; 29 CFR 1904.30; 29 CFR 1904.33; 29 CFR 1904.44; California: 8 CCR 5193; 8 CCR 14300.33; Illinois: 820 ILCS 225/4; 820 ILCS 305/6; 820 ILCS 310/6; 56 III. Adm. Code 350.220; 56 III. Adm. Code 350.230; 56 III. Adm. Code 350.240; 56 III. Adm. Code 350.250; 83 III. Adm. Code 615 Appendix A(65),(69); Indiana: Ind. Code Ann. 22-3-4-13; Ind. Code Ann. 22-3-7-37; Ind. Code Ann. 22-8-1.1-43.1; Iowa: Iowa Code 86.11; Iowa Code 88.6; Kentucky: KRS 338.161; KRS 342.038; Maryland: Md. Labor and Employment Code Ann. 5-702; Md. Labor and Employment Code Ann. 5-703; COMAR 09.12.21.06; COMAR 09.12.21.10; Michigan: MCL 408.1061; MCL 418.805; Mich. Admin. Code R 325.70015; New Jersey: N.J. Stat. 34:6A-40; New Mexico: 11.5.1.16 NMAC; N.M. Stat. Ann. 50-9-19; New York: NY CLS Work Comp 110; NY CLS Work Comp 131; 16 NYCRR 733.15(65); Ohio: ORC Ann. 4123.28; OAC Ann. 4123-3-03; OAC Ann. 4123-19-03; Pennsylvania: 77 P.S. 995; Tennessee: Tenn. Comp. R. & Regs. R. 0800-1-3-.04; Tenn. Comp. R. & Regs. R. 0800-1-3-.06; Texas: Tex. Lab. Code 409.006; 28 TAC 120.1; 28 TAC 120.2; 28 TAC 120.3; 28 TAC 120.4; Virginia: Va. Code Ann. 65.2-900; 20 VAC 5-300-40(65); West Virginia: W. Va. Code 16-36-2; W. Va. Code 21-3A-8; W. Va. CSR 42-15-5; W. Va. CSR 64-82-7; W. Va. CSR 64-82-7; Canada Federal: Canada Labour Code, Occupational Health and Safety Regulations (SOR/86-304), Section 15.6(1); 15.7(1) and 15.11; Canada Labour Standard Regulations s 24(4); Canada Occupational Safety and Health Regulations s 15.7,15.11,16.13; New Brunswick: First Aid Regulation, N.B. Reg. 2004-130 s 7,10;

Respirator Fit Test Records

Documentation of respirator fit testing and the respirator program

Until Superseded

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1910.134; 29 CFR 1910.1048(o); California: 8 CCR 5144; Michigan: Mich. Admin. Code R 325.2442a; Ohio: OAC Ann. 4123:1-21-02;

Safety Equipment Inspections

Documentation and certification records of safety equipment inspections; may include fire fighting equipment, fire extinguishers, safety shower and eye wash, ladders and platforms, emergency communication, etc.

Current Year + 5

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1910.38; 29 CFR 1910.68; 29 CFR 1910.157; 29 CFR 1910.160; 29 CFR 1910.179; 29 CFR 1910.217; 29 CFR 1910.1200: 40 CFR 68.95: 40 CFR 721.125: California: 8 CCR 6151: 8 CCR 6175: 19 CCR 574.5: 19 CCR 594.5: 19 CCR 904.1: 19 CCR 904.2: Indiana: 675 IAC 18-1.4-22; 675 IAC 22-2.3-15; Michigan: Mich. Admin. Code R 29.1625; Mich. Admin. Code R 408.10911; Ohio: OAC Ann. 1301:7-7-06; OAC Ann. 4123:1-21-02; OAC Ann. 4123:1-21-06; Pennsylvania: 34 Pa. Code 50.55; 34 Pa. Code 50.57; 34 Pa. Code 50.61; 34 Pa. Code 50.62; 34 Pa. Code 50.63; Canada Federal: Canada Occupational Safety and Health Regulations s 17.9; Quebec: Occupational Health and Safety, O.C. 885-2001, 2001 G.O. 2, 3888, Div. VI s 48;

Record Series Name

Record Series Description

Retention Period

Safety Inspection Records

Documentation associated with safety inspections at buildings/facilities and jobsites; also includes annual reviews based on the Toxic Catastrophe Prevention Act

Current Year + 10

Production Application:

Legal Citations: West Virginal: W. Va. CSR 87-1-12; Canada Federal: Canada Occupational Safety and Health Regulations s 10.6;

Safety Meter Inspection and Calibrations

Calibration and inspection records of different safety meter devices including explosimeters, CO monitors. EO monitors, smoke detectors, etc.

Current Year + 1

Until Superseded + 10

Production Application:

Legal Citations:

Safety Plans and Procedures Official copies of safety plans, policies and procedures developed to enhance safety in the

workplace and ensure compliance with government safety laws and regulations; may include hazardous communications, emergency response plans, fire evacuation plans, fire prevention

plans

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1910.38; 29 CFR 1910.39; 20 CFR 1910.1200; 40 CFR 68.39; California: Cal Lab Code 6401.7; 8 CCR 3203; 8 CCR 3220;

Illinois: 430 ILCS 45/4; Mich. Admin. Code R 408.10623; Mich. Admin. Code R 408.10624; Mich. Admin. Code R 408.41842; New Jersey: N.J.A.C. 7:1E-4.2; Ohio: OAC Ann. 3745-85-01; Pennsylvania: 25 Pa. Code 109.707; 34 Pa. Code 303.2; 34 Pa. Code 305.2; 34 Pa. Code 305.3; 52 Pa. Code 101.3; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.34; Canada Federal: Canada Federal: Canada Occupational Safety

and Health Regulations s 11.12;

Safety Records Records documenting the safety condition of field facilities. The records consist of safety

committee meeting minutes, near misses and other related records

Current Year + 5

Production Application:

Legal Citations: California: 8 CCR 3203; Pennsylvania: 34 Pa. Code 129.1005; Tennessee: Tenn. Comp. R. & Regs. R. 0800-2-3-.08; New Brunswick:

Occupational Health and Safety Act, S.N.B. 1983, c.O-0.2 s 14; Quebec: Health and Safety Committees, R.Q. c. S-21, r.6.1 Div. V s31;

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Record Series Name

Record Series Description

Retention Period

Safety Training Records

Documentation of safety training received by employees; typically includes labaratory operations, emergencies, noise, hazardous wastes, bloodborne pathogens, hazardous chemicals, asbestos and hazmat, Hazardous Materials Transportation HAZMAT Training Records

Life of Corporation

Production Application:

Legal Citations: NARUC 27; U.S. Federal: 29 CFR 1910.95; 29 CFR 1910.120 (Appendix E)(9); 29 CFR 1910.217; 29 CFR 1910.1001(m); 29 CFR 1910.1030(h); 49 CFR 172.704; Arizona: A.A.C. R9-14-616; California: 8 CCR 5193; 8 CCR 5208; Iowa: 875 IAC 3.22 (88, 89B); Kentucky: 803 KAR 2:200; Maryland: Md. Labor and Empl Code Ann. 5-503; Michigan: Mich. Admin. Code R 325.52129; Mich. Admin. Code R 325.52133; Mich. Admin. Code R 325.70015; Mich. Admin. Code R 325.70016; Mich. Admin. Code R 408.15119; New Jersey: N.J.A.C. 7:1E-2.12; N.J.A.C. 7:1E-2.15; N.J.A.C. 12:100-7.8; New York: 12 NYCRR 820.4; Pennsylvania: 34 Pa. Code 307.10a; Tennessee: Tenn. Code Ann. 50-3-2008; Tenn. Code Ann. 50-3-2015; Tenn. Comp. R. & Regs. R. 0800-1-9-.05; Tenn. Comp. R. & Regs. R. 0800-1-9-.11; Tenn. Comp. R. & Regs. R. 0800-1-9-.12; Texas: Tex. Health & Safety Code 502.009; 25 TAC 295.7; Canada Federal: Canada Occupational Safety and Health Regulations s 10.15,17.8; Ontario: Confined Spaces, O. Reg. 632/05 s 21;

Human Resources

ADA Compliance Records

Records pertaining to employees with disabilities and their accommodations under the Americans with Disabilities Act

Active + 3

Active + 5

Production Application:

Legal Citations:

Affirmative Action Plans and

Reporting

Plans, policies, reports and various documentation related to the affirmative action and equal employment opportunity programs; may include analysis records of HR activities and

developments to demonstrate compliance with affirmative action requirements

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1607.4; 41 CFR 60-1.12; 41 CFR 60-3.4; Canada Federal: Employment Equity Act s 17; Employment Equity Regulations s

11, 12:

Employee Information Database Database tracking employee personal information, employment history, status and payroll Duration of Employment + 7 information

Production Application: JD Edwards

Legal Citations: U.S. Federal: 29 CFR 1627.3(a); Arizona: A.A.C. R6-3-1702;

Employee Manuals Employee manual containing benefits of the corporation, personnel corporate policies and Until Superseded + 6 compensation

Production Application:

Legal Citations: U.S. Federal: 29 CFR 825.500;

III. Adm. Code 680.807; Iowa: 567 IAC 81.14 (455B, 272C); Michigan: Mich. Admin. Code R 325.11915; Pennsylvania: 25 Pa. Code 252.304; Northwest Territories: Boilers and Pressure Vessels Regulations, N.W.T. Reg. 006-93 s. 53; Ontario: Certification of Drinking Water System Operators and Water Quality Analysts, O. Reg. 128/04 s 29; Drinking Water Testing Services, O. Reg. 248/03 s 13; Yukon Territory: Boilers and Pressure Vessels Act Regulations, Y.O.I.C. 1980_303 Part II s. 17;

Active + 3

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Record Series Name

Record Series Description

Retention Period

External Discrimination Claims

Documentation pertaining to employee complaints of discrimination, retaliation, etc., received through external bodies, including but not limited to Equal Employment Opportunity Commission or state agency, including the complaitns, responses, supporting documentation,

Final Resolution + 5

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1602.7; 29 CFR 1602.14; 29 CFR 1602.21; Arizona: A.R.S. 41-1482; California: 2 CCR 7287.0; Iowa: 161 IAC 3.7;

Kentucky: KRS 344.250; 104 KAR 1:030; Missouri: 8 CSR 60-3.010; Tennessee: Tenn. Comp. R. & Regs. R. 1500-1-.03; Texas: Tex. Lab. Code

21.301; Canada Federal: Canada Labour Code s 257;

resolutions, opinions, etc.

