

Operational Control

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EP-08

1.0 Purpose

To provide instruction for the development and maintenance of operational controls and procedures that are associated with the identified significant environmental aspects in order to maintain conformity with the environmental policy, Objectives & Targets and other areas of the EMS.

2.0 Scope

This procedure applies to all <u>operations</u>, including <u>maintenance</u> and <u>purchasing</u>, associated with the identified significant environmental aspects of operations, goods and services.

3.0 Responsibilities

The EMR in conjunction with EMS Team (EMST) and other key employees are responsible for the overall process of identifying Operational Controls.

Other responsibilities will be defined in the operational control document and may include:

- Who maintains the work instruction (updates, revises, etc.)
- Who follows the work instruction (operators, maintenance personnel, purchasing, security, contractors)
- Who verifies only current updated versions are used and are in the relevant locations.

4.0 Forms Used

ER-08A	Operational Controls, Contractors & Key Characteristics				
NOTE: For Simple Facility scenarios, Form EF-03B-pg2 maybe used to document Op					
Controls					
ER-08B	Contractor Environmental Briefing Package				
ER-08C	Contractor Method Statement				
ER-08D	Supplier Environmental Awareness Form				
EF-01C	New Project Environmental Checklist				

5.0 Procedure

5.1 Operational Controls:

5.1.1 Operational Controls are defined as those operations needed to cover situations where their absence could lead to deviations from the environmental policy and/or objectives



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and targets (in other words, <u>controls are operations which if not controlled – could result in significant or serous environmental impacts</u>). Operational Controls may include but are not limited to:

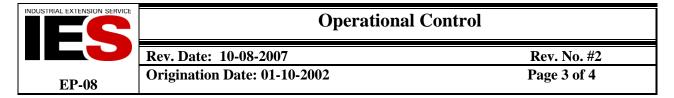
- Process Operator or Environmental Operator Work Instructions, Work Orders, etc
- Construction Control Documents
- Equipment <u>Preventive Maintenance</u> (PM)
- Permits or Regulations can be considered operational controls
- Compliance Assessment Checklists or procedures
- Environmental Manager Guidelines
- Others
- 5.1.2 At least annually, the EMST conducts a review of all plant operations to identify the Operational Controls which are typically associated with the identified significant environmental aspects, aspects associated with legal or other requirements, etc. The list of operational controls may be documented on ER-08A.
 - NOTE: For Simple Facility scenarios, Form EF-03B-pg2 maybe used to document Operatkional Controls
- 5.1.3 Operational Controls will designate operating parameters (psi, temp, flow, etc) if needed in order to properly stipulate the specific control.

5.2 New Projects:

5.2.1 If new projects, products or services (new projects) - can impact the environment – and may potentially affect existing operational controls or may create the need for new operational controls – the EMR will complete Form ER-01C (New Projects Environmental Checklist). If this results in new or modified Operational Controls – they will be listed on Form 08A and the written operational control will be modified as well.

5.3 Contractors

- 5.3.1 Contractors performing on-site operations at <COMPANY NAME> that can result in an environmental impact will follow this procedure except for contractors performing the activities below:
 - Contractor activities and services that are not performed at the Facility/Plant.
 - Contractors performing emergency services.
 - Contractors providing clerical, accounting or other similar administrative services
- 5.3.2 Affected contractors shall read and sign Contractor Environmental Briefing Package (ER-08B). If the work could potentially affect a <u>significant aspect</u> or potentially result in



an Environmental Legal violation, the Contractor shall also complete the Contractor Method Statement (EP- 08C).

- 5.3.3 The EMR or designee will verify ER-08B and if necessary, ER-08C, have been completed.
- 5.3.4 While on-site affected contractors shall conform to the <COMPANY NAME>'s EMS and to all applicable legal and other requirements.
- 5.3.5 Contractors shall maintain records as specified by the EMS and by contract requirements.
- 5.4 <u>Suppliers</u>
- 5.4.1 For the purposes of this procedure a Supplier is any person and/or company who provides any material, object, tool or related that's used by <COMPANY NAME > that can potentially create an impact on the environment.
- 5.4.2 The EMS Team will evaluate the need to communicate EMS procedures, EMS requirements, or other related information to suppliers of materials. If the EMS Team decides to make such communications, the EMR or designee send the supplier a copy of the EMS Supplier Environmental Awareness letter (ER-08D) and verify its completion and return.

6.0 References

ISO 14001-2004; 4.4.6

7.0 Related Procedures

EP-01 Environmental Aspects

EP-03 Objectives/ Targets/ Program

8.0 Records

ER-08A (App	Dendix H) Operational Controls, Contractors and Key Characteristics
EF-03A-pg2	Environmental Targets/Objectives/Programs (optional)
ER-08B	Contractor Environmental Briefing Package
ER-08C	Contractor Method Statement
ER-08D	Supplier Environmental Awareness Form
ER-01C	New Project Environmental Checklist



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9.0 **Revision History**

Revision No.	Description of Change	Page #	Date
1	Title Changes	1	1/10/2005
2	Minor Changes	All	10/8/2007