

SIMEC USKMOUTH POWER STATION ENVIRONMENTAL MANAGEMENT SYSTEM MANAGEMENT REVIEW FOR 2022

The Management Review of the Environmental Management System at SIMEC Uskmouth Power the Environmental Team on 18th January 2023.

Present:		Operations Manager
		Environment and Consents Manager (ECM)

SIMEC Uskmouth Power (SUP) Limited is the operator of Uskmouth Power Station, SUP is a wholly owned subsidiary of SIMEC Atlantis Energy. Uskmouth Power Station had acquired accreditation for the Uskmouth Environmental Management System (EMS) and Integrated Management System (IMS) during previous phases of operation. The intention of this review is to determine how best to utilise the non-accredited EMS currently available.

Uskmouth Power station is presently within a non-operational phase planning and permitting to support a fuel conversion have been withdrawn. Uskmouth Power station is being deplanted. Planning was granted 22/0823 in December 2022 for the installation of 230 MW BATTERY ENERGY STORAGE SYSTEM (BESS) on the former coal stock yard.

Planning BESS

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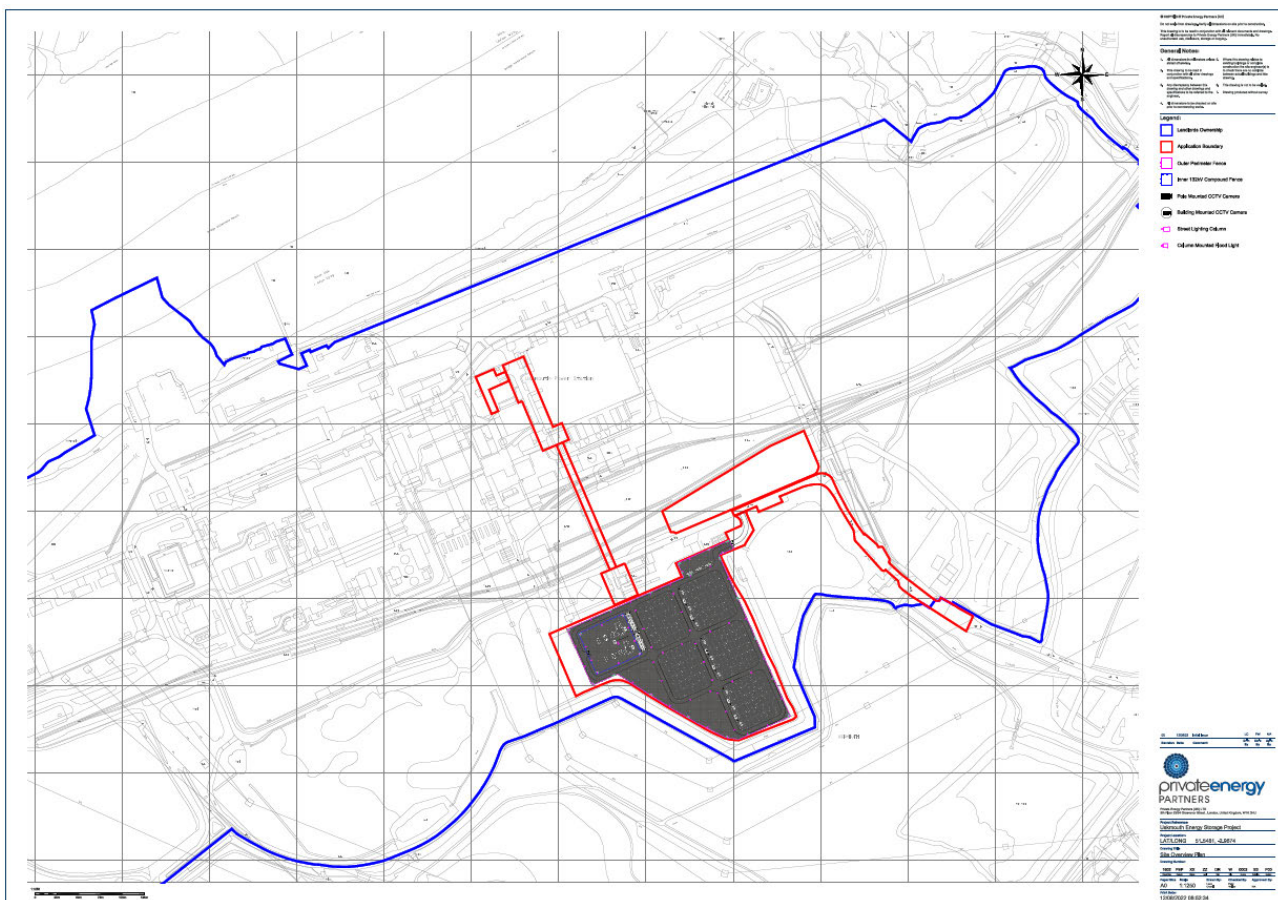


Figure 1 230 MW BATTERY ENERGY STORAGE SYSTEM (BESS) on the former coal stock yard.