Family Medical Leave Act Records Requests of individual employees who have exercised their rights to take extended leave

from employment under the U.S. Family Medical Leave Act. Records typically include dates/hours of FMLA leave taken, copies of notices of leave, employer policies, premium

payments of employee benefits, medical certifications, records of disputes

Production Application:

Legal Citations: U.S. Federal: 29 CFR 825.500; New Jersey: N.J.A.C. 4A:6-1.21B; Canada Federal: Canada Labour Standard Regulations s 24(2);

Human Resources Related Audits Audits conducted to ensure compliance with employment and labor laws (e.g., FLSA, I-9,

compensation, etc.), including supporting documentation and results

Audit Completion + 3

Production Application:

Legal Citations:

I-9 Records Forms documenting eligibility for employment as required by the U. S. Immigration and

Naturalization Service

Duration of Employment + 1 or 3 Years From Date of Hire, whichever is later

Production Application:

Legal Citations: U.S. Federal: 8 CFR 274a.2(b)(2)(A);

Record Series Name

Personnel Files - Master Set

Records consisting of the official personnel files for all employees throughout the organization; typically includes applications, resumes, drug/alcohol testing, and other preemployment documents, personnel status changes, correspondence, compensation, requests for reasonable accommodation, employee ethics training attendance acknowledgements, military leave forms, short term disability forms, disciplinary actions, annual performance reviews and exit interviews

Duration of Employment + 7

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Production Application:

Legal Citations:

NARUC 27; U.S. Federal: 29 CFR 516.5; 29 CFR 825.500; 29 CFR 1602.14; 29 USCS 1059; 41 CFR 60-1.12; 41 CFR 60-4.3; 41 CFR 60-250.80; 41 CFR 60-741.80; 49 CFR 382.301(d)(2); Arizona: A.A.C. R20-5-1210; California: Cal Gov Code 12946; Cal Lab Code 1197.5; Cal Unemp Ins Code 1085; 8 CCR 11040; 8 CCR 11160; 22 CCR 1085-2; Illinois: 820 ILCS 105/8; 820 ILCS 112/20; 56 III. Adm. Code 320.140; 56 III. Adm. Code 2520.110; 83 III. Adm. Code 615 Appendix A(48),(49),(50); Ind. Code Ann. 22-4-19-6; Ind. Code Ann. 22-9-2-6; 646 IAC 3-10-1; Iowa: 871 IAC 22.1 (96); 875 IAC 216.2 (91D); 875 IAC 216.3 (91D); 875 IAC 216.6 (91D); Kentucky: KRS 341.190; 787 KAR 1:180; 803 KAR 1:066; Maryland: Md. Labor and Employment Code Ann. 3-305; Md. Labor and Employment Code Ann. 8-625; COMAR 09.12.02.02; Michigan: MCL 408.479; Mich. Admin. Code R 408.702; Mich. Admin. Code R 408.9009; Mich. Admin. Code R 421.115; Missouri: 290.520 R.S.Mo.; 8 CSR 60-3.010; New Jersey: N.J.A.C. 7:18-2.10; N.J.A.C. 8:44-2.6; N.J.A.C. 12:16-1.3; N.J.A.C. 12:16-2.1; N.J.A.C. 12:16-2.2; N.J.A.C. 12:56-4.1; New Mexico: 11.3.400.401 NMAC; N.M. Stat. Ann. 51-1-27; New York: NY CLS Labor 575; 12 NYCRR 142-2.6; 16 NYCRR 733.15(27),(28); Ohio: ORC Ann. 4111.08; ORC Ann. 4111.14; ORC Ann. 4141.18; OAC Ann. 4141-23-01; Pennsylvania: 43 P.S. 336.6; 43 P.S. 766; 34 Pa. Code 63.64; 34 Pa. Code 231.31; 61 Pa. Code 113.8; Tennessee: Tenn. Code Ann. 50-7-701; Tenn. Comp. R. & Regs. R. 1500-1-.03; Texas: Tex. Lab. Code 205.024; Tex. Lab. Code 301.081; 40 TAC 815.106; Virginia: Va. Code Ann. 60.2-114; 16 VAC 5-32-10; 20 VAC 5-300-40(27),(28); West Virginia: W. Va. Code 21-1-3; W. Va. Code 21-1B-4; W. Va. Code 21-5-9; W. Va. Code 21-5C-5; W. Va. Code 21A-10-4; W. Va. CSR 42-5-4; W. Va. CSR 42-8-4; W. Va. CSR 42-8-7; W. Va. CSR 42-8-8; W. Va. CSR 83-1-5; Canada Federal: Canada Labour Standard Regulations s 24(1),(2); Employment Equity Act s 17; Employment Equity Regulations s 11, 12; Employment Insurance Act s 87; Employment Insurance Regulations a 19; New Brunswick: Employment Standards Act, S.N.B. 1982, c. E-7.2, Part IV s 60; Northwest Territories: Employment Standards Act, S.N.W.T. 2007, c. 13, Part 6 s 50; Labour Standards Act, R.S.N.W.T. 1988, c L-1, Part VI s 46; Ontario: Employer Health Tax Act, R.S.O. 1990, c. E.11, s 12; Quebec: Non-Remunerated Workers, R.R.Q., 1981 s 4; Registration System or the Keeping of a Register, R.Q. c. N-1.1 s 1; Yukon Territory: Employment Standards Act, R.S.Y. 2002 s.62;

Position Descriptions / Classifications

Records used to describe all classified positions in the organization. Records define the duties, responsibilities and qualifications of the positions and levels of compensation as reflected on salary scales or wage rate tables. Also includes job analyses showing physical requirements for specific positions

Until Superseded + 3

Production Application:

Legal Citations: U.S. Federal: 29 CFR 516.5; 29 CFR 1620.32; 29 CFR 1627.3(b)1; Illinois: 56 III. Adm. Code 2520.110; Maryland: Md. Labor and Employment Code Ann. 3-305; New Jersey: N.J.A.C. 7:1E-4.2; Pennsylvania: 43 P.S. 336.6;

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Record Series Name

Record Series Description

Retention Period

Recruitment Records

All documentation related to job positions available within the company. Typically includes position approvals, hiring requisitions, position descriptions, job posting records, advertising, applications and resumes, interview notes, testing, reference and background checks, correspondence, drug/alcohol test results of applicants not hired

Current Year + 3

Production Application:

Legal Citations: NARUC 27; U.S. Federal: 29 CFR 1602.14; 29 CFR 1607.4; 29 CFR 1627.3(b)1; 41 CFR 60-1.12; 41 CFR 60-4.3; 41 CFR 60-250.80; 41 CFR

60-741.80; 48 CFR 52.222-27; California: Cal Gov Code 12946; Illinois: 56 Ill. Adm. Code 2520.110; 83 Ill. Adm. Code 615 Appendix

A(48),(49),(50); New York: 16 NYCRR 733.15(27),(28); Virginia: 20 VAC 5-300-40(27),(28);

Relocation Records

Records relating to the relocation of employees from one community of work to another; may include relocation procedures, authorizations, records documenting expenses associated with

Current Year + 6

the move and reimbursement

Production Application:

Legal Citations: U.S. Federal: 26 CFR 1.446-1; 26 CFR 1.6001-1; 26 CFR 1.6038A-3; Revenue Procedure 98-25; 26 CFR 31.6001-1; 26 CFR 31.6001-5; Iowa:

701 IAC 51.3 (422);

Self-Identification Forms Records used to comply with Canadian employment requirements. The records show the

hiring status of legally protected groups, including minorities, persons with disabilities, and

other protected groups. Note: This record series applies only to Canadian employees

Production Application:

Legal Citations:

Service Award Records Information related to employee recognition for years of service; may include

correspondence, tracking information, notices to employees, gift selections, etc.

Current Year + 5

Current Year + 7

Production Application:

Production Application:

Record Series Name

Record Series Description

summaries required by ERISA and summary plan documents (SPD)

Retention Period

Benefit Plans

Plans describing the benefits provided to employees under various categories of benefits (i.e., health and dental insurance, pension plans, employee stock ownership, 401K and other saving plans, accidental death and dismemberment, etc.); may include benefit plan

Life of Plan + 6

Permanent

Current Year + 5

Duration of Employment / Final

Payment of Benefits + 6

Production Application:

Legal Citations: U.S. Federal: 29 CFR 1627.3(b)2; 29 USCS 1027; 29 USCS 1059

Benefits Center Calls Documentation related to calls received by the Benefits Centers regarding questions about

benefits from employees or retirees; includes birth certificates, tax returns and other

supporting documentation

Production Application: Clarify

Legal Citations:

Discrimination Test Results -

Benefits

Testing of the 401k plan against the Internal Revenue Service (IRS) requirements to ensure the plan is applicable to all employees and all salaries

Production Application:

Legal Citations:

Employee Benefit Files

Records related to employee benefits; typically includes beneficiaries, insurance coverage selected by employees, enrollment forms, payroll deduction authorizations, family status changes, letters, open enrollment materials, hardship withdrawal forms, contribution rate forms, distributions, mortgage loan forms, scholarship programs, matching gifts and savings

plans

Production Application:

Legal Citations: U.S. Federal: 29 USCS 1027; 29 USCS 1059;

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Record Series Name	Record Series Description	Retention Period
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Information Technology

Production Application:

Legal Citations:

Backup Schedules Schedules showing what is being backed up and the backup frequency Until Superseded + 1

Production Application:

Legal Citations:

Computer System / Network Logs Logs of system network activity used to track employee network usage, attacks on the 45 Days

network and to identify the systems that were touched and where the attack originated. Logs

also include firewall logs, intrusion detection logs and network monitoring logs

Production Application:

Legal Citations:

Content Filter Logs Logs used to monitor Internet usage 60 Days

Production Application:

Acquisitions - Non-consummated

These are records related to the acquisition of companies for which closing did not occur. The records consist of legal, financial, and business analysis of the acquisition prospects, as well as other due diligence documentation.

Active + 5

Production Application:

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Record Series Name

Record Series Description

Retention Period

Divestiture Records

Records pertaining to business entities which separate from the company. The records document the terms and conditions of the separation and the status of the assets and liabilities at the time of the divestiture

Permanent

Production Application:

Legal Citations: NARUC 37; Illinois: 83 III. Adm. Code 615 Appendix A(29-31); New York: 16 NYCRR 733.15(37); Virginia: 20 VAC 5-300-40(37);

Farm Property Leases

Lease agreements executed with local farmers who use company land for purposes of agricultural production

Life of Lease + 3

Production Application:

Legal Citations:

Initial Public Offerings – Due Diligence Records

Documents created to support the requirements of third parties in the IPO process. The records consist of eight categories of documents: environmental, human resources, corporate, contracts, intellectual property, real property, financial, and miscellaneous. The scope of the due diligence extends to all subsidiaries in each of the eight categories

Current Year + 7

Production Application:

Legal Citations:

Intellectual Property Assets - Patents

Records granting monopoly rights to produce and sell products and/or processes for the life of the patent. Records consist of patent applications, registered patents and supporting documentation

Permanent

Production Application:

Business Process / Sub-Proc	cess	S
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Record Series Name Record Series Description Retention Period

Intellectual Property Assets - Trademarks

Records related to the legal management of trademarks (words, symbols, etc., used to distinguish specific company products/services) as intellectual property. Generally includes applications, registration records and supporting documentation

Permanent

Production Application:

Legal Citations:

Legal Opinions Analysis of legal issues and opinions of counsel as to appropriate courses of action from both legal and business perspectives

Resolution of Issues Related to Opinion + 5

Production Application:

Legal Citations:

Litigation Cases Records relating to lawsuits involving the company as a party. The records consist of pretrial F discovery documents, briefs, pleadings, motions, orders and transcripts.

Final Resolution + 5

Production Application:

Legal Citations: Illinois: 83 Ill. Adm. Code 615 Appendix A(71);

Outside Counsel Files Records pertaining to the use of counsel in outside law firms for assistance in various legal matters; may include firm materials, surveys, bills, etc.

Active + 5

Production Application:

Legal Citations:

Permits Government issued permits for occupation/use, construction and operation/maintenance of facilities owned or operated by the company

Permanent

Production Application:

Legal Citations: NARUC 6; Illinois: 35 III. Adm. Code 320.204; 35 III. Adm. Code 690.205; 83 III. Adm. Code 615 Appendix A(7); 83 III. Adm. Code 615

Appendix A(8); Indiana: 327 IAC 8-3.5-12; New York: 16 NYCRR 733.15(6); Pennsylvania: 34 Pa. Code 403.42;

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Record Series Name

Record Series Description

Retention Period

Settlements and Final Judgements of Litigation Cases

Records relating to the final judgments of litigation cases and/or settlment records associated with litigation cases.

