



**IOWA**  
Department of  
Natural Resources



# Documentation

November 3, 2021



## Documents

- Written Procedures/Instructions on:
  - Environmental Compliance
  - How the EMS was Developed
  - How the EMS Will Continue to be Implemented
- Example Documents
  - Environmental Policy Statement
  - Communication Procedure
  - Spill Response Plan
  - Compliance Manual
  - Permit
  - Tank Operational Manual



2

## Documents

- Purpose of a Document is to:
  - Explain and Require Practices and Procedures to Promote Consistency
  - Identify Responsible Personnel
  - Identify Places Where Lack of Consistency in Performing a Task Would Lead to an Environmental Problem or Deviation of the EMS



3

## Document “Control”




- ⦿ Documents Need to be “Controlled” to:
  - Ensure Staff are Working From the Most Recent Version of the Document
  - Ensure the Use of Approved Procedures and Processes
  - Ensure the Staff that Need the Document Actually Receive (and are Aware of) the Document
- ⦿ Controlled Documents Need to Have a Review and Approval Process for Finalizing Documents
- ⦿ Document Control May Include:
  - Document Numbering Systems
  - Signature of Authorized Staff for Approval
  - Effective Date and/or Revision Number



4

## DOCUMENT CONTROL EXAMPLES

5



Dubuque Metropolitan Area Solid Waste Agency  
**DMASWA**  
providing environmentally sound solid waste solutions

925 Kerper Court  
 Dubuque, IA 52001-2405  
 Phone: 563-589-4250  
 Fax: 563-589-4252

### EMS Procedure Legal & Other – DMASWA

Effective Date: February 24, 2011

Revision Number: 1

Signature: *Chuck Hubbard*

Reviewed By: Bev Wagner  
 Approved By: EMS Core Team


*The InteleX Software on-line version and secured hardcopy are the controlled documents. Refer to the DMASWA's InteleX Software System for latest version.*

- 1.0 **PURPOSE**  
To establish a procedure tracking compliance and changes to all laws and regulations applicable to DMASWA.
- 2.0 **SCOPE**  
This procedure provides instructions and assigns responsibilities for the review, execution and documentation of all laws, regulations, and other requirements established at the federal, state and local levels as applicable to DMASWA.
- 3.0 **RESPONSIBILITY**

3.1 Agency Administrator Responsibilities:




6



**Metro Waste Authority**  
providing environmental solutions

**Environmental Management System Procedure  
 Legal and Other Requirements**



Document No: EMSP-LOR	Issue Date: 9/29/04	Revision No: 3	Revision Date: 06-08-10	Prepared By: Beth Shonts	Reviewed By: Core Team	Approved By: Core Team
--------------------------	------------------------	-------------------	----------------------------	-----------------------------	---------------------------	---------------------------

*The InteleX Software on-line version and secured hardcopy are the controlled documents. The secured hardcopy will be identified by an "Official Document" stamp giving date of distribution. Any and all other documents are uncontrolled. Contact the Document Control Manager or refer to the Metro Waste Authority's InteleX Software System for the latest version.*

**ISO 14001 REQUIREMENTS**

ISO 14001, section 4.3.2, Legal and Other Requirements, requires the following:

The organization shall establish, implement and maintain a procedure(s)

- a) to identify and have access to the applicable legal requirements and other requirements to which the organization subscribes related to its environmental aspects, and
- b) to determine how these requirements apply to its environmental aspects.

**CONTENTS**

- 1.0 PURPOSE
- 2.0 SCOPE
- 3.0 DEFINITIONS
- 4.0 RESPONSIBILITIES
- 5.0 PROCEDURES
- 6.0 REVIEW
- 7.0 REFERENCES/RELATED DOCUMENTS

1.0 **PURPOSE**



7

## RATHBUN AREA SOLID WASTE COMMISSION

---

Iowa EMS Pilot Project  
Environmental Management System  
Internal Audit/Assessment Procedure  
Doc ID# 010-01EMS-10  
Issue Date: October 8, 2010  
Reviewed By: EMS Core Team  
Approved By: Ralph Alshouse, Chairman

Signature: /s/ [Ralph Alshouse](#)     12/14/10

**1.0 Purpose**

To establish minimum requirements for planning, performing, and documenting annual internal audits of the Environmental Management System established at Rathbun Area Solid Waste Commission.

**2.0 Scope**


This procedure applies to all internal audits of RASWC's EMS within its determined EMS fenceline.

