

Metro Wastewater Reclamation District  
Environmental Management System for Biosolids

**Element 12: Documentation, Document Control and Record Keeping – Background**

Revision: 07	Revision Date: 05/08/09	Approved By:
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**BACKGROUND**

This element ensures that the Metro District continues to maintain documentation, documents, and records for its Biosolids Management program including the individual Elements of the EMS. The District has an established Records Management Program that is relevant and easily accessible, and that supports decision-making processes as they pertain to District activities. The Records Management Program provides the District with a well-managed system to store, access, and retrieve active and inactive informational records of all types. These include but are not limited to:

- Internal and External Correspondence
- Reports
- Regulatory documents
- Standard Operating Procedures, including EMS
- Reference Materials
- Shop drawings
- EMS Procedures

The Records Management Program staff provides this support on a day-to-day basis to all District Staff.

All records are assigned to an appropriate subject category utilizing a Record Series Code as established by the District Standard File Structure (DSF Structure). The DSF Structure is an alphanumeric combination of letters and numbers, known as a file code, based on the District's organizational structure and functional responsibilities. A record series is a group of similar or related documents that are normally used and filed together. Each alphabetical prefix represents a group of records series. The DSF Structure incorporates both documents and records as defined in the EMS Elements.

<i>ADM</i>	Administration	<i>PER</i>	Personnel
<i>DRAW</i>	Drawings	<i>PLAN</i>	Planning
<i>ENVI</i>	Environmental Monitoring	<i>PROC</i>	Process Control
<i>FIN</i>	Finance	<i>PUBR</i>	Public Relations
<i>GOV</i>	Government	<i>PUR</i>	Purchasing
<i>HWD</i>	Hauled Waste Disposal	<i>REC</i>	Records Management
<i>IAP</i>	Internal Auditing Program	<i>REF</i>	Reference Materials
<i>INS</i>	Insurance	<i>SAF</i>	Safety
<i>IS</i>	Information Services	<i>SECR</i>	Security
<i>IWP</i>	Industrial Waste/Pretreatment	<i>SEPW</i>	Septic Tank Wastes Disposal
<i>LAND</i>	Land Acquisition	<i>SMPL</i>	Sampling Program
<i>LEG</i>	Legal	<i>SPRS</i>	South Platte River System
<i>MSDS</i>	Material Safety Data Sheets	<i>TRN</i>	Training
<i>OFS</i>	Office Support	<i>UTL</i>	Utilities
<i>OPER</i>	Operations	<i>VEH</i>	Vehicles

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In order to maintain consistency and make all records easy to locate, all records, both hard copy and electronic will be assigned to the appropriate category (Record Series Code) based on the above.

Each numeric suffix consists of two to four numbers separated by a decimal where needed and represents a specific record series within the alpha group. The following is an example of typical file codes and record series in the DSF Structure:

OPER	OPERATIONS
OPER 01	Operations
OPER 05	Plant Management
OPER 10	Transmission
OPER 11	Transmission-INTSW
OPER 20	Wastewater Treatment
OPER 21	Primary Treatment
OPER 21.1	Wastewater Treatment-NPRI
OPER 21.2	Wastewater Treatment-SPRI

Example: Recommended identification for an electronic version of a standard operating procedure for applying biosolids would be listed as:

“PER 10.5 Policies & Procedures\SOP RR&R\Biosolids Transportation & Application\Applying Biosolids with Spreader Applicator.doc”

- “PER 10.5 Policies & Procedures” means the record is a policy or procedure
- “SOP RR&R” means the record can be found in the RR&R Department files
- “Biosolids Transportation & Application” is the actual sub-file the record resides in
- “Applying Biosolids with Spreader Applicator.doc” is the record name and doc denotes that the document was created using Microsoft Word.

All records (correspondence, logs, reports, manuals, etc.) are treated equally, not by level, and are categorized by subject folder and assigned a unique, sequential folder number generated by computer. The subject category is an alpha-numeric prefix and each record that is housed in that category is identified by its record name.

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**Element 12: Records Management System – Procedure**

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**PURPOSE**

The purpose of this procedure is to describe the process used by the Metro District to review and revise the Records Management System including EMS documentation.

**SCOPE**

This procedure covers all required documentation at all critical control points through the biosolids value chain.

