




ENVIRONMENTAL PROCEDURE

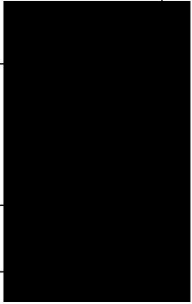
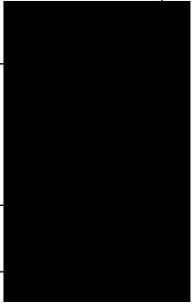
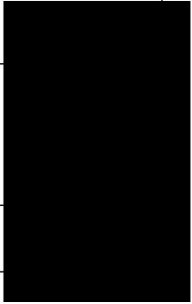
POLLUTION PREVENTION AND PREVENTATIVE MAINTENANCE

EP12

APPROVALS

 Date: 19/04/21

Quality & Environmental Manager, Management Representative

Rev	Revision Date	Description of Change	Originator
2	11/01/17	Significantly updated to include new ISO14001:2015 standard requirements	
3	19/11/20	Updated QHSE Manager to QHSE Manager. Updated HR Manager to relevant Department Manager. Removed reference to vehicle deliveries times Removed reference to Head of Operations	
4	19/04/21	Include latest Severn Trent consent level compliance and process to ensure thresholds are not exceeded	

This procedure defines the mechanism for controlling any adverse (potential) environmental impacts caused by air, water and land pollution or waste as a result of our activities, products and services and the steps necessary to ensure regular inspections, maintenance and repairs are carried out on obligatory production and facility machinery.

1 Documentation

6.3-4-3 Service Contract Log

External Contractors service documentation

EP08/01 Green Alert Form

Site Drainage Plans

Monitoring Data and Maintenance Records – consents & permits including noise levels

H&S Hazardous Material Approval & Control Procedure (H&S)

COSHH data, Policy and Guidelines & Safety Check Records

Spill Procedure Sign

Chemical Storage procedure

Sump check

2 Responsibility

The QHSE Manager and relevant Department Managers shall identify and evaluate all actual, normal, abnormal and potential pollution.

The Plant Engineer has overall responsibility for keeping all plant and equipment involved in site maintenance functioning at optimal performance.

Production Manager delegates day-to-day responsibilities to the Engineers and the Plant Supervisor.

Production/Machine Operators carry out specific routine checks and cleaning operations.

The relevant Department Manager shall maintain appropriate training records

3 Pollution Prevention

Minimising or mitigating pollution shall be evaluated by assessing risks, compliance obligations and significant aspects. Non-compliances shall be reported via the Green Alert Form, and an appropriate corrective action plan or environmental improvement programme shall be devised. If there is likely to be an effect on the local area, the regulatory authority shall be informed immediately. Where equipment adjustment does not prevent excessive emissions, the equipment shall be immediately shut down. All projects shall be evaluated for their potential to generate pollution. In the event of a significant alteration in volume, rate/content or waste, the QHSE shall be informed and consult with the appropriate regulatory body.

3.1 Land Management

The risk of soil and groundwater contamination shall be minimised by periodic inspections and maintenance of internal and external areas and pipelines, drains, drain interceptors, waste storage facilities, underground tanks/pits, sumps, bunded areas holding hazardous substances and cut off systems.

3.2 Air Emission

Air emissions can include all direct and indirect air emissions

- Direct (From onsite operation)
 - Dust – Dust arising from material processing is vented by an extraction system. This is under periodic maintenance and a servicing contract
 - VOCs - All activities using solvents shall be carried out in accordance with operating instructions

or local procedures to minimise use. Containers such as IBCs that store solvents shall be kept closed and away from the building when not in use within the appropriate storage area/bunds. Extraction units are installed over lines to prevent build up of VOCS in production area. These are serviced by external contractors.

Ozone depleting substances - All ozone depleting substances containing equipment shall be identified and recorded. Systems containing over 3 kg of ozone depleting substances are serviced on an annual basis and records maintained

Start up/Shut down, malfunction or breakdown of equipment - There are no adverse impacts. All plant, equipment or pipelines which control air emissions, or which may give rise to air emissions as a result of malfunction, shall be operated in accordance to manufacturers' instructions, inspected and maintained as per service contracts.

Vehicle exhaust emissions – From fleet

- Indirect (from onsite operations)
Greenhouse gases – From electricity use
Vehicle exhaust fumes – From delivery vehicles use
Fire emissions – From a potential emergency situation

3.3 Noise Management

Production noise levels shall be monitored and controlled.

4 Water Management

- A drainage plan detailing surface water and foul drains is maintained.
- Surface water drains are marked up a direction arrow indicating flow of water. Sewerage drains are marked with red paint. Where applicable, staff and contractors will be given instructions and a copy of the drainage map to ensure they understand the requirements on discharges to the sewer and surface water channels.

(BLUE) No discharge to surface water drains other than surface water

(RED) No discharges to the foul sewer other than sanitary and process wastewater. No waste oil, solvents or chemicals shall purposely be allowed to enter the drains.

Compliance with regulatory requirements, including requests for information, as well as meeting discharge limits and monitoring requirements shall be met and recorded. Refer to the discharge consent letter for threshold limits.

On request, wastewater and surface water analytical data will be submitted to the regulatory bodies. EA, Local Authority or Seven Trent consents that are required and granted, must conform to such consent conditions and shall be evaluated and demonstrated by the sampling and analysis as required. All communications with regulatory bodies shall be conducted in accordance with the EP06 Communications procedure.

Discharge consent threshold samples are taken at a minimum of every six months and sent to a verified external laboratory for testing. Results are recorded on the chart for wastewater spreadsheet. If any threshold levels are exceeded the cells will turn red to immediately raise a non-conformance. Non-conformances are raised and actioned via the Green Alert system.

5 Preventative Maintenance

Inspection, maintenance and repair programmes are scheduled and carried out on machinery/equipment to ensure optimum efficiency, minimize energy consumption and mitigate potential pollution. The integrity of the bunded area and sump are visually inspected during regular housekeeping audits.

5.1 Inspection, Maintenance and Repair

The Plant Engineer shall arrange to inspect and maintain all major production machinery according to the manufacturer's recommendations, in-house written maintenance procedures and associated environmental risks. Refer to 6.3-4-3 Service Contract Log for a list of relevant equipment.

Production/Machine Operators shall carry out any mandatory safety checks, in addition to any routine cleaning and operator checks according to the manufacturer's recommendations.

Breakdowns and minor machine problems shall be reported to the appropriate Manager or Supervisor. If there has been any detrimental impact on the environment it shall be reported to the QHSE as a non-conformance and a Green Alert Form completed.

6 Monitoring and Measurement & Records

The Plant Engineer, Plant Supervisor and Production Managers shall maintain appropriate training, schedules and servicing records to identify trends including:

- Date inspections were carried out on an individual piece of equipment or facility
- Maintenance / repairs that were identified
- Date repairs were undertaken

Hazardous Material Management

All hazardous materials are assessed and managed by the Production Manager and requests for new hazardous material are processed/reviewed as per H&S Hazardous Material & Control Procedure.

Chemical storage procedures and spills procedures are located by the chemical store.