



Draft: Element 5 – Operating Procedures

1. **Intent of the SEMS Element:** The organization develops and implements written operating procedures for the conduct of safe and environmentally sound activities.
2. **Audit Objectives:** Verify that components for the development of written operating procedures have been established, implemented and maintained and are suitable, adequate and effective in meeting the element requirements.

Key Principles:

- Components are established.
- Components are implemented and maintained.
- Components are suitable, adequate and effective.

3. Key Questions:

- a) What components have been established, implemented, and maintained for the development of written operating procedures?
- b) What components have been established, implemented, and maintained to ensure that there are written operating procedures for each operation addressed in the SEMS program?
- c) Do the written operating procedures cover the topics required by the regulation (§250.1913(a1) – (a12))?
- d) How are the written operating procedures made accessible to employees involved in related operations?
- e) What components have been established, implemented, and maintained for the review of the operating procedures at a specified frequency.
- f) What components have been established, implemented, and maintained to ensure that when changes are made to your operations, the operating procedures are updated to reflect the change?
- g) What components has been established, implemented, and maintained to ensure that when changes are made to your operations, personnel are informed of the change?
- h) Identify people accountable and responsible for implementing and maintaining the components established in Questions a-g and verify through sampling that they have the knowledge of the components.