**REFERENCES**

- NBP National Manual of Good Practice
- Records Management Program Manual (Administrative) (REC 05)
- Records Management Standard Operating Procedures Manual (PER 10.5)
- Records Retention and Disposition Schedule (REC 05.8), including all EMS related documents
- Records Series Indexes (located in Central Records reference area), including all EMS related documents
- Records Management Database
- EMS Manual (OPER 40.30)

**DEFINITIONS**

**EMS Records** – Records/reports of biosolids management activities required by the EMS and applicable biosolids laws and regulations, including but not limited to records/reports of monitoring, measurement, laboratory testing, inspections, operating logs, emergency response incidents, outside party inquiries, public participation meetings, audits, corrective actions, management reviews and periodic performance reports. Records describe the results of specific biosolids management activities for a prescribed event, activity and/or period of time.

**Record** – Regardless of the media, a record is any letter, memorandum, report, decision, process, procedure, or presentation that uses District’s funds to conduct any business transaction.

**Records Retention and Disposition** – A carefully planned, systematic, and consistent written policy governing the periods of retention of the life span of all types of Metro District records, including all EMS documents.

**Records Management** – The systematic control of the life cycle of a record from creation to final disposition or permanent storage.

**Records Series Code** – An alphanumeric code that represents a subject classification of a particular group of records, including all EMS documents.

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**RESPONSIBLE PERSONS**

- EMS Coordinator
- Records Management Administrator
- Department Heads

**RELATED TRAINING**

For related training, please refer to Element #8 of this manual.

**PROCEDURAL STEPS**

1. The Records Management Administrator will work with Legal Counsel and the Records Management Staff to review and update (as required) on a monthly or annual basis the Records Retention and Disposition Schedule.
2. The Records Management Administrator will work with Legal Counsel, the District Manager, the Internal Auditor, Department Heads, and other key personnel to review the Records Retention and Disposition Schedule every five (5) years. They will be looking for any new records series that need to be included, any record series that need to be deleted, and any retention times that need to be updated.
3. The Records Management Administrator will work with the Records Management Staff to review the Records Management Standard Operating Procedures Manual and update accordingly every three years in August.
4. The Records Management Administrator will report any changes that will affect the EMS Manual to the EMS Coordinator.

**Element 12: EMS Document Management – Procedure**

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**PURPOSE**

The purpose of this procedure is to describe the process used by the Metro District EMS Workgroup to revise the standard formats used by District staff to create and maintain EMS documents.

**SCOPE**

This procedure establishes document creation protocols, including approval by authorized staff, practices for keeping documents up-to-date and a system for reviewing and revising EMS documents that are out-of-date.

**REFERENCES**

- NBP National Manual of Good Practice
- Element #10: Operational Controls
- Element #13: Monitoring and Measurement

**DEFINITIONS**

**EMS Documents** – various documents that collectively comprise the biosolids environmental management system documentation, including the biosolids management policy, procedures, practices, operating instructions, and other supporting documents required by the environmental management system and applicable biosolids laws and regulations.

**RESPONSIBLE PERSONS**

- EMS Coordinator
- Records Management Administrator
- Department Heads

**RELATED TRAINING**

For related training, please refer to Element #8 of this manual.

**PROCEDURAL STEPS**

1. The EMS Coordinator will establish and maintain a standard document identification and marking system that is used uniformly throughout the EMS Manual and defines the initial creation date, approvals, revision date and version number.

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2. Each element will contain a header/footer on each page, which appears as follows:

HEADER FORMAT

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**Element ##: Title of Element – Section (Background, Procedure, List, or Table)**

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FOOTER FORMAT

**Original Issue Date:**

**Page (Section # - Page #)**

- Each element (except 1 and 2) will contain Background and Procedure sections. The element may also contain a Plan, List, or Table.
- As revisions are made, the Revision Number and Revision Date will be noted in the header of the new document.
- As revisions are made, all outdated documents will be marked with an Inactive stamp, dated and initialed, then filed in OPER 40.30 METROGRO, EMS in the appropriate element file.
- Revision will be filed electronically in **TF\OPER 40.30 METROGRO\EMS Manual\Elementnumber.doc or Tablename.doc**. *NOTE: Neither the revision number nor date will be used to identify the electronic file versions as these are directly linked to the Intranet to ensure that updates in real time.*
- Each year, after the annual review of the EMS Manual, the EMS Coordinator will reconcile the EMS Manual, Internet, and Intranet versions against the EMS Manual Record of Revisions Log.

