Environmental Management System: Document and Records Control Guidance

The Texas A&M University System

	The Texas A&M University System		
	Environmental Management System: Document and Records Control Guidance	Program:	Environmental Management
		Doc. No.:	ENVM-01-L1-S01-CH01-002
		Rev No:	002.04
		Date:	11/03/2021
	Level 1	Office:	A&M System Office of Environment, Safety & Security

Concurrence and Approval

This Environmental Management System Document and Records Control Guidance document was developed for use by all A&M System Members and has been reviewed and approved by the following approvers.

Document Custodian:

Gordon Evans, Environmental Manager

Approval:

03-NOV-2021

Gordon Evans, Environmental Manager   Date

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Certification (if required by law or regulation)

N/A

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Change History

Revision Number	Interim Change No.	Effective Date	Description of Change
001	0	26-APR-2010	Initial document release
002	0	25-JAN-2012	Migrated document to standardized environmental management system document format; corrected Section and Chapter List for errors in Section 6 beginning at Chapter 20.
002	01	03-OCT-2012	Updated Table 7-6 Section and Chapter List to include a new column listing development priority ranking for each Environmental Manual chapter.
002	02	21-JUN-2018	Changed A&M System seal to the revised TAM version
002	03	11-SEP-2020	Deleted inadvertent references to "Intelex" and slightly modified format of Table 7-6. Changed name of A&M System office overseeing the EMS.
002	04	03-NOV-2021	Added Texas Division of Emergency Management as a new member of the A&M System in Table 7-2.

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1   Introduction

This standardized document and record control system has been developed to facilitate consistent organization, management and control of environmental documents. The system is presented in detail in Section 7. Document and Record Control Guidance and consists of two parts, (1) the document and record numbering and control system and (2) the environmental management program list of sections and chapters.

Document and record numbering require some subjective judgment, but every document or record shares certain common attributes. Each is associated with a specific:

- *Program* (in this case Environmental Management and Hazardous Waste) designated by a four-letter abbreviation (e.g., ENVM);
- *Member*, as indicated by the official 2-digit Member ID code;
- *Level*, depending on whether it is a EMS-wide administrative document (L1), a program document such as an oil pollution prevention program (L2), or a program-related work instruction or procedure (L3); and
- *Section and Chapter Number*, each a three-digit code selected from a comprehensive outline for an environmental manual given in this document.

Once these codes are assigned to a document, its numbering is completed by sequentially assigning a three-digit number.

A *record*, such as an inspection report, laboratory analysis report or regulatory submittal, is considered a Level 4 document. Level 4 documents do not receive the full document numbering code but are instead sequenced and filed according to a brief record description followed by the date on which the record was generated.

The **List of Sections and Chapters** was developed after reviewing numerous regulatory schemas and environmental manuals from both industry and government, then comparing these to operations and activities that may be encountered in higher education. Collectively, these can be used as the table of contents for a comprehensive environmental manual, but in practice many chapters may never be needed or developed by a particular system member.

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2 Scope

Document and record control is an essential and integral part of any environmental management system (EMS). This guidance is therefore applicable and should be used by all A&M System members as they develop and implement their EMSs.

3 Operations / Departments Affected

All A&M System members and their departments that have significant interfaces with the environment (e.g., regulatory compliance requirements; activities that are judged to have significant and controllable impacts) are potentially affected by this guidance. As needs for systematic environmental stewardship are identified, these needs and the consequent programs, plans and actions should be documented using this control system.

4 Regulatory and Policy References and Interpretations

4.1 Applicable Laws and Regulations

Environmental management is governed by a far-reaching set of environmental laws and regulations, many of which apply to at least some of the activities and operations that occur on A&M System campuses and facilities. The regulations are too numerous to cite here, but they mostly fall under the authority of several major environmental laws, as listed below:

- Clean Air Act (CAA)
- Clean Water Act (CWA) (original title: Federal Water Pollution Control Amendments of 1972)
- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, or Superfund)
- Emergency Planning and Community Right-to-Know Act (EPCRA)
- Endangered Species Act (ESA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
- Federal Water Pollution Control Amendments - See Clean Water Act
- National Environmental Policy Act (NEPA)
- National Historic Preservation Act (NHPA)
- Oil Pollution Act (OPA)
- Pollution Prevention Act (PPA)
- Resource Conservation and Recovery Act (RCRA)
- Safe Drinking Water Act (SDWA)
- Superfund - See Comprehensive Environmental Response, Compensation, and Liability Act

