

**City of Dallas  
Environmental Management System**



**SENIOR MANAGEMENT REVIEW PROCEDURE**

<b>Document Number:</b>	OEQ-EMS-014	<b>Reviewed By:</b>	(Rev. 1 and Rev. 2) EMS Core Team (Rev. 3) OEQ Sr. Lead Auditor
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<b>Revision Number:</b>	3	<b>Signature:</b>	

**1.0 POLICY**

Implementation of programs and procedures with intent to meet or exceed all applicable environmental laws and regulations. Utilization of environmental management systems, as appropriate for our operations, to provide a framework for systematically reviewing and reducing our environmental footprint.

**2.0 PURPOSE**

The purpose of this procedure is to document and develop a primary agenda of issues to be included in the Senior Management Review meeting for evaluating the status of the City of Dallas Environmental Management System (EMS).

**3.0 RESPONSIBILITY**

**3.1 Senior Management (i.e., the City Manager and Assistant City Managers)** is responsible providing feedback to the Office of Environmental Quality (OEQ) and the City wide EMS Core Team on the EMS during the City Manager Office (CMO) management retreats.

**3.2 Department Directors** are responsible for identifying members of the department's "Top Management" team, participating in Departmental EMS Management Review and reviewing/providing EMS information to OEQ and the EMS Core Team to present during the Senior Management meeting.

**3.3 The Office of Environmental Quality** is responsible for the following:

**3.3.1** Providing Senior Management with EMS data and updates annually.

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- 3.3.2 Providing Senior Management with an annual EMS Report
- 3.3.3 Ensuring all necessary data and other information are collected prior to the meeting
- 3.3.4 Ensuring that City Wide Management Reviews are documented, and that this documentation is retained and readily accessible for review and audit.
- 3.3.5 Developing and submitting semiannual progress reports to the EPA regarding the City's implementation efforts of the EMS program as part of the Consent Decree.
- 3.4 The **City wide EMS Core Team** is responsible for developing an agenda to be used for EMS portion of the CMO meeting.
- 3.5 The **Environmental Management Representatives** (EMRs) are responsible for providing data on objective and targets, training and other EMS information to be included in the CMO Management meeting per OEQ request. Within their own department, the EMR shall lead the Departmental Management Review.

**4.0 PROCEDURE**

- 4.1 City Wide Management Review
  - 4.1.1 The EMS portion of the CMO Management meeting is intended as a forum for reviewing and/or improving the City of Dallas' EMS by providing management an opportunity to make any changes to the EMS as necessary to achieve its goals.
  - 4.1.2 At a minimum, the EMS portion of the meeting shall include the following agenda items:
    - 4.1.2.1 Results of internal audits and evaluations of compliance with legal requirements and other requirements;
    - 4.1.2.2 Suitability, adequacy, and effectiveness, of communications from external interested parties, including complaints;
    - 4.1.2.3 Suitability, adequacy and effectiveness of the City's environmental performance;
    - 4.1.2.4 Suitability, adequacy and effectiveness of objectives and targets and the status as found in the City Action Plan;
    - 4.1.2.5 Suitability, adequacy and effectiveness of nonconformities, corrective and preventative action plans;
      - 4.1.2.5.1 The EMS portion of the meeting will brief management on Nonconformances, Corrective

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and Preventive Actions from *both* internal and external audits.

4.1.2.5.2 Briefing on findings from internal audits will include Intelex NCR status information. A City-wide tally of the number of nonconformances at each Intelex status (“Investigation”, “Approval”, “Rejected”, “Complete Corrective Actions”, “Final Approval”, “Rejected by Final Approver”, and “Closed”) will be provided.

4.1.2.5.2.1 Intelex status can be described in “plain English” (example: “Complete Corrective Action” status could be described as “Department is working on its Action Plan but is not yet done”).

4.1.2.6 Suitability, adequacy, and effectiveness of training efforts;

4.1.2.7 Results of any action items from the previous CMO Management Retreat meeting;

4.1.2.8 Changes in circumstances or legal or other requirements as it relates to environmental aspects;

4.1.2.9 Providing direction for changes needed to the EMS.

4.1.3 Prior to its presentation, OEQ will audit the contents of the EMS portion of the meeting against the criteria of ISO14001:2004 section 4.6, “Management Review”. This audit will be conducted by OEQ staff *not* involved in writing the EMS portion of the meeting.

4.1.4 EMS meeting minutes are generated by OEQ and shall include, at a minimum, the list of attendees, a summary of key issues discussed, and any actions items arising from the meeting.

4.1.5 A copy of the meeting minutes is distributed to attendees and any individuals assigned action items. A copy of the meeting minutes shall be retained on file in OEQ.

**4.2 Departmental Management Review**

4.2.1 The Departments may perform their own internal management review at planned intervals. The Departmental EMR should assist in developing the required inputs to the meeting.

4.2.2 At a minimum, the EMS portion of the meeting should include the following items:

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- 4.2.2.1 Results of internal audits and evaluations of compliance with legal requirements and other requirements;
  - 4.2.2.2 Suitability, adequacy, and effectiveness, of communications from external interested parties, including complaints;
  - 4.2.2.3 Suitability, adequacy and effectiveness of the Department's environmental performance;
  - 4.2.2.4 Suitability, adequacy and effectiveness of objectives and targets and the status as found in the City Action Plan;
  - 4.2.2.5 Suitability, adequacy and effectiveness of nonconformities, corrective and preventative action plans;
  - 4.2.2.6 Suitability, adequacy, and effectiveness of training efforts;
  - 4.2.2.7 Results of any action items from the previous Departmental Management Review meeting;
  - 4.2.2.8 Changes in circumstances or legal or other requirements as it relates to environmental aspects;
  - 4.2.2.9 Recommendation for changes needed to the EMS if applicable.
- 4.2.3 The documentation of the Departmental Management Review should include a meeting agenda, meeting minutes or other outputs of decision and actions taken by top Management and sign-in sheet.
- 4.2.4 The EMR should maintain the records of Departmental Management Reviews in a manner that ensure accessibility during a review or audit.

**4.3 EPA Consent Decree**

A semi-annual and annual report is prepared by OEQ and distributed to the City wide EMS Core Team members and Senior Management documenting EMS-related initiatives throughout the year. Minimum requirements for this report shall include:

- 4.3.1 Progress in achieving pertinent milestones, including any obstacles encountered.
- 4.3.2 Total number of procedures requiring documentation for EMS
- 4.3.3 Total number of procedures for which documentation has been completed.

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4.3.4 Total number of procedures for which documentation was completed during that reporting period.

**5.0 REFERENCES**

EPA Consent Decree

**6.0 DEFINITIONS**

Not applicable

**7.0 CHANGE HISTORY**

7.1 REV. 2

7.1.1 Removed reference to CMO Retreat. Section 3.3

7.1.2 Changed requirement of CMO SR Management meeting to annual. Section 3.3

7.1.3 Added a Change History Section 7

7.2 REV. 3

7.2.1 Added Sections 4.1.2.5.1 and 4.1.2.5.2. OEQ must report on both internal and external findings; the report on internal audit findings must describe a count of NCRs by status.

7.2.2 Rev 2, Sections 4.1.3 and 4.1.4 were renumbered 4.1.4 and 4.1.5 to make room for a new section 4.1.3.

7.2.3 Added new section 4.1.3. This section requires that OEQ audit the Senior Management Review brief against the criteria of ISO14001:2004 section 4.6, "Management Review".