**3.0 Responsibilities**


3.1 EMR Responsibilities:

3.1.1 Establish audit schedule among internal auditor, Director and RASWC staff.

3.1.2 Designation of internal auditor (must be independent of day-to-day management of







RASWC  
3020 McCarty Street  
Centerville, IA 52544  
Phone/Fax: 641-437-7279  
raswc@iowatelecom.net



8

## Documentation: Many Styles

- Documentation Can be Simple to Very Complicated
  - Text
  - Flow Charts
  - Photographs with Explanations
- EMS Documentation Usually Contains Similar Sections
  - Scope
  - Responsibilities
  - Procedure
  - Training
  - Records

9

## Document Formatting



- Personalize the Document Format
  - Identify the Document Style, Layout and Control Procedure that Best Works for Your Organization
  - Keep the Format Consistent
- Review and Update the Format As Needed
- Communicate the Necessary Information



10

## Required Documents for Iowa EMS



- EMS Documents
  - Fenceline Statement
  - Environmental Policy
  - List of Significant Aspects/Impacts
  - List of Legal and Other Requirements
  - Objectives and Targets and Action Plan (for 6 Plan Component Areas)
  - Key Resources and Responsibilities



11

## Required Documents for Iowa EMS (cont.)

### ◉ EMS Procedures

- Environmental Impacts
- Legal and Other Requirements
- Objectives and Targets [Strongly Recommended]
- Communication, Training and Awareness [May be broken into 2]
- Monitoring and Measurement
- Assessment
- Reevaluation and Modification [Strongly Recommended]



12

## Required Documents for Iowa EMS (cont.)

### ◉ EMS Records

- Management Review Results
- Core Team Meeting Minutes
- Logs of External Info Requests/Responses
- Monitoring and Measurement Data
- Internal Audit Results
- Nonconformances/Corrective Actions

***Don't Forget Required Compliance Documents***

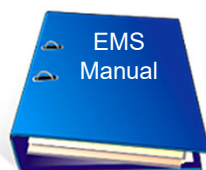


13

## Consider the Use of an EMS Manual



- ◉ An EMS Manual is Used to Tell “Our EMS Story” and May Also be Used to Keep All EMS Documentation in One Place
- ◉ Describes and Defines the Entire EMS Process in One Location and Answers the “W” questions - Who, Where, When, What, Why



14

A slide layout with a white left sidebar and a large green right section. The sidebar contains the DNR logo, the text 'IOWA Department of Natural Resources', the 'SOLID WASTE Environmental Management System' logo, and the Gresham Smith logo. The green section contains the word 'Records' in white text.

**DNR** IOWA  
Department of  
Natural Resources

SOLID WASTE Environmental  
Management  
System  
Committed to Continuous Improvement

**Gresham  
Smith**

**Records**

15



## Record - Definition



- ⦿ A Record is Written Proof or Evidence that:
  - The EMS or Compliance Program is in Place
  - The EMS or Compliance Program is Functioning
- ⦿ Most Records Cannot or Should Not Be Changed
- ⦿ Examples of Records
  - Completed Training Log
  - Completed Inspection Checklist
  - Manifests
  - Lab Results Related to an Objective and Target
  - EMS Annual Report



16

## Records



- ⦿ Purpose of a Record:
  - Demonstrate Conformity to the EMS
  - Demonstrate Compliance with the Law
- ⦿ Control of Records – Identify Where the Record is to Be Stored, For How Long, and When It Can or Will be Destroyed
- ⦿ Most Organizations Have a Records Retention or Retrieval Process Already in Place



17

## Records – Things to Consider

- ⦿ Identification of Records
  - What Records Am I Supposed to Keep?
- ⦿ Storage of Records
  - Where Are They Stored?
- ⦿ Retrieval of Records
  - How Can I Access the Records When I Need Them?
- ⦿ Retention of Records
  - How Long Do I Need to Keep Them?
- ⦿ Disposal of Records
  - When Can I Recycle Them?



18

## Example List of Required Records for Iowa EMS

- ⦿ Legal and Other Requirements List
- ⦿ Activities and Impacts List
- ⦿ Roles and Responsibilities Table
- ⦿ Monitoring and Measurement Data
- ⦿ Log of Information Requests from the Public with Corresponding Responses
- ⦿ Reevaluation Results
- ⦿ Management Review Record
- ⦿ Training Logs

**Don't Forget Records Required by Law!**



19

## Best Practices



- ◎ Ask, “What is the Value in Generating this Document or Record?”
  - Is it Required by Law?
  - Is it Required by the EMS?
  - Would it Eliminate Deviations that Could Cause Environmental Harm?
- ◎ Determine Whether There is an Existing Document Management/Control/Records Retention Process Already in Place
  - Use it!



20

## Best Practices



- ◎ Be Clear and Concise
- ◎ Consider Paper or Electronic Versions
- ◎ Designated Responsibility and Authority for Creating/ Revising Documents
- ◎ Retrieval of Old Documents
- ◎ Consider Log of Documents and Records



21

## Warning: “Over-Documentation” Problems

- ⦿ Remember You Have to Keep Up With It!
- ⦿ If I Say I’m Going to Do Something in a Written Procedure, Then I Better Be Doing It
- ⦿ If the EMS Becomes About Generating Paperwork, Then We Missed the Point



22

## Questions?

SOLID WASTE **Environmental  
Management  
System**

*Committed to Continuous Improvement*

23