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- Superfund Amendments and Reauthorization Act (SARA) - See Comprehensive Environmental Response, Compensation, and Liability Act
- Toxic Substances Control Act (TSCA)

Other environmental laws are less central to the day-to-day management of higher education, but one or more may have some bearing on certain A&M System activities or operations. These may include:

- Antiquities Code of Texas (ACT)
- Atomic Energy Act (AEA)
- Chemical Safety Information, Site Security and Fuels Regulatory Relief Act
- Energy Independence and Security Act (EISA)
- Energy Policy Act
- EO 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- EO 13045: Protection of Children From Environmental Health Risks and Safety Risks
- EO 13211: Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use
- Federal Food, Drug, and Cosmetic Act (FFDCA)
- Food Quality Protection Act (FQPA) - See FFDCA and FIFRA
- Marine Protection, Research, and Sanctuaries Act (MPRSA, also known as the Ocean Dumping Act)
- National Technology Transfer and Advancement Act (NTTAA)
- Noise Control Act
- Nuclear Waste Policy Act (NWPA)
- Occupational Safety and Health (OSHA)
- Ocean Dumping Act - See Marine Protection, Research, and Sanctuaries Act
- Pesticide Registration Improvement Act (PRIA) - See FIFRA
- Shore Protection Act (SPA)

4.2 Regulatory Agencies Having Jurisdiction

In Texas, the Texas Commission on Environmental Quality (TCEQ) is the principle environmental regulatory body for most compliance requirements. Other environmental programs are variously governed by:

- the U.S. Environmental Protection Agency (EPA),
- the U.S. Army Corps of Engineers (USACE),
- the U.S. Fish & Wildlife Service (FWS),
- the Texas Department of State Health Services (DSHS),
- the Texas General Land Office (GLO),
- the Texas Department of Agriculture (TDA),

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- the Railroad Commission of Texas (RRC),
- the Texas State Soil and Water Conservation Board (TSSWCB),
- the Texas Parks & Wildlife Department (TPWD),
- the Texas State Energy Conservation Office (SECO),
- the Texas Water Development Board (TWDB),
- the Texas Department of Licensing and Registration (TDLR), and
- the Texas Historical Commission (THC).

4.3 A&M System Environmental Policy

Given the complex legal and regulatory picture, in addition to the plethora of voluntary environmental stewardship and conservation measures that may be implemented in higher education, The Texas A&M University System promulgated an environmental policy in 2006 requiring each A&M System member to develop an environmental management system (EMS) and assign resources to plan, expand, maintain and monitor the EMS. The policy is found in paragraph four (4) of the System policy 24.01 Risk Management.

5   Structure and Responsibilities

Environmental points-of-contact or others assigned as document custodians are responsible to understand and use this guidance. As a central part of the system-wide EMS, use and maintenance of this system is necessary to allow consistent organization, information-sharing and retrieval by users.

6   Training and Licensing/Certification Requirements

Persons given the responsibilities to prepare, review and update environmental documents and records should be provided this guidance and a short orientation to the EMS.

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7 Document and Record Control Guidance

All A&M System or member-originated environmental programs should implement the requirements of this guidance. Related references include:

- The Texas A&M University System *Environmental Management System Manual*;
- The set of *EMS Level 2 Document Templates* that provide the preferred formats for most Level 1, 2 and 3 documents, with one template customized for each system member.
- The *EMS Location Structure Guide* used to identify member locations for use in the EMS.

7.1 Document and Record Numbering and Control System

7.1.1 Document Revision Numbering System

As documents are periodically reviewed or as minor editorial or procedural issues are identified, changes may need to be incorporated into a controlled document. A *major revision* involves major changes that may include reorganization, procedural alterations, or multiple editorial corrections through a document done at the same time. *Minor changes* are ones that do not merit a fully-revised edition (e.g., minor corrections/errata; single, non-process technical changes). These revisions are listed in the *Change History* section in the front of the document, wherein each successive revision or minor change is sequentially numbered and described. Use the following numbering scheme:

- Number major document revisions: 1, 2, 3, 4, 5, etc.
- Use letters to designate minor (i.e., non-process) changes: a, b, c, d, etc.

