



Division of Operations Environmental Implementation Procedure
Bureau: Highway Maintenance

Date: 2/10/11

Procedure EIP-9

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Documentation, Document Control, and Records Management

Revision: 3.1

PURPOSE:

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

DEFINITIONS:

Documentation - all relevant EMS documents and records. EMS documentation describes the core elements of the EMS.

EMS documents - describe current activities or guide future activities, and form the core of the EMS. EMS documents can be changed or revised as operations and activities change.

Controlled documents - documents subject to restricted access for modification, approval, distribution, and removal.

Records - evidence of past activities that are permanent and never change. Records must be maintained to demonstrate compliance with EMS requirements, legal/regulatory requirements, and NHDOT policies and procedures.

RESPONSIBILITY:

Office of Stewardship and Compliance (OSC):

- Provide guidance to Bureaus in establishing, documenting, and implementing Bureau-level EMS document control and records management systems.

Director/Bureau Administrator:

- Establish and maintain Division level EMS documentation and a document control procedure and records management system for Division-level EMS documentation.
- Advocate that personnel under his/her supervision understand and follow established EMS document control and records management procedures and systems.

Bureau EMS Coordinator:

- Establish and maintain Bureau-level EMS document control and records management systems.
- Coordinate with OSC to maintain and control appropriate documents and records.
- Communicate the requirements for maintaining Bureau-level documents and records to Bureau staff.



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Bureau EMS Team:

- Manage the Bureau's Documents and Records Logs.

Bureau Employees:

- Understand and follow the established EMS document control and records management procedures and systems.

DOCUMENTS AND RECORDS:

- EIP-9-Form 9a Environmental Documents Log
- EIP-9-Form 9b Environmental Records Log

PROCEDURE FOR EMS DOCUMENT CONTROL:

1. OSC and the Bureau EMS Team identify which documents are to be included in the EMS framework.
2. OSC and the Bureau EMS Team identify which documents should be "controlled documents".

At the Division level, this should include, at a minimum:

- EMS 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.
- Bureau-specific EIPs and associated documents (i.e., Aspect/Impact Table, Objectives and Targets Matrix).
- Bureau or facility-specific environmental plans (i.e., SPCC plans).
- Environmental permits.
- Written operational control procedures and work instructions.

3. OSC and/or the Bureau EMS Coordinator authorize a key individual to be the controlled document "owner". This person has responsibility for review, revision, and distribution of current controlled documents, and for removal of obsolete documents.



4. The Bureau EMS Coordinator 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. OSC and/or the Bureau EMS Coordinator will determine where the document will be located and how it will be controlled. This may be accomplished most easily by posting a "read-only" version on a shared computer drive. In this case, the document should be marked "uncontrolled when printed" along with information on where to find the current, controlled version.
6. OSC and the Bureau EMS Team review controlled documents at least annually to determine if revisions are needed.
7. OSC and the Bureau EMS Coordinator communicate to all document users that new revision is available, and describe any significant changes that were made. Simultaneously, obsolete documents should be removed or archived. This is simple to do if electronic documents are used and stored in a single shared-access location, but is more complicated with paper documents that may be located at distant facilities.
8. For uncontrolled documents, it is still a good EMS practice for the Bureau EMS Coordinator to develop a standardized document format that includes the date, revision and author of the document, and a document review schedule.
9. The Bureau EMS Team lists all documents on the Environmental Documents Log (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 at least annually.

PROCEDURE FOR EMS RECORDS MANAGEMENT:

1. OSC and the Bureau EMS Team identify key records associated with the EMS. These may include:



- Records related to legal and regulatory compliance, hazardous waste determinations, manifests, inspections, tank registrations, and USDOT shipping papers.
 - Records related to environmental permits such as NPDES testing results.
 - Records related to operational equipment and systems, specifications, inspections, service records, and testing results.
 - Training records.
 - Records related to environmental setbacks such as spill reports.
 - Invoices, purchasing, waste disposal, and recycling records.
 - Records related to EIPs such as meeting minutes, correspondence, and data collected for Progress Indicators.
2. OSC and the Bureau EMS Coordinator determine 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 develops a consistent filing or storage system to be used at all records storage locations throughout the Bureau, and identify the individual(s) responsible for maintaining records at each location.
 4. The Bureau EMS Team develops a standard policy for legibility of records. This may include specifying that all records must be legible, only black ink is used, or that all records are scanned and saved electronically.
 5. The Bureau EMS Team periodically reviews records to ensure that they are legible, complete, accurate, and well organized (i.e., filed chronologically).
 6. OSC specifies and implements a records retention policy to ensure that records are kept according to regulatory or other requirements. Most environmental regulations specify the length of time records must be retained. For example, hazardous waste inspection logs can be destroyed after 3 years, while records related to tank installation, service, and repair must be retained for the life of the facility. In any event, EMS-related records must be maintained through at least one EMS audit cycle.
 7. Where possible, OSC will create standardized formats for records such as inspection forms and inventory logs that can be used throughout all facilities. This provides



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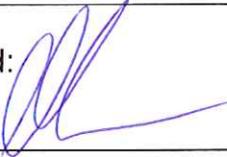
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consistency of recordkeeping and demonstrates a systematic approach to records management. Templates used for recordkeeping should also be managed as controlled documents.

- 8. OSC and the Bureau EMS Coordinator list all applicable records on the Environmental Records Log (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 should be reviewed and updated at least annually.

Approved: 	Revision #: <u>3.1</u>
Name _____	Revision Date: <u>2/10/11</u>
Title <u>State Maint Engineer</u>	Supersedes
Date <u>2/15/11</u>	Revision #: <u>3.0</u>

