

**City of Dallas
Environmental Management System**



DOCUMENTS AND RECORDS MANAGEMENT PROCEDURE

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Revision Number:	4	Signature:	<i>Kris Sweckard</i>

1.0 Policy Reference

Implementation of programs and procedures with an intent to meet or exceed all applicable environmental laws and regulations.

2.0 Purpose

This procedure describes the methods for environmental document and records management including the document numbering system, document control and approval, and document/records retention.

3.0 Scope

This procedure applies to all City employees when engaged in City-related work activities which have an environmental impact within the Environmental Management System (EMS) fenceline. This procedure applies only to environmental documents and records, not all documents or records generated by a facility within the EMS (regardless of whether the facility has an environmental permit to operate).

4.0 Responsibilities & Authority

4.1 **Director of the Office of Environmental Quality (OEQ)** is responsible for reviewing and approving City wide EMS procedures.

4.2 **OEQ** is responsible for the following:

4.2.1 Preparing City wide EMS procedural documents for review and adoption by the EMS core team.

4.2.2 Posting the City wide EMS procedures and documents on the Intellex system. EMS procedures are also posted on the City's Intranet and Internet websites.

4.2.3 Reviewing and revising City wide EMS procedures and documents, as required.

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- 4.2.4 Removing and controlling obsolete City wide EMS procedures and documents from Intellex for storage and retention that will prevent unintended use. Also, obsolete EMS procedures are removed from the City's Intranet and Internet websites.
- 4.2.5 Maintaining a document index for City wide EMS procedures and forms.
- 4.2.6 Storing and maintaining EMS records as specified in the EPA Consent Decree and listed in Table 1.

4.3 City Department Managers/Environmental Management Representatives (EMRs) are responsible for the following:

- 4.3.1 Preparing, obtaining appropriate management approval, and maintaining department-specific EMS and environmental compliance documents.
 - 4.3.2 Reviewing and revising department EMS and environmental compliance documents as required.
 - 4.3.3 Assigning departmental EMS document numbers according to this procedure for EMS and environmental compliance documents.
 - 4.3.4 Removing departmental obsolete EMS and environmental compliance documents from all points of issue and use, retaining one copy of the document, marking it as obsolete, and filing it at a separate location for record history verification, and destroying all other copies in order to prevent unintentional use of an obsolete document.
 - 4.3.5 Maintaining departmental EMS and environmental compliance records in accordance with the City's document retention program. This duty may be assigned within the Department as needed.
- 4.4 The **EMS Core Team** is responsible for reviewing EMS procedures and environmental documentation, as required.

5.0 Procedures

5.1 EMS Document Numbering

Environmental documents are generated to support the development and implementation of the EMS and environmental compliance. This procedure focuses on those EMS and environmental compliance documents that must be controlled to ensure the document is approved and the current version is in use.

The EMS and environmental compliance document number system for the City's EMS is as follows:

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- 5.1.1 The first three characters will be the abbreviation used to indicate the City Department who is responsible for updating and maintaining the document (i.e., document leader). The first three characters will be followed by a dash.
- 5.1.2 The second three characters will indicate the subject of the document according to the following table:

Subject	Abbreviation
Administrative (internal departmental)	ADM
Compliance Documents	CPL
Environmental Management System	EMS
Policy	POL
Procedures (internal departmental)	PRO
Work Instruction	WKI

The second three characters will be followed by a dash.

- 5.1.3 The third characters will be numbers assigned in sequential ascending order.
- 5.1.4 A fourth set of characters may be added in numerical order after a period to number a document, form, record, or attachment that is generated because of a procedure.
- 5.1.5 The Departments may further add an identifier for the division, section and/or facility, such as CH for City Hall or LRH for Lake Ray Hubbard.
- 5.1.6 Examples of this document number system are as follows: An EMS aspect procedure developed by OEQ: OEQ-EMS-001; A Storm water Manual prepared by Sanitation: SAN-CPL-014; an example list of objectives and targets prepared by OEQ: OEQ-EMS-003.001; an example record matrix by Dallas Water Utilities Lake Ray Hubbard, DWU-EMS-008.01-LRH.
- 5.1.7 EMS and environmental compliance documents and records that are originated outside of the City of Dallas and for which the City of Dallas personnel has no control in creating or authority to edit/revise such as environmental equipment manual or vendor's calibration record of city equipment do not have to follow this procedure's numbering system and do not have to be maintained in Intalex. Handling of these external documents and records shall be controlled as outlined in Section 5.3 of this procedure. Environmental documents of external origin contemplated by this procedure include only those documents that are used for decisions with an environmental impact or for making an environmental decision. For example, operators manuals for vehicles may be used by EBS for appropriate vehicle maintenance on

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air control devices and would be considered a document of external origin by EBS, but is not used for any environmental decisions by the driver of the vehicle.

