

		CORRECTIVE ACTION TIMING PLAN				BUSINESS UNIT :- Pontypool Site											HSE 0064 & HSE 0065 January 2022	
						CHAMPION :- Shane Thomas												
OWNER :- S. Thomas ----- Phone :- 4178		SUBJECT :- Corrective actions ref. ISO 14001 issues 2022														DATE :- 20/01/2022		
																Last update :- 25/01/2023		
No.	ELEMENT	CONCERN	CORRECTIVE ACTION	Resp.	Target Date	Initiated	10%	20%	30%	40%	50%	60%	70%	80%	90%	100%	Action Complete	COMMENTS
1	Legislative compliance	Compliance with IPPC permit conditions	Provide annual usage figures for effluent, water waste & energy for 2021 to the NRW	ST	Feb '22												Jan '22	Information submitted
2	Legislative compliance	Compliance with IPPC permit conditions	IC4 - Review emission of zinc released via the V-notch to reduce levels to benchmarks noted in section 3.2.2 of the Agency Guidance Note IPPC S2.07	ST	Feb '22												Jan '22	Information submitted
3	Legislative compliance	Compliance with IPPC permit conditions	IC6 - Undertake an assessment of the energy management improvement measures on site	ST/NJ	Jul '22												Jul '22	Energy team meets weekly to discuss and focus on energy savings
4	Legislative compliance	Compliance with IPPC permit conditions	Conduct stack emissions monitoring for the zinc nickel plant and anodise plant.	ST	May '22												May '22	Monitoring completed - awaiting report
5	Legislative compliance	Compliance with IPPC permit conditions	Provide NRW with completed Annual Pollution Inventory for the site with 2021 data	ST	Mar '22												Mar '22	Data provided via online portal
6	General	Chemical Management	Investigate system to pump chemicals into the tanks without having to manually lift them onto the catwalk.	SW	Sep '22													Hydrochoric acid - completed. Project ongoing with other chemicals
7	General	Control of dangerous weeds	Continued treatment of japanese knotweed on site.	NJ	Dec '22												Dec '22	Drumbrake facory and land sold
8	Ground Contamination	Current site contamination from past processes	Continue with the remediation of chlorinated solvent contamination with the TRW Remediation Team Arcadis	ST	Dec '22												Dec '22	Project ongoing to Arcadis Remediation timing plan. All works completed for 2022 completed to plan.
9	General	Emergency planning	Plan a fire evacuation for Q2 2021 accross all 3 shifts	ST	Jul-21												Jul-21	
10	Energy Management	Energy Monitoring/reduction	Develop energy (Electrical) KPIs for the each cell - Collect base line data for energy usage in each cell.	ST/NJ	Aug '22													This is proving difficult as the submetering system requires improvement and also the visibility of cell production data
11	Energy Management	Energy Monitoring/reduction	Improve control and flexibility in terms of compressed air	CH/NJ	Dec '22												Dec '22	Several low level isolation valves installed to allow equipment to be isolated when not being used in prodction
12	Energy Management	Energy Monitoring/reduction	Reduce air leaks by removing old/redundant equipment	CH/NJ	Dec '22												Dec '22	This is a long term issue that is ongoing - Equipment removed as it becomes redundant. Services removed at the same time.
13	Energy Management	Energy Monitoring/reduction	Identify and remove redundant compressed air pipe work	CH/NJ	Dec '22												Dec '22	This is a long term issue that is ongoing - Twilight valve fitted to isolate machine shop from assembly when required. Removed as identified and when relevent
14	Energy Management	Energy Monitoring/reduction	Continue energy team to review sub metering data to target improvements	AW	Dec '22													This is a long term issue that is ongoing - several meters returned to working order in 2022 but some on-going issued