Permanent

Production Application:

Legal Citations:

Compliance / Regulatory

Rate Case Documentation Documentation related to the submission of a rate case application to the appropriate

regulatory commission. Documents may include formal applications, exhibits, pre-filing testimonies; responses to data requests and discovery, and any supporting documentation

Active + 20

Production Application:

Legal Citations: Illinois: 83 Ill. Adm. Code 615 Appendix A(71);

Regulatory Commissions Orders Decisions on the rate case and tariff spelling out rates for the various classes of service;

Permanent

includes tariff schedules

Production Application:

Legal Citations: NARUC 5,6,46; California: Cal Pub Util Code 487; Illinois: 220 ILCS 5/9-103; 83 III. Adm. Code 255.20; 83 III. Adm. Code 615 Appendix

A(7),(36); Iowa: 199 IAC 21.2 (476); Kentucky: KRS 278.160; 807 KAR 5:011; Missouri: 4 CSR 240-3.340; New Mexico: N.M. Śtat. Ann. 62-8-3; New York: 16 NYCRR 89.1; 16 NYCRR 733.15(5),(6),(46),(47); Ohio: ORC Ann. 4905.30; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-

.05; Texas: 30 TAC 291.103; Virginia: 20 VAC 5-300-40(46),(47); West Virginia: W. Va. CSR 150-2-2; W. Va. CSR 150-7-4 4.1.d; 4.2.a, 4.5.b, 4.12.a; Ontario: Small Drinking Water Systems, O. Reg. 319/08 s 10; Germany: Tax Code, Art. 147;

Regulatory Complaints Formal complaints regarding service and other issues received from applicable regulatory Final F

authorities

Final Resolution + 5

Production Application:

Record Series Description

Retention Period

Regulatory Filings

Reports and formal filings submitted to federal and state regulatory agencies. Records consists of copies of required submissions and schedules, affidavits, petitions, motions, testimonies, interrogatories, orders, lead lag studies (recommended cash working capital requirements), and all supporting documentation

Current Year + 20

Current Year + 25

Permanent

Production Application:

Legal Citations: California: 20 CCR 1.8; 20 CCR 1.13; Iowa: 199 IAC 31.2 (476);

SEC Filings Reports of company operations (i.e. 8ks, 10qs, 10ks) submitted to the U.S. Securities and

Exchange Commission and maintained on that agency's website. These include filings

submitted under both the 1933 and 1934 Securities and Exchange Acts

Production Application:

Legal Citations: NARUC 5; U.S. Federal: 17 CFR 230.402; 17 CFR 230.428; 17 CFR 230.433; 17 CFR 230.471; 17 CFR 232.302; 17 CFR 232.304; 17 CFR

270.8b-11; Illinois: 83 III. Adm. Code 615 Appendix A(4); New Mexico: 17.3.610.14 NMAC; New York: 16 NYCRR 733.15(5); Virginia: 20 VAC 5-

300-40(5);

SEC Filings - Supporting

Documentation

Supporting documentation used to prepare the various reports submitted to the Securities and Exchange Commission. Records may include financial statement backups for forms 3, 4,

and 5, remarks, shareholder listings, vote counts, share counts, inspector of election reports,

employee benefit plan information and copy of employee benefit plan annual reports

Production Application:

Legal Citations: NARUC 2; U.S. Federal: 17 CFR 230.428; Illinois: 805 ILCS 5/7.30; 83 Ill. Adm. Code 615 Appendix A(4); Indiana: Ind. Code Ann. 23-1-52-1;

Iowa: Iowa Code 491.47; Kentucky: KRS 271B.16-010; Maryland: Md. Corp. & Assoc. Code Add. 2-209; New Jersey: N.J. Stat 14A:5-28; New Mexico: N.M. Stat. Ann. 53-11-31; N.M. Stat. Ann. 53-11-50; New York: NY CLS Bus Corp 624; 16 NYCRR 733.15(2),(3),(5); Ohio: ORC Ann.

1701.37; Tennessee: Tenn. Code Ann. 48-26-101; Tenn. Code Ann. 67-5-1106; Virginia: 20 VAC 5-300-40(5);

Special Tariff Reports Reports submitted biannually to state regulatory authorities for customers with incentive rates Current Year + 5

Production Application:

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

State Regulation Records -Homeowner Services

Records with state regulatory agencies. The records consist of annual or periodic regulatory filings, correspondence with agency officials, and other compliance-related matters

Current Year + 5

Production Application:

Legal Citations: Illinois: 215 ILCS 152/45; New Mexico: N.M. Stat. Ann. 59A-58-15;

Contracts

Contracts and Agreements -General

Contracts and agreements executed between the organization and other parties for a wide variety of business purposes, specifying the terms and conditions and other obligations of the parties; may include supporting documents used to develop the agreements

Expiration of Agreement + 6

Production Application:

Legal Citations:

Customer Contracts Contracts with customers for all lines of business operated by AWE. The contracts show

rights and obligations and terms and conditions with customers. May also include customer correspondence and other supporting documentation

Expiration of Contract + 6

Production Application:

Legal Citations: Indiana: 327 IAC 7.1-3-3;

Employment Agreements Contracts and agreements with company employees specifying the terms and conditions of

their employment. Also includes severance agreements

Expiration of Contract + 6

Production Application:

Legal Citations: NARUC 7; California: Cal Lab Code 1197.5; Cal Lab Code 2810; 18 CCR 3020; Illinois: 56 Ill. Adm. Code 240.400; 83 Ill. Adm. Code 615

Appendix A(9); Iowa: Iowa Code 91A.3; Iowa Code 91A.6; New York: 16 NYCRR 733.15(7); Virginia: 20 VAC 5-300-40(7);

Legal Citations: Illinois: 83 III. Adm. Code 615 Appendix A(35); New Jersey: N.J.A.C. 14:3-6.2; New York: 16 NYCRR 733.15(45); Virginia: 20 VAC 5-300-

40(45); West Virginia: W. Va. CSR 150-7-5 5.1.d;

Business Process / Sub-Process		Page 83 of 114	
Record Series Name	Record Series Description	Retention Period	
Subcontractor Management Records	Records used to manage the company's relations with subcontractors. The records consist of copies of contracts, subcontractor performance reports, problem resolutions and other related subcontractor matters	Expiration of Agreement + 6	
Production Application:			
Legal Citations: Illinois: 8	83 III. Adm. Code 602.60;		
Vendor Contracts	Contracts with vendors supplying products and services to the company; including contracts with marketing consultants and vendors	Expiration of Contract + 6	
Production Application:			
Legal Citations:			
Water Sales Agreements	Sale-for-resale agreements; sales of water to municipalities which do not operate their own treatment plants; rather, they purchase water from the company	Expiration of Agreement + 6	
Production Application:			
Legal Citations:			
Corporate			
Annual Meeting Records	Records of the annual meeting of shareholders. May include proxy statements and related materials, meeting agenda, and other records used in planning and conducting the meetings	Current Year + 20	
Production Application:			

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Legal Citations: NARUC 1; Illinois: 83 III. Adm. Code 615 Appendix A(1); Virginia: 20 VAC 5-300-40(1);

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Record Series Name

Record Series Description

Retention Period

Annual Reports

Annual reports submitted to state regulatory authorities including Secretaries of State and **Public Service Commissions**

Permanent

Production Application:

Legal Citations: NARUC 3; U.S. Federal: 17 CFR 232.304; Illinois: 83 III. Adm. Code 615 Appendix A(64); Iowa: 199 IAC 23.1 (476); New Mexico: 17.3.610.14 NMAC: New York: NY CLS Tax 211: 16 NYCRR 733.15(2).(3): Ohio: ORC Ann. 5733.03: Virginia: 20 VAC 5-300-40(4):

Board of Directors Minutes of

Meetings

Master set of minutes of meetings of the company's board of directors. Also includes minutes of BOD committees of the parent company and first tier subsidiaries, to include the Service Company, Capital Corp, Laurel Oak Properties Corp., and TWHLL (a limited liability company)

Permanent

Production Application:

Legal Citations: NARUC 6; Arizona: A.R.S. 10-1601; California: Cal Corp Code 1500; Illinois: 805 ILCS 5/7.75; 83 III. Adm. Code 615 Appendix A(5),(6); Indiana: Ind. Code Ann. 23-1-52-1; Iowa: Iowa Code 490.1601; Iowa Code 491.47; Kentucky: KRS 271B.7-080; KRS 271B.16-010; Michigan: MCL 450.1485; Missouri: 351.215 R.S.Mo.; New Jersey: N.J. Stat 14A:5-28; New Mexico: 17.12.720.13 NMAC; 17.3.360.9 NMAC; N.M. Stat. Ann. 53-11-31; N.M. Stat. Ann. 53-11-48; N.M. Stat. Ann. 53-11-50; New York: NY CLS Bus Corp 624; 16 NYCRR 733.15(6); Ohio: ORC Ann. 1701.37; Pennsylvania: 15 Pa.C.S. 1508; Tennessee: Tenn. Code Ann. 48-26-101; Texas: Tex. Bus. Corp. Act art. 2.44; Tex. Business Organizations Code 3.151; Virginia: Va. Code Ann. 13.1-770; 20 VAC 5-300-40(2),(3),(6); West Virginia: W. Va. Code 31D-16-1601; Canada Federal: Canada Business Corporation Act s 20; Income Tax Regulations s 5800; New Brunswick: Companies Act, R.S.N.B. 1973, c. C-13, s 104, 105; Northwest Territories: Business Corporations Act, S.N.W.T. 1996, c. 19, Part IV s 21; Ontario: Business Corporations Act, R.S.O. 1990, c. B.16 Part XI, s 140; Corporations Act, 1990, Part VII, s 299, 300, and 302; Quebec: Companies Act, R.S.Q. c. C-38, Part I, Div. XXVII s 104, 105, 107; Companies Act, R.S.Q. c. C-38, Part II, Div. XIX s 197, 198, 200; Yukon Territory: Business Corporations Act, R.S.Y. 2002, s. 23;

Corporate Organization Charts

Master copies of the official corporate organization structure.

Until Superseded + 3

Production Application:

Legal Citations:

Corporate Policies and Procedures

Master copies of official company policies, directives, procedures and practices

Until Superseded + 10

Production Application:

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Record Series Name

Record Series Description

Retention Period

Corporate Records

Company's official file of corporate documents, including but not limited to: licenses and qualifications to do business for all jurisdictions, formations and dissolutions, subsidiary stock records, charters and bylaws, articles of incorporation, powers of attorneys, and other records Permanent

Production Application:

Legal Citations: NARUC 6; Arizona: A.R.S. 10-120; A.R.S. 10-1601; California: Cal Corp Code 213; Illinois: 83 III. Adm. Code 615 Appendix A(7); Iowa: Iowa Code 490.1601; Kentucky: KRS 271B.16-010; New York: 16 NYCRR 733.15(6); Canada Federal: Canada Business Corporation Act s 20; New Brunswick: Companies Act, R.S.N.B. 1973, c. C-13, s 104, 105; Northwest Territories: Business Corporations Act, S.N.W.T. 1996, c. 19, Part IV s 21; Ontario: Business Corporations Act, R.S.O. 1990, c. B.16 Part XI, s 140; Quebec: Companies Act, R.S.Q. c. C-38, Part I, Div. XXVII s 104, 105, 107; Companies Act, R.S.Q. c. C-38, Part II, Div. XIX s 197, 198, 200;

Ethics Certifications

Annual certifications of company employees that they have read, understand, and are in compliance with the company's Code of Ethics

7 Years

Production Application:

Legal Citations:

Ethics Committee Records

Records consisting of reports to the company's Ethics Committee. The reports summarize open and resolved cases, significant alleged violations of policy, and other related matters. Also includes minutes of committee meetings

7 Years

Production Application:

Legal Citations:

Ethics Investigations Records

Records related to allegations and investigations pertaining to possible violations of the company's Code of Ethics and resulting investigations

Final Resolution + 5

Production Application: NetWork

KAW_R_HDR_NUM00		
Business Process / Sub-Pr		Page 86 of 114
Record Series Name	Record Series Description	Retention Period
Ethics Policies and Procedures	Records documenting the development of the company's Code of Ethics and related policies and procedures	Until Superseded + 7
Production Application:		
Legal Citations:		
Ethics Training Records	Records documenting training provided to company employees and ethics investigators concerning the Code of Ethics and responsibilities for compliance	7 Years
Production Application:		
Legal Citations:		
Quarterly Board of Directors Meeting Records	Records prepared for uses at the Quarterly Board of Directors Meetings (Board Books)	Current Year +20
Production Application:		
Legal Citations:		
Real Estate		
Eminent Domain Proceedings – Legal Documentation / Valuation Data	Legal and business strategies in formulation of the company's position, legal briefs, discovery documentation, valuation analyses and justification, customer research findings and analysis, communications strategies and tactics	Permanent
Production Application:		
Legal Citations:		

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Legal Citations: Illinois: 83 Ill. Adm. Code 615 Appendix A(68); New Mexico: 17.12.720.18 NMAC; Ohio: OAC Ann. 1301:8-3-04; Pennsylvania: 7 P.S. 6610;

Production Application:

Record Series Description

Retention Period

Rental and Lease Agreements

Records used to manage and administer company owned rental property. The records consist of rental agreements, leases, rent payments, repair and maintenance records, and other related records. This will also include rental or property lease agreements for properties that the Company is renting or leasing from a third party.

Expiration of Agreement + 7

Production Application:

Legal Citations:

Shareholder Relations

Shareholder Dividend Registers

Registers listing dividends paid to shareholders of company stock

Current Year + 6

Production Application:

Legal Citations: NARUC 1; U.S. Federal: 26 CFR 1.561-2; Quebec: Companies Act, R.S.Q. c. C-38, Part I, Div. XXVII s 104, 105, 107; Companies Act, R.S.Q. c.

