CORRECTIVE ACTION TIMING PLAN

BUSINESS UNIT :- *Pontypool Site*

CHAMPION :- [redacted]

HSE 0064 & HSE 0065
January 2023

DATE :- 25/01/2023

Last update :- 31/01/2024

OWNER :- S. Thomas
Phone :- 4178

SUBJECT :-

Corrective actions ref. ISO 14001 issues 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 2022 to the NRW	ST	Feb '23												Feb '23	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 '23												Feb '23	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 '23												Aug '23	
4	Legislative compliance	Compliance with IPPC permit conditions	Provide NRW with completed Annual Pollution Inventory for the site with 2022 data	ST	Mar '23												Mar '23	Data provided via online portal
5	Ground Contamination	Current site contamination from past processes	Continue with the remediation of chlorinated solvent contamination with the ZF Remediation Team Arcadis	ST	Dec '23												Dec '23	Works completed in 2023 in line with Arcadis Remediation timing plan
6	General	Emergency planning	Plan a fire evacuation for Q2 2023 accross all 3 shifts	ST	Jul '23												Jul '23	
7	Energy Management	Energy Monitoring/reduction	Improve control and flexibility in terms of compressed air - Conduct 2 air leak surveys per year	CH/NJ	Dec '23												Dec '23	New Air leak detection equipment purchased Feb 2023
8	Energy Management	Energy Monitoring/reduction	Continue energy team to review sub metering data to target improvements	AW	Dec '23												Dec '23	
9	Energy Management	Energy Monitoring/reduction	Review Machine shutdown procedures to maximise energy saving when not in use	ST/AW	Jul '23												Jul '23	Machine shutdown procedures in place but are continually being refined to achieve better energy savings
10	Energy Management	Energy Monitoring/reduction	Use sub metering to improve Energy Profile for the site	AW	Oct '23												Oct '23	Use of Power BI to help visualise the issues
11	Energy Management	Energy Monitoring/reduction	Re-look at viability of localised boiler units for process plants – Combined heat and power unit	AW/NJ	Dec '23												Jul '23	Project not viable. New proposal to remove HPHW from the site and replace with individual tank heaters
12	General	Chemical Management	Investigate system to pump chemicals into the tanks without having to manually lift them onto the catwalk.	SW	Sep '23													On-going project - could not be progressed until space was made available following other site projects
13	Ground Contamination	Ground contamination prevention	Inspect interceptor for oil contamination & clean out if necessary	NJ	Jul '23												Jul '23	Visual inspection of the interceptor from road level any oil contamination will be present on the surface
14	General	Hazardous materials management	Document periodic visual inspections carried out on Asbestos Containing Materials.	NJ	Jun '23												Jun '23	2023 Asbestos survey carried out
15	General	Housekeeping throughout the site	Continue with the 5C/Housekeeping improvement projects in each business.	All	Dec '23												Dec '23	Continual item each year
16	Legislative compliance	Nuisance	Conduct internal noise survey	All	Oct '23												Jul '23	
17	Legislative compliance	Nuisance	Conduct external noise survey	All	Oct '23												Jul '23	

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18	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	All	Nov '23													Quote for new filter press obtained. Business case required to obtain CAPEX spend. 45% reduction in hydroxide sludge waste achieved with current filter presses
19	General	Site Management	Develop a zinc plant decomissioning plan to ensure that the closure and removal of equipment takes environmental issues into account	All	Dec '23												Dec '23	Ground water monitoring carried out - awaiting results
20	General	Information knowledge	Conduct annual MWF refresher training - Information leaflet on MWF to be issued to employees - review document to ensure it remains relevant	All	Oct '23												Sep '23	MWF information leaflet issued
21	General	Legionella Management	Carry out remedial works in line with the 2022 Legionella risk assessment	All	Jun '23												Jun '23	
22	Waste Management	Waste Management	Review waste streams to determine further opportunities to reuse/reduce/recycle	All	Dec '23													On-going throughout the year
23	Waste Management	Waste Management/reduction	Review the procedure for the waste yard to ensure wastes are handled correctly	All	Jul '23													This is a long term issue that is ongoing
24	Waste Management	Waste Monitoring/reduction	Reinvestigate potential to recycle plastic tray packaging	All	Dec '23												Dec '23	Some recycling opportunities but it is dependent upon the tray and plastic used. Each load is assessed prior to disposal.
25	Waste Management	Waste Management/reduction	Investigate reduction in chemical container waste - Dosing zinc nickel chemicals from IBC as opposed to carboys	All	Aug '23													HCL carboys repleed with IBC delivery system. Further improvements to be made folowing removal of the HPHW system which will create space for the IBCs
26	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.	All	Dec '23													Due to proces inefficiencies whilst on six tanks. No current solution available - Chemical supplier has been involved in the discussion regarding options/alternatives. ACTION ONGOING
27	Maintenance	Effective control of fume from the plating process	Review plant maintenance matrix schedule to ensure that the maintenance is being carried out at the appropriate time intervals	All	Apr '23												Apr '23	Maintenance schedule reviewed and re-issued by ML
28	Waste Management	Waste Monitoring/reduction	Investigate sampling each IBC of zinc nickel plating solution waste to determine the concentrations of metals and direct to the correct waste stream.	All	May '23												May '23	Not currently viable
29	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.	All	Jul '23												Jul '23	Use of PowerBI software to collate information and assist in highlighting energy issues
30	Energy Management	Energy Monitoring/reduction	Improve temperature control of the Zinc nickel plating tanks – reduction in use of the chiller	All	July '23												July '23	All 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.

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31	Waste Management	Waste Monitoring/reduction	Review briquetting of aluminium swarf to include all swarf and add a bin lifter to remove the need for forklift truck movement in the area	All	Dec '23													New briquetter ordered, delivery date end of Feb '24
32	Waste Management	Waste Monitoring/reduction	Review briquetting of cast iron swarf to investigate if all cast iron swarf can be briquetted	All	Dec '23													CAPEX required for more briquetters or a larger unit
33	Waste Management	Waste Monitoring/reduction	Review method for disposal of the filter paper	All	Dec '23												Dec '23	Waste disposed of in clip top drums via GD Environmental
34	Waste Management	Waste Monitoring/reduction	Review the use of filter paper media to clean coolant in machines	All	Dec '23												Dec '23	Cost to retrofit existing machines prohibitive at present. Cost per machine circa £35K
35	Waste Management	Waste cost reduction	Review the process to determine if there are alternative options to disposing of the various waste streams	All	Sep '23												Sep '23	Best disposal options currently in place
36	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.	All	Mar '23												Mar '23	No policy update since the 2018 version. ZF plan to review the policy in 2024.
37	Legislative compliance	Nuisance	Identify and train person to carry out the internal and external noise survey	All	Jun '23												Jun '23	
38	Ground Contamination	Current site contamination from past processes	Check with [redacted] in relation to the project end	All	Apr '23												Dec '23	Project closed end of 2023. Majority of bore hole filled to prevent risk of further contamination.
39	General	General System Management	Investigate linking procedures and controls to the aspects	All	Apr '23												Apr '23	
40	Energy Management	Energy Monitoring/reduction	Electrification of the zinc nickel plant heating to replace HPHW	All	Dec '23												Aug '23	Plant converted to electric saving 400,000m^3 of gas/annum equating to approx. 3.5 GWh
41	Energy Management	Energy Monitoring/reduction	Investiagte alternative factory heating options to replace the boilers	All	Dec '23													Capex agreed, awaiting confirmation of Welsh Government funding