For example:
- 1-a initial revision
- 1-b minor change to initial revision
- 1-c minor change to initial revision
- 2-a major change to initial revision
- 2-b minor change to second revision
- 2-c minor change to second revision
- 2-d minor change to second revision
- 3-a major change to second revision

7.1.2 Document Numbering System

Documents in the EMS will be numbered using a standard structure. The reason behind this is so that any Member viewing a document from any Member location will know what the document is about before reading it. Follow this numbering template, PROG-MI-L#-S##-CH##-###.

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For example, a document may be numbered ENVM-01-L3-S06-CH09-001. The highlighted parts are described below.

Program Code

The first part of the document number (four letters) designates the part of the Environmental, Health and Safety (EHS) program to which the document applies. Although this guide currently applies only to environmental documents, it is envisioned that it may expanded to encompass the entire EHS program throughout the enterprise. Programs listed in Table 7-1 are patterned after the organization of the Texas A&M University EHS Department and reflect the areas of focus in a fully developed EHS management system. For the purposes of environmental documents, this code will always be ***ENVM***.

Table 7-1 Four-digit Codes Designating EHS Programs

Program (PROG) Name	4 digit code
General Safety & Security	GENS
Agricultural Safety	AGRS
Biological Safety	BIOS
Emergency Preparedness	EMGP
Environmental Management and Hazardous Waste	ENVM
Fire and Life Safety	FIRS
Food Safety	FOOS
Hazardous Material Shipping	HZMT
Industrial Hygiene and Chemical Safety	IHCS
Laboratory Safety	LABS
Occupational Health	OCCH
Occupational Safety	OCCS
Radiological Safety	RADS
Scientific Diving Safety	DIVS
Research Safety	RESS

Member Identification Numbers

The Texas A&M University System uses a standard set of two-digit codes designating individual members (Table 7-2). These codes appear in system's accounting and human resources systems, so, for consistency, the same are used for environmental documents. These are the second set of numbers, highlighted in gray, in the document numbering example shown above.

Table 7-2 A&M System Member ID Codes

Member Name	2-digit Member ID (MI) Code
Texas A&M System Offices	01
Texas A&M University	02
Tarleton State University	04
Prairie View A&M University	05
Texas A&M AgriLife Research	06

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Texas A&M AgriLife Extension Service	07
Texas A&M Engineering Experiment Station	08
Texas A&M Engineering Extension Service	09
Texas A&M University at Galveston	10
Texas A&M Forest Service	11
Texas A&M Transportation Institute	12
Texas A&M University-Corpus Christi	15
Texas A&M International University	16
Texas A&M University-Kingsville	17
West Texas A&M University	18
Texas A&M Veterinary Medical Diagnostic Laboratory	20
Texas A&M University-Commerce	21
Texas A&M University-Texarkana	22
Texas A&M Health Science Center	23
Texas A&M University-Central Texas	24
Texas A&M University-San Antonio	25
Texas Division of Emergency Management	30
Texas A&M University at Qatar	

Document Level

In an EMS, there is a hierarchy of documents.

- L1 – Overall EMS program documents that define and control the EMS are considered Level 1 (L1) documents. There are few of these L1 documents and should only infrequently need significant revision once the EMS is well-established.
- L2 – Level 2 documents are major documents that define programs and their broad requirements.
- L3 – Level 3 documents are specific work instructions or procedures used to implement a program.
- L4 – Level 4 documents are program records, such as inspection reports, analytical reports and maintenance records. Their numbering is different from this main document numbering scheme, as seen below in Section 7.1.3.

The document numbering system uses these level codes as indicated by the green highlighting in the numbering example given above.

Table 7-3 Alphanumeric Document Level Descriptions and Codes

Level Number and Description	2-digit document level code
Level 1, top level, from System Offices	L1
Level 2, Program document	L2
Level 3, Work Instruction, Procedure	L3

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Section Number

The fourth set of alphanumeric characters in the document numbering format designate the *section number*, as indicated by blue highlighting in the example given above. The section numbers are derived from the comprehensive environmental manual section and chapter system listed below in Section 7.2. The letter "S" is included in the document numbering so that a layperson may intuitively understand the meaning of the designation. Table 7-4 summarizes and references the section number guidance.