C-38, Part II, Div. XIX s 197, 198, 200;

Shareholder Proxies Records related to various issues that are voted upon by the shareholders by proxy, in Permanent

compliance with regulations pertaining to the administration of proxy votes

Production Application:

Legal Citations: NARUC 2; Illinois: 83 III. Adm. Code 615 Appendix A(5),(6); New York: 16 NYCRR 733.15(2),(3); Virginia: 20 VAC 5-300-40(2),(3),(6);

Shareholder Records Records related to annual shareholder meetings, copies of list of shareholders owning stock in Permanent

the company, and other related records

Production Application:

Legal Citations: NARUC 2; Arizona: A.R.S. 10-1601; Iowa: Iowa Code 491.47; Kentucky: KRS 271B.16-010; Maryland: Md. Corp. & Assoc. Code Add. 2-209;

New Jersey: N.J. Stat 14A:5-28; New Mexico: N.M. Stat. Ann. 53-11-31; N.M. Stat. Ann. 53-11-50; New York: NY CLS Bus Corp 624; 16 NYCRR 733.15(2),(3); Ohio: ORC Ann. 1701.37; Tennessee: Tenn. Code Ann. 48-26-101; Tenn. Code Ann. 67-5-1106; Ontario: Corporations Act, 1990, Part VII, s 299, 300, and 302; Quebec: Companies Act, R.S.Q. c. C-38, Part I, Div. XXVII s 104, 105, 107; Companies Act, R.S.Q. c. C-

38, Part II, Div. XIX s 197, 198, 200;

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Record Series Name

Record Series Description

Retention Period

Stock Transfer Records

Records showing the ownership of public companies through stock transactions; includes shareholder registers showing shares of stock owned by individual investors

Current Year + 6

Production Application:

Legal Citations:

NARUC 1; Illinois: 83 III. Adm. Code 615 Appendix A(1); New Mexico: N.M. Stat. Ann. 53-11-31; New York: 16 NYCRR 733.15(1); Tex. Business Organizations Code 21.173; Virginia: 20 VAC 5-300-40(1); Canada Federal: Canada Business Corporation Act s 20; New Brunswick: Companies Act, R.S.N.B. 1973, c. C-13, s 104, 105; Northwest Territories: Business Corporations Act, S.N.W.T. 1996, c. 19, Part IV s 21,50; Ontario: Business Corporations Act, R.S.O. 1990, c. B.16 Part XI, s 140,141; Quebec: Companies Act, R.S.Q. c. C-38, Part I, Div. XXVII s 104, 105, 107; Companies Act, R.S.Q. c. C-38, Part II, Div. XIX s 197, 198, 200; Yukon Territory: Business Corporations Act, R.S.Y. 2002, s. 23,50;

Operations

Boiled Water Orders

Orders requested and issued by state agenices due to actual or potential contaminated water

Current Year + 5

Production Application:

Legal Citations:

Carbon / Filter Media Project Records

Records related to carbon and filter media projects performed primarily for municipalities. The documentation demonstrates adherence to relevant standards and includes: contracts, quotations, project costs and timelines, bid sureties, raw materials purchasing, transportation of spent carbon, customs brokerage records, health and safety and environmental documentation

Project Completion + 7

Production Application:

Legal Citations:

Comprehensive Planning Studies (CPS)

Studies identifying the needs of the water company or water system; may include population studies, demand studies, hydrologic modeling

Current Study + 20 Years

Production Application:

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Daily Work Orders

Daily work orders for any and all installation, maintenance or other activities involving the system infrastructure. These are maintained on paper as well as digital files

Current Year + 6

Production Application: ORCOM / ECIS, Advantax, PowerPlant, Paper Vision

Legal Citations: NARUC 26; Illinois: 83 III. Adm. Code 615 Appendix A(67); New York: 16 NYCRR 733.15(26); Virginia: 20 VAC 5-300-40(24-26);

Engineering Plans and Drawings

Engineering records of the physical infrastructure of company operated plants and other facilities. The records consist of approved engineering plans and drawings, technical specifications, design calculations, and other design and build records

Permanent

Production Application: AutoCAD

Legal Citations: U.S. Federal: 48 CFR 52.236-16; 48 CFR 52.236-21; 48 CFR 552.227-71; Arizona: A.A.C. R18-9-D302; California: 22 CCR 64604; 26 CCR 22-64604; Missouri: 4 CSR 240-60.010; Texas: 30 TAC 290.46; Northwest Territories: Public Water Supply Regulations, R.R.N.W.T. 1990, c. P-23

s.23;

Engineering Project Files -Construction Phase

Construction phase documents include shop drawings/submittals, equipment components, reviewed and approved drawings, requests for information from contractors, change orders, final notices of completion, inspection reports, quality control and materials testing reports, INTE drawings, final working drawings, as-built drawings, shop drawings, repair and alteration drawings, contract drawings, project specifications, lighting plans, disability access records, maps, photographs and material and soil reports.

Life of Facility / Until Facility is Sold + 6

Production Application:

Legal Citations:

NARUC 35; Arizona: A.R.S. 40-360.30; A.A.C. R18-4-115; A.A.C. R18-9-D302; A.A.C. R18-9-D302; California: 22 CCR 64604; 26 CCR 22-64604; Illinois: 83 III. Adm. Code 310.70; 83 III. Adm. Code 615 Appendix A(28); Indiana: 327 IAC 8-3.5-12; Maryland: COMAR 20.73.02.10; COMAR 20.73.05.05; COMAR 26.03.12.04; Michigan: Mich. Admin. Code R 323.2190; New Mexico: 17.12.750.9 NMAC; 17.13.950.10 NMAC; 17.3.580.10 NMAC; New York: 16 NYCRR 503.10; 16 NYCRR 733.15(35),(36); Ohio: OAC Ann. 3745-42-11; Pennsylvania: 25 Pa. Code 963.18; 34 Pa. Code 403.42; 34 Pa. Code 403.43; Virginia: 20 VAC 5-300-40(36); West Virginia: W. Va. CSR 47-60-18; Northwest Territories: Public Water Supply Regulations, R.R.N.W.T. 1990, c. P-23 s.23;

Engineering Project Files - Design Phase

Project files related to engineering projects in the design phase. Records may include engineering reports, engineering plans, design concepts, cost analyses

Project Completion + 20

Production Application: Lotus Notes

Legal Citations: Illinois: 83 III. Adm. Code 310.70; New Mexico: 17.3.580.10 NMAC; New York: 16 NYCRR 733.15(35),(36);

KAW R HDR NUM001 111517 Attachment **Business Process / Sub-Process** Page 91 of 114 **Retention Period Record Series Name Record Series Description Engineering Specifications** Documentation includes bidding documents for the construction project, technical Permanent specifications and drawings Production Application: Legal Citations: Missouri: 4 CSR 240-60.010; Texas: 30 TAC 290.46; **Engineering Standards** Industry accepted codes, calculation methods, practices, etc. used in the process of Until Superseded + 10 engineering Production Application: Legal Citations:

Current Year + 5 Excavation / Restoration Records Records documenting excavations to customer or public property and restoration of the property back to the condition in which it was found prior water main breaks; includes

trenching logs

Production Application:

Legal Citations:

Fertilizer Product Records Records showing quarterly analysis of fertilizer products and details of shipment to end users Current Year + 6

Production Application:

Legal Citations:

Current Year + 10 Field Notes Observations of the field personnel related to disposal systems for waste water, soil or

ground water testing, dig and test pits

Production Application:

Record Series Na		Retention Period
Graph Chart Recorders	Charts recording the elevation of the river	10 Years
Production Application:		
Legal Citations:		
Illegal Connections	Records documenting the entry of unwanted water or other substances into the company's infrastructure	Current Year + 10
Production Application:		
Legal Citations:		
Laboratory Annual Cert	ifications Annual laboratory certifications conducted by state regulatory authorities	Expiration + 5
Production Application:		
Legal Citations:	Pennsylvania: 27 Pa.C.S. 4111;	
Laboratory Raw Data	Raw data used to create the final laboratory reports; including test results from instrumentations, calibrations of instruments, other criteria required to confirm results, drinking water samples, bacterial samples, microbiological chemical sampling data and water quality data. Also includes chair of custody forms for the samples	Current Year + 12
Production Application:		
Legal Citations:	U.S. Federal: 40 CFR 136.6; 40 CFR Part 136 Appendix A; 40 CFR Part 136 Appendix C; 40 CFR 141.80; 40 Cf 615; A.A.C. R18-11-602; California: 22 CCR 64604; 22 CCR 64690.80; 23 CCR 2550.8; 23 CCR 2550.9; 26 Cf 1-2; 327 IAC 8-2-20; Iowa: 567 IAC 42.5 (455B); 567 IAC 135.19 (455B); Kentucky: 401 KAR 8:020; Maryla Missouri: 10 CSR 60-9.010; New Jersey: N.J.A.C. 7:10-8.2; N.J.A.C. 7:18-4.5; Ohio: OAC Ann. 3745-81-33; Cf 3745-81-90; Pennsylvania: 25 Pa. Code 252.307; 25 Pa. Code 252.402; 25 Pa. Code 252.501; Tennessee: Te 140; Texas: 30 TAC 290.46; Northwest Territories: Public Water Supply Regulations, R.R.N.W.T. 1990, c. P-2 Drinking Water, R.Q. c. Q-2, r.18.1.1 Ch. III, Div. III s 30;	CR 22-64604; Indiana: 327 IAC 8-nd: COMAR 26.04.01.21; DAC Ann. 3745-81-80; OAC Ann. nn. Comp. R. & Regs. R. 1200-5-

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Current year + 20

Laboratory Test Reports

Test reports showing final laboratory test results; may include analytical reports, chemical analyses from well samples, lead and copper reports and discharge sample reports. Tests may be related to bacteria, organic, volatile organic compounds, plant processes, wet chemistry, metals, ion-exchange. Reports may be from internal and external testing facilities. Reports may be used to report drinking water quality to federal and state regulatory authorities

Production Application:

Legal Citations: U.S. Federal: 40 CFR 136.6; 40 CFR Part 136 Appendix A; 40 CFR Part 136 Appendix C; 40 CFR 141.33; 40 CFR 141.80; 40 CFR 141.91; 40 CFR 141.405; Arizona: A.A.C. R9-14-617; A.A.C. R18-4-103; California: 22 CCR 64423.1; 22 CCR 64453; 22 CCR 64470; 22 CCR 64690.80; 26 CCR 22-64423.1; 26 CCR 22-64470; Illinois: 35 III. Adm. Code 185.204; 35 III. Adm. Code 611.350; 35 III. Adm. Code 611.361; 35 III. Adm. Code 611.860; 327 IAC 8-2-47; Kentucky: 401 KAR 8:020; 401 KAR 8:150; 401 KAR 8:300; Maryland: COMAR 26.04.01.21; COMAR 26.08.05.07; Michigan: Mich. Admin. Code R 325.11506; Missouri: 4 CSR 240-10.030 (32-43); 10 CSR 60-9.010; New Jersey: N.J.A.C. 7:18-2.13; N.J.A.C. 7:18-4.6; N.J.A.C. 7:18-5.5; N.J.A.C. 7:18-5.6; Ohio: ORC Ann. 6109.12; OAC Ann. 3745-81-80; OAC Ann. 3745-81-90; OAC Ann. 3745-89-04; Pennsylvania: 25 Pa. Code 109.1107; 25 Pa. Code 252.706; 25 Pa. Code 271.103; 25 Pa. Code 271.621; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.14; Tenn. Comp. R. & Regs. R. 1200-5-1-.15; Tenn. Comp. R. & Regs. R. 1200-5-1-.17; Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Tenn. Comp. R. & Regs. R. 1200-5-1-.33; Texas: 30 TAC 290.44; 30 TAC 290.46; 30 TAC 290.117; Virginia; 9 VAC 25-32-460; 9 VAC 25-790-270; 12 VAC 5-585-300; 12 VAC 5-585-390; Ontario: Drinking Water Systems, O. Reg. 170/03 s 13(1),(2),(3); Drinking Water Testing Services, O. Reg. 248/03 s 13; Small Drinking Water Systems, O. Reg. 319/08 s 10; Small Drinking Water Systems, O. Reg. 319/08 s 22; Yukon Territory: Solid Waste Regulations, Y.O.I.C. 2000/11 s. 10;

