

## SAFETY, HEALTH AND ENVIRONMENTAL MANAGEMENT SYSTEM OPERATING PROCEDURE

### Document Control

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Christopher Taylor  
PLMG/SIIM(ISSS)

APPROVED:

//SIGNED// \_\_\_\_\_ 12/09/2014  
Peer Reviewer Date

//SIGNED// \_\_\_\_\_ 12/10/2014  
Regional Records Officer Date

//SIGNED// \_\_\_\_\_ 12/10/2014  
Independent QA Reviewer Date

//SIGNED// \_\_\_\_\_ 12/10/2014  
Designated Safety, Health, and Environmental Management Official Date

**Recertified:**

Name					
Date					

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## A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform method for the control of documents relevant to Region 7's Safety and Health Management System (SHMS) and Environmental Management System (EMS). Per OHSAS 18001:2007 and ISO 14004:2004(E), the control of documents under both the SHMS and EMS are equally important to ensure:

- Documents remain legible and can be identified with the appropriate organization, division, function, activity, or contact person;
- Documents (other than records) are regularly reviewed, revised as necessary, and approved by authorized personnel prior to use;
- The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the system are performed; and
- Obsolete documents are promptly removed from all points of issue and points of use.

This OP applies to all documents generated on behalf of Region 7's SHMS and EMS. In instances where procedures can be applied to both systems, a combined OP will be developed instead of a separate document for each system. It is envisioned that an integrated Safety, Health, and Environmental Management System (SHEMS) will evolve. Until then processes, procedures, documents, and other pertinent components applicable to either one or both of the systems will be developed and managed as described in subsequent sections.

## B. DEFINITIONS

All definitions may be found in the documents titled *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* (SHEMS 1006.9000.02) contained in the Region's EMS and SHMS Manuals. For the purposes of this OP, the following terms apply:

- Document
- Document Control
- Record

## C. PROCEDURAL STEPS

- a. Until such time as Region 7 creates a fully integrated SHEMS, the EMS Coordinator is responsible for maintaining all joint, SHEMS documents.
- b. To ensure the legibility of documents, all internally generated SHMS, EMS, and SHEMS documents should normally be prepared using the Region's standard word processing program; however, the EMS/SHMS Coordinators may deviate from this if they deem it necessary to do so. All documents will be saved in a format that can easily be viewed by others.
- c. All externally generated SHEMS and EMS documents must be forwarded to the EMS Coordinator as soon as is practical so they may be properly controlled in accordance with this OP. Similarly, all externally generated SHMS documents must be forwarded to the SHMS Coordinator for proper management.
- d. All SHMS and EMS documents must comply with the following requirements:
  - (1) **Document Control Code:** A Document Control Code (DCC) must be assigned to every Region 7 SHMS and EMS document by the SHMS or EMS Coordinator for their respective

system. The EMS Coordinator will assign DCCs for SHEMS documents in consultation with the SHMS Coordinator. DCCs are an eleven-digit alphanumeric code with a format of XXXX.XXXX.XXX where the first four digits represent a document's EPA Record Schedule Number (as defined in the Region 7 SHEMS File Plan found at Attachment 1); the middle four digits define the type of document; the next two digits define the specific document within a document type series; and the last digit defines the document's revision status. A "SHMS" prefix will be added to the DCC for all SHMS documents covered by this OP, while EMS documents will have an "EMS" prefix and SHEMS documents will have a "SHEMS" prefix. Documents will be numbered within the following document type codes:

- Management Review Documents – 1000 series
- Management Program (MP) Documents – 2000 series
- Operational Control (OC) Documents – 3000 series
- Aspect/Significant Aspect Lists and Hazard/Risk Lists – 4000 series
- Audits – 5000 series
  - External Conformance Audit Documents – 5100 series
  - Internal Conformance Audit Documents – 5200 series
  - Internal Compliance Assessments – 5300 series
  - External Compliance Assessments – 5400 series
  - Corrective/Preventive Action Plans – 5500 series
- Training Documents – 6000 series
- Operating Procedure (OP) Documents – 7200 series
- Employee Suggestion Documents – 8000 series
- Miscellaneous Documents – 9000 series

Specific document numbers will be assigned sequentially within a series as new documents are added. Revision codes will be assigned sequentially, A through Z, whenever the document is revised. For example, the fourth revision to this OP would have a DCC of SHEMS 1006.7210.02D.

- (2) **Document Identification:** Except as noted below, all documents will include the following information in the header in the upper right-hand corner of each page of the document:

EMS (or SHEMS or SHMS) (DCC)  
(Date)  
Page of

The EMS or SHMS Coordinator may determine that it is inappropriate for some documents, such as poster versions of policy statements, to be labeled with this information. In these instances, the Coordinator will assign a DCC and note this decision, as well as a description of the document, on a memo in the EMS or SHMS Manual as appropriate.

