

US EPA ARCHIVE DOCUMENT

Appendix A: Workshop Training for Module 7

EMS Guide Meat Processing

EMS Documentation and Records

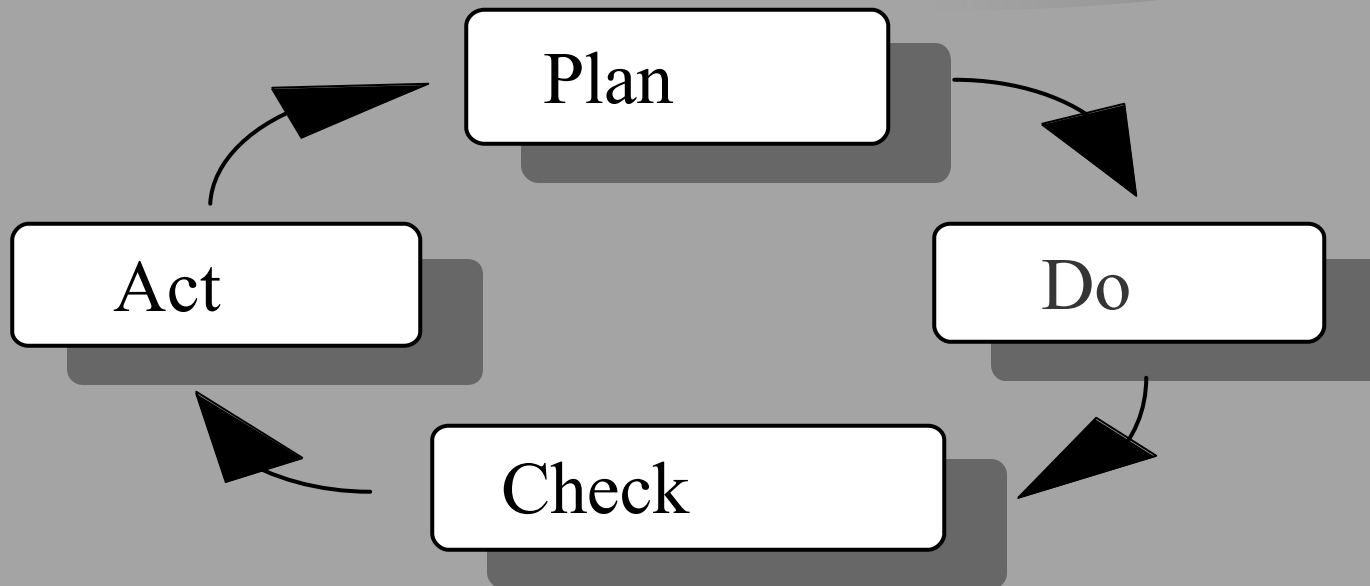


Today

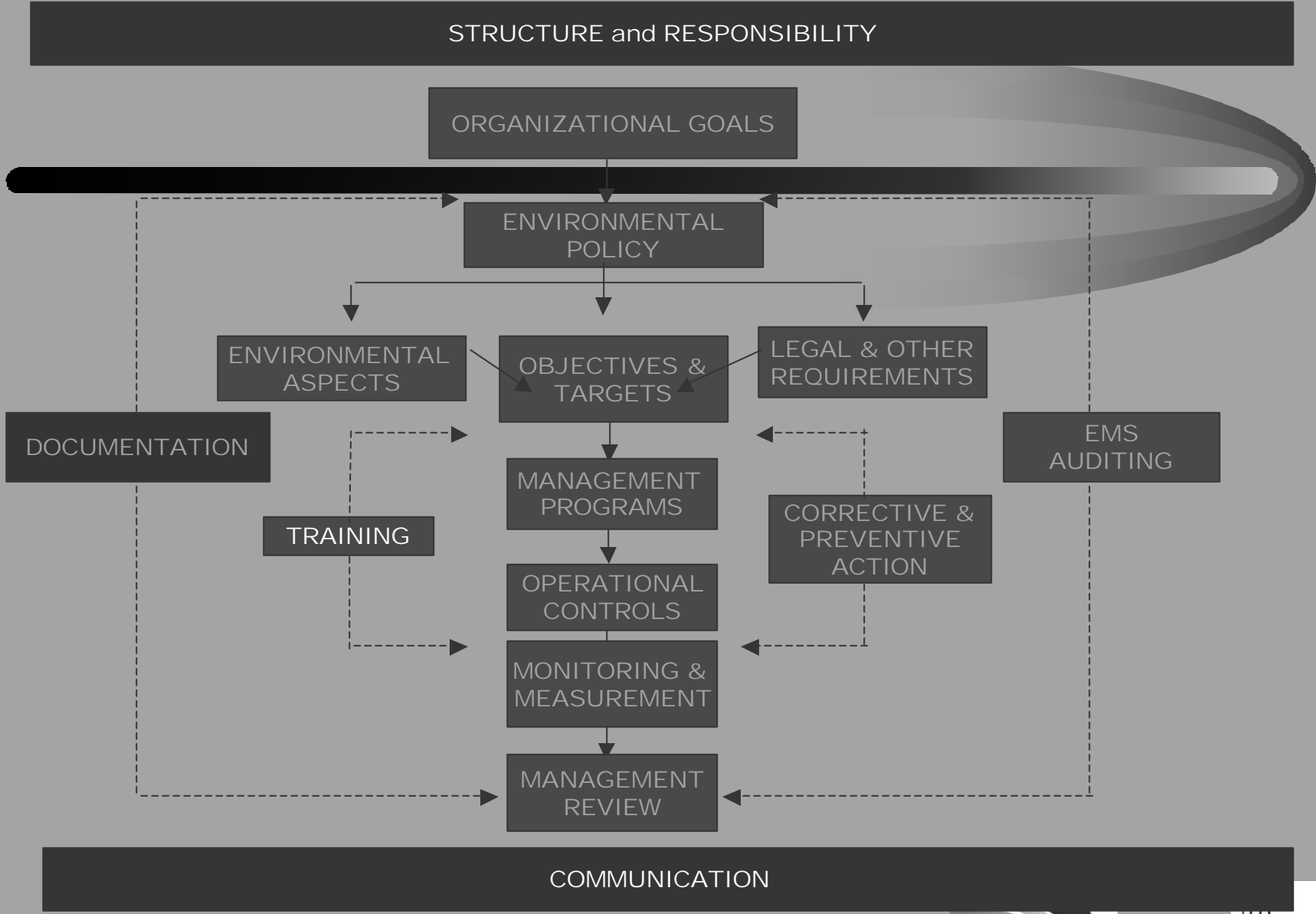
- Documentation.
- Document Control.
- Records.
- Emergency Preparedness and Response.
- Homework.



EMS Framework



Relationship Among Environmental Management System Elements



Documentation

- Documentation describes what your system consists of, it's core elements, and directions to related or supporting documentation.



