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## **SIMEC Uskmouth Power Station Environmental Management System**

### **MANAGEMENT REVIEW FOR 2018**


The Management Review of the Environmental Management System at SIMEC Uskmouth Power by Senior Managers, Engineers and the Environmental Management Group on 30<sup>th</sup> April 2019.

Present:

Required:		Plant Manager
		Environmental Manager
		Environmental Officer
		Environmental Administrator
		Fuel and Plant Performance Engineer

Uskmouth has had accreditation for its Environmental Management system (EMS) and Integrated Management System (IMS); however, this was allowed to lapse due to uncertainty in the plants future. The Intention of this review is to determine how best to re-inforce the non-accredited EMS currently available and to determine whether there is an advantage to striving for formal accreditation.

Atlantis Energy has taken over ownership of the Uskmouth Power Station through a reverse merger with SIMEC, they have rebranded and are now registered as SIMEC Atlantis Energy (SAE). SIMEC Uskmouth Power (SUP) the power station is a wholly owned subsidiary of SIMEC Atlantis Energy.

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The major environmental milestones/issues for 2018 were;

- Removal of coal stock from site
- Dust control from coal and ash movements.
- Change of ownership and associated administrative updating of permits and licencing.
- Introduction to waste derived fuel (energy pellet) and SUP conversion to burn this fuel.
- Small scale combustion trial of energy pellet.


The major environmental milestones/issues for Q1 2019 are;

- December monthly emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 28<sup>th</sup> January)
- 2018 annual emissions report (EPR/LP3131SW Schedule 4, table S4.3 NRW due 28<sup>th</sup> January)
- Annual environmental report on performance and activities ((EPR/LP3131SW Condition 4.2 Reporting 4.2.2, NRW due 31<sup>st</sup> January)
- EU ETS stage 2 verification Audit (BSI due 28<sup>th</sup> January 2019)
- EU ETS update Registry with Verification Report (NRW due 11<sup>th</sup> March 2019)
- EU ETS Surrender allowance to EU Registry account (EU Registry 2448 allowance need to be purchased prior to 26<sup>th</sup> March 2019)
- Pollution Inventory report (NRW 31<sup>st</sup> March)

The major Project milestones/issues for 2019

are;


- Fuel pellet development (density, particulate size and pellet manufacturing Plant).
- Environmental Planning and Permitting (EPP)
- Major ecology surveys to support this project.
- Stage 1 Front End Engineering Design (FEED).
- Project Financial decision.

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**Management System Review**

<b>REVIEWED BY:</b> <b>MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL GROUP</b>			<b>DATE: 30/04/2019</b>
<b>REVIEW ISSUE: ENVIRONMENTAL POLICY</b>	<b>OK</b>	<b>Improve</b>	
Relevant to nature, scale, environmental impact	Y		
Committed to continual improvement	Y		
Committed to prevention of pollution	Y		
Committed to compliance with legal and other requirements	Y		
Provides for setting objectives and targets	Y		
Communicated to employees	Y		
Publicly available	Y		
<b>Comments:</b> <p>The policy has been reviewed and remains fit for purpose.</p> <p>Will be reviewed in light of new fuel</p>			
<b>Improvements:</b> <p>None Required</p>		<b>Action:</b> <p>Complete</p>	




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<b>REVIEW ISSUE: DOCUMENT CONTROL</b>	<b>OK</b>	<b>Improve</b>	
Relevant & up to date	Y		
Periodically reviewed, revised, approved		Y	
Available to all staff	Y		
Obsolete documents removed from use		Y	
Obsolete documents retained when necessary		Y	
Procedures and responsibilities established	Y		
<b>Other Issues:</b>  All site documents (LMI's, Opps instructions etc) are currently being reviewed and revamped into the Integrated Management System (IMS). This will also bring in all the relevant generation procedures, risk standards etc.			
<b>Improvements:</b>  Updating to an Integrated Management System (IMS) as the conversion continues  Roll out the new document library to site, when the document overhaul process is complete.		<b>Action:</b>  Document Administrator	