- (3) **Responsible Person:** Most, but not all documents, will have the person responsible for maintaining the document identified within the document. Examples of documents that follow this convention include OPs and OC and MP forms when they are filled out. Examples of documents that would not follow this convention include external conformance audit reports and blank OC and MP forms. Documents not specifying a responsible person will be the responsibility of the EMS or SHMS Coordinator as appropriate.
- (4) **Document Reviews:** The current versions of active documents, except for audit (5000 series) and employee suggestion (8000 series) documents, should be reviewed periodically (typically once each EMS/SHMS cycle), either by the responsible person or someone

designated by the EMS or SHMS Coordinator, to determine their continued adequacy, suitability, and relevance. The reviewer should place a memo in the appropriate Working Files folder to capture document reviews that are not otherwise annotated on the document itself. Documents that are no longer needed should be retired in accordance with EPA document retention guidelines.

- d. The EMS Coordinator will maintain an EMS Manual that contains (or provides direction to) the current, official versions of all documents and any records deemed crucial to operating the system. The EMS Manual will be electronic and maintained on the Region 7 local area network (LAN). The sections of the Manual will align with the sections of ISO 14001:2004(E) and cross reference the Region 7 SHEMS File Plan as shown in Attachment 2. The EMS Coordinator will control access to the Manual. The footer section of official versions of documents will be annotated with the phrase “UNCONTROLLED WHEN PRINTED”. Similarly, the SHMS Coordinator will maintain and control access to a SHMS Manual that aligns with sections of OHSAS 18001 and cross references the file plan at Attachment 2. Official versions of SHMS documents, as well as SHEMS documents, will also have the phrase “UNCONTROLLED WHEN PRINTED” annotated in the footer section.
- e. As Region 7 continues to develop and implement its SHMS, certain documents will be created that serve both the SHMS and EMS, and will eventually serve a fully integrated SHEMS. As noted above, these documents are designated as SHEMS documents and are developed and maintained by the EMS Coordinator with the concurrence of the SHMS Coordinator. Official versions of these documents will be placed in both the EMS and SHMS Manuals until the SHEMS is developed and a new SHEMS Manual is established.
- f. Management Program and Operational Control Leads are responsible for the official documents, miscellaneous documents, and records needed to properly maintain their program/control. As such, the EMS and SHMS Coordinators will create sections of their Manuals on the share drive portion of the LAN and provide the Program and OC Leads with access to them.
- g. To ensure EMS documents are available to the Region 7 staff and interested parties external to the Region, copies of selected documents will be posted on the Region’s EMS Internet site in accordance with the guidelines contained in the current version of the EMS Internal and External Communications OP (EMS 1006.7210.08). The EMS Coordinator will provide new/updated EMS documents to PLMG/SIIM(IRMS) for posting to the Internet site on an as needed basis. Other documents deemed suitable for internal use only will be uploaded to the Region 7 EMS SharePoint site by the Coordinator, Management Program Leads, or others at their direction. SHMS documents will not be posted on the Internet at this time; however, some documents may be posted to the Region 7 SHMS SharePoint site as it becomes operational.
- h. Unless prescribed by other Headquarters EPA or Region 7 directives, non-current versions of EMS, SHEMS, and SHMS documents will be retained by their respective Coordinator for three years or until the completion of the first external conformance audit following their removal from service, whichever is later.

#### **D. RECORDS MANAGEMENT**

This OP may require the generation of the following records:

<u>Record</u>	<u>Responsible Person</u>	<u>Record Location</u>
Document Review Memo	EMS Coordinator	EMS Files
Document Review Memo	SHMS Coordinator	SHMS Files

This OP may also result in the generation of additional EMS or SHMS records. Any records created will be managed in accordance with the most current version of this OP and SHEMS 1006.7210.17, *Records Management*.

## **E. QUALITY ASSURANCE AND QUALITY CONTROL**

The use of DCCs described in Paragraph c (1) above, along with a consistent application of the remaining document control approach defined in this OP, should achieve suitable results to the issues described in Section A above. Ultimately, the quality assurance and quality control (QA/QC) success of the document control/records management process and this OP will be determined through the internal and external conformance audit processes. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of SHEMS 1006.7210.12.

## **F. REFERENCES**

Current versions of the following references are assumed if no date is provided.