Locate Requests

Notifications received from the one call notification or before you dig systems informing the utility of requests for marking of their lines

Current Year + 5

Production Application:

Legal Citations: New Mexico: 18.60.5.9 NMAC;

Main Breaks / Replacement Records

Records documenting breaks to water mains and repairs and replacements to these

components of the system infrastructure

Life of Equipment + 10

Production Application:

Legal Citations: Kentucky: 401 KAR 8:150;

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Record Series Name Record Series Description Retention Period

Manhole Inspection Records Inspection records of manholes located at wastewater plants Current Year + 3

Production Application:

Legal Citations: Ohio: OAC Ann. 4901:1-15-10;

Meter Card Records Historical records of each meter installed, relocated, removed or tested Permanent

Production Application: ORCOM / ECIS

Legal Citations: NARUC 23,49; Illinois: 83 III. Adm. Code 600.150; 83 III. Adm. Code 615 Appendix A(59); Indiana: 170 IAC 6-1-4; Iowa: 199 IAC 21.3 (476);

Kentucky: 807 KAR 5:006; COMAR 20.70.05.03; COMAR 20.70.05.04; COMAR 20.70.05.05; New Jersey: N.J.A.C. 14:3-4.7; New Mexico: 17.12.750.9 NMAC; 17.13.950.10 NMAC; New York: 16 NYCRR 733.15(23.3); Ohio: OAC Ann. 4901:1-15-19; Pennsylvania: 52 Pa. Code 65.8; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-.05; Tenn. Comp. R. & Regs. R. 1220-4-3-.09; Virginia: 20 VAC 5-300-40(23.3); West

Virginia: W. Va. CSR 150-7-6;

Meter Reading Edits Meter reads downloaded and reviewed for inconsistencies which may require a re-read. Edits Current Year + 3

show number of consecutive estimate accounts, accounts with inactive consumption and

accounts showing zero usage

Production Application:

Legal Citations: NARUC 48; Illinois: 83 III. Adm. Code 615 Appendix A(36-38); New York: 16 NYCRR 733.15(48),(49); Virginia: 20 VAC 5-300-40(48),(49);

Meter Replacement Records Records documenting replacement of meters installed or in inventory Current Year + 10

Production Application:

Legal Citations:

Meter Retirements Records of meter retirements or out of service; includes test and disposal documentation Retirement of Meter + 3

Production Application:

Legal Citations: Iowa: 567 IAC 21.6 (476); Maryland: COMAR 20.70.05.04; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-.10;

Record Series Description

Retention Period

Meter Test Records

Records of test performed on meters upon initial receipt, before installation, during service period and retirement

Retirement of Meter + 3

Production Application:

Legal Citations:

NARUC 23; Illinois: 83 III. Adm. Code 600.150; 83 III. Adm. Code 615 Appendix A(59); Indiana: 170 IAC 6-1-4; 170 IAC 6-1-11; Iowa: 567 IAC 21.6 (476); Kentucky: 807 KAR 5:006; Maryland: COMAR 20.70.06.06; Missouri: 4 CSR 240-10.030 (1-8); New Jersey: N.J.A.C. 14:3-4.5; N.J.A.C. 14:3-4.7; New York: 16 NYCRR 500.1; 16 NYCRR 733.15(23.3); Ohio: OAC Ann. 4901:1-15-19; Pennsylvania: 52 Pa. Code 65.8; Tennessee: Tenn. Comp. R. & Regs. R. 1220-4-3-.05; Tenn. Comp. R. & Regs. R. 1220-4-3-.09; Tenn. Comp. R. & Regs. R. 1220-4-3-.31; Virginia: 20 VAC 5-300-40(23.3); West Virginia: W. Va. CSR 150-7-6;

Non-Revenue Water

Records used to track the water that is produced and sold; the difference is non-revenue;

Current Year + 15

that is, water for which no revenue was generated

Production Application:

OPS SQL Software Database

Legal Citations: New York: 16 NYCRR 503.8; 16 NYCRR Accounts (460), (461), (463-465), (467), (602), (621), (924);

Operating Data - Contract Facilities

Data showing the operation of client facilities, including water quality monitoring, equipment monitoring; and other continuously tracked and monitored aspects of facility operations. The data is generated by the SCADA system and also includes summaries for management and regulatory reporting

7 Years or Per Contract. whichever is longer

Production Application:

Legal Citations:

Operations Production Delivery (OPD) Data

Records consisting of water delivery data (data that flows through the company's systems). The data is used for state reporting and trend analyses purposes. Also includes statistical reports on water sources and usage. The data is extracted from JD Edwards and other sources

Current Year + 15

Production Application:

Legal Citations: U.S. Federal: 40 CFR 141.175; 40 CFR 141.629; California: 22 CCR 64662; Illinois: 35 Ill. Adm. Code 611.957; 35 Ill. Adm. Code 611.979;

Indiana: 327 IAC 8-2.6-4; 327 IAC 8-2.6-5; Maryland: COMAR 26.04.01.27; Ohio: OAC Ann. 3745-81-77; OAC Ann. 3745-81-79;

Pennsylvania: 25 Pa. Code 109.701;

Business Process / Sub-Process

Record Series Name

Record Series Description

Retention Period

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Operator Log Books / Sheets

Manual daily logs completed by operators during their routine inspection of the facility including any wells or equipment; noting chemical analyses, plant operational status, well meter readings, chlorine residuals, equipment alarms, process changes, equipment repairs, lists of chemicals fed into the system, gauge readings and any problems or atypical conditions that may exist. Records are kept in log books at each plant site as well as each operator having their own log book to maintain on a daily basis

Current Year + 10

Production Application: **OPS SQL Software Database**

Legal Citations: NARUC 22,23; U.S. Federal: 40 CFR 63.1589; 40 CFR 141.76; 40 CFR 141.175; 40 CFR 141.571; 40 CFR 141.629; Arizona: A.A.C. R18-4-125; California: 22 CCR 64653.5; 22 CCR 64657.20; 22 CCR 64662; 35 III. Adm. Code 611.276; 35 III. Adm. Code 611.805; 35 III. Adm. Code 611.925; 35 III. Adm. Code 611.957; 35 III. Adm. Code 611.979; 35 III. Adm. Code 653.605; 35 III. Adm. Code 653.704; 83 III. Adm. Code 600.120; 83 III. Adm. Code 600.130; 83 III. Adm. Code 615 Appendix A(39),(58),(59); Indiana: 327 IAC 8-2.6-2; 327 IAC 8-2.6-4; 327 IAC 8-2.6-5; 327 IAC 8-2.6-6; Iowa: 567 IAC 42.4 (455B); 567 IAC 43.5 (455B); 567 IAC 43.9 (455B); Kentucky: 401 KAR 8:150; 401 KAR 8:162; 401 KAR 8:510; Maryland: COMAR 26.04.01.27; COMAR 26.04.01.05-4; Michigan: MCL 324.3303; Mich. Admin. Code R 325.10504; Mich. Admin. Code R 325.10722; Mich. Admin. Code R 325.11506; Missouri: 10 CSR 60-4.050; 10 CSR 60-4.055; New Jersey: N.J.A.C. 7:10A-1.12; New Mexico: 17.12.750.9 NMAC; 17.13.950.10 NMAC; New York: 16 NYCRR 503.5; 16 NYCRR 733.15(22.4),(23.3); Ohio: OAC Ann. 3745-81-72; OAC Ann. 3745-81-77; OAC Ann. 3745-81-79; OAC Ann. 3745-82-03; Pennsylvania: 25 Pa. Code 109.701; 52 Pa. Code 65.14; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Tenn. Comp. R. & Regs. R. 1200-5-1-.31; Texas: 30 TAC 290.44; 30 TAC 290.45; 30 TAC 290.46; Virginia: 9 VAC 25-790-270; 20 VAC 5-300-40(22.4),(23.3); West Virginia: W. Va. CSR 33-9-10; W. Va. CSR 150-5-5 5.1.7,5.3.4; W. Va. CSR 150-7-5 5.1.d; Canada Federal: Northwest Territories Waters Regulations, SOR/93-303 s 15; New Brunswick: Water Quality Regulation, N.B. Reg. 82-126 s 17; Northwest Territories: Boilers and Pressure Vessels Regulations, N.W.T. Reg. 006-93 s. 30; Public Water Supply Regulations, R.R.N.W.T. 1990, c. P-23 s.23; Ontario: Certification of Drinking Water System Operators and Water Quality Analysts, O. Reg. 128/04 s 27; Quebec: Quality of Drinking Water, R.Q. c. Q-2, r.18.1.1 Ch. III, Div. I s 22; Yukon Territory: Water Regulation, Y.O.I.C/ 2003/58 s. 14; Boilers and Pressure Vessels Act Regulations, Y.O.I.C. 1980 303 Part III s. 56;

Plant Equipment Records

Records on items of equipment installed or otherwise used by the company. The records describe the equipment, its technical capabilities and other aspects of its operation, maintenance, use and applicable warranties

Life of Equipment

Production Application:

Legal Citations: NARUC 22: U.S. Federal: 40 CFR 141.175; California: 8 CCR 5142: 8 CCR 5143: 22 CCR 64662; Illinois: 35 III. Adm. Code 653.801: 35 III. Adm. Code 653.802; 35 III. Adm. Code 653.804; 83 III. Adm. Code 615 Appendix A(59); Indiana: 327 IAC 8-10-10; New York: 16 NYCRR 733.15(23.3); Texas: 16 TAC 74.70; Virginia: 20 VAC 5-300-40(23.3); Canada Federal: Canada Occupational Safety and Health Regulations s 5.17, 12.14;

Plant Maintenance Records -**Contract Operations**

Records showing plant maintenance activities and upgrades in processing capabilities. The data is required to be reported to the municipalities

Expiration of Contract + 3

Production Application:

Legal Citations: U.S. Federal: 48 CFR 52.246-4; 48 CFR 52.246-5; 48 CFR 52.246-12; 48 CFR 552.227-71; 48 CFR 5152.245-9001; Arizona: A.A.C. R18-9-D302:

Record Series Description

Retention Period

Plant Maps and Plats

Maps and plats of the company's plants, distribution facilities/lines, and other physical infrastructure

Permanent

Production Application:

Legal Citations:

NARUC 35; Arizona: A.R.S. 45-343; Illinois: 35 III. Adm. Code 174.203; 35 III. Adm. Code 174.303; 83 III. Adm. Code 600.140; 83 III. Adm. Code 615 Appendix A(24-27); Indiana: 170 IAC 8.5-2-6; Iowa: 199 IAC 21.4 (476); Kentucky: 401 KAR 8:200; 807 KAR 5:071; Maryland: COMAR 20.70.04.02; COMAR 20.75.04.02; Missouri: 4 CSR 240-60.010; New Jersey: N.J.A.C. 14:3-6.2; New Mexico: 17.12.750.9 NMAC; 17.13.950.10 NMAC; New York: 16 NYCRR 733.15(35),(36); Ohio: OAC Ann. 4901:1-15-14; Pennsylvania: 25 Pa. Code 109.706; 52 Pa. Code 65.4; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.17; Tenn. Comp. R. & Regs. R. 1220-4-3-.14; Texas: 30 TAC 290.46; 30 TAC 291.81; Virginia: 20 VAC 5-300-40(35); West Virginia: W. Va. CSR 150-5-2 2.1.1, 2.5.1; W. Va. CSR 150-7-2; Quebec: Waterworks and Sewer Services, R.Q. c. Q-2, r.7, Div. II s 11;

Pumpage Records

Records documenting the amount of water pumped into the system each day. The total includes the quantities of water used in routine system operations as well as treated water. Records are also kept on the amount of water being pumped out by each well in the system. These are maintained daily on paper (facility logs) as well as the OPS SQL software database Current Year + 15

Production Application: **OPS SQL Software Database**

Legal Citations: NARUC 22,23; Illinois: 83 III. Adm. Code 600.120; 83 III. Adm. Code 615 Appendix A(58); New Jersey: N.J.A.C. 7:10-5.6; New York: 16 NYCRR 733.15(22.4); Ohio: OAC Ann. 4901:1-15-14; Virginia: 20 VAC 5-300-40(22.4); Canada Federal: Northwest Territories Waters Regulations, SOR/93-303 s 15; Yukon Territory: Water Regulation, Y.O.I.C/ 2003/58 s. 14;

