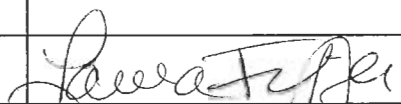




**City of Dallas  
Environmental Management System**



**PROCEDURE FOR OPERATIONAL CONTROLS**

<b>Document Number:</b>	OEQ-EMS-009	<b>Reviewed By:</b>	City wide EMS Core Team
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**1.0 POLICY REFERENCE**

Prevention of pollution at its source through implementation of best management practices and resource conservation measures to reuse, reclaim, and recycle materials we generate.

**2.0 PURPOSE**

This document describes the procedure for determining, documenting and implementing operational controls.

**3.0 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.

**4.0 RESPONSIBILITY & AUTHORITY**

4.1 The Office of Environmental Quality (OEQ) is responsible for the following:

4.1.1 Assisting City Facility's with the identification of operational controls, the writing of work instructions, and development of inspection procedures.

4.2 Facility Managers are responsible for the following:

4.2.1 Identifying operational controls required to control situations where their absence could lead to pollution and/or deviation from the environmental policy.

4.2.2 Maintaining operational controls according to manufacturer instructions or developed procedures.

4.2.3 Establishing work instructions to control significant environmental impacts and/or other activities requiring standardized procedures.

4.2.4 Establishing and implementing appropriate inspections.

**City of Dallas**  
**Environmental Management System**

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- 4.2.5 Coordinating with other Departments who have responsibilities for maintaining operational controls at their facility.
- 4.2.6 Maintaining a facility list of operational controls.
- 4.2.7 Reviewing inspections and/or operational controls at planned intervals.
- 4.2.8 Ensuring that appropriate and competent facility personnel are trained on operational controls
- 4.3 The Department Environmental Management Representative (EMR) is responsible for the following:
  - 4.3.1 Providing support to the Facility Managers to ensure that all applicable operational controls are identified and documented.
  - 4.3.2 Preparing and maintaining the list of departmental operational controls

**5.0 PROCEDURES**

- 5.1 Operational controls fall within two categories:

- Structural controls
- Administrative controls

Structural controls are physical devices designed to reduce or eliminate pollution such as berms or oil-water separators. Administrative controls are practices designed to reduce or eliminate pollution at its source. Administrative controls include work instructions and operating procedures. A work instruction is a general guideline for an activity that emphasizes processes, practices, materials or products that avoid, reduce or control pollution. An operating procedure is a set of specific, detailed, step-by-step instructions for performing a task, including processes, practices, materials or products that avoid, reduce or control pollution.

Operational controls must support and further the City's environmental policy.

- 5.2 Operational controls may also be associated with legal, regulatory, or other requirements.
- 5.3 Each Facility in the EMS will determine the current operational controls in operation at the facility and those operational controls that are necessary to control the significant environmental impacts.

Documentation of structural controls shall include:

- a description of the control
- designation of responsibility for maintenance and inspection of the control

**City of Dallas**  
**Environmental Management System**

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- a reference to the maintenance and inspection schedule
- a reference to the maintenance and inspection procedure
- a reference to the training requirements for the responsible person

Documentation may include a reference to the associated aspect, objective, or activity.

Documentation of administrative controls shall include:

- designation of the control as a procedure or a work instruction
- document identifier of the source control
- designation of responsibility for conducting training on the administrative control
- a reference to competency requirements for city employees performing the administrative control operation

Documentation may include a reference to the associated significant aspect, objective, or activity.

Example documentation for operational controls is provided in Attachment A and B.

- 5.4 Any work instructions will be reviewed with responsible personnel and will be posted in an appropriate location near the operation.
- 5.5 Operation controls must be periodically maintained and evaluated. Maintenance, inspection, and training records must be maintained on file for three (3) years or as required by regulation.
  - 5.5.1 The inspections will be documented and performed at a frequency specified in the maintenance procedures.
  - 5.5.2 The designated inspectors will receive appropriate training.
  - 5.5.3 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.

## **6.0 RELATED DOCUMENTS**

None

## **7.0 DEFINITIONS**

- 7.1 Structural Control – Physical devices designed to reduce or eliminate pollution

**City of Dallas**  
**Environmental Management System**

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- 7.2 Administrative Control – practices designed to reduce or eliminate pollution at its source. Administrative controls include work instructions and operating procedures.
- 7.3 Work Instruction – A general guideline for an activity that emphasizes processes, practices, materials or products that avoid, reduce or control pollution
- 7.4 Operating Procedure – Specific, detailed, step-by-step instructions for performing a task, including processes, practices, materials or products that avoid, reduce or control pollution