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<b>REVIEW ISSUE: EMS MANUAL</b>	<b>OK</b>	<b>Improve</b>	
Format, relevant & Up-to-date	Y		
Communicated internally	Y		
Collates policy, objectives & Targets and programme	Y		
Documents key roles & responsibilities	Y		
Provides direction to related documentation	Y		
Covers incident & emergencies	Y		
<b>Comments:</b> IMS will replace EMS manual			
<b>Improvements:</b> None Required		<b>Action:</b> None Required	


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<b>REVIEW ISSUE: LEGAL AND OTHER REQUIREMENTS</b>	<b>OK</b>	<b>Improve</b>	
Procedure	Y		
Relevant and up to date		Y	
Communicated internally as appropriate	Y		
Includes compliance	Y		
<p><b>Other Issues:</b></p> <p>All needs to be reviewed in light of new fuel</p> <p>Recent audits have identified issues with the environmental register of legislation.</p>			
<p><b>Improvements:</b></p> <p>Being assessed by External company and updates will be supplied</p>		<p><b>Action:</b></p> <p>Environmental Manager</p>	


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<b>REVIEW ISSUE: ENVIRONMENTAL ASPECT EVALUATION</b>	<b>OK</b>	<b>Improve</b>	
Relevant and up to date	Y		
Uskmouth Power Station ability to control	Y		
Availability internally	Y		
Incorporated into the EMS	Y		
<b>Comments:</b> All needs to be reviewed in light of new fuel Some of the legislation stated in significant environmental aspects is out of date.			
<b>Improvements:</b> To be reviewed against register of legislation		<b>Action:</b> When register complete	




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<b>REVIEW ISSUE: EXTERNAL COMMUNICATION</b>	<b>OK</b>	<b>Improve</b>	
Procedures established	Y		
Communication documented	Y		
Responses documented	Y		
Effective tracking	Y		
Public reporting	Y		
<b>Comments:</b> <p>All needs to be reviewed in light of the conversion project</p> <p>Regular communication in place with our statutory regulators, contractors, Severn Power, NGC, EMC and local community.</p>			
<b>Comments:</b> <p>None Required</p>		<b>Action:</b> <p>None Required</p>	

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<b>REVIEW ISSUE: INTERNAL COMMUNICATION</b>			<b>OK</b>		<b>Improve</b>
Between Levels-	Relevant		Y		
	Effective		Y		
	Responsive		Y		
Between Departments-	Relevant		Y		
	Effective		Y		
	Responsive		Y		
<p><b>Comments:</b></p> <p>All needs to be reviewed in light of conversion project</p> <p>The monthly SHE meeting incorporates Environmental section, and representatives from all site departments and site term contractors are required to attend and participate.</p> <p>Risk boards in place and updated.</p>					
<p><b>Improvement:</b></p> <p>None Required</p>				<p><b>Action:</b></p> <p>None Required</p>	

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<b>REVIEW ISSUE: TRAINING AND AWARENESS</b>				<b>OK</b>	<b>Improve</b>
Awareness Training	Relevant	Y			
	Effective	Y			
Task Related Training	Relevant	Y			
	Effective	Y			
Staff at levels aware of:					
Importance of conformance with procedures				Y	
Environmental impacts of activities				Y	
Roles & Responsibilities				Y	
Consequence of departure from procedure				Y	
Procedure for identifying training needs					Y
Training for specialised EM function					Y
Training of contractors				Y	
<b>Comments:</b> <p>All needs to be reviewed in light of new fuel and conversion</p> <p>Updating from 14001:2004 to 2015 and training done as required.</p> <p>The Instinct training package is used for basic environmental training on site and currently all staff and contractors are required to undertake a refresher course on what is considered to be the six most relevant topics.</p>					
<b>Improvement:</b> <p>None Required</p>				<b>Action:</b> <p>None Required</p>	