Research Project Documents

Documentation related to various research projects conducted including research on water, wastewater, drinking water, water reuse, water treatment technology, water quality, testing for microbes, corrosion. Documents include progress reports, project data, test results, and all supporting documentation

Project Completion + 3

Current Year + 20

Production Application:

Legal Citations:

Research Reports

Final reports, research papers or journals papers prepared stating final results of research performed. Reports or papers may be published or contained in a database if results are

numerous

Production Application:

KAW R HDR NUM001 111517 Attachment **Business Process / Sub-Process** Page 98 of 114 **Retention Period Record Series Name Record Series Description** Life of Equipment Sanitary Sewer Backups / Records documenting backups or overflows of the sanitary sewer components of the system Overflows infrastructure and repairs or other action taken to restore normal operation **Production Application:** Legal Citations: Maryland: COMAR 26.08.10.06; Sanitary Sewer Cleaning Records documenting sewer cleanings utilizing jet roddings and other methods of sewer Current Year + 5 inspections and maintenance Production Application:

SCADA Non-Regulatory Historical Data

Legal Citations:

Records consisting of SCADA data not required to be retained by regulatory authorities but which has long-term value for trend analysis and other operational purposes. The data consists of snapshots captured in fifteen minute time intervals

Current Year + 6

Production Application: SCADA

Record Series Description

Retention Period

SCADA Production / Operational Data

Records consisting of SCADA data showing the operation of water treatment plants and distribution facilities, including production and distribution of water, water quality, flows, pressures, analytics, production/treatment plant and distribution systems for remote sites 6 Years

SCADA Production Application:

Legal Citations: NARUC 22,23; U.S. Federal: 40 CFR 141.76; 40 CFR 141.175; 40 CFR 141.571; 40 CFR 141.629; California: 22 CCR 64653.5; 22 CCR 64657.20; 22 CCR 64662; Illinois: 35 III. Adm. Code 611.276; 35 III. Adm. Code 611.805; 35 III. Adm. Code 611.925; 35 III. Adm. Code 611.957; 35 III. Adm. Code 611.979; 35 III. Adm. Code 653.605; 35 III. Adm. Code 653.704; 83 III. Adm. Code 615 Appendix A(39),(58); Indiana: 170 IAC 6-1-19; 327 IAC 8-2.6-2; 327 IAC 8-2.6-4; 327 IAC 8-2.6-5; 327 IAC 8-2.6-6; Iowa: Iowa Code 21.7 (476); 567 IAC 43.5 (455B); 567 IAC 43.9 (455B); Kentucky: 401 KAR 8:150; 401 KAR 8:162; 401 KAR 8:510; Maryland: COMAR 26.04.01.05-4; COMAR 26.04.01.27; Michigan: MCL 324.3303; Mich. Admin. Code R 325.10504; Mich. Admin. Code R 325.10722; Mich. Admin. Code R 325.11506; Missouri: 4 CSR 240-10.030 (32-43); 10 CSR 60-4.050; 10 CSR 60-4.055; New Jersey: N.J.A.C. 7:10A-1.12; New Mexico: 17.12.750.9 NMAC; 17.13.950.10 NMAC; New York: 16 NYCRR 503.5; 16 NYCRR 733.15(22.4); Ohio: OAC Ann. 3745-81-72; OAC Ann. 3745-81-77; OAC Ann. 3745-81-79; OAC Ann. 3745-82-03; Pennsylvania: 25 Pa. Code 109.701; 52 Pa. Code 65.6; 52 Pa. Code 65.14; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Tenn. Comp. R. & Regs. R. 1200-5-1-.31; Texas: 30 TAC 217.330; 30 TAC 290.44; 30 TAC 290.45; 30 TAC 290.46; Virginia: 9 VAC 25-790-270; 20 VAC 5-300-40(22.4); West Virginia: W. Va. CSR 33-9-10; W. Va. CSR 150-5-5 5.1.7,5.3.4; W. Va. CSR 150-7-5 5.1.d; Canada Federal: Northwest Territories Waters Regulations, SOR/93-303 s 15; New Brunswick: Water Quality Regulation, N.B. Reg. 82-126 s 17; Ontario: Certification of Drinking Water System Operators and Water Quality Analysts, O. Reg. 128/04 s 27; Quebec: Quality of Drinking Water, R.Q. c. Q-2, r.18.1.1 Ch. III, Div. I s 22; Yukon Territory: Water Regulation, Y.O.I.C/ 2003/58 s. 14;

SCADA Regulatory Data

Records consisting of SCADA data required to be reported to governmental regulatory authorities. The data consists of snapshots captured in fifteen minute time intervals and includes plant effluent water quality data, turbidity data, chlorine residuals data and any other data for which regulatory reporting is mandated

Current Year + 15

Production Application: SCADA

Legal Citations:

NARUC 22,23,49; U.S. Federal: 40 CFR 141.76; 40 CFR 141.175; 40 CFR 141.560; 40 CFR 141.571; 40 CFR 141.629; Arizona: A.A.C. R18-4-103; California: 22 CCR 64653.5; 22 CCR 64657.20; 22 CCR 64662; Illinois: 35 III. Adm. Code 611.276; 35 III. Adm. Code 611.805; 35 III. Adm. Code 611.925; 35 III. Adm. Code 611.956; 35 III. Adm. Code 611.957; 35 III. Adm. Code 611.979; 35 III. Adm. Code 653.605; 35 III. Adm. Code 653.704; 35 III. Adm. Code 654.402; 83 III. Adm. Code 615 Appendix A(39),(58); Indiana: 327 IAC 8-2.6-2; 327 IAC 8-2.6-4; 327 IAC 8-2.6-5; 327 IAC 8-2.6-6; Iowa; 567 IAC 43.5 (455B); 567 IAC 43.9 (455B); 567 IAC 43.10 (455B); Kentucky; 401 KAR 8:020; 401 KAR 8:150; 401 KAR 8:162; 401 KAR 8:510; Maryland: COMAR 26.04.01.05-4; COMAR 26.04.01.27; Michigan: MCL 324.3303; Mich. Admin. Code R 325.10504; Mich. Admin. Code R 325.10722; Mich. Admin. Code R 325.11506; Missouri: 10 CSR 60-4.050; 10 CSR 60-4.055; New Jersey: N.J.A.C. 7:10A-1.12; New Mexico: 17.12.750.9 NMAC; 17.13.950.10 NMAC; New York: 16 NYCRR 503.5; 16 NYCRR 733.15(22.4),(48),(49); Ohio: OAC Ann. 3745-81-72; OAC Ann. 3745-81-75; OAC Ann. 3745-81-77; OAC Ann. 3745-81-79; OAC Ann. 3745-82-03; OAC Ann. 4901:1-15-14; Pennsylvania: 25 Pa. Code 109.701; 52 Pa. Code 65.14; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.31; Texas: 30 TAC 290.44; 30 TAC 290.45; 30 TAC 290.46; Virginia: 9 VAC 25-790-270; 20 VAC 5-300-40(22.4),(48),(49); West Virginia: W. Va. CSR 33-9-10; W. Va. CSR 150-5-5 5.1.7,5.3.4; W. Va. CSR 150-7-5 5.1.d; Canada Federal: Northwest Territories Waters Regulations, SOR/93-303 s 15; New Brunswick: Water Quality Regulation, N.B. Reg. 82-126 s 17; Ontario: Certification of Drinking Water System Operators and Water Quality Analysts, O. Reg. 128/04 s 27; Quebec: Quality of Drinking Water, R.Q. c. Q-2, r.18.1.1 Ch. III, Div. I s 22; Yukon Territory: Water Regulation, Y.O.I.C/ 2003/58 s. 14;

Record Series Description

Retention Period

Service Interruption Records

Records related to any service interruption/outage that may occur

6 Years

Production Application:

Legal Citations:

NARUC 65; U.S. Federal: 40 CFR 141.33; 40 CFR 141.405; California: 22 CCR 64470; 26 CCR 22-64470; Illinois: 83 III. Adm. Code 600.220; 83 III. Adm. Code 615 Appendix A(65); Indiana: 170 IAC 6-1-22; 170 IAC 8.5-3-4; Iowa: Iowa Code 21.7 (476); Kentucky: 807 KAR 5:066; 807 KAR 5:071; Maryland: COMAR 20.70.07.04; Missouri: 4 CSR 240-10.030 (1-8); New Jersey: N.J.A.C. 14:3-3.7; New York: 16 NYCRR 503.3; Pennsylvania: 52 Pa. Code 65.5; Texas: 30 TAC 291.90; Virginia: 20 VAC 5-300-40(65); West Virginia: W. Va. CSR 150-5-4 4.2.1,4.8.1,4.9.2; W. Va. CSR 150-7-4 4.1.d; 4.2.a,4.5.b,4.12.a;

Standard Operating Procedures -

Laboratories

Standard operating procedures, guidance documents and guality assurance documents

outlining the procedures and processes to be used in laboratories

Current Year + 10

Production Application:

Legal Citations: Arizona: A.A.C. R9-14-615; California: 22 CCR 64813; 22 CCR 64815; Maryland: COMAR 26.08.05.09; Michigan: Mich. Admin. Code R 324.1411; Mich. Admin. Code R 324.1413; New Jersey: N.J.A.C. 7:14C-1.4; N.J.A.C. 7:18-4.5; N.J.A.C. 7:18-5.5; N.J.A.C. 8:44-2.8; Pennsylvania: 25 Pa. Code 252.304; 25 Pa. Code 252.307; 25 Pa. Code 252.401; Ontario: Drinking Water Testing Services, O. Reg. 248/03 s

13;

Standard Operating Procedures -Operations

Standard operating procedures, guidance documents and guality assurance documents outlining the procedures and processes used by the various operations related departments Until Superseded + 10

Production Application:

Legal Citations: Arizona: A.A.C. R18-9-D302; California: Cal Wat Code 13263.2; 22 CCR 64534.8; Kentucky: 401 KAR 8:160; New Jersey: N.J.A.C. 7:10A-1.12; Texas: 30 TAC 217.16; 30 TAC 290.42; 30 TAC 290.46; Virginia: 9 VAC 25-31-800; Ontario: Safe Drinking Water Act, 2002, S.O. 2002, c. 32 Part III s 17;

System Flushing Records

Records documenting regular and periodic flushing of hydrants and other components of the company's system infrastructure, to include the results of these maintenance routines and

Current Year + 10

any corrective actions taken

Production Application:

Legal Citations: Arizona: A.A.C. R18-4-103; California: 22 CCR 64453; 22 CCR 64604; 26 CCR 22-64604; Illinois: 35 Ill. Adm. Code 611.805; Indiana: 170 IAC 6-1-21; 327 IAC 8-2-20; Missouri: 10 CSR 60-4.055; New York: 16 NYCRR 503.7; Ohio: OAC Ann. 4901:1-15-10; OAC Ann. 4901:1-15-14; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.17;

Business Process / Sub-Process

Record Series Name Record Series Description

Page 101 of 114 **Retention Period**

System Maintenance Records

Records documenting any and all regular and periodic maintenance performed on the company's equipment or other components of the infrastructure

Life of Equipment

Production Application: Jobplus, 7i Datastream

Legal Citations: Arizona: A.A.C. R18-4-115; A.A.C. R18-9-D302; California: 17 CCR 7605; 22 CCR 64688; Kentucky: 807 KAR 5:071; Maryland: COMAR 20.70.02.04; COMAR 20.75.02.05; Michigan: Mich. Admin. Code R 325.11111; Missouri: 4 CSR 240-10.030 (1-8); 10 CSR 60-11.010; New Jersey: N.J. Stat. 58:10-23.11d13; N.J.A.C. 14:3-6.2; N.J.A.C. 14:9-2.2; New Mexico: 17.13.950.11 NMAC; Ohio: OAC Ann. 3745-7-09; OAC Ann. 3745-81-19; OAC Ann. 4901:1-15-14; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.17; Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Texas: 30 TAC 290.45; 30 TAC 290.46; Virginia: 9 VAC 25-790-270; 9 VAC 25-790-300; 12 VAC 5-585-300; Ontario: Small Drinking Water Systems, O. Reg. 319/08 s 14,15;

