

RECORDS

Background and Exhibits

The purpose of records management is simple—to help you demonstrate that your facility is actually implementing the EMS as designed. While records have value internally, you also may need to provide them to external parties (such as customers, a registrar, or the public), as evidence of EMS implementation. Records management is sometimes seen as bureaucratic, but it is difficult to imagine a system operating consistently without accurate records.

Records provide evidence that the processes that make up your EMS are being implemented as described. The basics of records management are to decide which records you will keep, how you will keep them, and for how long. You should also think about how you will dispose of records once you no longer need them.

If your facility has an ISO 9001 (or other) management system, you should already have a process in place for managing records. This process could be adapted for EMS purposes.

Here are some things to think about to expedite the determination of your facility's process for records management:

- Start by identifying which EMS records are required. Look at your other procedures and work instructions to determine what evidence is needed to demonstrate implementation. Also consider records that are required by various legal requirements.
- Focus on records that add value and avoid bureaucracy. If records have no value or are not specifically required, don't collect them. The records you choose to keep should be accurate and complete.
- Create forms to implement your EMS. When these forms are filled out, they become records. Forms should be simple and understandable for the users. This Guide provides example forms that may be relevant to your operations and EMS.
- Establish a records retention policy and stick to it. Make sure that your policy takes into account records retention requirements specified in applicable environmental regulations. For example, hazardous waste manifests must be maintained for a specified period of time under RCRA. Therefore, that time period would be appropriate to use for this record as part of your EMS.
- Be sure to consider who needs access to what records in what circumstances when designing your records management process.
- Consider using an electronic EMS records management system if your facility uses computers extensively. Maintaining records electronically can provide an excellent means for rapid retrieval of records as well as controlling access to sensitive records.
- Think about which records might require additional security. Do you need to restrict access to certain records? Should a back-up copy of critical records be maintained at another location? Should a hard copy of some records be maintained in case an inspector arrives and your computer system is down (this has actually happened to facilities)?

Examples of types of records you might maintain include:

- Legal, regulatory, and other code requirements;
- Results of environmental aspects identification;
- Reports of progress towards meeting objectives and targets;
- Permits, licenses, and other approvals;
- Job descriptions and performance evaluations;
- Training records;
- EMS audit and regulatory compliance audit reports;
- Reports of identified nonconformities, corrective action plans, and corrective action tracking data;
- Hazardous material spill/other incident reports;
- Other emergency response and security-related records;
- Communications with customers, suppliers, contractors, and other external parties;
- Results of management reviews;
- Sampling and monitoring data;
- Maintenance records; and
- Equipment calibration records.

Key questions to ask when developing a records management program include:

- What records are kept?
- Who keeps them?
- Where are they kept?
- How are they kept?
- How long are they kept?
- How are they accessed?
- How are they disposed?

Refer to ***Exhibit 16-1: Summary Checklist*** for a set of steps that can help you develop and maintain your facility's record management program. ***Exhibit 16-2: Procedure for Environmental Records (EP-005)*** provides a customizable procedure that you can use to manage your facility's records for the EMS. Its supporting form, Index of Environmental Records (EF-005.01), is an example of a form that could be used to track when documents are created, replaced, and determined to be obsolete.

Exhibit 16-1: Summary Checklist

RECORDS

- Step 1: Records provide evidence that EMS procedures, work instructions, and other activities are appropriately implemented. *Example 16-1: Environmental Records Organizer* provides a list of environmental records you may want to include.
- Step 2: Using Form EF-005.01, develop an index for your facility's records. Include in the index the record title and number, retention periods, controlling authorities, and locations where the records may be found (see *Example 16-2: EMS Records Management Table*).
- Step 3: Capture the approach used to manage environmental records in a written procedure. *Exhibit 16-2: Procedure for Environmental Records (EP-005)* and supporting Form EF-005.01 provide a template. Include this customized procedure in your EMS manual (see *Exhibit 10-3: EMS Manual*).

Exhibit 16-2: Procedure for Environmental Records (EP-005)

<p>1.0 Purpose/Scope This procedure identifies the management of environmental records at the [Facility's Name].</p> <p>2.0 Activities Affected The areas and departments specified in the Index of Environmental Records.</p> <p>3.0 Forms Used 3.1 Index of Environmental Records (EF-005.01)</p> <p>4.0 References 4.1 ISO 14001:1996, Element 5.5.3</p> <p>5.0 Definitions Records: documented information that: (a) is evidence of an environmental activity or event that has been or is being performed; or (b) is required to be retained for future reference. It is information on environmental performance.</p> <p>6.0 Exclusions None</p> <p>7.0 Procedure 7.1 Records shall be maintained and retained as specified in the Index of Environmental Records (EF-005.01). 7.2 Record retention will be consistent with applicable legal and other requirements. 7.3 Each area or department manager or designee shall have access to a master list of all EMS records relevant to their area or department, as applicable. 7.4 Each activity responsible for maintaining a record has the responsibility for establishing the method for filing and indexing records to ensure accessibility.</p> <p>8.0 General Rules Records shall be legible, readily retrievable, and stored and maintained so as to prevent damage, deterioration, or loss as appropriate to the importance of the record.</p> <p>9.0 Records Records shall be retained as specified in this procedure, EP-005.</p> <p>Record of Revisions</p> <table border="1"> <thead> <tr> <th>Revision Date</th> <th>Description</th> <th>Sections Affected</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Revision Date	Description	Sections Affected						
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Index of Environmental Records (EF-005.01)

