

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
	Approved By:	OEQ Managing Director	Effective Date:	3/29/2018
	Description of Last Change:	Revised due date in section 6.2.4.2		
Document Title:	<b>Documents and Records Management</b> ISO 14001:2015 7.5			

1. **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.
  
2. **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).
  
3. **ENVIRONMENT:** Utilization of environmental management systems, as appropriate for our operations, to provide a framework for ensuring documents and records are managed appropriately.
  
4. **DEFINITIONS:**
  - 4.1 **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.
  - 4.2 **Uncontrolled Document** – a document that does not need to be handled in accordance with this procedure
  - 4.3 **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.
  - 4.4 **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.
  - 4.5 **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.

## 5. Responsibilities & Authority

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

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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5.2 The Office of Environmental Quality (OEQ) is responsible for the following:

- 5.2.1 Preparing the City's EMS procedural documents for review and adoption by the EMS core team.
- 5.2.2 Posting the City's EMS procedures on the Intranet and Internet websites.
- 5.2.3 Reviewing and revising the City's EMS procedures and documents, as required.
- 5.2.4 Removing and controlling obsolete EMS procedures and documents from the City's Intranet and Internet websites.
- 5.2.5 Maintaining a document index for EMS procedures and forms.
- 5.2.6 Storing and maintaining the City's EMS records as specified in the EPA Consent Decree and listed in Table 1.

5.3 Facility Managers and Environmental Management Representatives (EMRs) are responsible for the following:

- 5.3.1 Preparing, obtaining appropriate management approval, and maintaining department-specific EMS and environmental compliance documents.
- 5.3.2 Reviewing and revising department EMS and environmental compliance documents as required.
- 5.3.3 Assigning departmental EMS document numbers in accordance with this procedure for EMS and environmental compliance documents.
- 5.3.4 Ensuring current versions of EMS and environmental documentation are available for use by department personnel and removing obsolete versions.
- 5.3.5 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.

5.4 The EMS Core Team is responsible for reviewing EMS procedures and environmental documentation, as required.

## 6. PROCEDURES

### 6.1 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

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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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:

- 6.1.1 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.
- 6.1.2 The second three characters will indicate the subject of the document according to **Table 1: Document Type Abbreviations**. The second three characters will be followed by a dash.

**Table 1: Document Type Abbreviations**

<b>Subject</b>	<b>Abbreviation</b>
Compliance Documents	CPL
Environmental Management System	EMS
Policy	POL
Procedures	PRO
Work Instruction	WKI
Form	FRM

- 6.1.3 The third characters will be numbers assigned in sequential ascending order.
- 6.1.4 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.
- 6.1.5 The Departments may further add an identifier for the division, section and/or facility, such as CH for City Hall or CM for Conservation Management.
- 6.1.6 Examples of this document number system are as follows: A Stormwater Manual prepared by Sanitation: SAN-CPL-014; an example record matrix by Dallas Water Utilities Conservation Management, DWU-PRO-002-CM.
- 6.1.7 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 manuals or vendor's calibration record of City

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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equipment, do not have to follow this procedure's numbering system. Handling of these external documents and records shall be controlled as outlined in Section 6.3 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, operator's manuals for vehicles may be used by EBS for appropriate vehicle maintenance on 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.

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

6.1.9 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

6.1.10 Examples of Environmental Records of External Origin (not all inclusive)

Manifests

Licenses (pesticide applicator license, water treatment operator license)

Permits

## 6.2 EMS and Environmental Compliance Document Control and Revisions

6.2.1 All EMS procedures prepared by OEQ for use by City Departments will be maintained on the City's Intranet and Internet sites and in the City's ISO data management system. OEQ will have sole responsibility for making changes.

6.2.2 All EMS procedures shall contain a document number, effective date, revision number, document approver name/position, and the description of the last change.

6.2.3 The following EMS documentation is required to be in the City's ISO data management system:

Environmental Risk, Aspects, Impacts, Significant Aspects

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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	Description of Last Change:	Revised due date in section 6.2.4.2		
Document Title:	<b>Documents and Records Management</b> ISO 14001:2015 7.5			

Scoring of Significant Aspects  
Environmental Management Plan  
Compliance Obligations (where possible – link to aspects)  
Nonconformance and Corrective Action Reports  
External Communication

- 6.2.4 Changes to EMS procedures can be 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.
- 6.2.4.1 Compliance Obligations and EMS Objectives and Targets shall be initially entered into the City’s ISO data management system by December 31, 2017.
  - 6.2.4.2 All other EMS documentation shall be initially entered into the City’s ISO data management system by June 30, 2018
- 6.2.5 Disputes over changes to OEQ-EMS procedures will be resolved by the Managing Director of OEQ.
- 6.2.6 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.
- 6.2.7 Proposed revisions to a City 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.
- 6.2.8 All department EMS and environmental compliance documents are approved by the appropriate management level.
- 6.2.9 Departments shall ensure that required EMS documents are available for affected employees at the employee point of use.
- 6.2.10 When obsolete documents are removed from the City’s Intranet and Internet sites, a copy (electronic or paper) is marked as obsolete and is placed in the obsolete files of the OEQ or the affected department.
- 6.2.11 EMS and environmental compliance documents may be approved using an electronic signature system, as required.
- 6.2.12 The City’s ISO data management system is the official repository of controlled environmental documents and records related to activities, environmental aspects, impacts and significant aspect scoring, updates,

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and reviews as required by EMS procedures. Reports printed from the City's ISO data management system are uncontrolled documents after 15 days.

