

US EPA ARCHIVE DOCUMENT

Document Control

Background and Exhibits

To ensure that personnel are consistently performing their jobs in the right way, the facility must provide them with the proper tools. In the context of an EMS, the tools needed are correct and up-to-date procedures, instructions, and other documents. People in your facility probably use various documents (procedures, work instructions, forms, drawings, etc.) as they perform their duties and have some means to manage the documents. You also need to manage documents for your EMS. Without a way to manage these EMS documents, you can't be sure that people are working with the right tools.

To ensure that everyone is working with the proper EMS documents, your facility should have a procedure that describes how such documents are controlled. Implementation of this procedure should ensure that EMS documents:

- Can be located;
- Are periodically reviewed to make sure they are still valid;
- Are current and available where needed; and
- Are removed if they are obsolete.

Your document control procedure should address responsibility and authority for:

- Preparing documents;
- Making changes to them; and
- Keeping them up-to-date.

Here are some things to think about to expedite the development of your facility's document control procedure:

- Don't make your document control procedure more complicated than it needs to be. While larger facilities often have complex processes for document control, smaller facilities can use simpler processes.
- Make the job easier by limiting distribution. Determine how many copies you really need and where they should be maintained for ease of access.
- Consider using a paperless system if the people that need access to documents are

connected to a local area network or have access to the facility's internal Web site. Such systems can facilitate control and revision of documents considerably. There also are a number of commercial software packages that can simplify the document control effort. To avoid edits to documents by unauthorized personnel, you can convert documents to a read-only format (such as PDF) before putting them on the network.

- Prepare a document control index that shows all of your EMS documents and the history of their revision. Include this index in your EMS manual. Also, if multiple paper copies of documents are available at the facility, prepare a distribution list, showing who has each copy and where the copies are located.
- Highlight the changes (by underlining, bold-face, etc.) as your procedures or other documents are revised. This will make it easier for readers to find the changes.

Use your answers to the questions provided in *Exhibit 11-1: Element Review Questions* to begin the process of determining your facility's documentation control procedure.

Exhibit 11-2: Procedure for Document Control (EP-014) is provided as an example of a procedure that describes how EMS documents can be controlled. *Exhibit 11-3: Master Document List for EMS Manual* provides a comprehensive list of the policies, manuals and plans, procedures, and forms that make up the EMS Manual.

Exhibit 11-1: **Element Review Questions**

Questions	Your Answers
<p>Do we have an existing process for controlling EMS documents?</p> <p>If yes, does that process need to be revised? In what way?</p>	
<p>Who needs to be involved in this process within our facility?</p>	
<p>Who needs access to controlled copies of EMS documents? How do we ensure that they have access?</p>	
<p>How do we ensure that EMS documents are periodically reviewed and updated as necessary?</p>	
<p>Who has authority to generate new documents or modify existing ones? How is this process managed?</p>	
<p>How are users alerted to the existence of new EMS documents or revisions to existing ones?</p>	
<p>How do we ensure that obsolete documents are not used?</p>	
<p>Is our EMS document control process integrated with other organizational functions (such as quality)?</p> <p>If so, how do we ensure proper coordination between environmental and other functions?</p>	
<p><i>Our next step on document control is to . . .</i></p>	

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Exhibit 11-2: **Procedure** for **Document Control** (EP-014)**1.0 Purpose/Scope**

This procedure defines the mechanism for controlling EMS documents. The purpose of this procedure is to ensure that those personnel requiring access to EMS documents have the most up-to-date versions and are aware of the document control process.

