




# Sterling Chemical Malta Ltd

## PROCEDURE: DEVELOPMENT OF OPERATIVE CONTROL PROCEDURES

### REVISION HISTORY

Revision Date	Revision Number	Sections affected	Change description
22.01.2014	00		First issue

Procedure Number: <b>MPA_4.4.6</b>	Edited by: <b>RDOC</b>	Revision by: <b>RSGA</b>	Approved by: <b>Top Management</b>
Pagina 1 di 4			

 Sterling Chemical Malta Ltd	PROCEDURE	Procedure Number: MPA_4.4.6
Date issue: 22.01.2014	DEVELOPMENT OF OPERATIONAL CONTROL PROCEDURES	Revision 00
		Page 2 of 4

## 1. PURPOSE

By developing operational control procedures for critical activities [i.e., those activities associated with significant environmental aspects (EMSs)], Sterling Chemical Malta Ltd intends to mitigate and control, to the extent possible, the environmental impacts associated with its SEAs

## 2. SCOPE

Documented procedures also called operational control procedures should be established where the absence of procedures could lead to deviations from the environmental policy (including the commitments to compliance and pollution prevention) or from your objectives and targets. Determining which operations should be covered by documented procedures and how those operations should be controlled is a critical step in designing an effective EMS. Remember that you might need operational controls to manage that SEAs have legal requirements, regardless of whether you established objectives and targets for each of them.

## 3. DEFINITIONS

*SEA*: Significant Environmental Aspect

*EMS*: Environmental Management System

*HSE Committee*: Health, Safety and Environmental Committee

*RSQA*: Environmental Management Representative


*RDOC*: Responsible of Documentations and Communications

## 4. REFERENCE DOCUMENTS

MDA_4.2	Environmental policy
MPA_4.3.1	Environmental aspects
MPA_4.3.2	Legal Requirements and other requirements
MPA_4.4.2	Training
MPA_4.6	Management Review

## 5. RESPONSIBILITY

*RDOC*: Responsible of Documentation and Communications of the Environmental Management System has the task to periodically check the evolution of the environmental aspects and intervene by proposing new operational control procedures

	Sterling Chemical Malta Ltd	PROCEDURE	Procedure Number: MPA_4.4.6
Date issue: 22.01.2014	DEVELOPMENT OF OPERATIONAL CONTROL PROCEDURES	Revision 00	
		Page 3 of 4	

## 6. PROCEDURE

### 6.1 Draft operational controls

- The HSE committee, with additional input from other employees as needed, carries out a root cause analysis of each SEA to determine the underlying cause(s) of the environmental impact. As part of the root cause analysis, the committee will determine the need for (and adequacy of, if already existing) operational control procedures to control the critical activities related to the and record findings on Form MMA\_4.4.6-A. The HSE committee, with input from operations managers as needed, will also select one or more indicators for the purposes of monitoring Sterling environmental performance related to each SEA.
- Where there is a need to create or modify an operational control procedure, the HSE committee assigns a member of the HSE committee to draft an operational control procedure, with input from the employees who undertake that procedure. Where possible, environmental controls will be integrated into existing operational control procedures. In other cases, a new procedure will be written. The operational control procedure will be issued as a “Work Instruction,” (that is, a summary list of required steps or measures). In addition to describing the steps necessary to carry out the particular activity in an environmentally sound manner, the work instruction will include steps to conduct monitoring, as applicable.
- After the operational control procedure has been developed and implemented, its status is recorded as such on Form MMA\_4.4.6-A. The procedure itself is entered into the relevant Sterling Chemical Malta Ltd operator’s handbook and/or is posted at the site of the activity in question. It is also listed in the EMS manual, or included in it, as a procedure related to the EMS.

## 7. RECORDS

Records shall be retained consistent with the Procedure for Environmental Records

## 8. APPENDIX

[Appendix 1 Register operational control procedures \(MMA\\_4.4.6-A\)](#)



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FORM - draft

Form Number  
MMA\_4.4.6-A

## REGISTER OPERATIONAL CONTROL PROCEDURES

Revision 00

Page 4 of 4

Date of issue: 22.01.2014

SEA	Measurement Indicator(s)	Associated Job Functions	Existing Operational Control Procedures	Operational Control Procedures Development/ Modification Needed	Person Responsible/ Status	Location Posted