		CORRECTIVE ACTION TIMING PLAN					BUSINESS UNIT :- Pontypool Site										HSE 0064 & HSE 0065 January 2022	
							CHAMPION :- Shane Thomas										DATE :- 20/01/2022	
OWNER :- S. Thomas ----- Phone :- 4178		SUBJECT :- Corrective actions ref. ISO 14001 issues 2022															Last update :- 25/01/2023	
No.	ELEMENT	CONCERN	CORRECTIVE ACTION	Resp.	Target Date	Initiated	10%	20%	30%	40%	50%	60%	70%	80%	90%	100%	Action Complete	COMMENTS
15	Energy Management	Energy Monitoring/reduction	Review Machine shutdown procedures to maximise energy saving when not in use	ST/AW	Jul '22												Jul '22	Machine shutdown procedures in place but are continually being refined to achieve better energy savings
16	Energy Management	Energy Monitoring/reduction	Use sub metering to improve Energy Profile for the site	ST	Oct '22													Use of Power BI to help visualise the issues Several issues with the SMARTSET meters identified
17	Energy Management	Energy Monitoring/reduction	Re-look at viability of localised boiler units for process plants – Combined heat and power unit	AW/NJ	Dec '22													Project on hold until 2026 due to upgrades to the powergrid by Western Power. Unable to connect CHP unit to the grid Alternative options being considered.
18	Ground Contamination	Ground contamination prevention	Inspect interceptor for oil contamination & clean out if necessary	NJ	Jul '22												Jul '22	Visual inspection of the interceptor from road level.
19	General	Hazardous materials management	Document periodic visual inspections carried out on Asbestos Containing Materials.	NJ	Jun '22												Jun '22	2022 Asbestos survey carried out
20	General	Housekeeping throughout the site	Continue with the 5C/Housekeeping improvement projects in each business.	All	Dec '22												Dec '22	Continual item each year
21	General	Information knowledge	Conduct annual MWF refresher training - Information leaflet on MWF to be issued to employees - review document to ensure it remains relevant	ST	Oct '22												Oct '22	
22	General	Legionella Management	Carry out remedial works in line with the 2021 Legionella risk assessment	NJ	Jun '22												Jun '22	
23	General	Legionella Management	Remove redundant water pipe work to reduce dead ends, etc	NJ	Dec '22												Dec '22	Removed as identified and when relevent
24	Legislative compliance	Nuisance	Conduct internal noise survey	ST	Oct '22													
25	Legislative compliance	Nuisance	Conduct external noise survey	ST	Oct '22													
26	Waste Management	Quantity of sludge tankers required	Re-investigate capacity of the filter presses to improve filter cake production and reduce req ^{mt} for sludge tankers	ST/NJ	Nov '22													Quote for new filter press obtained. Business case required to obtain CAPEX spend. Project placed on
27	General	Site Management	Develop a Drumbrake closure plan to ensure that the closure and removal of equipment takes environmental issues into account	ST/SJ	Dec '22												Dec '22	Factory emptied and TBC permits surrendered
28	Waste Management	Waste Management	Review waste streams to determine further opportunities to reuse/reduce/recycle	ST	Dec '22												Dec '22	
29	Waste Management	Waste Management/reduction	Review the procedure for the waste yard to ensure wastes are handled correctly	ST/NJ	Jul '22												Dec '22	
30	Waste Management	Waste Management/reduction	Investigate reduction in chemical container waste	ST	Aug '22													HCL carboys replced with IBC delivery system. Project on-going Other carboys are under review
31	Waste Management	Water usage & effluent produced	Determine cost to remove regeneration plant for zinc process	NJ	Dec '22												Dec '22	Zinc plant is now moth balled and will be decommissioned when funds become available.

		CORRECTIVE ACTION TIMING PLAN				BUSINESS UNIT :- Pontypool Site										HSE 0064 & HSE 0065 January 2022					
						CHAMPION :- Shane Thomas										DATE :- 20/01/2022					
OWNER :- S. Thomas ----- Phone :- 4178		SUBJECT :- Corrective actions ref. ISO 14001 issues 2022																		Last update :- 25/01/2023	
No.	ELEMENT	CONCERN	CORRECTIVE ACTION	Resp.	Target Date	Initiated	10%	20%	30%	40%	50%	60%	70%	80%	90%	100%	Action Complete	COMMENTS			
32	Waste Management	Waste Monitoring/reduction	Reinvestigate potential to recycle plastic tray packaging	ST/SJ	Dec '22												Dec '22	Some recycling opportunities but it is dependent upon the tray and plastic used. Each load is assessed prior to disposal.			
33	Waste Management	Waste Monitoring/reduction	Investigate why the zinc nickel plating solution waste is being produced and take the necessary actions to eliminate/reduce this waste stream.	AW	Dec '22												Dec '22	Due to proces inefficiencies whilst on six tanks. No current solution available - Chemical supplier has been involved in the discussion regarding options/alternatives 37% reduction in waste achieved			
34	Energy Management	Energy Monitoring/reduction	Review reports can be generated by the new sub metering software so that the data can be used to prioritise actions.	AW	Jul '22												Jul '22	Use of PowerBI software to collate information and assist in highlighting energy issues			
35	Energy Management	Energy Monitoring/reduction	Improve temperature control of the Zinc nickel plating tanks – reduction in use of the chiller	CH	July '22												July '22	5 out 6 tanks on auto temp. control valves. Chiller pipework modified to include a return loop to prevent the chiller dead heading when there is no flow through the system. ACTION ONGOING			
36	Waste Management	Waste Monitoring/reduction	Review briquetting of cast iron swarf to investigate if all cast iron swarf can be briquetted	PT	Dec '22													80% of cast iron swarf is now briquetted			
37	Waste Management	Waste Monitoring/reduction	Review method for disposal of the filter paper	ST	Dec '22												Dec '22	Waste is becoming problematic for disposal			
38	Waste Management	Waste Monitoring/reduction	Review the use of filter paper media to clean coolant in machines	CH	Dec '22												Dec '22	2 new SW machine delivered 2021 with paperless filtration system Cost to retrofit existing machines prohibitive at present			
39	Waste Management	Waste cost reduction	Review the process to determine if there are alternative options to disposing of the various waste streams	ST	Sep '22												Sep '22				
40	Legislative compliance	General System Management	Check if the policy has been updated since 2018. If so obtain a copy of any new policy documents and display on site.	ST	Mar '22												Mar '22	No policy update since the 2018 version			
41	Legislative compliance	Nuisance	Identify and train person to carry out the internal and external noise survey	ST	Jun '22												Jun '22				
42	Waste Management	Waste Monitoring/reduction	Determine if there is a need to drop the Zn Ni rinse tanks every time we do weekly maintenance on the process	AW	May '22												May '22	Tanks are assessed for cleanliness before dropping.			
43	Ground Contamination	Current site contamination from past processes	Check with ZF Remediation Project Co-ordinator in relation to the project end	ST	Apr '22												Apr '22	Remediation programme accelerated due to the sale of the drumbrake factory. Program should be completed by the end of 2023.			
44	General	Energy Monitoring/reduction	Development of a 5 year energy improvement plan	ST/SJ	Jul '22												Jul '22				