System Operations Data

Historical data generated from the SCADA system and showing details of system operation, including but not limited to flows, pressure, tank levels, inventory levels, motor run time, etc. Current Year + 6

Production Application: SCADA

Legal Citations: NARUC 22,23,49; U.S. Federal: 40 CFR 141.76; 40 CFR 141.175; 40 CFR 141.571; 40 CFR 141.629; California: 22 CCR 64653.5; 22 CCR 64657.20; 22 CCR 64662; Illinois: 35 III. Adm. Code 611.276; 35 III. Adm. Code 611.805; 35 III. Adm. Code 611.925; 35 III. Adm. Code 611.957; 35 III. Adm. Code 611.979; 35 III. Adm. Code 653.605; 35 III. Adm. Code 653.704; 83 III. Adm. Code 615 Appendix A(39),(58); Indiana: 170 IAC 6-1-19; 327 IAC 8-2.6-2; 327 IAC 8-2.6-4; 327 IAC 8-2.6-5; 327 IAC 8-2.6-6; Iowa: Iowa Code 21.7 (476); 567 IAC 43.5 (455B); 567 IAC 43.9 (455B); Kentucky: 807 KAR 5:066; 401 KAR 8:150; 401 KAR 8:162; 401 KAR 8:510; Maryland: COMAR 20.70.07.03; COMAR 26.04.01.05-4; Michigan: Mich. Admin. Code R 325.10722; Mich. Admin. Code R 325.11506; Missouri: 4 CSR 240-10.030 (32-43); 10 CSR 60-4.050; 10 CSR 60-4.055; New York: 16 NYCRR 733.15(22.4),(48),(49); Ohio: OAC Ann. 3745-81-72; OAC Ann. 3745-81-77; OAC Ann. 3745-81-79; OAC Ann. 3745-82-03; Pennsylvania: 25 Pa. Code 109.701; 52 Pa. Code 65.6; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.31; Texas: 30 TAC 217.330; Virginia: 20 VAC 5-300-40(22.4),(48),(49); West Virginia: W. Va. CSR 150-5-5 5.1.7,5.3.4; W. Va. CSR 150-7-5 5.1.d;

Treatment Plants – Operated by **AWM**

Records related to treatment plants owned by AWWM. Files may include project descriptions and requirements, preliminary drawings, presentation drawings, RFPs (requests for bids), proposal evaluations, INTE drawings, final working drawings, as-built drawings, shop drawings, repair and alteration drawings, contract drawings, project specifications, lighting plans, disability access records, contracts and agreements with architects, engineers, consultants, vendors, contractors, budget records, correspondence, meetings and minutes, reports, maps, photographs and material and soil reports

Permanent

Production Application:

Legal Citations: U.S. Federal; 40 CFR 63.1589; Arizona: A.A.C. R18-9-D302; Illinois: 35 III. Adm. Code 360.301; 35 III. Adm. Code 360.302; 35 III. Adm. Code 360.502; 35 III. Adm. Code 360.602; 35 III. Adm. Code 360.Appendix C; 35 III. Adm. Code 380.904; Ohio: OAC Ann. 3745-42-11; Northwest Territories: Public Water Supply Regulations, R.R.N.W.T. 1990, c. P-23 s.23; Ontario: Ontario Water Resources Act, R.S.O. 1990 s. 53.1(7);

Business Process / Sub-Process

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Record Series Name

Record Series Description

Retention Period

Treatment Plants – Owned by AWWM

Records related to treatment plants owned by AWWM. Files may include project descriptions and requirements, preliminary drawings, presentation drawings, RFPs (requests for bids), proposal evaluations, INTE drawings, final working drawings, as-built drawings, shop drawings, repair and alteration drawings, contract drawings, project specifications, lighting plans, disability access records, contracts and agreements with architects, engineers, consultants, vendors, contractors, budget records, correspondence, meetings and minutes, reports, maps, photographs and material and soil reports

Permanent

Production Application:

Legal Citations: U.S. Federal; 40 CFR 63.1589; Arizona: A.A.C. R18-9-D302; Ohio: OAC Ann. 3745-42-11; Northwest Territories: Public Water Supply

Regulations, R.R.N.W.T. 1990, c. P-23 s.23; Ontario: Ontario Water Resources Act, R.S.O. 1990 s. 53.1(7);

Valve and Hydrant Records Records containing listings and descriptions of all valves and hydrants currently in use at the

company's field sites, to include type, location, regular and periodic inspection records and

other information concerning this equipment and its installation and use

Life of Equipment

Production Application:

Legal Citations: Illinois: 83 Ill. Adm. Code 600.140; Ohio: OAC Ann. 4901:1-15-10;

Vibration Analysis Reports

Reports submitted to plant supervisors stating the results of vibration analyses or inspections performed on pumps to test vibration

Current Year + 5

Production Application:

Legal Citations:

Water Line Event Reports Reports submitted to regulatory commissions notifying the commission of events when someone hit their water line

Current Year + 7

Production Application:

Legal Citations:

Risk Management

Record Series Description

Retention Period

Business Continuity Plans

Approved, official business continuity plans covering any and all requirements for the continuance of critical business functions in the event of an interruption from any cause

Until Superseded + 10

Production Application:

Legal Citations: Pennsylvania: 52 Pa. Code 101.3;

Event Management Process

Records

Reports and case files related to the management of events adversely impacting the company Final Resolution + 10

from a 60 inch water main break, lost laptops, security incidents, thefts or break-ins. Note:

This record series does not include ITS related events

Production Application:

Legal Citations: Maryland: COMAR 20.70.08.01; Michigan: MCL 423.509; Missouri: 4 CSR 240-60.040; New Jersey: N.J.A.C. 14:3-6.7; West Virginia: W. Va.

CSR 150-5-6; W. Va. CSR 150-7-7;

Insurance Claims Supplemental Documentation

Documentation supplementing insurance claims information held by insurance carriers; may include internal investigations, employee interviews

Final Resolution + 4

Production Application:

Legal Citations: NARUC 21; Illinois: 83 III. Adm. Code 615 Appendix A(18),(69); New York: 16 NYCRR 733.15(21); Virginia: 20 VAC 5-300-40(20),(21);

Insurance Policies - Liability Policies of insurance which provide coverage of a liability nature. The records include policies Permanent

of financial products, executive risk, casualty and other liability policies

Production Application:

Legal Citations: NARUC 20; Illinois: 83 III. Adm. Code 615 Appendix A(18); New York: 16 NYCRR 733.15(19-21); Virginia; 20 VAC 5-300-40(20),(21);

Insurance Policies - Non-Liability Property and other non-liability policies or contracts of insurance Life of Policy + 6

Production Application:

Legal Citations: NARUC 20; Illinois: 83 III. Adm. Code 615 Appendix A(18); New York: 16 NYCRR Accounts (460),(461),(463-465),(467),(602),(621),(924); 16

NYCRR 733.15(19-21); Virginia: 20 VAC 5-300-40(20),(21);

Record Series Description

Retention Period

Workers' Compensation

Records related to compensation to employees for on-the-job accidents; includes workers claims and all supporting documents and required filings

Final Resolution + 30

Production Application:

Legal Citations: NARUC 21; Kentucky: KRS 342.400; Ohio: ORC Ann. 4123.26; OAC Ann. 4123-3-02; OAC Ann. 4123-3-35; OAC Ann. 4123-17-17; OAC Ann. 4123-19-03; West Virginia: W. Va. CSR 85-3-7; W. Va. CSR 85-9-4; W. Va. CSR 85-18-13; W. Va. CSR 85-18-15; W. Va. CSR 85-18-17; W.

Va. CSR 85-20-5; Canada Federal: Canada Labour Standard Regulations s 24(4);

Security

Badge Records

Records documenting and tracking badge numbers issued to employees and non-employees

Active + 1

Production Application:

Legal Citations:

Security Hotline / Intranet & Corporate Security Investigations Notifications of security related incidents which may result in a case file and would include records documenting general investigations conducted by the Company's Security Department. The records consist of findings and other documentation of the investigators and records evidencing actions taken, disposition of charges, or other resolutions of matters

Final Resolution +5

Production Application:

Legal Citations: California: 10 CCR 260.210

Security System Records

Records related to design of security systems to ensure the protection of the organization's property, people, information and other assets. Typically includes risk analysis records, recommendations for new or upgraded security/protective systems, technical specifications, drawings, etc.

Active + 3

Production Application:

Record Series Description

Retention Period

Business Development Proposals and Bid Files - Homeowner Services

Files on municipal service line protection program bids in which Homeowner Services participate; includes both successful and non-successful bids

Current Year + 10

Production Application:

Legal Citations:

Commercial Development Committee Records Meeting minutes and supporting documentation of the company's Commercial Development Committee (CDC). The records document the decision-making process concerning investments in the development of commercial opportunities. The proposed deals are analyzed by state committees and then by this, the national committee for final review/approval. The four stages are: policy approval, development approval, bid approval, and implementation approval. The deals are about any and all regulated and non-regulated business activities – the company's five lines of business: military, biosolids/residuals, operations and management, and homeowner services and applied water management. The cost, risks and benefits are analyzed, reviewed and approved, modified or rejected

Permanent

Production Application: Lotus Notes

Legal Citations: Iowa: 199 IAC 40.4 (476);

Market Development – Partner Relationships

Records related to new business development that is done by methods other than the company's traditional footprint. Examples include alternative relationships with municipalities and other non-traditional business develop methods

Life of Relationship + 10

Production Application:

Legal Citations:

Marketing and Advertising Release Forms

Permission forms signed by employees to use their likeness in advertising or marketing pieces

Duration of Use of Corresponding Photography

Production Application:

October 2010

Production Application:

Supply Chain

216.6 (91D); Maryland: COMAR 03.06.03.02; Michigan: MCL 205.67; MCL 205.68; MCL 205.104; MCL 205.104a; Mich. Admin. Code R 205.23; Missouri: 12 CSR 10-3.574; New Jersey: N.J. Stat. 54:32B-16; New York: 20 NYCRR 533.2 (a),(b); Ohio: OAC Ann. 5703-9-02; Pennsylvania:

61 Pa. Code 34.2; West Virginia: W. Va. CSR 110-15-14a;

October 2010

Production Application:

Legal Citations:

Record Series Name

Record Series Description

Retention Period

Vendor Files

Records used to manage relationships with vendors including service contractors (i.e. plumbers, sewer line cleaning contractors). Also include attestations received from vendors that the vendors has completed employee background checks to the company's standards

Life of Relationship + 3

Production Application:

Legal Citations:

Materials Management

Asset Maintenance Records Records Records of the maintenance performed on assets; including predictive maintenance,

Life of Asset

13 Months

preventive maintenance and frequency of maintenance

Production Application:

Legal Citations: Kentucky: 807 KAR 5:071; Maryland: COMAR 20.70.02.04; COMAR 20.75.02.05; New Jersey: N.J.A.C. 14:9-2.2; Ohio: OAC Ann. 3745-7-09;

OAC Ann. 4901:1-15-14; Tennessee: Tenn. Comp. R. & Regs. R. 1200-5-1-.20; Texas: 30 TAC 290.46; Virginia: 9 VAC 25-790-300; Ontario:

Small Drinking Water Systems, O. Reg. 319/08 s 14,15;

Computerized Maintenance Management System (CMMS) System used to track the maintenance history of all assets and also contains asset inventories Life of Asset

Production Application: Computerized Maintenance Management System (CMMS)

Legal Citations:

Inventory Reports Reports showing quantities on hand of various inventory items (i.e. pipe, meters, flanges,

chemicals and other items on which inventory is maintained). The data is downloaded from the JD Edwards system and is used to develop inventory turnover reports and otherwise

manage the goods on inventory

Production Application:

Legal Citations:

Business Process / Sub-Process

Record Series Description

Page 112 of 114

Property Inventory Records – Fixed Assets

Record Series Name

Inventory records of installed equipment and other fixed assets

Life of Asset / Equipment

Retention Period

Production Application: JD Edwards, Jobplus, OPS SQL Software Database

Legal Citations:

NARUC 41,42,44; California: 22 CCR 64688; Illinois: 83 III. Adm. Code 615 Appendix A(12),(22),(23),(53-57); 86 III. Adm. Code 140.701; New York: 16 NYCRR 733.15(41),(42),(44); Ohio: OAC Ann. 3745-95-06; OAC Ann. 4901:1-15-12; Quebec: Minister of Revenue, R.S.Q. c. M-31,

Ch. 1, Div. V s34, 35;

Property Inventory Records -

Turnover Assets

Inventory records of items that are used or consumed, depleted and restocked on a regular basis. Operational examples include: costs of chemicals; chemical inventory on hand, fuel

Current Year + 6

inventory (diesel fuels), Stock E inventories, Stock C inventories, etc.