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**Element 12: Management for Revising EMS Documents and EMS SOPs & Associated Documents – Procedure**

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**PURPOSE**

To assure that all procedures and practices are kept up-to-date with the latest requirements and that personnel are fully trained and following these requirements.

**SCOPE**

This procedure will ensure that EMS changes of all types, including changes in policies, organizational structures, critical control points, legal and other requirements, goals and objectives, public participation and communication plans, operational controls, emergency procedures, monitoring and measurement procedures and/or corrective actions, EMS SOPs, and EMS related documents are completed.

**REFERENCES**

- NBP National Manual of Good Practice
- Element #4: Legal and Other Requirements
- Element #5: Goals and Objectives
- Element #6: Public Participation
- Element #7: Roles and Responsibilities
- Element #8: Training
- Element #9: Communications
- Element #10: Operational Controls of Critical Control Points
- Element #11: Emergency Preparedness and Response Plan
- Element #12: Management for Revising EMS Documents - Procedure
- Element #13: Monitoring and Measurement
- Element #14: Nonconformance and Corrective and Preventive Actions
- EMS SOP Review/Update Frequency list (by Department)
- Environmental Management System for Biosolids Standard Operating Procedures memo dated December 16, 2004

**DEFINITIONS**

**Management for Revising Documents** – A systematic, standardized process for updating documents, training, procedures and practices to the current requirements.

**RESPONSIBLE PERSONS**

- EMS Coordinator
- Department Heads

**Element 12: Management for Revising EMS Documents and EMS SOPs & Associated Documents – Procedure**

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**RELATED TRAINING**

For related training, please refer to Element #8 of this manual.

**PROCEDURAL STEPS FOR EMS DOCUMENTS**

1. Each year the EMS Workgroup will review the current biosolids value chain, critical control points, legal and other requirements, goals and objectives, public participation and communication plans, operational controls (and all related records and forms), emergency procedures, monitoring and measurement procedures and/or corrective actions, and the overall EMS Manual to identify any revision(s) needed.
2. The EMS Coordinator will compile and review the proposed revision(s) from the EMS Workgroup and, if appropriate, approve them. Recommended revision(s) from the EMS Workgroup not approved by the EMS Coordinator shall be returned to the EMS Workgroup with a written explanation of concern(s) related to the revision(s).
3. When the EMS Workgroup has resolved the concerns, the EMS Coordinator will review and approve.
4. The EMS Coordinator will process the document per the EMS Document Management Procedure.
5. The EMS Coordinator will distribute the revised EMS documents to appropriate staff and ensure that new versions are posted on the Internet and Intranet.
6. The EMS Coordinator will coordinate with Human Resources staff any training or re-training that might need to be provided due to any operational or process revisions.
7. Any minor changes to the EMS Manual that are found during the year will be documented and filed in the Element 12 hard copy file and held for review and consideration during the annual review of the EMS Manual in April. Approved revisions will be processed per the EMS Document Management Procedure.

**PROCEDURAL STEPS FOR EMS SOPs & ASSOCIATED DOCUMENTS**

1. EMS SOPs and their associated documents that are identified throughout the EMS Manual will be reviewed and revised on a set frequency.
2. The frequency of review and update has been determined by each Department Head as noted on the EMS SOP Review/Update Frequency list.
3. The EMS Coordinator will maintain a list of review dates for those documents.
4. When appropriate, the EMS Coordinator will notify the appropriate EMS Workgroup member that a review and update is required and their associated documents.

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5. EMS Workgroup members will then coordinate with the department the review and update process then forward that information to the EMS Coordinator for tracking purposes.
6. EMS Workgroup members will ensure newly updated EMS SOPs include the appropriate SOP criteria as spelled out in the *Environmental Management System for Biosolids Standard Operating Procedure* memo dated December 16, 2004.
7. EMS Workgroup members will document the review and update process and submit it (via email, memo, etc.) to the EMS Coordinator to use as backup.