### 6.3 EMS and Environmental Compliance Record Management/Retention

- 6.3.1 EMS and environmental compliance records that are generated due to environmental monitoring and measurements, compliance obligations, and/or a City EMS procedural requirement shall be known as EMS Records. The City Secretary's Office are available to assist Departments in record retention.
- 6.3.2 EMS Records shall be stored and maintained in a manner so they are readily retrievable and protected from damage, deterioration, or loss.
- 6.3.3 EMS Records are determined by the Department. 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.
- 6.3.4 EMS Records shall be identified, legible, and the distribution of them controlled.
- 6.3.5 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.
- 6.3.6 Departments may create an "Environmental Document/Record Matrix" which shall include at least; the document/record's name, filing/storage location, and retention requirement. See the example in **Table 2: "Example Document/Record Matrix"**
- 6.3.7 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 3: "Consent Decree EMS Records Retention"** and must be uploaded to a central storage system. These records will be retained for at least three years following termination of the Consent Decree. EMS records as listed in **Table 4: "EMS Records Retention"** must be retained for the specified period of time. Other EMS-related documents not listed in Table 4 (e.g., shipping invoices) will be retained in accordance with the City's normal record retention policy or legal requirement.

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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	Description of Last Change:	Revised due date in section 6.2.4.2		
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6.3.8 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.

6.3.9 EMS Records may be approved using an electronic signature system.

## 7. REFERENCES

7.1 Administrative Directive (AD) 3-73 Environmental Management Program

7.2 OEQ-EMS-008.01 EMS Document Index

**Table 2: Example Document/Record Matrix**

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

**Table 3: Consent Decree EMS Records Retention**

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

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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Document Title:	<b>Documents and Records Management</b> ISO 14001:2015 7.5			

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

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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Document Title:	<b>Documents and Records Management</b> ISO 14001:2015 7.5			

**Table 4: EMS Records Retention**

<b>EMS Procedure No.</b>	<b>EMS Procedure Title</b>	<b>Record Description</b>	<b>EMS Procedure Reference</b>	<b>Retention Period</b>
COD-EMS-PRO-001	Environmental Aspects, Impacts, and Risk	Environmental risks, opportunities, aspects and impacts; significance	6.1-6.3	3 Years After Consent Decree Termination
COD-EMS-PRO-002	Compliance Obligations	List of compliance obligations	6.1.3, 6.1.6	3 Years After Consent Decree Termination
COD-EMS-PRO-003	Objectives, Targets, and Environmental Programs	Director letter to OEQ stating OTs, OT Progress Reports, entry into data management system	6.1-6.3	3 Years After Consent Decree Termination
COD-EMS-PRO-004	Contractor Management	(7.2 Competence, 7.3 Awareness in standard)	6.1-6.2	3 Years After Consent Decree Termination
COD-EMS-PRO-005	Organizational Roles, Responsibilities & Authorities	Organizational Roles, Responsibilities & Authorities	6.3-6.4	3 Years After Consent Decree Termination
COD-EMS-PRO-006	Training, Awareness, and Competency	Training sign-in or attendance sheets for environmental training	6.1, 6.3, 6.4	3 Years After Consent Decree Termination
COD-EMS-PRO-007	Internal Communications	Environmental policy	6.4	3 Years After Consent Decree Termination
COD-EMS-PRO-008	Documents and Records Management	EMS Records Retention	6.3.6	3 Years After Consent Decree Termination
COD-EMS-PRO-009	Operational Controls	Facility/department list of operational controls	6.3, 6.5, 6.6	3 Years After Consent Decree Termination

 <b>City of Dallas</b>	Document Number:	COD-EMS-PRO-008	Revision Number:	7
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**Table 4: EMS Records Retention**

<b>EMS Procedure No.</b>	<b>EMS Procedure Title</b>	<b>Record Description</b>	<b>EMS Procedure Reference</b>	<b>Retention Period</b>
COD-EMS-PRO-010	Emergency Preparedness & Response	Environmental Incident reports per AD 3-74, review of Emergency Preparedness Response Plan	6.5-6.7, 6.9	3 Years After Consent Decree Termination
COD-EMS-PRO-011	Monitoring, Measurement and Calibration	Documentation of tracking performance indicators (environmental data), calibration records	6.1, 6.9	3 Years After Consent Decree Termination
COD-EMS-PRO-012	Nonconformity and Corrective Action	All Documentation is in the City's ISO data management system	6.3-6.9	3 Years After Consent Decree Termination
COD-EMS-PRO-013	EMS Internal Audits	Audit reports	6.9, 6.11	3 Years After Consent Decree Termination
COD-EMS-PRO-014	Management Review	Management Review records, sign-in sheet, management review meeting minutes	6.1, 6.2.1	3 Years After Consent Decree Termination
COD-EMS-PRO-017	Evaluation of Compliance	Audit Plan, Audit Reconciliation, Compliance assessment checklists, reports, and correspondence	6.2, 6.3, 6.5.1.4, 6.5.1.6, 6.5.2.4, 6.5.2.6, 6.6,	3 Years After Consent Decree Termination
COD-EMS-PRO-019	External Communication	External requests for EMS information	6.1.4, 6.1.5	3 Years After Consent Decree Termination