5.1.8 EMRs are not required to have a table listing all documents of external origin, but those documents must be available for use.

5.1.9 **Examples of Environmental Documents of External Origin** (not all inclusive)

Equipment Maintenance Manual

Equipment Operational Manual

Regulatory Reports generated by outside agencies such as EPA, TCEQ, and DOT

Environmental Equipment Training Manuals created by the original manufacturer

Material Safety Data Sheets

5.1.10 **Examples of Environmental Records of External Origin** (not all inclusive)

Manifests

Licenses (pesticide applicator license, water treatment operator license)

Permits

5.2 EMS Document and Environmental Compliance Document Control and Revisions

5.2.1 All EMS procedures prepared by OEQ for use by City Departments will be maintained in the Intellex system. OEQ will have sole responsibility and access for making changes.

5.2.2 All EMS procedures shall contain a document number, issue date, effective date, revision number, document reviewer name, document approver name, and the signature of the approver at the appropriate management level. Both issue date and effective date will be added as older procedures are revised.

5.2.3 The following EMS documentation is required to be in Intellex

City Wide EMS Procedures

Aspects, Impacts, Activities

Scoring of Significant Aspects

Environmental Management Plan

Legal and other (where possible – link to aspects)

Nonconformance, Corrective and Preventive Action Reports

External Communication

Training Matrix

Roles and Responsibility Matrix

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- 5.2.4 Changes to EMS procedures which reside in Intelex can be tracked in the Intelex system and submitted to the document approver for consideration. If a dispute arises over a suggested change, the matter is resolved by the Department director or the assigned document owner.
- 5.2.5 Disputes over changes to OEQ-EMS procedures will be resolved by the Managing Director of OEQ.
- 5.2.6 Revised EMS and environmental compliance documents determined by OEQ or the department as requiring comments or peer review are distributed to the appropriate user groups, reviewers, approvers, and applicable facility/department managers.
- 5.2.7 Proposed revisions to an EMS procedure will be sent to EMRs and to affected departments outside the EMS fenceline for review. If document revisions are clarifications only, the document does not need to be sent out for comments.
- 5.2.8 All revised finalized department EMS and environmental compliance documents are approved by the appropriate management level.
- 5.2.9 Personnel without access to Intelex can access the OEQ EMS procedures through the City of Dallas/OEQ Intranet site.
- 5.2.10 Departments shall ensure that required EMS documents are available for affected employees at the employee point of use.
- 5.2.11 When obsolete documents are removed from Intelex, a paper copy is marked as obsolete and is placed in the obsolete files of the OEQ or the affected department.
- 5.2.12 EMS and environmental compliance documents may be approved using an electronic signature system.
- 5.2.13 Intelex is the official repository of controlled environmental documents and records related to activities, environmental aspects, impacts and significant aspect scoring, updates, and reviews as required by EMS procedures. Reports printed from Intelex are uncontrolled documents. Thus, any printed Intelex reports kept longer than two (2) days shall be stamped as "Uncontrolled".

5.3 EMS and Environmental Compliance Record Management/Retention

- 5.3.1 EMS and environmental compliance records that are generated due to environmental monitoring and measurements, environmental legal requirements, and/or a City wide EMS procedural requirement shall be known as EMS Records. The City Secretary's Office is available to assist Departments in record retention, especially regarding environmental legal requirements.
- 5.3.2 EMS and environmental compliance records are determined by the Department. All records generated by a facility are not necessarily part

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of the EMS. Only those records that are of an environmental nature, regardless of the environmental permitting of the facility, are required to be managed according to this procedure. For example, daily work shift logs, safety records, and call records for maintenance and repairs generated by a facility are not required to be managed under this procedure.

- 5.3.3 EMS records shall be identified, maintained and the distribution of them controlled.
- 5.3.4 EMS Records retention time shall be established and recorded. For environmental compliance retention times, please refer to the environmental regulation or the City Secretary's Office.
- 5.3.5 Departments may create an "Environmental Document/Record Matrix" which shall include at least; the document/record's name, filing/storage location, and retention requirement.
- 5.3.6 Records shall be legible and identifiable.
- 5.3.7 Environmental Records shall be stored and maintained in a manner so they are readily retrievable and protected from damage, deterioration, or loss.

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5.3.8 Here is a format example for a Document/Record Matrix Table.

