

Set Operational Controls

What

Operational controls are documented procedures, work instructions, best practices, posted placards, and action plans that cover situations where their absence could lead to deviations from the environmental policy. For instance, without which you might deviate from your commitment to comply with legal requirements or to achieve environmental performance improvement. At least one operational control should be in place for each significant environmental aspect (SEA) to ensure compliance with legal requirements and company policies (e.g., procedures, work instructions or posted placards) or to achieve improvement objectives (i.e., action plans).

Form 9: Links Between SEAs, Goals, Completion Dates, Operational Controls, and Monitoring and Measurement in Section 11 below provides examples of types of operational controls for addressing compliance assurance and environmental improvement objectives.

Document procedures for emergency preparedness and response (EP&R) that describe the “who, what, and when” of:

1. Assessing the potential for accidents and emergencies;
2. Preventing incidents and their environmental impacts;
3. Responding to incidents (emergency plans and procedures);
4. Routine testing of emergency plans and procedures; and
5. Mitigating impacts associated with accidents and emergencies.

Because many EH&S regulatory programs require emergency plans and/or procedures, you probably won't have to start from scratch. Examples of requirements related to EP&R that may apply to you are listed below.

Some facilities address these requirements through Integrated Contingency Plans that combine the requirements of regulatory programs into one consolidated plan. For information about this streamlined approach, and electronic versions of federal government guidance for consolidated plans, visit www.epa.gov/region1/enforcement/epcra/oneplan.html.

Regulatory Driver	Requirement
RCRA	Contingency Plan (LQG), Preparedness and Prevention Plan (LQG and SQG)
CWA	Spill Prevention, Control and Countermeasure Plan (SPCC) and Storm Water Pollution Prevention Plans (SWPPP)
OSHA	Process Safety Management
CAAA	Risk Management Program
EPCRA	Community Right-to-Know Reporting and Coordination with Local and State Emergency Response Committees

Who

The EMS Team ensures that operational controls are adequate and fills any gaps you find with new operational controls.

Why

Your operations and activities that are associated with SEAs must be under control to comply with your environmental policy. Operational controls ensure that operations and activities (such as waste water discharge monitoring, waste management, environmental performance improvement) are carried out effectively.

How

Your facility may already document most of the operational controls you'll need. Even so, it's important to survey your entire facility and its operations to match existing operational controls with your list of SEAs.

Typical Activities and Operational Controls at Metal Finishing Facilities

Activity	Operational Control
Purchase of Raw Materials	<ul style="list-style-type: none">• Subcontractor Requirements• Chemical Inventory Procedure
Raw Material and Waste Storage and Handling	<ul style="list-style-type: none">• Above-ground Tank Inspection• Spill Reporting and Clean-up• Secondary Containment Inspection• Hazardous Waste Area Inspection• Bulk Storage and Containment• Bulk Liquids Transfer• Containerized Material Storage• Hazardous Waste Satellite Accumulation*• Container Labeling*• Empty Container Handling*• Hazardous Waste Operations Procedure• Control of Discharge and Disposal• Waste Consolidation Guidelines• Waste Manifest/Chain of Custody
Shops and Facility Maintenance	<ul style="list-style-type: none">• Environmental Compliance Assessment Checklist• Maintenance and Machine Shop Checklist• Disposition of Fluorescent Bulbs, Batteries, and Mercury Items
Wastewater Management	<ul style="list-style-type: none">• Critical Ranges of Vital WWTP Operational Indicators• Other Wastewater Plant SOPs
Air Quality Management	<ul style="list-style-type: none">• Centralized Air Pollution Control SOPs• Regulatory Reporting Calendar