Production Application: JD Edwards, Jobplus, OPS SQL Software Database

on hippineation. 35 Edwards, sobplas, of 6 64E contware Batabase

Legal Citations: NARUC 41,42,44; Illinois: 83 Ill. Adm. Code 615 Appendix A(54-57); 86 Ill. Adm. Code 140.701; Iowa: 701 IAC 11.4 (422,423); Maryland:

COMAR 03.06.03.02; Michigan: MCL 205.67; MCL 205.68; MCL 205.104; MCL 205.104a; New York: 16 NYCRR 733.15(41),(42),(44); Ohio: OAC Ann. 4901:1-15-12; Virginia: 20 VAC 5-300-40(40-42),(43); Quebec: Minister of Revenue, R.S.Q. c. M-31, Ch. 1, Div. V s34, 35;

Transportation

Commercial Drivers Daily Logs Logs of daily hours of service of each commercial vehicle as required by Department of

5 Years

Current Year + 3

Transportation

Production Application:

Legal Citations: U.S. Federal: 49 CFR 395.8; Arizona: A.R.S. 23-286; California: 13 CCR 1212; Kentucky: 601 KAR 1:201; 601 KAR 9:135; New Mexico;

18.2.3.14 NMAC; New York: 12 NYCRR 175.4; 20 NYCRR 483.1; 20 NYCRR 483.2; Ohio: OAC Ann. 4901:2-1-03; Texas: 43 TAC 18.32; Canada

Federal: Commercial Vehicle Drivers Hours of Service Regulations, SOR 2005-313, s 85; New Brunswick: Carrier Profile and Compliance

Regulation, N.B. Reg. 2004-6;

Commercial Vehicle Inspection Reports

Random vehicle inspections of commercial vehicles performed by performed by Department

of Transportation and the Ontario Ministry of Transportation

Production Application:

Legal Citations: Illinois: 86 Ill. Adm. Code 386.132; 92 Ill. Adm. Code 396.2010; New Mexico: 18.3.5.12 NMAC; Tennessee: Tenn. Comp. R. & Regs. 1340-6-1-

.27;

Business Process / Sub-Process

Record Series Description

Page 113 of 114 **Retention Period**

Driver Qualification Files

Record Series Name

Documentation on commercially licensed drivers, used for DOT compliance reporting. Records may include employment applications, requests for past employment verifications and replies, driver physical examinations, new hire data sheets, road test records, copies of valid commercial driver's license (CDL) and social security card, motor vehicle reviews originals and annuals, certificates of record of violations, annual reviews of driving records, pre-employment drug test statements, drug and alcohol inquiries from previous employers, copies of received company drug and alcohol policies, and receipts for federal motor carrier regulation handbooks

Duration of Employment + 3

Production Application:

Legal Citations: U.S. Federal: 49 CFR 380.511; 49 CFR 382.601; 49 CFR 382.301; 49 CFR 382.401; 49 CFR 391.25; 49 CFR 391.27; 49 CFR 391.31; 49 CFR 391.33; 49 CFR 391.51; 49 CFR 391.53; 49 CFR 396.11; Arizona: A.R.S. 28-5231; A.A.C. R17-5-204; California: 13 CCR 25.15; 13 CCR 1212; Michigan: MCL 480.13; MCL 480.14; Ohio: OAC Ann. 4901:2-5-04; New Brunswick: Carrier Profile and Compliance Regulation, N.B. Reg. 2004-6;

Drivers Daily Trip Records

Records documenting that the company's fleet vehicles are safe for the trip and road. These are legal documents; driver attestations of vehicle road worthiness

2 Years

Production Application:

Legal Citations: California: Cal Veh Code 34505.5; New Brunswick: Carrier Profile and Compliance Regulation, N.B. Reg. 2004-6;

Vehicle (Fleet) Management Records

Records consisting of vehicle orders, maintenance records, fuel receipts, resale documents, titles, registrations, leases and related fleet management documentation

Life of Equipment

Production Application:

Legal Citations: U.S. Federal: 49 CFR 396.11; California: Cal Veh Code 34505.5; Iowa: Iowa Code 326.19; Kentucky: KRS 131.185; KRS 138.680; 601 KAR 1:201; Maryland: COMAR 03.03.04.04; COMAR 20.95.01.12; Michigan: MCL 479.11; New Mexico: 18.3.7.13 NMAC; New York: 20 NYCRR 491.4: Ohio: ORC Ann. 5728.07: OAC Ann. 4901:2-17-04: Pennsylvania: 61 Pa. Code 313.13: Texas: 43 TAC 18.17: 43 TAC 18.32: West Virginia: W. Va. CSR 110-14a-5; New Brunswick: Carrier Profile and Compliance Regulation, N.B. Reg. 2004-6; Trip Inspection Report and Records Regulation, N.B. Reg. 94-77 s. 8; Quebec: Bills of Lading, R.Q. c. T-12; Quebec: Regulation respecting international highway transportation equipment, R.Q. c. I-1, r.14.001s. 7(2);

Vehicle Accident Reports

Records used to report accidents involving company owned or leased vehicles. The records consist of investigation reports, photos and other related records

Final Resolution + 3

Production Application:

Legal Citations:

Business Process / Sub-Process

Record Series Description Retention Period

Vehicle Mileage Reports

Record Series Name

Monthly mileage reports submitted by drivers

Current Year + 7

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Production Application:

Legal Citations

Kentucky: KRS 138.680; 601 KAR 1:201; 601 KAR 9:135; Maryland: Md. Tax-General Code Ann. 9-209; COMAR 03.03.04.04; Pennsylvania: 75 Pa.C.S. 9610; 61 Pa. Code 313.12; Texas: Tex. Tax Code 162.115(i); Tex. Tax Code 162.216(i); 34 TAC 3.174; 34 TAC 3.340(b)(11); West Virginia: W. Va. CSR 110-14a-5; Quebec: Regulation respecting international highway transportation equipment, R.Q. c. I-1, r.14.001s. 7(2);

Witness: Linda C. Bridwell

2. Provide a detailed explanation and supporting evidence of any financial savings experienced by KAWC as a result of the transition to AMR meters.

Response:

In Case No. 2010-00036, KAW included \$12,253,716 for Labor and Labor Related Expenses including group insurance. There were 152 forecasted employees in that rate case, including 14 meter readers and 2 meter technicians. Looking at Workpaper 3-1 and 3-6 filed in response to the Commission Staff's First Request for Information in that case, those 16 employees represented \$972,974 of the overall Labor and Labor Related Expenses in that case. This does not include any costs for vehicles or equipment.

In Case No. 2012-00520, KAW included \$10,908,996 in Labor and Labor Related Expenses including group insurance. There were 138 forecasted employees of KAW based on reorganization and efficiencies in the operations. There were 9 meter readers and 1 meter technician with three of the meter reader positions scheduled to end during the forecasted period. Again, referring to Workpaper 3-1, those 10 employees represented \$575,756 of the overall Labor and Labor Related Expenses in that case.

In Case No. 2015-00418, KAW included \$10,844,106 in Labor and Labor Related Expenses including group insurance. There were 139 forecasted employees of KAW. There were 5 meter readers and 2 meter technicians. Again, referring to Workpaper 3-1, those 7 employees represented \$476,572 of the overall Labor and Labor Related Expenses in that case.

Since the 2010 rate case, KAW has not laid off any meter readers. The reductions in work force shown above have been handled through attrition, retirements, and expansion of other field service positions as needed. However, KAW customers have clearly experienced the financial savings from the transition to AMR meters.

Witness: Kevin N. Rogers

3. Provide a detailed explanation of benefits KAWC has experienced as a result of the use of AMR meters in its system.

Response:

KAW completed its transition to automatic meter reading (AMR) technology in 2013 which has benefited the customer, the Company, and employees by providing better and more expansive information in a safer manner and at a significantly lower operating cost than was being incurred with the manually read meters. This technology clearly demonstrates a very valuable step forward, benefiting all the stakeholders.

AMR enables the Company to gather much more usage and diagnostic data than was previously available from manually read meters. This capability allows the Company to better profile usage data and patterns to identify potential leaks, reverse flow, magnetic tampering, and battery status as well as register and transmitter issues. This previously unavailable data allows for a monthly diagnostic capability to assess the functionality of the meter and offer better assurance the meter is operating safely and reliably. This new usage profiling also enables better explanations to the customer of unusual usage or patterns and helps their understanding in identifying plumbing or leak issues that could be unnecessarily contributing to their bills. The electronic data gathering is less prone to errors from number transpositions or other mistakes inherent in more manual data capturing methods and therefore reduces the risk for billing errors.

The drive-by technology of AMR provides a safer work environment by reducing the risk of injury to employees. AMR has proven to reduce: the risk of slips, trips, and falls; strains from the repetitive motion of lifting meter lids; and unpredictable encounters with dogs. These risks are inherently greater in the walking required for manually read meters. For rural settings, two meter readers would previously drive the route, stopping at each setting to allow one meter reader to get out of the vehicle to read the meter while the driver remained in the vehicle. With the AMR technology, KAW was able to eliminate the need for the second meter reader and utilize a much safer process for the meter reader. Our meter readers have had no recordable injuries since the conversion to AMR was completed in 2013.

AMR technology provides for very cost effective data gathering as well as increased visibility to real time work progress. The technology has allowed the Company to significantly improve its operating efficiency by reducing the manpower cost of meter reading from 15 people in 2009 to 5 in 2017. Based on 2017 labor expenses, this reduced

manpower avoided an estimated \$767,000 of labor and labor-related costs to our customers. AMR also gives the department supervisors visibility into the progress of work throughout the day. This allows the reassignment of resources to other areas as time becomes available, thereby also increasing productivity and avoiding additional costs to the customer.

Through discussions with personnel responsible for meter reading and meter repair, they have not noticed a specific increase in service orders generated following the transition to AMR. This could be a function of the gradual implementation (from 1998 through 2013) that KAW used to transition to AMR, or any number of other reasons. However, there is no question that the increased information generated gives both KAW and its customers greater confidence in the system operations.

AMR has demonstrated to be a significant step forward benefiting our customers with better, more accurate information, providing the Company with expanded, more meaningful information to better manage work resources throughout the day, assess the safety and reliability of our meters more frequently, and provide a safer work environment for our employees. All these benefits have been gained with an extremely cost effective solution for our customers by avoiding approximately \$767,000 of costs in 2017 alone.

Witness: Linda C. Bridwell

4. Provide a list of other states and or jurisdictions where KAWC or its parent company, American Water Works Company, Inc. has requested confidential treatment of its Valve Inspection Procedures (as referenced in its Petition for Confidential Treatment filed on May 18, 2017). Provide the results of these requests.

Response:

American Water subsidiaries sought and received confidential protection of the Valve Operation, Inspection and Maintenance Practice in:

New Jersey New York

Pennsylvania

In addition to the above, in general, American Water and its subsidiaries consider their Practices to be confidential and have sought and received confidential protection of their Practices in:

Illinois

Indiana

Iowa

Kentucky

Maryland

Missouri

Tennessee

Virginia

West Virginia

To our knowledge, confidential protection of American Water Practices has been granted in all states that have requested and filed copies of the Practices.

Witness: Linda C. Bridwell

5. In her testimony at the public hearing on October 31 2017, Linda Bridwell testified that KAWC would be conducting an internal audit regarding compliance with existing regulations. Provide a time frame in which that audit is expected to be completed.

Response:

Subsequent to the public hearing on October 31, 2017, KAW confirmed that two supervisors in the production department started an internal audit regarding compliance with existing PSC and DOW operational regulations. This was started after the notice of deficiency was received from the 2016 PSC Inspection. KAW is utilizing this initial effort to assist in completing a comprehensive internal audit regarding compliance with existing regulations. The comprehensive, internal audit will be completed by the end of 2017.

Because of the identification of the gap in KAW's compliance process, KAW will update the compliance audit annually beginning in 2018.