





4.0 Environmental Reporting and Recordkeeping

4.1 IDENTIFY REPORTING AND RECORDKEEPING

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4.4 REPORTING AND RECORDKEEPING COMPLETION CHECKLIST





4.1 Identify Reporting and Recordkeeping

Keys



Establish reporting and recordkeeping to document the environmental status of all operations and activities.

[R 324.1505(2)(b)(v)]

- Procedures - What you do.
- Work Instructions - How you do it.
- Records - Evidence of what you did.

Remember you may also have to keep some records for a set period of time based on legal requirements.

Records are used to document the status of an EMS and the environmental status of the operations and activities. They are necessary to prove that your EMS is functioning efficiently.

Reports, procedures, work instructions and records kept for and generated by your EMS include the following:

1. EMS manual and the system procedures.
2. Environmental program development documents (aspects and impacts).
3. EMS procedures and work instructions for operations and activities.
4. Internal monitoring reports and records (inspection, calibration and monitoring logs) generated as a result of EMS procedures.
5. Training records.
6. Environmental, legal, and other requirements required for business.
7. Internal and external communications.
8. Auditing results.

You need to decide for your recordkeeping procedures:

1. What records to keep and control?
2. Where to keep the records?
3. How long to keep the records?
4. How to keep, update and access the records?

What records to keep?

Create a reference list for your EMS of the records that need to be kept. Include on the list location of the records and how long to keep the records. In Section 2 of this manual, information was gathered on your facility. The environmental and legal requirements you identified should be included in this list. All the documents you have been creating in this help manual for your EMS need to be included. Also, include information needed to track your regulatory compliance and your implementation of objectives.

On the following page is an example Reference Table for Joseph’s Forklift and Hauling Company. A blank table (Form 4.1) is provided for your use or you can create your own documentation table/system.



EXAMPLE 4.1

Joseph's Forklift and Hauling Company

Records and Recordkeeping

<u>Record Type</u>	<u>Responsible Department</u>	<u>Location</u>	<u>Retention</u>
EMS manual and system procedures	Administration	Administration- EMS files	Life of Facility
EMS Environmental Program Development -Aspects and Impacts -Objectives and Targets	Administration/Operations	Administration- EMS files	Life of Facility
EMS Operations and Activities Procedures -Work instructions	Administration/Operations	Administration- EMS files	Life of Facility
EMS Operations and Activities Monitoring Records -Monitoring data -Calibration data -Corrective action -Status reports	Operations	Operations- Department files Administration- EMS files	Life of Facility
Training Records -EMS training -Procedures and work instructions -Environmental training -Health and safety training	Administration Administration Operations Administration Administration	Administration- EMS files Administration- EMS files Operations-Department files Administration- Env. / H.S. files Administration- Env. / H.S. files	Life of Facility
Environmental / Legal Records -Air permit -SWPPP -SPCC -Manifests/Waste tracking	Administration/Operations	Administration- Env. / H.S. files	10 years beyond end of permit 10 years beyond end of permit Life of Facility Life of Facility
Internal Communications -Notices -Status reports	Administration	Administration- EMS files	Life of Facility
External Communications -Notices/Press releases -Correspondence	Administration	Administration- EMS files	Life of Facility
Auditing Results -EMS audits -Environmental audits -Corrective action/status reports	Administration	Administration- EMS files	Life of Facility

Date: August 20, 1999

Authorized by: Chris Joseph



4.2 Record Management

Keys

Stay organized!

Remember to properly manage your records, you need to control:

- ID Numbers
- Revision Dates
- Policies
- Procedures
- Work Instructions

How to keep and access the records?

Generation of records means that you have to manage the records. An efficient system to manage this must be developed. Records can be kept in the following forms:

1. Paper copy
2. Electronic files
3. Computerized database/management system developed for your facility

All of these forms cost money. A computerized database/management system tailored for your facility would probably cost the most money initially, but it could save time and money later.

To help you, develop a standardized numbering system for all the types of records. Decide who can have access or the level of security you need for your records. Decide who can modify files and how to remove obsolete files.





4.3 EMS Procedure for Reporting and Recordkeeping

Keys



Review records for status and to make sure you are keeping the necessary records for legal requirements.

A procedure for reporting and recordkeeping should be developed for your EMS. The procedure needs to include:

- the kinds of records to keep,
- identification of records,
- indexing of records,
- tracking of records, and
- updating records (including modification dates and version numbers),
- removal of obsolete records, and
- archiving of records if required.

On the following page is a procedure for reporting and recordkeeping for Joseph's Forklift and Hauling Company's EMS. Review this example and develop your procedure for your system documentation.



EXAMPLE 4.2

Joseph's Forklift and Hauling Company

EMS Procedure No. EMS-3 Records and Recordkeeping

I. Purpose

This procedure is to establish and maintain records and recordkeeping procedures for Joseph's Forklift and Hauling Company.

II. Scope

This procedure for records and recordkeeping contains provisions to identify, maintain and store records necessary for the EMS.

III. Definitions

N/A

IV. Procedures

A. Identify Records

Records to be kept for the EMS include the following:

- EMS Manual and system procedures
- EMS Environmental Program development
- EMS Operations and Activities procedures
- Monitoring, inspection, calibration, and performance logs and reports
- Training records
- Environmental/ Legal records
- Internal Communications
- External Communications
- Auditing results

A listing of records kept for the EMS will be maintained and reviewed annually to assure the appropriate records are being kept to document system performance and to meet any environmental / legal requirements.

B. Indexing / Filing

A numeric system will be developed to identify documents.

- All EMS procedures necessary to establish the system requirements will be identified as EMS-#.

- Procedures for Operations and Activities will be numbered chronologically (Procedure No. 1, 2, 3, etc.). Work instructions and monitoring forms necessary for each procedure will be numbered with the procedure number followed by the instruction/form number (1-1, 1-2, 1-3, etc.).
- Additions or expansions to the numbering system will be developed as necessary.

C. Retention Times

Documents developed for the EMS system are to be retained for the life of the facility.

Any environmental/legal requirements are to be maintained at least to the minimum length of time required by law.

D. Obsolete Records

Upon updating EMS procedures and work instructions, obsolete procedures, work instructions or other identified records are to be removed.

V. Records

A listing of records for the EMS will be kept and updated as necessary for reference.

VI. Updates and Reviews

Records and recordkeeping practices will be reviewed and updated annually, or upon the addition of new environmental/legal requirements and process changes.

VII. Responsibilities

The EMS Manager is responsible for identifying, maintaining, and storing the necessary records. It is the responsibility of every department to initiate any changes in recordkeeping that are needed in their department.

Updating and removal of obsolete records must be coordinated and approved by the EMS Manager.

VIII. Related Documentation

A listing of all EMS records and recordkeeping procedures will be maintained on file by the EMS manager.

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Date: August 27, 1999

Reviewed by: Chris Josephi

Date: August 30, 1999

Issue Date: 8-30-99

Version #: 1



4.4 Reporting and Recordkeeping Completion Checklist

Check Box

- 1. Have you identified what records need to be kept for the EMS?
- 2. Have you identified how to keep and access the records?
- 3. Have you identified where to keep the records?
- 4. Have you identified how long to keep the records?
- 5. Have you written a procedure for reporting and recordkeeping for your EMS?