1. ISO 14004:2004(E); *Environmental Management Systems – General Guidelines on Principles, Systems, and Support Techniques*; November 15, 2004
2. OHSAS 18001:2007; *Occupational Health and Safety Management Systems – Requirements*; July 2007
3. US EPA R7, *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions*, SHEMS 1006.9000.02
4. US EPA R7, *Document Control*, SHEMS 1006.7210.02
5. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 1006.7210.12
6. US EPA R7, *Environmental Management System Audit*, EMS 1006.7210.13
7. US EPA R7, *Records Management*, EMS 1006.7210.17

**ATTACHMENT 1**  
**EPA Region 7 Safety, Health, and Environmental Management System File Plan**

<b>Schedule</b>	<b>Item</b>	<b>Title</b>
0095	e	<b>Web Content – Unique</b> This item is specific to the content of the EMS Internet and EMS & SHMS SharePoint sites and not included in another Schedule/Item
0579	a	<b>Personal Injury Files</b> This item is specific to forms, reports, correspondence, and other materials relating to on-the-job injuries generated under the SHMS
0583	a	<b>Occupational Injury Files</b> This item is specific to OSHA Forms 100, 101, 102 and 200 generated under the SHMS
0584	b	<b>Industrial Hygiene Files – Employee Exposure Records</b> This item is specific to Job Hazard Analyses (JHAs), employee exposure reports, medical monitoring and surveillance records, and other materials related to the safety & health protection of workers generated under the SHMS and not included in another Schedule/Item
0584	c	<b>Industrial Hygiene Files – Asbestos Monitoring Records</b> This item is similar to Schedule 0584, Item b, but is specific to materials related to asbestos exposure and monitoring
1001	a	<b>Safety and Health – Property Safety Inspections</b> This item is specific to safety inspections completed under the SHMS
1001	b	<b>Safety and Health – Other Safety and Health Records</b> This item is the default Schedule/Item for all SHMS documents (excluding SHMS Operating Procedures) and records designated as “SHMS Record” and not included in another Schedule/Item
1005	d	<b>Financial Management – Payroll Records Not Covered Elsewhere</b> This item is specific to the ECSP Annual Application forms

- 1006            b            **Administrative Management – Other Administrative Management Records**  
This item includes all EMS/SHEMS/SHMS documents and all records designated as an “EMS Record,” “SHEMS Record,” or “SHMS Record” not included in another Schedule/Item
- 1006            d            **Administrative Management – Transitory Files**  
This item includes all other EMS, SHMS, and SHEMS records not included in another Schedule/Item
- 1009            a            **Motor Vehicles and Personal Property – Vehicle Accident Records**
- 1009            b            **Motor Vehicle and Personal Property – Vehicle Lease & Release Records**
- 1009            c            **Motor Vehicles and Personal Property – Vehicle and Equipment Maintenance Records**
- 1009            d            **Motor Vehicles and Personal Property – Other Vehicle Records**  
This item is specific to completed copies of the Region 7 Government Vehicle Utilization Form

**ATTACHMENT 2**

**SHEMS File Plan / ISO 14001:2004(E) / OHSAS 18001:2007 Cross Reference Table**

<b>Section Number</b>	<b>ISO 14001:2004(E) Section Heading</b>	<b>OHSAS 18001:2007 Section Heading</b>	<b>Region 7 SHEMS File Plan Item Code</b>
3.0	Terms and Definitions	Terms and Definitions	1006
4.1	General Requirements	General Requirements	1006
4.2	Environmental Policy	OH&S Policy	1006
4.3.1	Environmental Aspects	Hazard Identification, Risk Assessment, and Determining Controls	0579; 0584; 1001; 1006; 1009
4.3.2	Legal and Other Requirements		1006
4.3.3	Objectives, Targets and Programs	Objectives and Programs	1001; 1006
4.4.1	Resources, Roles, Responsibility and Authority	Resources, Roles, Responsibility, Accountability, and Authority	1001; 1006
4.4.2	Competence, Training and Awareness	Competence, Training, and Awareness	1001; 1006
4.4.3	Communication	Communication, Participation, and Consultation	0095; 1001; 1006
4.4.4	Documentation	Documentation	1006
4.4.5	Control of Documents	Control of Documents	1006
4.4.6	Operational Control	Operational Control	1001; 1006; 1009
4.4.7	Emergency Preparedness and Response	Emergency Preparedness and Response	0579; 0583; 1001; 1006
4.5.1	Monitoring and Measuring	Performance Measurement and Monitoring	1001; 1006
4.5.2	Evaluation of Compliance	Evaluation of Compliance	192/193
4.5.3	Nonconformity, Corrective Action, and Preventive Action	Incident Investigation, Nonconformity, Corrective Action, and Preventive Action	0579; 0583; 1001; 1006
4.5.4	Control of Records	Control of Records	1001; 1006
4.5.5	Internal Audit	Internal Audit	1001; 1006
4.6	Management Review	Management Review	1001; 1006