2.0 Activities Affected

All areas and departments

3.0 Forms Used

3.1 Master Document List (EF-014.01)

4.0 References

4.1 ISO 14001:1996, Element 4.4.5

5.0 Definitions

None

6.0 Exclusions

None

7.0 Procedure

- 7.1 The Environmental Management Representative (EMR) or designee shall be responsible for coordinating, developing, issuing, and controlling environmental management system documents.
- 7.2 Procedures shall be in a format that is consistent with other controlled documents at the facility.
- 7.3 The EMR or designee shall maintain a master set of EMS documents.
- 7.4 Each area or department manager or designee should maintain a list of, or have access to, all EMS documents relevant to their area or department, as applicable.
- 7.5 Relevant documents are available at the locations where they are needed.
- 7.6 Personnel ensure current versions are available and used.
- 7.7 The Cross Functional Team shall review and approve changes to EMS documents.
- 7.8 All controlled documents shall be marked with the words "CONTROLLED DOCUMENT."
- 7.9 Controlled versions of system documents may be placed on the computer system for access by area or department personnel.
- 7.10 All controlled documents issued by the EMR or designee shall be recorded on a Master Document List.
- 7.11 The EMR or designee shall:
 - 7.11.1 Provide notice to affected personnel to ensure that they are aware of the new or revised document; and
 - 7.11.2 Issue controlled copies of those documents to appropriate personnel.

Exhibit 11-2: Procedure for Document Control (EP-014) (continued)

8.0 General Rules

All documents not marked with the words “Controlled Document” shall be considered uncontrolled.

9.0 Records

Records shall be retained consistent with the Procedure for Environmental Records (EP-005).

Record of Revisions

Revision Date	Description	Sections Affected

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Exhibit 11-3: **Master Document List** for **EMS Manual**

ID	Title	Issue Date	Location	Authorized By
Policy				
	Environmental Policy			
Manuals & Plans				
	EMS Manual			
	Integrated Spill Plan			
Procedures & Related Forms				
EP-001	Procedure for Identification of Legal and Other Requirements			
EF-001.01	Legal and Other Requirements			
EP-002	Procedure for Obtaining Agency Approval			
EP-003	Procedure for Environmental Aspects, Objectives and Targets, and Programs			
EF-003.01	Identification and Significance Determination of Environmental Aspects and Setting Objectives and Targets			
EF-003.02	Environmental Management Program(s)			
EP-004	Procedure for Communication with Stakeholders			
EF-004.01	External Stakeholder Communication Record			
EP-005	Procedure for Environmental Records			
EF-005.01	Index of Environmental Records			
EP-006	Procedure for Environmental Management System Management Review			
EF-006.01	Management Review Record			
EP-007	Procedure for Emergency Preparedness and Response			
EP-008	Procedure for Environmental Training and Awareness			
EF-008.01	Training Needs Analysis – Environmental Courses			
EF-008.02	Training Needs Analysis—Procedures and Work Instructions by Area/Department			
EP-009	Procedure for Monitoring and Measurement			
EP-010	Procedure for Environmental Review for New Purchases, Processes, and Products			
EF-010.01	Project Environmental Checklist			
EP-014	Procedure for Document Control			
EF-014.01	Master Document List			
EP-015	Procedure for Corrective and Preventive Action			
EF-015.01	Corrective and Preventive Action Request			
EF-015.02	Corrective and Preventive Action Tracking Log			
EP-016	Procedure for Contractors and Sub-contractors			
EF-016.01	Environmental Briefing Packet and Contractor Method Statement Template			

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Exhibit 11-3: Master Document List for EMS Manual (continued)

ID	Title	Issue Date	Location	Authorized By
EP-017	Procedure for Environmental Management System and Regulatory Compliance Audits			
EF-017.01	Internal EMS Audit Checklist			
EF-017.02	Internal EMS Audit Schedule Form			
Work Instructions & Related Forms				
EWI-001	Operational Control for Coating and Thinner Use			
EF-001.01	Paint Use Approval Form			
EF-001.02	Shipyard Receipt Compliance Certification Form			
EWI-002	Operational Control for Container Labeling			
EWI-003	Operational Control for Hazardous Waste Satellite Accumulation Areas			
EF-003.01	Weekly Hazardous Waste Satellite Storage Inspection Checklist			
EWI-004	Operational Control for Empty Chemical Container Handling			
EWI-005	Operational Control for Abrasive Blast Containment, Cleanup, and Storage			
EWI-006	Operational Control for Bilge and Contaminated Ballast Water			