Record Name	Review Frequency	Facility Retention	Storage Location	Final Retention
Manifest		4 years	Environmental files in Building #1	Dallas Municipal Archives and Records Center
Notice of Registration	Annually	4 years	Environmental files in Building #1	Dallas Municipal Archives and Records Center
Audit Records		3 years after Consent Decree	Environmental files in Building #1	
Environmental daily/weekly checklist	Annually	4 years	Filing cabinet in shop store.	
Environmental Training sign in sheets		3 years after Consent Decree	Departmental Training files	Dallas Municipal Archives and Records Center

Records required to be generated for purposes of reporting Consent Decree EMS progress to the EPA will be generated by OEQ. These records are listed in Table 1 and must be uploaded to a central storage system as specified by the Public Works and Transportation Department. These records will be retained for at least three years following termination of the Consent Decree.

EMS records as listed in Table 2 must be retained for the specified period of time. Other EMS-related documents not listed in Table 2 (e.g., shipping invoices) will be retained in accordance with the City's normal record retention policy.

5.3.9 Afterwards, obsolete EMS records can be archived at the Dallas Municipal Archives and Records Center. Contact them for details regarding the City record retention program.

5.3.10 EMS and environmental compliance records may be approved using an electronic signature system

6.0 Related Documents

Administrative Directive (AD) 3-73 Environmental Management Program

OEQ-EMS-008.01 EMS Document Index

OEQ-EMS-016 City of Dallas Intellex Guidance Manual

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7.0 Definitions

7.1 Controlled Document – a document (including environmental forms) that needs to be managed within the EMS to ensure regular updating, maintenance and separation from obsolete documents in accordance with this procedure.

7.2 Uncontrolled Document – a document that does not need to be handled in accordance with this procedure.

7.3 EMS Procedures – documents that are listed in OEQ-EMS-008.01, EMS Document Index with the exception of OEQ-EMS-018, Guide to the City of Dallas EMS, which is the history of EMS at the City of Dallas.

7.4 EMS Records – Environmental documentation which records results of environmental activities performed. Examples of EMS records include: audit reports, completed environmental checklists/forms, air monitoring calibration records and EMS meeting notes/summaries. EMS records must be managed according to this procedure. Note: A form that has been filled out is a record. A blank form that has not been filled out is a document.

7.5 Documents and Records of External Origin – Environmental documents and/or records created by a non-City entity that are relied upon to make environmental decisions.

8.0 Change History: Revision 2 (01/22/08)

8.1 Added Tables 1 and 2 which identify records to be retained according to the EPA Consent Decree and the EMS, respectively.

8.2 Added statements on electronic signature and electronic files.

8.3 Added statement regarding distribution to departments outside the EMS fenceline.

Revision 3 (04/03/08)

8.4 Added Section 5.2.13 clarifying that printed Intelex records are out of date after two (2) days from the date of printing. Printed Intelex records more than two days old shall be stamped as “Uncontrolled”.

8.5 Revised definition of “Controlled document” in Section 7.1 to include environmental forms.

8.6 Clarified in Section 7.4 that a filled out form is a record, while a blank form is a document.

8.7 Added definition of documents and records of external origin as Section 7.5.

Revision 4 (12/08/11)

8.8 Changed “ISOsoft” to “Intelex” throughout the document.

8.9 In Sections 4.2.2 and 4.2.4, clarified that procedures are added and removed, respectively, from City Intranet and Internet websites.

8.10 In Section 5.2.2, added requirement for “issue date” in addition to “effective date”.

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**Table 1
Consent Decree EMS Records to be Retained**

Record Description	Consent Decree Reference	Retention Period
EMS Implementation Plan	Appendix C, Paragraph 3, Pages 56-57	3 Years After Consent Decree Termination
Initial Review (Gap Analysis) for 11 Facilities	Appendix C, Paragraph 6, Page 58	3 Years After Consent Decree Termination
Development Plans for 11 Facilities	Appendix C, Paragraph 7, Pages 58-59	3 Years After Consent Decree Termination
Semiannual Progress Reports on EMS Implementation	Appendix C, Paragraph 10, Pages 59-60	3 Years After Consent Decree Termination
Annual Progress Reports on Environmental Metrics	Appendix C, Paragraph 10, Page 60	3 Years After Consent Decree Termination
EMS Auditor Qualifications Statement	Appendix C, Paragraph 12, Page 61	3 Years After Consent Decree Termination
EMS Audit Schedule and Plan	Appendix C, Paragraph 16, Pages 62-63	3 Years After Consent Decree Termination
EMS Audit Reports for 11 Facilities	Appendix C, Paragraph 20, Pages 64-65	3 Years After Consent Decree Termination
Initial Audit Responses and Action Plans for 11 Audit Reports	Appendix C, Paragraph 22, Pages 65-66	3 Years After Consent Decree Termination
Final Audit Responses and Action Plans for 11 Audit Reports	Appendix C, Paragraph 23, Page 66	3 Years After Consent Decree Termination
Requests for Certification of EMS Implementation for 11 Facilities	Appendix C, Paragraph 25, Pages 66-67	3 Years After Consent Decree Termination

