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ATTACHMENTS: None

A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform method for the control, retention, and maintenance of records 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 records under both the SHMS and EMS are important to ensure they:

- Remain legible, identifiable, and traceable with the appropriate organization, division, function, activity, or contact person; and
- Are stored, protected, retrievable, retained, and disposed of properly.

This OP applies to all records 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 OP for each system. It is envisioned that an integrated Safety, Health, and Environmental Management System (SHEMS) will evolve. Until that integration process occurs records 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 document titled *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions* contained in the Region's EMS and SHMS Manuals. For the purposes of this OP, the following terms apply:

- Document
- Interested Party
- Record

C. PROCEDURAL STEPS

1. The generation/designation of records is typically specified in OPs, operational control (OC) documents, and management program documents. These documents will specify the name of the record, its location, and the person responsible for maintaining it so as to ensure it is traceable to the activity involved. In determining where to maintain records, it is generally best to keep them as close as possible to where they are generated. Hardcopy records will be maintained in the management system files located in or near offices (in desks, file cabinets, etc.) belonging to the EMS or SHMS Coordinator, Management Program Leads, or OC Leads or in other file storage locations such as the Region 7 Records Center. Electronic copies may be stored on the Region's email server, on individual computer hard drives, or on the LAN in "EMS Working Files" or "SHMS Working Files" folders or in other folders.

Records may be retrieved by the record holder; the EMS or SHMS Coordinator may also retrieve records stored electronically on the LAN.

2. Records must be neat (legible) and stored/maintained in such a way so as to prevent their loss or damage and to facilitate their retrieval.
3. EMS, SHMS, and SHEMS records are identifiable primarily through their content and storage location. At the discretion of the EMS and SHMS Coordinators, certain records may be annotated with the following information in the header in the upper right-hand corner of each page:

EMS (or SHMS) Record
(Date)

The purpose of this annotation is to designate certain records as being especially critical to understanding the operation of the management system. Typically these records will be placed in the EMS or SHMS Manual.

4. Unique record keeping retention requirements may be specified in the OP or other governing document that directs the generation and/or maintenance of records. If there is no applicable governing document, or unless otherwise directed by EPA records management requirements, records will be kept for three years or until the completion of the first external conformance audit since the record was generated, whichever is later. Records no longer needed will be disposed of at the discretion of the record holder in accordance with applicable EPA records management requirements; they may be erased (electronic copy) or otherwise destroyed by shredding, recycling, or disposal in the trash (hardcopy).
5. Records that need to be made accessible to all Region 7 personnel and/or external stakeholders will be forwarded to the EMS or SHMS Coordinator, as appropriate, for distribution.

D. RECORDS MANAGEMENT

This OP may result in the generation of EMS or SHMS records. Any records created will be managed in accordance with the most current version of this OP.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The consistent application of the records management 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 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 006.7210.12.

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 Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions*
4. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 006.7210.12
5. US EPA R7, *Environmental Management System Audit*, EMS 006.7210.13