Table 7-4 Section Numbers Used in the Document Numbering System

Section Number Description	Code
Corresponds to the section number and name as listed in the Section and Chapter List below	S##

Chapter Number

The fifth set of alphanumeric characters in the document numbering format designate the *chapter number*, as indicated by fuchsia highlighting in the example given above. The chapter numbers are derived from the comprehensive environmental manual section and chapter system listed below in Section 7.2. The letters "CH" are included in the document numbering so that a layperson may intuitively understand the meaning of the designation. Table 7-5 summarizes and references the chapter number guidance.

Table 7-5 Chapter Numbers Used in the Document Numbering System

Chapter Number Description	Code
Corresponds to the chapter number and name as listed in the Section and Chapter List below	CH##

Sequential Document Number

The last three '###'s are assigned sequentially, beginning with 001. The first document for a specific Program/Member/Level/Section/Chapter is 001, the second document 002, and so on. Documents are numbered sequentially by adding one whole number.

7.1.3   Record Numbering System (level 4 documents)

Records should be saved in a corresponding document folder structure and numbered sequentially. Use Table 7-6 Section and Chapter List as a guide to creating and numbering a document folder structure.

Follow this numbering template for records, 'FY##-YYYYMMDD-record description'. The record name should include the record date, expressed as YYYYMMDD. The record description should precede the date and be as short, yet descriptive as possible (e.g., *FY10-20090927-Storm Water*

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Inspection). Where similar records are stored, they should be given the same name with different dates. Where multiple inspections of various locales or equipment are recorded as separate forms or reports, each record name may also include the identification number of the individual unit (e.g., *FY12-20120125-SPCC Inspection-EMG-27* to designate a specific emergency generator).

7.2 Environmental Manual Section and Chapter Numbering System

As mentioned previously, a comprehensive outline for a hypothetical environmental manual for higher education has been developed. The table may need to be modified in the future, but the intent was to anticipate all or most environmental issues or programs and provide a named section and chapter for each (Table 7-6).

Table 7-6 Section and Chapter List

			Program Priority
Section 01	**General and Administration**		
	Chapter 01	Environmental Management System	1
	Chapter 02	Permitting, Licensing and Registration	
	Chapter 03	Agency Inspections, Inquiries, and Enforcement	
	Chapter 04	Academic Curriculum, Research and Development, and Public Education	
	Chapter 05	Environmental Partnerships	
	Chapter 06	Supplier Audit Process	
	Chapter 07	Pollution Prevention	
Section 02	**Land and Natural Resource Protection (NEPA; CERCLA; NHPA/ACT)**		
	Chapter 01	Environmental Due Diligence Process (EDDP)	1
	Chapter 02	Innocent Owner/Operator Certificates	
	Chapter 03	NEPA Environmental Assessment	2
	Chapter 04	Development Permits	
	Chapter 05	Antiquities (Archaeology & Historic Buildings)	
Section 03	**The Built Environment and Resource Conservation**		
	Chapter 01	Campus Planning and Architectural Standards	
	Chapter 02	Energy	1
	Chapter 03	Water	1
	Chapter 04	Raw Materials	

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			Program Priority
	Chapter 05	Commodities and Consumables	
	Chapter 06	Product Stewardship	
	Chapter 07	Transportation, Parking and Fleet Management	
Section 04	**Air Quality (Clean Air Act)**		
	Chapter 01.1	Air Permits and Emissions Authorizations	1
	Chapter 01.2	Standard Permits	
	Chapter 01.3	New Source Review (NSR) Permits	
	Chapter 01.4	Federal Operating Permits	
	Chapter 02	Emissions Inventory and Potential to Emit	
	Chapter 03	Visible Emissions, Particulate and Outdoor Burning	
	Chapter 04	Combustion Unit (e.g., boilers) and Stationary Internal Combustion Emissions	
	Chapter 05	Motor Vehicles	
	Chapter 06	Painting and Striping Operations	
	Chapter 07	Managing Refrigerants and Associated Appliances	2
	Chapter 08	Special Requirements for Nonattainment Areas	1
	Chapter 09	Open Burning	
	Chapter 10	Training and Certifications	
	Chapter 11	Required Monitoring, Records and Reporting	
Section 05	**Water Protection, Improvement and Conservation (Clean Water Act; Oil Pollution Act)**		
	Chapter 01	Water Program Administration	
	Chapter 02	Community Drinking Water Systems	1
	Chapter 03	Noncommunity Drinking Water Systems	2
	Chapter 04	Construction / Land-Disturbing Activities	1
	Chapter 05	Facility Storm Water Compliance / Municipal Separate Storm Sewer Systems (MS4)	1
	Chapter 06	Drain/Sink Discharge of Chemicals	1
	Chapter 07	Wastewater Treatment and TPDES Permits	1
	Chapter 08	Nondischarging Waste Treatment Systems	
	Chapter 09	Wetlands Protection and Dredge and Fill Permits	
	Chapter 10	Oil Pollution Prevention and Coastal Zone Protection	1
	Chapter 11	Vehicle Washing	2