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<b>REVIEW ISSUE: SETTING OBJECTIVES AND TARGETS AND THE MANAGEMENT PROGRAMME</b>	<b>OK</b>	<b>Improve</b>	
At each function and level		Y	
Reflect legal requirements	Y		
Reflect environmental aspects		Y	
Reflect business requirements		Y	
Reflect views of interested parties		Y	
Consistent with environmental policy	Y		
Communicated internally		Y	
Covers improvements		Y	
Methodology for addition of new items		Y	
Methodology for amending targets		Y	
<b>Comments:</b> <p>All needs to be reviewed in light conversion</p> <p>Uskmouth Power Station achieved high standards of performance in Safety Health and Environmental management. The Organisational review will incorporate 14001 into the IMS system.</p>			
<b>Improvement:</b> <p>None Required</p>	<b>Action:</b> <p>None Required</p>		

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<b>REVIEW ISSUE: NON-CONFORMANCE AND CORRECTIVE PREVENTATIVE ACTION</b>	<b>OK</b>	<b>Improve</b>	
Do Uskmouth Power determine the cause?	Y		
Is corrective action planned?	Y		
Is corrective action monitored?	Y		
Are changes documented	Y		
Under the control of the environmental management team?	Y		
<b>Comments:</b> All needs to be reviewed in light of new fuel and conversion			
<b>Improvement:</b> None Required	<b>Action:</b> None Required		

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<b>REVIEW ISSUE: INTERNAL AUDIT</b>	<b>OK</b>	<b>Improve</b>	
Present position		<b>Y</b>	
Outstanding recommendation	Y		
Audit methodology & protocols	Y		
Effective reporting and follow up		<b>Y</b>	
Aid to continuous improvement	Y		
Auditors independence	Y		
Audit resources	Y		
<b>Comments:</b> All needs to be reviewed in light of new fuel and conversion			
<b>Improvement:</b> Lead Auditor Training to be provided		<b>Action:</b> Environmental Manager and Environmental Officer	


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<b>REVIEW ISSUE: EMERGENCY PREPAREDNESS AND RESPONSE</b>	<b>OK</b>	<b>Improve</b>	
Covers environmental aspects	Y		
Communicated internally	Y		
Subject to review and continuous improvement	Y		
Incident response equipment		Y	
Testing		Y	
<b>Comments:</b> All needs to be reviewed			
<b>Improvement:</b> Evaluate if equipment provided are still valid Evaluate the number of Incident/emergency exercises.		<b>Action:</b> Health and Safety Officer	


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<b>REVIEW ISSUE: MONITORING AND MEASUREMENT</b>		<b>OK</b>	<b>Improve</b>		
Present position		Y			
Documented		Y			
Planned		Y			
Recorded		Y			
<b>Comments:</b> All needs to be reviewed in light of conversion Reviewed and deemed to be effective.					
<b>Improvement:</b> None Required			<b>Action:</b> None Required		



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<b>REVIEW ISSUE: RECORD KEEPING</b>	<b>OK</b>	<b>Improve</b>	
Method of holding record		<b>Y</b>	
Appropriate, relevant and up-to date	<b>Y</b>		
Available	<b>Y</b>		
<b>Comments:</b> All needs to be reviewed in light of conversion Documents are currently held in a number of formats on site.			
<b>Improvement:</b> Review methods and formats of storing documents		<b>Action:</b> IMS Steering Group	

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<b>REVIEW ISSUE: ISO 14001 STANDARD</b>		<b>OK</b>		<b>Improve</b>	
Is EMS Compliant with standard				<b>Y</b>	
Has standard been revised		<b>Y</b>			
<p>Comments:</p> <p>SUP wish to re-establish a formal EMS but it will be incorporated into IMS</p> <p>EMS was based on the 2004 standard, this will be revised the latest version being ISO 14001:2015</p>					
<p>Improvement:</p> <p>Review EMS in view of ISO 14001:2015</p>			<p>Action:</p> <p>Document Administrator and Environmental Officer</p>		