ENVIRONMENTAL MANAGEMENT SYSTEM OPERATING PROCEDURE

Operational Controls

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ATTACHMENTS: None

A. PURPOSE AND APPLICABILITY

The purpose of this Operating Procedure (OP) is to establish a uniform process for identifying, developing, and maintaining operational controls that help maintain the Region's activities, products, and services (*e.g.*, processes), that contribute to significant environmental aspects, within specified parameters. Typically these parameters include compliance with all legal and other requirements to which the Region subscribes. Operational controls may also be developed and applied to processes that contribute to environmental aspects not deemed to be significant.

This OP applies to all operational controls within the stated scope of the EPA Region 7 Environmental Management System (EMS).

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* (SHEMS 1006.9000.02) contained in the EMS Manual. For the purposes of this OP, the following terms apply:

- Activity, Product, or Service
- EMS Document
- EMS Record
- Environmental Aspect
- Legal and Other Requirements
- Operational Controls
- Significant Environmental Aspect

C. PROCEDURAL STEPS

Operational controls are developed and maintained for certain processes that contribute to the Region's significant environmental aspects in order to ensure that the processes are conducted within specific parameters. These parameters are typically legal and other requirements to which the Region subscribes; however, they may also take the form of best management practices that improve process performance. Operational controls implemented in Region 7 may include administrative controls (*e.g.*, policies, guidelines, and procedures), physical controls (*e.g.*, drain covers and door locks), and engineering controls (*e.g.*, continuous reading pH meters).

To the greatest extent practical, operational controls should be developed and maintained by employees and managers who work with the specific process. If an operational control is developed and/or maintained by someone else, input and coordination from individuals who work with the process must be obtained. The following procedures should be used to identify, develop, and maintain operational controls:

1. The EMS Coordinator and others who have knowledge of the Region's processes that contribute to its significant environmental aspects will review those processes and identify existing operational controls and document/validate these controls on the Region 7 EMS Operational Control Master List (an EMS document; EMS 1006.3500.99).
2. Physical and engineering operational controls will be documented on the Operational Control Form Template (SHEMS 1006.3500.00) in the following manner (Note: Completed templates are EMS Documents):
   A. Complete the Administrative Data Fields (A, B, C, D, E, F, and G) of the template.
      (1) In Field A insert the name of the operational control.

(2) In Field B list the environmental aspects, significant or otherwise, the control is helping to manage (*e.g.*, consumption of energy).

(3) In Field C insert the appropriate document control code in accordance with the most current version of SHEMS 1006.7210.02, *Document Control*. Do not include the version number portion of the code.

(4) In Field D insert the date the form is completed. This is also the date used in the top right corner of the document. Updates to information on the form are indicated by changing the date in Field D. If an update to the form is considered significant enough by the EMS Coordinator to warrant updating the version number of the form, then the date in the top right corner would also be updated.

(5) In Field E insert the name, organization, and phone number of the person with overall responsibility for the operational control.

(6) In Field F provide a brief description of the control and list any references that further define the control and/or its operating parameters.

(7) In Field G insert the specific process(es) and/or general activity area(s) that contribute to the significant environmental aspect(s) and are being controlled. For example, a wastewater neutralization system with a continuous reading pH meter may be installed as a control on the specific process of discharging wastewater. Similarly, sections of a facility lease agreement may serve as a control by providing for input into the general activity area of facility operations (*e.g.*, maintenance of ventilation systems, conduct of landscaping activities, and application of pesticides).

B. Complete the Performance Indicator Fields (H) of the template by including the name of the performance indicator(s) that are used to assess the success of the operational control, the indicator's monitoring frequency, the record(s)/document(s) associated with the performance indicator, and the name of the person responsible for monitor performance and maintaining the record(s)/document(s) along with the location of where the record(s)/document(s) is/are maintained.

C. In Field I list the actions that should be taken if the operational control fails.

D. Complete the Maintenance Action Fields (J) of the template by including the name of the maintenance action(s) that are used to ensure the operational control continues to operate as intended, the schedule for the maintenance action, the record(s)/document(s) associated with the maintenance action, and the name of the person responsible for completing the action and maintaining the record(s)/document(s) along with the location of where the record(s)/document(s) is/are maintained.

E. In Field K provide any additional information relative to the identification, development, and/or maintenance of the operational control such as updates and changes to the control, difficulties/successes, and other notes.

2. As the need to develop additional operational controls becomes evident the individuals most closely associated with the process, along with the EMS Coordinator as necessary, will develop, implement, and document the appropriate control(s). The control will be added to the Region 7 EMS Operational Control Master List; physical and engineering controls will also be documented on the template using the procedure outlined in steps 1A – 1E above.

3. Operational controls may be identified, developed, and applied to environmental aspects that are not

deemed to be significant environmental aspects. Typically these controls will be developed by a person with close affiliation to the process contributing to the aspect with consultation from the EMS Coordinator. These controls will be documented and maintained in the same manner described in this OP for controls for significant environmental aspects.

4. All operational controls will be evaluated during an EMS cycle to ensure they remain relevant and effective for maintaining the process(es) within the specified parameters and are being properly maintained. More frequent evaluations may be specified by the control's manufacturer or by the Operational Control Lead in order to meet a higher headquarters directive or simply as a best management practice. The rationale for conducting shorter interval evaluation frequencies for physical and engineering controls must be documented in Field K of the operational control form. The evaluation will be conducted by the Operational Control Lead, or their designee, and the results forwarded to the EMS Coordinator for documenting on the Region 7 EMS Operational Control Master List and in Field K of the operational control form as necessary.

D. RECORDS MANAGEMENT

This OP may result in the generation of EMS records. Any records created will be managed in accordance with the most current version of SHEMS 1006.7210.02, *Document Control*, and SHEMS 006.7210.17, *Records Management*.

E. QUALITY ASSURANCE AND QUALITY CONTROL

The quality assurance and quality control (QA/QC) success of the procedure for identifying, developing, and maintaining operational controls, as detailed in this OP, will be determined through the internal and external EMS conformance audit processes, as well as the compliance audit process. Deficiencies noted during these audits will be managed through the Region's Corrective/Preventive Action Process as defined in the current version of SHEMS 1006.7210.12.

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. US EPA R7, *US Environmental Protection Agency Region 7 Safety, Health, and Environmental Management System Terms and Definitions*, SHEMS 1006.9000.02
3. US EPA R7, *Document Control*, SHEMS 1006.7210.02
4. US EPA R7, *Corrective/Preventive Action Process*, SHEMS 1006.7210.12
5. US EPA R7, *Records Management,* SHEMS 1006.7210.17
6. US EPA R7, *Operational Control Form Template*, SHEMS 1006.3500.00