From: Tripp, Anthony
To: "Stuart Stapleton";
cc: Debbie Oleksienko; Russell, Merlin;
Subject: RE: Electronic document approval questions
Date: Monday, December 03, 2012 2:27:00 PM

Stuart,

I have no objections to maintaining your records electronically in the manner specified in earlier documents.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

From: Stuart Stapleton [mailto:Stuart.Stapleton@eqonline.com]
Sent: Wednesday, November 28, 2012 9:46 AM
To: Tripp, Anthony
Cc: Debbie Oleksienko
Subject: RE: Electronic document approval questions

Tony,

I hope you had a good Thanksgiving and that you survived Black Friday in one piece. Here's an oldie but a goodie. This issue came back up recently and I'm not sure where we left it. Will keeping all of the operating records (Manifests, waste profiles including analytical (MSDS if provided), profile re-certifications, LDR's, daily job reports and container contents sheets) in an electronic format meet all of the record retention requirements?

Stuart Stapleton
QEHS Manager

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From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us]
Sent: Thursday, February 11, 2010 11:40 AM
To: Stuart Stapleton
Subject: RE: Electronic document approval questions

Thanks, Stuart. That is how I understood it, but I just needed confirmation.

Tony

From: Stuart Stapleton [mailto:Stuart.Stapleton@eqonline.com]
Sent: Thursday, February 11, 2010 11:27 AM
To: Tripp, Anthony
Subject: RE: Electronic document approval questions

Tony,

What I meant was if you ask for it we can immediately pull it up on the compter and print a copy. This is the method we have used for all inspections since I arrived here in 2007.

Stuart Stapleton, CHMM
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>>> "Tripp, Anthony" <Anthony.Tripp@dep.state.fl.us> 2/11/2010 11:09:07 AM >>>
Stuart,

One clarification; you state that "Upon request the files will be accessed .."
Does that mean that for an unannounced inspection there might be delays in viewing the records, or that the records would be immediately available for viewing via computer but a delay could be expected for wanting to look at printed versions?

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section

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From: Stuart Stapleton [mailto:Stuart.Stapleton@eqonline.com]
Sent: Tuesday, February 09, 2010 10:35 AM
To: Tripp, Anthony
Cc: Bob Mulholland; Gene Cieply; Larry Sinatra
Subject: Re: Electronic document approval questions

Tony,

Sorry for the delay. My responses are below. We are open for suggestions and guidance.

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>>> "Tripp, Anthony" <Anthony.Tripp@dep.state.fl.us> 10/13/2009 5:10 PM >>>
Stuart,
You have asked for approval of the procedure for converting paper copies to electronic copies for records retention purposes. Before granting approval I will need to know more about your process. The more specific you can be in your response the better.
What documents do you intend to convert to electronic format?
Manifests, waste profiles including analytical (MSDS if provided), profile recertifications, LDR's, daily job reports and container contents sheets.
What is the procedure for converting to electronic format?
We store multiple file types PDF, BMP, JPG and TIFF. They can be scanned or attached. they are stored in databases.
What electronic format is used and what image quality is maintained (what dpi)? The Florida Department of State requires use of PDF-A format with 300 dpi image density, although TIF images have been used in the past.
We don't always know the DPI because we also attach documents. We scan to 150 DPI for bitmap. We tried 300 and it didn't print as well.
What is the quality control process for storing electronic images? The Florida Dept. of State requires 100% quality control, every image is compared to the original for content and quality.
This is completed as part of the review process when it is scanned.
Are these electronic files backed-up to an independent storage system maintained off-property?

Yes.
What is the frequency of back-up?
Nightly. Every quarter we archive the previous and keep them on tape offsite.
What is the procedure for making these electronic images available to inspectors and Department employees?
Upon request the files will be accessed and either viewed on the computer screen or printed for review.
How long are electronic records maintained?
Indefinitely.
What is done with the paper copy?
Shredded after final review for accuracy and completeness.
Please feel free to provide any additional information you feel will aid in the approval process.
Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
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