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			Program Priority
	Chapter 12	Release Reporting and Emergency Response	1
	Chapter 13	Training and Required Certifications	
	Chapter 14	Required Monitoring and Testing	
	Chapter 15	Required Recordkeeping and Reporting	
Section 06	**Solid and Hazardous Waste (Resource Conservation and Recovery Act)**		
	Chapter 01	Waste Program Administration	
	Chapter 02	Hazardous Waste Registration	1
	Chapter 03	On-Going Determination of Hazardous Waste Generator Status	1
	Chapter 04	Pollution Prevention (P2) Plan and Waste Avoidance	2
	Chapter 05	Waste Recognition / Hazardous Waste Determination	1
	Chapter 06	Municipal Solid Waste (Trash)	2
	Chapter 07	Disposal Prohibitions	3
	Chapter 08	Waste Treatment	4
	Chapter 09	Hazardous Waste Management at the Point of Generation (Satellite Accumulation)	1
	Chapter 10	Hazardous Waste Intra-Campus Transportation	3
	Chapter 11	Hazardous Waste Management at Central Accumulation Areas	1
	Chapter 12	Hazardous Waste Manifests	1
	Chapter 13	Pre-Transport Requirements (Packaging, Labeling, Marking, Placarding)	1
	Chapter 14	Contractors: Waste Transportation, Disposal, Recycling, and Emergency Response	1
	Chapter 15	Training and Required Certifications	1
	Chapter 16	Required Monitoring, Records and Reporting	
	Chapter 17	Preparedness and Prevention	
	Chapter 18	Contingency Plan and Emergency Procedures	
	Chapter 19	Release Reporting	
	Chapter 20	Universal Waste (Batteries, Pesticides, Mercury-Containing Equipment, Lamps, and Paint and Paint-related Waste)	1
	Chapter 21	Special Wastes: Aerosol Cans	2
	Chapter 22	Special Wastes: Animal Carcasses and Specimens	2
	Chapter 23	Special Wastes: Demolition Debris	2
	Chapter 24	Special Wastes: Empty Containers	3
	Chapter 25	Special Wastes: Ethidium Bromide	4
	Chapter 26	Special Wastes: Food Waste	5

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			Program Priority
	Chapter 27	Special Wastes: Formalin	2
	Chapter 28	Special Wastes: Grease and Grit Trap Wastes	3
	Chapter 29	Special Wastes: Laboratory Glass (Uncontaminated)	5
	Chapter 30	Special Wastes: Light Ballasts and Capacitors (PCB-Free)	4
	Chapter 31	Special Wastes: Medical and Biohazard Waste	1
	Chapter 32	Special Wastes: Nonhazardous Chemical Waste	4
	Chapter 33	Special Wastes: Pharmaceuticals, Controlled Substances, Precursor Chemicals and Apparatus	1
	Chapter 34	Special Wastes: Sewage Sludge	4
	Chapter 35	Special Wastes: Treated Wood	5
	Chapter 36	Special Wastes: Oil Cleanup Debris	5
Section 07	**Reuse, Recycling and Materials Diversion**		
	Chapter 01	Reuse, Recycling and Materials Diversion Program Administration	
	Chapter 02	General recycling (e.g., aluminum, cardboard, glass, metal, paper, plastic)	2
	Chapter 03	Used Antifreeze	5
	Chapter 04	Nonhazardous Batteries (also see Universal Waste)	5
	Chapter 05	Used / Spent Lead Acid (Automotive) Batteries	3
	Chapter 06	Electronics and Computers (e-waste)	3
	Chapter 07	Nonhazardous Lamps (also see Universal Waste)	5
	Chapter 08	Mercury (also see Universal Waste)	3
	Chapter 09	Latex and Nonhazardous Paint and Paint-related Waste (also see Universal Waste)	5
	Chapter 10	Used Oil	3
	Chapter 11	Used Oil Filters	3
	Chapter 12	Paint Solvents (also see Universal Waste)	1
	Chapter 13	Photographic Processing Waste	5
	Chapter 14	Oily Rags and Wipers	5
	Chapter 15	Solvent Rags and Wipers	5
	Chapter 16	Scrap Tires	5
	Chapter 17	Nontreated Wood	6

