	Document Number:	COD-OEQ-EMS-009	Revision Number:	2	
	Approved By:	OEQ Managing Director	Effective Date:	12/01/2017	
City of Dallas			ure up to date with ISO 14001:2015		
Document Title:	Operational Controls				

- 1.0 **PURPOSE:** This procedure describes the process for determining, documenting and implementing operational controls.
- 2.0 **SCOPE:** This procedure addresses operations and activities that can have a significant impact on the environment, and applies to City employees engaged in City-related work activities within the EMS fenceline.
- 3.0 **ENVIRONMENTAL:** Utilization of Environmental Management Systems, as appropriate for our operations, to provide a framework for systematically reviewing and reducing our environmental footprint.

4.0 **DEFINITIONS**:

- 4.1 **Operational Controls:** The means by which an organization controls and manages the activities, products and services associated with the significant environmental aspects.
 - 4.1.1 **Administrative Control:** Practices or procedures designed to reduce or eliminate pollution at its source.
 - 4.1.2 **Engineering Control**: Physical devices designed to reduce or eliminate pollution.
- 4.2 **Procedure:** A documented method for completing an activity that emphasizes processes, practices, materials or products that avoid, reduce or control pollution.
- 4.3 **Significant Aspect/Impact:** An environmental aspect that has or can have one or more significant environmental impact(s).
- 4.4 **Work Instruction:** A set of specific, detailed instructions for performing a task or activity that avoids, reduces or controls pollution.

5.0 **RESPONSIBILITY & AUTHORITY**

- 5.1 Department Directors are responsible for control of operations, processes, activities, personnel and equipment within their Department.
- 5.2 The Office of Environmental Quality (OEQ) is responsible for the following:
 - 5.2.1 Assisting with the identification of operational controls, the writing of work instructions, and development of inspection procedures when requested.
- 5.3 Departmental Facility Managers are responsible for the following:
 - 5.3.1 Identifying operational controls required to control process or activities where the absence of a control could lead to pollution or deviation from the environmental policy.

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- 5.3.2 Maintaining operational controls per manufacturer instructions or developed procedures.
- 5.3.3 Establishing work instructions to control significant environmental impacts and/or other activities requiring standardized procedures.
- 5.3.4 Establishing and implementing appropriate inspections.
- 5.3.5 Coordinating with other departments who have responsibilities for maintaining operational controls at their facility.
- 5.3.6 Maintaining a facility list of operational controls.
- 5.3.7 Reviewing inspections and/or operational controls at planned intervals.
- 5.3.8 Ensuring that appropriate and competent facility personnel are trained on operational controls.
- 5.4 The Department Environmental Management Representative (EMR) is responsible for the following:
 - 5.4.1 Providing support to the Departmental Facility Managers to ensure that all applicable operational controls are identified and documented.
 - 5.4.2 Preparing and maintaining the list of departmental operational controls on the City's ISO data management system.

6.0 **PROCEDURES**

- 6.1 Operational controls fall within two categories:
 - 6.1.1 Engineering controls: physical devices, such as berms or oil-water separators, designed to reduce or eliminate pollution.
 - 6.1.2 Administrative controls: practices designed to reduce or eliminate pollution at its source. Administrative controls include work instructions and procedures.
- 6.2 Operational controls may be associated with compliance obligations including legal, regulatory, or other requirements.
- 6.3 Each facility in the EMS will determine and document the current operational controls in operation at the facility and those operational controls that are necessary to control the significant environmental impacts.
 - 6.3.1 Documentation of engineering controls shall include:
 - 6.3.1.1 A description of the control and how it affects the process/equipment

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- 6.3.1.2 Designation of responsibility for maintenance and inspection of the control
- 6.3.1.3 A reference to the maintenance and inspection schedule
- 6.3.1.4 A reference to the maintenance and inspection procedure
- 6.3.1.5 A reference to the training and/or competency requirements for the responsible person.
- 6.3.2 Documentation of administrative controls shall include:
 - 6.3.2.1 Designation of the control as a procedure or work instruction
 - 6.3.2.2 Document identifier of the source control
 - 6.3.2.3 Designation of responsibility for conducting training on the administrative control
 - 6.3.2.4 A reference to competency requirements for City employees or contractors performing the administrative control.
- 6.4 Work instructions will be reviewed with responsible personnel and be posted in an appropriate location near the operation.
- 6.5 Operation controls must be periodically maintained and evaluated. Maintenance, inspection, and training records must be maintained on file for at least three (3) years or as required by regulation or the City's document retention schedule.
 - 6.5.1 The inspections will be documented and performed at a frequency specified in the maintenance procedures.
 - 6.5.2 The designated inspectors will receive appropriate training.
 - 6.5.3 Any issues noted on the inspection will be brought to the attention of a supervisor and corrective action will be performed and documented on the inspection form.
- 6.6 Operational controls shall be documented in the City's ISO data management system.

7.0 **REFERENCES**:

- 7.1 ISO 14001:2015
- 8.0 **RECORDS**:

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8.1 Records will be generated at the Department level and may consist of relevant, procedures, work instructions, inspections, training requirements etc.