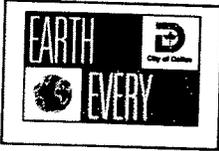


**City of Dallas
Environmental Management System**



SENIOR MANAGEMENT REVIEW PROCEDURE

Document Number:	OEQ-EMS-014	Reviewed By:	(Rev. 1 and Rev. 2) EMS Core Team (Rev. 3 and Rev. 4) OEQ Sr. Lead Auditor)
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Revision Number:	4	Signature:	<i>Frank A. Camp</i>

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 **Required Inputs to Management Review.** OEQ shall document its preparation and analysis of the following inputs to management review:

- results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes
- communication(s) from external interested parties, including complaints,
- the environmental performance of the organization, including environmental incidences and enforcement actions such as notices of violation, etc.
- the extent to which objectives and targets have been met,
- status of corrective and preventive actions,
- follow-up actions from previous management reviews,

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- changing circumstances, including developments in legal and other requirements related to its environmental aspects, and
- recommendations for improvement.

Analysis should emphasize trending data. Trends, both positive and negative, should be highlighted in the review meeting. Negative trends that indicate weakening environmental performance should result in a decision or action item assigned by senior management.

4.1.3 Required Outputs from Management Review. The City's EMS requires senior management to assess the policy, objectives and targets, and other elements of the EMS. Decisions and actions from this assessment must be documented. OEQ can seek the required assessments, decisions, and action items from the Assistant City Manager with authority over the EMS and/or the senior management attending the review meeting. Either way, OEQ must document senior management's assessment of the following:

- Does the Policy need to be revised?
- Is the list of objectives and targets suitable and adequate?
- Is progress on objectives adequate?
- Are there new objectives that need to be pursued?
- Do the trends observed in the EMS data indicate the need to improve elements of the EMS?
- Do audit results (including evaluation of compliance and conformance with "other requirements") indicate the need to improve elements of the EMS?
- Do external communications, including complaints indicate the need to improve elements of the EMS?
- Does the environmental performance of the City indicate the need to improve elements of the EMS?
- Does the status of corrective and preventive actions indicate the need to improve elements of the EMS?
- Do the results of action items from the last management review indicate the need to improve elements of the EMS?
- Do changing circumstances including legal or "other" developments indicate the need to improve elements of the EMS?
- Are OEQ's recommendations for improvement approved for implementation?

4.1.4 Required Format for Documenting Sr. Management Review.

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4.1.4.1 An **agenda** must be kept. At a minimum, the EMS portion of the meeting shall include the following agenda items:

- Results of internal audits and evaluations of compliance with legal requirements and other requirements;
- Communications from external interested parties, including complaints;
- The City's environmental performance;
- Status of Objectives and targets
- Status of internal and external audit nonconformities, corrective and preventative action plans, including a City-wide tally of the number of nonconformances at each Intellex status ("Investigation", "Approval", "Rejected", "Complete Corrective Actions", "Final Approval", "Rejected by Final Approver", and "Closed"); (NOTE: Status can be provided in "Plain English")
- Status of the EMS training program;
- Results of any action items from the previous CMO Management Retreat meeting;
- Changes in circumstances or legal or other requirements as it relates to environmental aspects;

4.1.4.2 **Minutes** must be documented and must highlight **decisions and action items** made by senior management. Because management review records need to connect "inputs" to "outputs," OEQ staff must note what information triggered a given decision or action item.

- Minutes must also record the list of attendees

4.1.4.3 Similarly, any **decisions and action items** received by OEQ from the Assistant City Manager with authority over the EMS must be documented in a manner that records the "input" that triggers the decision/action item and the "output" question (see 4.1.3 above) that is being answered.

- Records of action items shall include designation of staff assigned to complete the action.

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Assignment can be to a department, division, or person.

4.1.4.4 The **PowerPoint presentation** must be kept as part of the senior management review records.

- The PowerPoint provides a summary of key issues discussed.

4.1.4.5 **Reports, spreadsheets, etc.**, used for "input" must be kept.

4.1.4.6 **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.

4.1.5 Prior to its presentation, OEQ will audit the PowerPoint presentation prepared for 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.

4.1.6 After the review meeting, OEQ will review the overall senior management review presentation process (including inputs, outputs, the agenda, the minutes, and the PowerPoint) in order to ensure the documented connection of inputs to outputs.

- Special attention should be given to trending data indicating weak or declining environmental performance. There should always be a decision or action item triggered by negative performance trends.

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:

4.2.2.1 Results of internal audits and evaluations of compliance with legal requirements and other requirements;

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

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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".

7.3 REV. 4

7.3.1 Added section 4.1.2 "Required Inputs to Management Review"

7.3.2 Added section 4.1.3, "Required Outputs from Management Review"

7.3.3 Added section 4.1.4, "Required Format for Documenting Sr. Management Review"

7.3.4 Moved rev. 3 section 4.1.2 to Rev. 4 section 4.1.4.1.

7.3.5 Integrated rev. 3 sections 4.1.2.5.1 and 4.1.2.5.2 into rev. 4 section 4.1.4.1.