**City of Dallas  
Environmental Management System**

Attachment A: Example of Structural Controls Document

Oak Street Service Center Structural Controls

Activity	Aspect	Structural Control	Structural Control Unique ID	Inspection and Maintenance Procedure and Schedule	Inspection and Maintenance Responsibility	Required Training for Responsible Person
Storing Vehicles	Stormwater/Surface Water Discharges	covered storage area with impermeable (concrete sealed with epoxy) floor, local drains are bermed	EBS-SCI-001 <sup>2</sup>	EBS-PRO-001 <sup>1</sup>	Facility Maintenance Supervisor	see Training Matrix EBS-TRN-001
Repairing Vehicles (Mechanical)	Stormwater/Surface Water Discharges	covered shop with impermeable (concrete sealed with epoxy) floor	EBS-SCI-001	EBS-PRO-001	Facility Maintenance Supervisor	see Training Matrix EBS-TRN-001
Repairing Vehicles (Mechanical)	Stormwater/Surface Water Discharges	berms contain designated repair areas	EBS-SCI-001	EBS-PRO-001	Facility Maintenance Supervisor	see Training Matrix EBS-TRN-001
Washing Parts	Wastewater Generation & Disposal	water-based system, parts washers equipped with water recycling system	EBS-SCI-002, EBS-SCI-003	EBS-PRO-002	Facility Maintenance Coordinator	see Training Matrix EBS-TRN-001
Salvaging Parts	Stormwater/Surface Water Discharges	covered shop with impermeable (concrete sealed with epoxy) floor	EBS-SCI-001	EBS-PRO-001	Facility Maintenance Supervisor	see Training Matrix EBS-TRN-001
Salvaging Parts	Wastewater Generation & Disposal	water-based system parts washers equipped with water recycling system	EBS-SCI-002, EBS-SCI-003	EBS-PRO-002	Facility Maintenance Coordinator	see Training Matrix EBS-TRN-001
Salvaging Vehicles	Stormwater/Surface Water Discharges	see Repairing Vehicles, Storing Vehicles	EBS-SCI-001	EBS-PRO-001	Facility Maintenance Supervisor	see Training Matrix EBS-TRN-001
Fueling Vehicles	Spills, Air Emissions	Fueling bay with impermeable floors, vapor recovery nozzles, automatic shutoff, berms	EBS-SCI-004	EBS-PRO-003	Facility Maintenance Supervisor	see Training Matrix EBS-TRN-001
Fueling Vehicles	Spills, Air Emissions, Material Consumption	UST equipped with automatic tanks gauge, secondary containment, vapor monitoring, automatic shut-off, overfill alarm, corrosion protected tank, line-leak detection	EBS-SCI-005	EBS-PRO-004	Facility UST Coordinator	see Training Matrix EBS-TRN-001
Washing Vehicles	Stormwater/Surface Water Discharges	wash bay, equipped with wastewater recycling system, connected to sanitary sewer, sloped and bermed	EBS-SCI-006	EBS-PRO-005	Facility Maintenance Coordinator	see Training Matrix EBS-TRN-001
Washing Equipment	Stormwater/Surface Water Discharges	wash bay, equipped with capture and reuse system, connected to sanitary sewer, sloped and bermed	EBS-SCI-007	EBS-PRO-006	Facility Maintenance Coordinator	see Training Matrix EBS-TRN-001
Stormwater management	Stormwater/Surface Water Discharges	oil/water separator	EBS-SCI-008	EBS-PRO-007	Facility Stormwater Coordinator	see Training Matrix EBS-TRN-001
Stormwater management	Stormwater/Surface Water Discharges	storm interceptor	EBS-SCI-009	EBS-PRO-008	Facility Stormwater Coordinator	see Training Matrix EBS-TRN-001
Stormwater management	Stormwater/Surface Water Discharges	sand trap	EBS-SCI-010	EBS-PRO-009	Facility Stormwater Coordinator	see Training Matrix EBS-TRN-001

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**City of Dallas**  
**Environmental Management System**

Attachment B: Example Administrative Control Document

Oak Street Service Center Administrative Controls

Activity	Aspect	Administrative control	Document ID	Training and Review Responsible Party	Operational Responsibility
Storing Vehicles	Stormwater/Surface Water Discharges	Work Instruction	EBS-PRO-010	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Mechanical)	Stormwater/Surface Water Discharges, Spills	Work Instruction	EBS-PRO-011	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Mechanical)	Stormwater/Surface Water Discharges, Spills	Operating Procedure	EBS-PRO-012	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Electrical)	Stormwater/Surface Water Discharges, Spills	Work Instruction	EBS-PRO-013	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Electrical)	Stormwater/Surface Water Discharges, Spills	Operating Procedure	EBS-PRO-014	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (AC)	Stormwater/Surface Water Discharges, Spills, Air Emission	Work Instruction	EBS-PRO-015	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (AC)	Stormwater/Surface Water Discharges, Spills, Air Emission	Operating Procedure	EBS-PRO-016	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Electronics)	Material Consumption	Work Instruction	EBS-PRO-017	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Electronics)	Material Consumption	Operating Procedure	EBS-PRO-018	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Fuel)	Air Emission, Spills	Work Instruction	EBS-PRO-019	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Fuel)	Air Emission, Spills	Operating Procedure	EBS-PRO-020	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Body)	Air Emission, Spills	Work Instruction	EBS-PRO-021	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Body)	Air Emission, Spills	Operating Procedure	EBS-PRO-022	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Brakes)	Air Emission, Exposures/Injuries	Work Instruction	EBS-PRO-023	Senior Mechanic	Mechanics (All Grades)
Repairing Vehicles (Brakes)	Air Emission, Exposures/Injuries	Operating Procedure	EBS-PRO-024	Senior Mechanic	Mechanics (All Grades)
Washing Parts	Stormwater/Surface Water Discharges, Spills, Air Emission	Work Instruction	EBS-PRO-025	Senior Mechanic	Mechanics (All Grades)
Salvaging Vehicles	Stormwater/Surface Water Discharges, Spills	Work Instruction	EBS-PRO-026	Senior Mechanic	Mechanics (All Grades)
Battery Maintenance	Wastewater Generation & Disposal, Material Consumption	Work Instruction	EBS-PRO-027	Senior Mechanic	Mechanics (All Grades)
Parts Requisition	Material Consumption	Work Instruction	EBS-PRO-028	Senior Mechanic	Purchasing Coordinator
Administration and Paperwork	Material Consumption	Work Instruction	EBS-PRO-030	All facility personnel	All facility personnel
General Materials Use/Recycling	Material Consumption	Work Instruction	EBS-PRO-031	All facility personnel	All facility personnel

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