Document	Record	Retention (yrs)	Controlled By	Location
EP-001	Legal and Other Requirements (EF-001.01)			
EP-003	Identification and Significance Determination of Environmental Aspects and Setting Objectives and Targets (EF-003.01)			
	Linking SEAs, Objectives and Targets, and EMS Operational Control Procedures to Measurement Indicators, Job Functions, Responsible Parties, and Applicable Processes (EF-003.02)			
	Environmental Management Program(s) (EF-003.03)			
EP-004	External Stakeholder Communication Record (EF-004.01)			
EP-005	Index of Environmental Records (EF-005.01)			
EP-006	Management Review Record (EF-006.01)			
EP-007	Emergency Preparedness and Response Requirements Matrix (EF-007.01)			
EP-008	Training Needs Analysis—Environmental Courses (EF-008.01)			
	Training Needs Analysis—Procedures and Work Instructions by Area/Department (EF-008.02)			
EP-009	Environmental Measurement Indicators Log (EF-009.01)			
	Calibration Log (EF-009.02)			
	Compliance Tracking Log (EF-009.03)			
EP-010	Project Environmental Checklist (EF-010.01)			
EP-014	Master Document List (EF-014.01)			
EP-015	Corrective and Preventive Action Request (EF-015.01)			
	Corrective and Preventive Action Tracking Log (EF-015.02)			
EP-016	Environmental Briefing Packet and Contractor Method Statement Template (EF-016.01)			
EP-017	Internal EMS Audit Checklist (EF-017.01)			
	Internal EMS Audit Schedule Form (EF-017.02)			

Examples

Example 16-1: Environmental Records Organizer is an example of a list of environmental records. *Example 16-2: EMS Records Management Table* lists records and their locations, people responsible, etc. related to the EMS. This example does not include all records that would need to be maintained for the EMS or for environmental regulatory purposes, but is included for illustrative purposes.

Example 16-1: Environmental Records Organizer

Air Emissions Regulations	Loss Prevention Information
Air Emissions Fees	Other Permits & Permit Applications
Air Emissions Inventories	Other Security-Related Records
Air Emissions Permits	Pollution Prevention (P2) Regulations
Air Permit Applications	Pollution Prevention Fees
Air Permit(s): Historical	Pollution Prevention Reporting
Annual Licenses & Fees	Recycling Information
Compliance Reporting	Recycling Projects
Compliance Plans	Special Wastes
Community Right-to-Know EPCRA Regulations	Solid Waste Permit
EPCRA Reporting	Solid Waste Fees
Hazardous Waste Regulations	Spill Reports
Hazardous Waste Permit/ID Number	Spill Response Actions
Hazardous Waste Fees	Stormwater Regulations
Hazardous Waste Biennial Report	Stormwater Permit
Hazardous Waste: Open Manifests	Training Records
Hazardous Waste: Closed Manifests	VOC/HAPs Reporting
Historical Data	VOC Annual Analysis
Indoor Air Quality	Wastewater Regulations
	Wastewater Fees
	Wastewater Permit
	Wastewater: Semi-Annual Reporting

Example 16-2: EMS Records Management Table

Title: EMS RECORDS MANAGEMENT TABLE Revision Date: November 7, 2000 Print Date: February 16, 2004 (<u>Uncontrolled</u> document if printed)	Doc. No.: EMF-4.5.3 Approval by: Page 1 of 2
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Record Type	Person Responsible	Location	File Method	Retention Minimum
ADMINISTRATION				
Records on costs - purchasing, operations, and disposal	Office Manager	Admin. Office	Date order	3 years
Utility bills	Office Manager	Admin. Office	Date order	3 years
Record of annual waste quantity received	Office Manager	Admin. Office	Date order	Life of facility
Certificates of Insurance	Office Manager	Admin. Office	Date order	Life of facility
Waste Analysis Sheets	Office Manager	Admin. Office	Customer name	3 years
Waste Manifests - outgoing	Office Manager	Admin. Office	Date order	3 years
HUMAN RESOURCES				
Training Needs Analysis and Training Records	Human Resource Manager	Human Resource Office	By type and date order	5 years
ENVIRONMENTAL				
Incident Reports	Env. Dept.	Env. Office	Date order	3 years
Complaint Reports	Env. Dept.	Env. Office	Date order	3 years
EMS communications with external parties	Env. Dept.	Env. Office	Issue	3 years
Decision regarding external communication of significant environmental aspects	Env. Dept.	Env. Office	Date order	3 years
Major Source Determination Records	Env. Dept.	Env. Office	Date order	Life of facility
Title V Permit Exemption	Env. Dept.	Env. Office	Date order	Life of facility

Record Type	Person Responsible	Location	File Method	Retention Minimum
Correspondence regarding Air Notices	Env. Dept.	Env. Office	Date order	5 years
Odor Control System Permit	Env. Dept.	Env. Office	Date order	5 years or per permit
Air Emission Reports	Env. Dept.	Env. Office	Date order	5 years
Records on waste disposal sites used	Env. Dept.	Env. Office	Site name	Life of facility
EMS Audit Reports	Env. Dept.	Env. Office	Date order	5 years
EMS Corrective and Preventive Action Notices (Form 15-sa) and Database Logging Summary (Tracking Log format of Form 15-2b)	Env. Dept - EMR	Env. Office – CAPAN database	Date order	2 years after completion of action
EMS Management Review Records (Form 18-2)	Env. Dept. – EMS Coordinator	Env. Office	Date Order	Life of facility