



Document and Record Management Tips for Environmental Compliance

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Areas of expertise:

- Environmental compliance
- Air quality compliance
- Multi-media compliance auditing
- Management systems
- Environmental training



Senior Consultant, Manager of Tellevate's Training Services

- Certified environmental and management systems auditor
- Previous experience as a Regulatory Inspector and Compliance Assistance Provider
- 22 years environmental and auditing experience



Document and Record Management



What's the big deal?

• “If it’s not documented, it’s not done”

Unannounced inspections

Institutional knowledge

Operational continuity

Simplify compliance demonstration



Document and Record Management Challenges



Look familiar?



Document and Record Management



Challenges

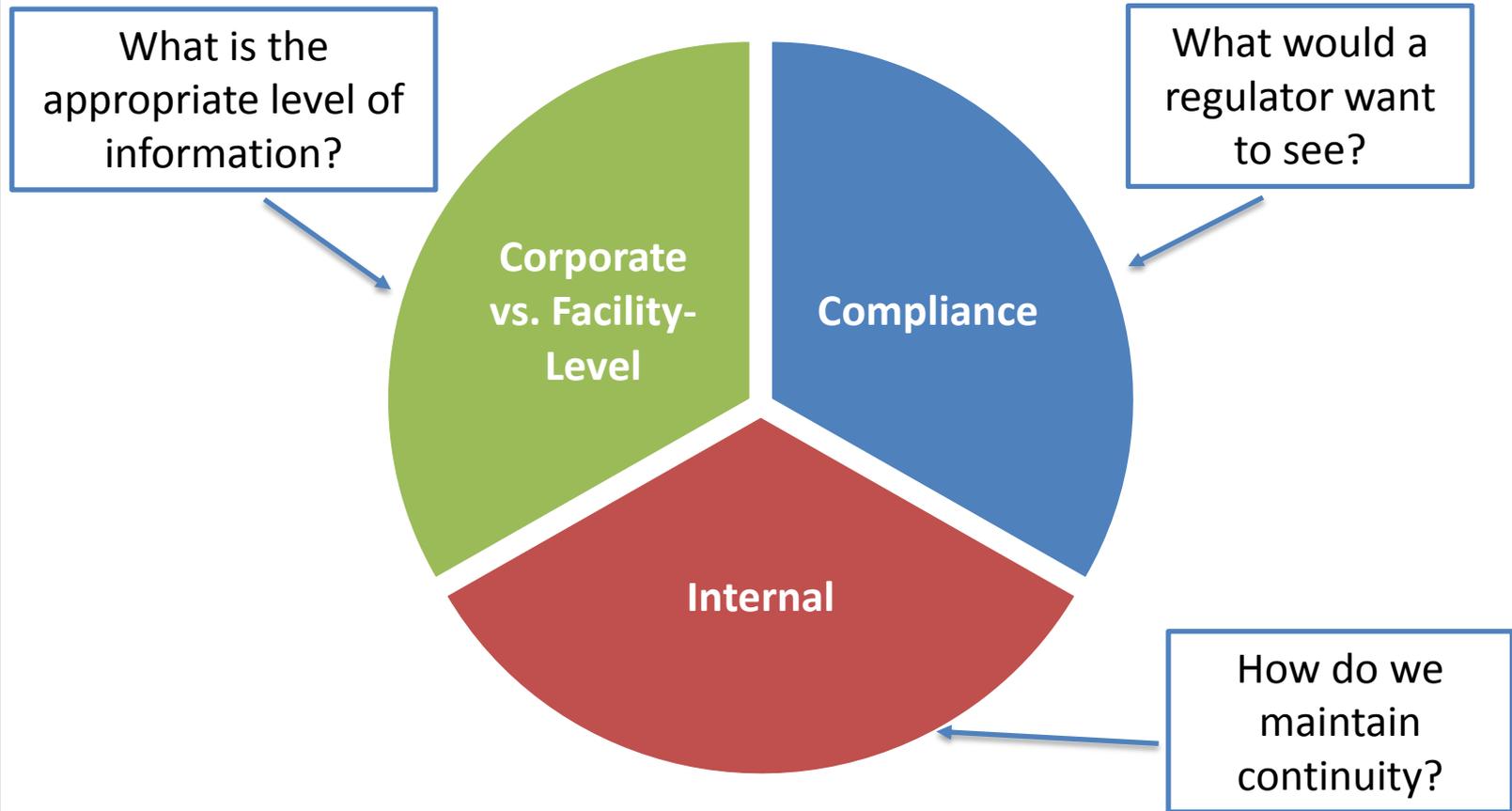
- Aligning needs, styles, viewpoints, etc.
- Data and paper overload
- Staff turnover
- Inconsistent processes and procedures
- Lack of a central repository/system
- Balance of hard copy vs. electronic
- Retention times – internal vs. regulatory



Document and Record Management



Different needs, same challenges



Document and Record Management Tips



Determine the What and Why

- Understand the program
- Read, really read, permits, plans, and procedures
- What is required vs. “nice to know”
 - Regulatory
 - Guidance



Document and Record Management Tips



Determine Who

- Define roles
- Who is responsible?
- Do you have backups assigned?
- Document and communicate roles
 - Do they know it's their responsibility?
 - What do we do if the official recordkeeper isn't here during the inspection?