Documentation

- Importance of documentation:
 - Word-of-mouth information transfer not reliable;
 - Provides a way to assess progress of EMS;
 - Important to consistency of application between personnel and departments; and/or
 - Prevents loss of information.



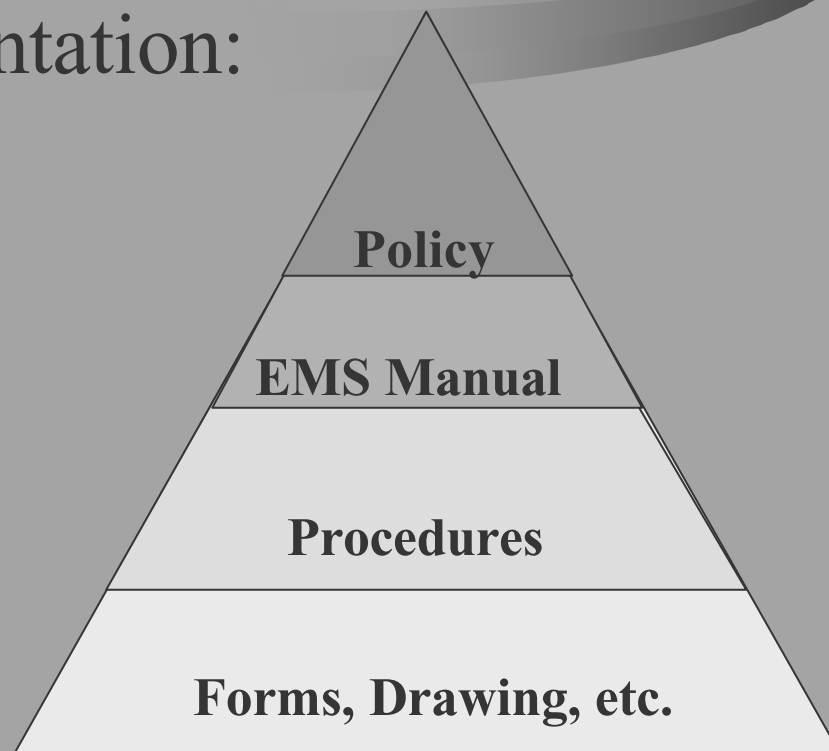
Documentation

- EMS manual:
 - Describes the core elements of the system; and
 - Provides direction to related documentation.
 - Try to limit one page per EMS element.
 - Keep it simple and easy to read.



