Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance
Procedure EIP-9
Documentation, Document Control, and Records Management

Purpose:

The purpose of this Environmental Implementation Procedure (EIP) is to establish and maintain methods for controlling and managing documentation related to the EMS.

Responsibility:

Commissioner/Division Director:
- Approves a Department level document control procedure, and records management system for EMS documentation.
- "Owner" of controlled documents such as Programs, and Directives.
- Advocate that personnel under his/her supervision understand and follow established EMS document control and records management procedures and systems.
- Communicate the implementation of standardized formats for records, such as inspection forms and inventory logs that will be used throughout The Department.

Office of Stewardship and Compliance (OSC):
- Provide guidance to Commissioners/Directors and Bureau Administrators in establishing, documenting, and implementing Bureau-level EMS document control and records management systems.

Bureau Administrator:
- Approves a Bureau level document control procedure, and records management system for EMS documentation.
- "Owner" of controlled documents.
- Advocate that personnel under his/her supervision understand and follow established EMS document control and records management procedures and systems.

District Engineer or Designee:
- Oversee management of the district’s Documents and Records

Bureau EMS Coordinator:
- Coordinates the review, revision, and distribution of current controlled documents, and removal/replacement of obsolete documents.
- Communicate the requirements for maintaining Bureau-level documents and records to Bureau staff, as appropriate.

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Safety & Environmental Coordinators:
- Communicate the requirements for maintaining Bureau-level documents and records to District staff, as appropriate.
- Manage appropriate District Documents and Records

Bureau EMS Team:
- Establishes and maintains Bureau level EMS document control and records management systems
- Review and maintain the Bureau’s Documents and Records as appropriate.

Bureau Employees:
- Understand and follow the established EMS document control and records management procedures and systems. The level of understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities.

DOCUMENTS AND RECORDS:
- EIP-9-Form 9a Environmental Documents List
- EIP-9-Form 9b Environmental Records List
- EIP-9-Form 9c Documents Review Checklist

PROCEDURE FOR EMS DOCUMENT CONTROL:

1. Bureau EMS Team identifies which documents are to be included in the EMS framework.

2. Bureau EMS Team identifies which documents should be “controlled documents”.

At the Department level, this should include, at a minimum:
- Environmental Policy.
- General Legal and Other Requirements Listing.
- Templates, worksheets, forms and EIPs intended for use by all Bureaus.

At the Bureau level, this should include, at a minimum:
- Commitment Statement.
- EMS Manual.
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- Bureau-specific EIPs and associated documents (i.e., Aspect/Impact Table, Objectives and Targets Matrix).
- Bureau or facility-specific environmental plans.
- Environmental permits.
- Written operational control procedures and work instructions.

3. Bureau Administrators is the designated “owner” of all controlled documents. The Bureau's EMS Coordinator will coordinate the review, revision, and distribution of current controlled documents, and the removal of obsolete documents. The Bureau EMS Coordinator compiles all proposed document revisions, reviews proposed document revisions with Bureau EMS team members to determine adequacy and achieve consensus, and presents the new or revised document to Bureau Administrator and OSC. Bureau Administrator approves the documents and signs them as appropriate.

4. The Bureau EMS Coordinator shall use the standardized controlled document format developed by OSC and include identifying information on all controlled documents. This includes at a minimum:
   - Document name.
   - Document date.
   - Revision number.

5. Bureau EMS Coordinator will determine where documents will be located and how they will be controlled. Controlled documents consist of a PDF posted on the shared computer S: Global Drive, as well as on EMS coordinators secured J: drive. Current copies are maintained on the bureau S: drive as well as on EMS coordinators secured J: drive.

6. Bureau EMS Team shall review controlled documents periodically to determine if revisions are needed.

7. The document owner or designee, including but not limited to OSC and the Bureau EMS Coordinator, communicate to all document users that a new revision is available, and describe any significant changes that were made. Obsolete electronic controlled documents are moved to an archive folder in the shared computer S: Global Drive. Paper document copies located in Bureau EMS Manuals and Patrol Shed EMS Binders are replaced with updated versions and outdated paper document copies are

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8. For uncontrolled documents, the Bureau EMS Coordinator develops a standardized document file format.

9. The Bureau EMS Team lists all documents on the Environmental Documents List (EIP-9-Form 9a) with pertinent information including the document control status, document location, current revision number and date, and document "owner." or individual responsible for maintaining the document. This list should be reviewed and updated periodically, as appropriate.

PROCEDURE FOR EMS RECORDS MANAGEMENT:

1. OSC and the Bureau EMS Team identify key records associated with the EMS. These may include:
   - Meeting minutes related to EMS Quarterly, and Annual Management Review Meetings, or as appropriate.
   - Records related to legal and regulatory compliance, hazardous waste determinations, manifests, inspections, tank registrations, and USDOT shipping papers.
   - Records related to environmental permits or registrations.
   - Records related to operational equipment and systems, specifications, inspections, service records, and testing results.
   - Training records.
   - Records related to environmental incidents such as spill reports.
   - Records related to specific EIPs such as correspondence, and data collected for Progress Indicators.

2. The Bureau EMS Team determines where key records are to be located. Records should be filed or stored in a location and manner that makes them easy to locate and retrieve. For regulatory compliance purposes, some records will need to be retained in hardcopy at facilities rather than at the Bureau office. Other records may be maintained electronically or in hardcopy.

3. The Bureau EMS Team members identify and maintain a filing or storage system that will allow for reliable access of files and or documents.

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4. All Bureau EMS records must be legible.

5. S&E Coordinator EMS Coordinator, and/or EMS Peer Review Team periodically review records to confirm that they are legible, complete, accurate, and well organized.

6. Records shall be retained and stored according to regulatory or other requirements. Most environmental regulations specify the length of time records must be retained. Records older than their required retention time should be archived or discarded properly.

7. The Commissioner/Division Directors may require implementation of standardized formats for records, such as inspection forms and inventory logs that will be used throughout The Department. Templates used for recordkeeping should also be managed as controlled documents.

8. The Bureau EMS Team list all applicable records on the Environmental Records List (EIP-9-Form 9b), with pertinent information including the name of the record, purpose and applicable regulatory citation or EMS element, record location, retention requirement, and individual(s) responsible for generating and for maintaining records. This list shall be reviewed and updated periodically.