

10 Set Up Documentation for Your EMS

What

Documentation is a requirement of an EMS, but it should not be the main emphasis. Limit your documentation efforts to the minimum necessary. EMS documentation is different than EMS records. EMS documentation describes what you do and how you do it, while EMS records demonstrate that you are doing what the documentation said you would do.

Some sort of EMS Manual, either electronic or hard copy, can be your EMS documentation and should:

- Describe the core elements of your EMS and how the elements interact; and
- Provide direction to related documentation.

Who

People in each area of your facility that has environmental impacts should contribute to EMS documentation. The EMS Coordinator compiles the information into a report or environmental database.

Why

Documentation describes the elements of your EMS, demonstrates compliance with environmental regulations, and lists key employees.

How

Keep your EMS documentation simple. Your EMS Manual doesn't need to describe every detail of your EMS. Instead, it can reference other documents or procedures. Update your EMS documentation as needed, based on any system improvements you put in place. Take a look at "Star Plating's" EMS Manual, which is included in Part II of this publication.

Documentation can be in electronic or hard copy format. Make sure that your documentation is legible and that the most up-to-date version is available on site. Documentation should be available for all EMS components, including:

- Your environmental policy;
- Your organizational chart or lists/tables of key responsibilities;
- A description of how your facility satisfies the EMS requirements;
- System-level procedures (for example, procedure for corrective and preventive action);
- Activity- or process-specific operational control procedures/work instructions; and
- Other EMS-related documents (such as emergency preparedness and response plans, training plans, etc.).

If you already have documentation for certain regulations or permits, use it for your EMS instead of recreating it.

Measure and Record Your Performance

What

Measurement and record keeping means that your facility:

- Monitors operations and activities that can have significant environmental impacts and/or compliance consequences;
- Tracks performance (including your progress in achieving your goals);
- Calibrates and maintains monitoring equipment; and
- Periodically evaluates compliance with applicable laws and regulations through internal audits.

The measurement process uses records and generates records. Records prove that the processes that make up your EMS are being implemented. Records management helps you 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 when 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.

Who

EMS procedures and work instructions designate who performs measurement activities, who records completion of EMS activities, and who manages the records that are created. The intent of the EMS is to make as much of the measurement and record keeping as practical the responsibility of people whose jobs could significantly impact the environment. The EMS Coordinator or department where the environmental activity occurs is responsible for managing the relevant records.

Why

Measurement and record keeping helps you manage your organization. The results of pollution prevention and other efforts are easier to demonstrate when current and reliable data are available. These data can help you demonstrate the EMS' value to top management.

The purpose of records management is to demonstrate that your facility is implementing the EMS as designed. While records have value internally, you also may need to give them to others (such as customers, a registrar, or the public), as proof of EMS implementation.

Note on Measuring Performance

You may want to tie your measurements to production numbers to make sure that you don't inaccurately show progress. For example, if your goal is to reduce energy use in kilowatts by 10 percent over the next three years and during that time you reduce your production, then your energy savings may be a result of reduced production and not of improved performance. In this example, a better measure would be kilowatts used per 1,000 units produced.

How

Choose a limited number of factors that can have a big impact on the outcome of a process, then determine how to measure those factors. See Sample Form 9: Links Between SEAs, Goals, Completion Dates, Operational Controls, and Monitoring and Measurement, below, for a sample form you can customize to show the link between measurement and your SEAs.

Here are some things to consider as you determine your facility's process for records management:

- Identify which EMS records are required. Look at your other procedures and work instructions to decide what evidence is needed. Also consider records that are required by legal requirements.

- Focus on records that add value. 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.
- Establish a records retention policy and stick to it. Make sure that your policy takes into account records retention requirements specified in environmental regulations. For example, hazardous waste manifests must be maintained for a specified period of time under RCRA.
- Consider who needs access to what records in what circumstances.
- 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 kept at another location? Should a hard copy of some records be kept in case an inspector arrives and your computer system is down?

Sample Form 9: Links Between SEAs, Goals, Completion Dates, Operational Controls, and Monitoring and Measurement

Significant Aspect	Goal	Operational Control	Monitoring and Measurement	Completion Date	Progress to Date
Metal Cyanide Emissions	Maintain compliance	<ul style="list-style-type: none"> • Title V Permit • Air Emissions Abatement Equipment O&M 	<ul style="list-style-type: none"> • Air Emissions Abatement Equipment Monitoring Log • Compliance audit • Regulatory reporting • EMS audits 	Ongoing	Ongoing
Water Use	Reduce water use	<ul style="list-style-type: none"> • Water use reduction Action Plan 	<ul style="list-style-type: none"> • Monthly water bills • EMS audits 	50% by January 2009	10% reduction as of January 2004
Human Exposure to Toxic Materials/ Chromium Emissions	Investigate potential for reduction	Human exposure to toxic materials action plan	<ul style="list-style-type: none"> • Human exposure reduction tracking metric • EMS audits 	Complete study by January 2005	Best available technologies have been identified and vendors have been contacted.