Documentation

- Other EMS documentation:
 - Procedures
 - Work instructions
 - Hierarchy



Documentation

- Preparation
 - What documents already exist, what is the purpose, and do they work.
 - Integrate into existing documentation system.
 - Tailor to organizational needs.
 - Format.



Required Documents

- Environmental policy.
- Aspect identification procedure.
- Legal and other identification procedure.
- Procedure for determination of significance including, how any risk rating processes work.
- Objectives and targets procedure.
- The operational control procedures.



Recommended Documentation

- A standard form / format / template for your environmental management program description.
- A standard form for process mapping and aspect identification worksheet.
- Any other standardized forms that have been developed for the EMS.



Activity: Documentation

- From your own work answer the following questions:
 - What documents do you have already?
 - What elements do you feel require documentation?
 - What elements may not require written documentation?



Document Control

- Requires a procedure to ensure:
 - EMS documents can be located;
 - Documents are periodically reviewed;
 - Current versions are available; and
 - Obsolete documents are removed.
 - Also designates responsibility and authority.



Document Control

- Elements of document control:
 - Revision date/issue;
 - Effective date;
 - Approval (signature);
 - Revision number;
 - Document number;
 - Copy number; and/or
 - Cross references.



Document Control

- Hints
 - Don't make procedure too complicated.
 - Limit distribution.
 - Consider network.
 - Document control index.
 - Highlight changes.



Records

- Records provide evidence that the processes that make up the EMS are being implemented as described.



Records

- Procedure
 - Which records?
 - How will they be stored?
 - For what length of time?
 - Disposal methods?
 - Who maintains the records?
 - Who has access?



Records

- Typical records may include:
 - Training records;
 - Sampling and monitoring data;
 - Calibration records;
 - Permits and licenses;
 - Job descriptions;
 - Audit reports; and/or
 - Management reviews.



Records

- Review procedures and work instructions to determine what evidence may be required.
- Choose records that add value and not just paper work.
- Generate new forms if needed.



Required Records

- A description of the scope of your plant's EMS.
- List of activities, products, and services associated with your plant.
- Grouped aspects and associated impacts (Note: The activities, products, and services and aspects and impacts may be a combined record).
- For all aspects, associated environmental legal and other requirements.
- Record of each objective and target.
- Each EMP description.



Recommended Records

- A record of the level of public access to the EMS your plant will be providing.
- Results of the gap assessment.
- A record of who the members of your EMS core team / committee are, records of their skills and areas of expertise and training in EMS (if any) they have received.
- Records of decisions that the core team has made.
- Records of key decisions made by the EMS representative / coordinator.



Recommended Records

- Records of key communications (Note: These can overlap with decisions and may be in the form of emails, meeting notes, or written direction).
- Detailed list of all identified aspects and impacts (If process mapping or aspect identification work sheets were used they become part of the record).
- If your plant generates or uses interpretations of regulatory requirements, consider these as these as records to retain.



Recommended Records

- Records to support the determination of significance for actual aspects.
- If there are any significant aspects for which you have not established an objective or target, record the rationale for why this was not practical.
- Monitoring of progress towards objectives and targets.
- Detail on EMPs including: method / means, responsibility, performance indicators, timeframe, and approval of the programs by top management.



Activity: Records

- From your own work answer the following questions:
 - What records do you need to manage effectively?
 - How long do they need to be retained?
 - Should access be limited?
 - How do the records relate to EMS effectiveness or environmental performance?



Emergency Preparedness and Response

- Effective emergency preparedness and response plan should include:
 - Assessing the potential for accidents and emergencies;
 - Preventing accidents and the environmental impact;
 - Emergency response plans and/or procedures; and/or
 - Mitigating impacts associated with accidents.



Emergency Preparedness and Response

- Useful sources of information:
 - Material safety data sheets; and
 - Facility plans, layouts.



Emergency Preparedness and Response

- Typically an organization should consider:
 - Regulatory and legislative requirements for:
 - Environment;
 - Environment-related health and safety;
 - Hazardous materials and materials handling;
 - Transportation of dangerous goods;
 - Water and energy;
 - Spills; and/or
 - Fire and building codes.
- Links back to aspects.



Typical Elements of an Emergency Procedure

Phases to be managed:

- Before
 - Identification
 - Prevention
 - Preparedness
- During
 - Priority actions
 - Appropriate response
- After
 - Recovery
 - Review of causes
 - Correction and prevention



Homework

- Determine what documents and records are needed and in place.
- Review existing emergency preparedness and response plan.

