

## **Establishing Operational Controls**

### **I. PURPOSE**

The purpose of this EMS procedure is to provide guidance for determining the operational controls that are applied to the EPA Region 9 office activities, operations, products and/or services that are associated with the significant environmental aspects.

### **II. SCOPE**

This procedure is used to establish the operational controls that are applicable to all activities, products or services that are associated with significant environmental aspects, as well as other important activities, product and services that we decide to manage through our EMS.

### **III. GENERAL INFORMATION**

Operational controls are required to assure that activities, operations, products and /or services maintain stability within specified criteria, and that conditions that prevent Region 9 from achieving its objectives and targets or stated policy commitments are avoided. Operational controls are integral to the EMS and specific for each significant aspect.

The EMS Implementation Team is responsible for establishing and maintaining operational controls. The EMS Lead assigns responsibility for each operational control to the appropriate significant environmental aspect (SEA) lead.

#### **Definition**

**Operational Controls:** Broadly defined to include technology (e.g. shut off valves) and administrative (e.g. operator intervention, standing procedures, training, communication, contract language) controls. Operational controls are applied to activities, operations, products or services to prevent the environmental aspect they exhibit from becoming an impact.

### **IV. APPROACH**

The following steps are taken to determine the need for operational controls:

1. Each significant aspect is reviewed in conjunction with its activities, operations, products and / or services to determine whether operational controls (either

- technological or administrative) already exist, need updating, or need to be developed and implemented.
2. Individuals at relevant functions and levels are involved in updating or developing operational controls. (e.g. The SEA Lead for paper use reduction works with the information technology manager to update the existing SOP for setting up computers to add a step that defaults to double sided printing). The updated or new operational controls are communicated to those individuals tasked with implementing the operational controls and special training will be provided when needed (See SP-ET).
  3. Where applicable, documentation of the operational controls specifies their operating criteria, their maintenance plans, and the actions to be taken when they may be interrupted or might otherwise fail. Any documentation associated with operational controls is kept current and accessible.

#### V. RECORDS

The following records may be created for operational controls:

1. Records of any actions taken in the event of interrupted or failed controls.
2. Records that demonstrate the functioning of operational controls either ongoing or periodic depending on what is appropriate and implemented.

#### IV. REVISION HISTORY

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Author: EMS Lead