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**Table 2
EMS Records to be Retained**

EMS Procedure No.	EMS Procedure Title	Record Description	EMS Procedure Reference	Retention Period
OEQ-EMS-001	Env. Aspects, Impacts, and Significance Criteria	Aspects and impacts inventory	5.1.5	3 Years After Consent Decree Termination
		Documentation of setting significance threshold	5.2.3	3 Years After Consent Decree Termination
		Justification for not setting an OT for a significant aspect	5.2.4	3 Years After Consent Decree Termination
OEQ-EMS-002	Legal and Other Requirements	List of legal and other requirements	5.1.6	3 Years After Consent Decree Termination
OEQ-EMS-003	Objectives, Targets, and Env. Management Programs	Director letter to OEQ approving OTs (initial and annual)	5.1.4	3 Years After Consent Decree Termination
		Director letter to OEQ notifying of mid-year updates to OTs	5.1.4	3 Years After Consent Decree Termination
		OEQ master OT list	5.1.5	3 Years After Consent Decree Termination
		City Wide and Multi-dept. OT committee meeting minutes	5.2.6	3 Years After Consent Decree Termination
OEQ-EMS-005	Structure and Responsibility Example Table	Structure and Responsibility Table	N/A	3 Years After Consent Decree Termination
OEQ-EMS-006	Training, Awareness, and Competency	Training sign-in or attendance sheets for environmental training	6.6	3 Years After Consent Decree Termination
OEQ-EMS-007	Internal Communication	Awards applications	5.1	3 Years After Consent Decree Termination

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EMS Procedure No.	EMS Procedure Title	Record Description	EMS Procedure Reference	Retention Period
OEQ-EMS-009	Operational Controls	Facility/department list of operational controls	4.2.6, 4.3.2 & 5.3	3 Years After Consent Decree Termination
		Documentation of inspections and/or operational controls	4.2.7	3 Years After Consent Decree Termination
OEQ-EMS-010	Emergency Preparedness & Response	Environmental Incident reports per AD 3-74	4.9.1	3 Years After Consent Decree Termination
		Documentation of Tabletop Exercises	5.3	3 Years After Consent Decree Termination
OEQ-EMS-011	Monitoring and Measurement	Documentation of tracking performance indicators (environmental data)	5.5	3 Years After Consent Decree Termination
		Equipment calibration records	5.8	3 Years After Consent Decree Termination
OEQ-EMS-012	Nonconformance, Corrective/Preventative Action	All Documentation is in Intelx	4.2.1 4.2.2	3 Years After Consent Decree Termination
OEQ-EMS-013	EMS Audits	Audit reports	5.3.7	3 Years After Consent Decree Termination
		Audit plan	5.1.5	3 Years After Consent Decree Termination
OEQ-EMS-014	Senior Management Review	Management EMS reports	3.3.2 3.4	3 Years After Consent Decree Termination
		Departmental management review meeting minutes, agenda, sign-in sheet (if applicable)	4.2.3	3 Years After Consent Decree Termination
OEQ-EMS-015	Calibration	Monitoring equipment inventory	5.4	3 Years After Consent Decree Termination
		Calibration logs and records for monitoring equipment	5.6	3 Years After Consent Decree Termination

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EMS Procedure No.	EMS Procedure Title	Record Description	EMS Procedure Reference	Retention Period
		Calibration procedures	4.1.1	3 Years After Consent Decree Termination
		Calibration equipment certification/verification records	5.3	3 Years After Consent Decree Termination
OEQ-EMS-017	Evaluation of Compliance	Compliance assessment checklists	5.1	3 Years After Consent Decree Termination
		Compliance assessment reports and correspondence	5.14	3 Years After Consent Decree Termination
		Monthly compliance assessment status records (i.e., OEQ accountability reports)	5.16	3 Years After Consent Decree Termination
OEQ-EMS-018	Guide to City of Dallas EMS	Environmental policy	4.2	3 Years After Consent Decree Termination
OEQ-EMS-019	External Communication	External requests for EMS information	5.5	3 Years After Consent Decree Termination
OEQ-EMS-020	Management of Change	Environmental review records	5.1	3 Years After Consent Decree Termination
		QMP records (forms attached to procedure)	5.2	3 Years After Consent Decree Termination