Document and Record Management Tips



Define Where

- Central repository
 - Hard copy files
 - Electronic
 - Combination of both
- Naming convention
- File structure and organization
- Accessibility



Document and Record Management Tips



Determine How and When

- Methods vary depending on requirement
- Data collection
 - Keep it simple
 - Ensure it meets basic requirements
 - Hand written vs. electronic
 - Consider communication of information
- Consider requirement frequency and retention time



Document and Record Management Tips



Develop Procedure

- Align with EHS Management System
- Broad vs. specific program procedure
- Define and document
 - What
 - Why
 - Who
 - Where
 - How
 - When



Procedure Considerations



Think beyond “record”

- Document decisions and how they are made
- Capture institutional knowledge
- Task management tools and tracking



Procedure Considerations



Corporate vs. Facility-Level

- Different document needs
 - Corporate office may need permit application, regulatory correspondence, supporting documentation, etc.
 - Facility may need detailed day-to-day documentation, operational records, daily observations, etc.
- Facilities need required records to demonstrate compliance



Procedure Considerations



Corporate vs. Facility-Level

- Corporate may request more information from facilities
- Consider electronic system or intranet to share files
- Open communication and teamwork critical
- Conduct internal audits



Document and Record Management Tips



Monitor and Measure Performance

- Internal and/or external audit
- Regulatory inspections
- Track deficiencies and corrective actions
 - Why were records missing or incomplete?
 - Identify root cause
 - Make continual improvements
 - Be proactive vs. reactive



Document and Record Management Tips



What Works?

- Form workgroup
- Utilize facilitator
- Ask others
 - Similar industry
 - State/local agencies
 - Regulator
 - Management consultant
- Implement procedure and monitor performance



Document and Record Management Examples



Electric Utility

- Central corporate office with many off-site locations
- EMS aligns with ISO 14001
- Procedures developed
- Facility staff implementation
- Improved communication and ease of compliance demonstration



Document and Record Management Examples



Documents and Records

Type	Name
⊕ Environmental Program :	(8)
⊕ Environmental Program : Air Quality	(229)
⊕ Environmental Program : Chemical Handling and Releases (CERCLA- EPCRA - TRI - Tier II)	(20)
⊕ Environmental Program : Greenhouse Gas Emissions	(7)
⊕ Environmental Program : PCB and Asbestos Management (TSCA)	(2)
⊕ Environmental Program : Pest and Vegetation Management	(7)
⊕ Environmental Program : Radioactive Material - Nuclear Gauge	(19)
⊕ Environmental Program : Risk Management - RMP	(45)
⊕ Environmental Program : Spill Prevention, Control and Countermeasure (SPCC- Oil)	(3)
⊕ Environmental Program : Tank Management	(6)
⊕ Environmental Program : Waste Management	(154)
⊕ Environmental Program : Water Management	(109)
⊖ Add new document	

Record Views

- ❑ MATS Documentation
- ❑ 316(b) Documentation
- ❑ DDDDD Industrial Boiler MACT for Major Sources
- ❑ ZZZZ RICE MACT

⊖ Environmental Program : Water Management (109)

- ⊕ Document Type : Correspondence (30)
- ⊕ Document Type : Discharge Monitoring Reports (40)
- ⊕ Document Type : Groundwater Monitoring Reports (1)
- ⊕ Document Type : Guidance (1)
- ⊕ Document Type : Permit (14)
- ⊕ Document Type : Plan (4)
- ⊕ Document Type : Procedure (1)
- ⊕ Document Type : Record (4)
- ⊕ Document Type : Report (14)



Document and Record Management Examples



State Agency Knowledge Database

- Manage data vs. records
- Document air permitting decisions
- Capture institutional knowledge
- Improve consistency
- Reduce time spent developing permit
- Tool for new staff and public



Document and Record Management Examples



Date of Decision*

Public/Internal*

Industry*

Category*

Title/Subject of Decision*

Reference*

Decision Description*

Supporting Reference*



Document and Record Management Examples



Date of Decision	Public/Internal	Type	Industry	Category
10/22/1997	Internal	Regulatory	All	Rule Applicability
5/14/2004	Internal	Regulatory	All	Monitoring
7/2/2004	Internal	Regulatory	All	Permit Applicability
9/29/2009	Internal	Regulatory	All	Monitoring
12/1/2009	Internal	Process/Procedure	All	Emission Limits/Standards
9/29/2010	Internal	Regulatory	All	Rule Applicability



Document and Record Management Top Tips



Understand requirements

Develop central repository

Define and document roles

Determine method of documentation

Develop and implement procedures

Monitor and measure performance



QUESTIONS?

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