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			Program Priority
Section 08	**Petroleum Storage Tanks**		
	Chapter 01	PST Design and Installation	3
	Chapter 02	PST Registration	1
	Chapter 03	Vehicle Fueling and Vapor Recovery	5
	Chapter 04	PST Financial Responsibility Requirements	5
	Chapter 05	Training and Required Certifications	4
	Chapter 06	Required Monitoring and Testing	3
	Chapter 07	Required Recordkeeping and Reporting	3
	Chapter 08	Preparedness and Prevention	5
	Chapter 09	Emergency Procedures	5
	Chapter 10	Release Reporting	4
	Chapter 11	PST Closure	6
Section 09	**Toxic Substances (Toxic Substances Control Act)**		
	Chapter 01	Toxic Substances Program	5
	Chapter 02	Asbestos Operations and Maintenance (O&M) Plan	1
	Chapter 03	Notification for Demolitions and Renovation	1
	Chapter 04	Storing and Disposing of Asbestos	2
	Chapter 05	Lead-Based Paint	4
	Chapter 06	Mold	2
	Chapter 07	PCBs	4
	Chapter 08	Training and Required Certifications	5
	Chapter 09	Required Monitoring, Records and Reporting	5
	Chapter 10	Preparedness and Prevention	5
	Chapter 11	Emergency Procedures	5
	Chapter 12	Release Reporting	5
	Chapter 13	Other Chemicals – TSCA Compliance	2
Section 10	**Pesticides (Federal Insecticide, Fungicide and Rodenticide Act (FIFRA))**		
	Chapter 01	Managing Pesticides	3
	Chapter 02	Worker Protection Standard	1

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	Chapter 03	Training and Required Certifications	1
	Chapter 04	Required Monitoring and Testing	
	Chapter 05	Required Recordkeeping and Reporting	
	Chapter 06	Preparedness and Prevention	
	Chapter 07	Emergency Procedures	
	Chapter 08	Release Reporting	2
Section 11	**Chemical Safety (Emergency Planning and Community Right-to-Know Act (EPCRA); Hazard Communication; Chemical Facility Antiterrorism (CFAT) Standard)**		
	Chapter 01	Chemical Commodity Management and Inventory	1
	Chapter 02	Hazard Communication	1
	Chapter 03	Workplace Chemical List and Tier 2 Reporting	1
	Chapter 04	Chemical Facility Antiterrorism Standard	1
	Chapter 05	Controlled Substances	1
	Chapter 06	Precursor Chemicals and Apparatus	1
	Chapter 07	Training (Hazard Communication) and Required Certifications	1
	Chapter 08	Required Monitoring, Records and Reporting	
	Chapter 09	Preparedness and Prevention	
	Chapter 10	Emergency Procedures	
	Chapter 11	Release Reporting	
Section 12	**Environmental Emergency Preparedness**		
	Chapter 01	Plans	3
	Chapter 02	Drills	2
Section 13	**Environmental Emergency Response**		
	Chapter 01	Overview	3
	Chapter 02	Response Team Development	1
	Chapter 03	Maintaining Proficiency	2
Section 14	**Spill and Release Reporting**		
	Chapter 01	General Reporting Guidelines	1
	Chapter 02	Hazardous Substance Releases	1

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Table 7-6 Section and Chapter List

			Program Priority
	Chapter 03	Hazardous Waste Releases	1
	Chapter 04	Oil Spills	1
	Chapter 05	Chemical Safety Board Incident Reporting	1
Section 15	**Contractor and Supplier Environmental Process**		
	Chapter 01	Contractor and Supplier Environmental Process	5

8   Management, Monitoring and Measurement

The document custodian and environmental program manager should periodically check documents for adherence to this numbering system.

9   Change Management

This guidance should be reviewed on a five-year schedule for possible revisions. Minor corrections between scheduled reviews (Interim Changes) should be published as needed.