The major environmental milestones for Q1 2022 are;

- Following the re-establishment of Electrical Grid connection in April 2019 the only use of diesel generators is for routine testing purposes.
 - December 2022 monthly emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 31st January 2023)
 - Quarter 4 2022 emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 31st January 2023).
 - 2022 annual emissions report (EPR/LP3131SW Schedule 4, table S4.3 NRW due 31st January 2023).
 - Annual environmental report on performance and activities (EPR/LP3131SW Condition 4.2 Reporting 4.2.2, NRW due 31st January 2023).
 - EU ETS stage 2 verification Lucideon (due 31st March 2023)
 - EU ETS update Registry with Verification Report (NRW due 31st March 2023)
 - PRTR - Pollution Inventory report (NRW 31st March 2023)

The Management System Review following documents were reviewed on 18th January 2023 by:

- [REDACTED]
- [REDACTED]

ENVIRONMENTAL POLICY	OK	Improve
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	
Comments: The Environmental Policy has been reviewed and remains fit for purpose.		
Improvements: None Required	Action: Complete	

KEY RESPONSIBILITIES	OK	Improve
Relevant to requirements of process	Y	
Communicated internally	Y	
Cover provision of resources	Y	
Cover initiating action for compliance	Y	
Cover recording environmental problems	Y	
Cover the provision of corrective action	Y	
Cover action in emergency	Y	
Comments: Currently fit for purpose, ongoing review required		
Improvements:	Action: Environmental Management Team	

DOCUMENT CONTROL	OK	Improve
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	
Comments: Currently fit for purpose, ongoing review required		
Improvements:	Action: Environmental Management Team	

EMS MANUAL		OK	Improve
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	
Comments: Currently fit for purpose, ongoing review required			
Improvements:		Action: Environmental Management Team	

LEGAL AND OTHER REQUIREMENTS		OK	Improve
Procedure		Y	
Relevant and up to date		Y	
Communicated internally as appropriate		Y	
Includes compliance		Y	
Comments: Currently fit for purpose, ongoing review required			
Improvements :		Action: Environmental Management Team	

ENVIRONMENTAL ASPECT EVALUATION		OK	Improve
Relevant and up to date		Y	
Uskmouth Power Station ability to control		Y	
Availability internally		Y	
Incorporated into the EMS		Y	
Comments: Currently fit for purpose, ongoing review required			
Improvements:		Action: Environmental Management Team	

REVIEW ISSUE: EXTERNAL COMMUNICATION		OK	Improve
Procedures established		Y	
Communication documented		Y	
Responses documented		Y	
Effective tracking		Y	
Public reporting		Y	

Comments: Currently fit for purpose..			
Comments: Ongoing Stakeholder engagement		Action: Environmental Management Team	

INTERNAL COMMUNICATION		OK	Improve
Between Levels-	Relevant	Y	
	Effective	Y	
	Responsive	Y	
Between Departments-	Relevant	Y	
	Effective	Y	
	Responsive	Y	

Comments: internal meetings and site audits. Currently fit for purpose, ongoing review required			
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Improvement:	Action: Environmental Management Team
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TRAINING AND AWARENESS		OK	Improve
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	
Comments: The Instinct training package is used for basic environmental training on site and currently all staff and contractors are required to undertake refresher courses. Currently fit for purpose, ongoing review required			
Improvement:		Action: Environmental Management Team	

REVIEW ISSUE: SETTING OBJECTIVES AND TARGETS AND THE MANAGEMENT PROGRAMME		OK	Improve
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	
Comments: Currently fit for purpose, ongoing review required			
Improvement:		Action: Environmental Management Team	

NON-CONFORMANCE AND CORRECTIVE PREVENTATIVE ACTION		OK	Improve
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	
Comments: No non-conformance issues in 2022			
Improvement: None Required		Action: None Required	

INTERNAL AUDIT	OK	Improve
Present position		Y
Outstanding recommendation	Y	
Audit methodology & protocols	Y	
Effective reporting and follow up		Y
Aid to continuous improvement	Y	
Auditors independence	Y	
Audit resources	Y	
Comments: Audit Schedule is established, and audits planned. Currently fit for purpose, ongoing review required		
Improvement:	Action: Environmental Management Team	
REVIEW ISSUE: EMERGENCY PREPAREDNESS AND RESPONSE	OK	Improve
Covers environmental aspects	Y	
Communicated internally	Y	
Subject to review and continuous improvement	Y	
Incident response equipment	Y	
Testing	Y	
Comments: A fit for purpose gatehouse procedure. Currently fit for purpose, ongoing review required		
Improvement:	Action: Environmental Management Team	

MONITORING AND MEASUREMENT	OK	Improve
Present position	Y	
Documented	Y	
Planned	Y	
Recorded	Y	
Comments: Reviewed and deemed to be effective. Currently fit for purpose, ongoing review required		
Improvement:	Action: None Required	
RECORD KEEPING	OK	Improve
Method of holding record	Y	
Appropriate, relevant, and up-to date	Y	
Available	Y	
Comments: Currently fit for purpose, ongoing review required		
Improvement:..	Action: Environmental Management Team	

EMS ISO 14001 STANDARD	OK	Improve
Is EMS Compliant with standard		Y
Has standard been revised	Y	
Comments: Fit for purpose during this non-operational phase		
Improvement: Review EMS in view of ISO 14001:2015	Action: Environmental Management Team	

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