



SIMEC USKMOUTH POWER STATION ENVIRONMENTAL MANAGEMENT SYSTEM MANAGEMENT REVIEW FOR 2021

The Management Review of the Environmental Management System at SIMEC Uskmouth Power by Senior Managers, and the Environmental Team on 24th January 2022.

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 whilst acquiring planning and permitting to support a fuel conversion.

Permit variation – The permit variation application was called in by Welsh Ministers on 6th Oct 2021. Uskmouth Power Station has submitted an application to vary the environmental permit held by Simec Uskmouth Power Limited (SUP) at Uskmouth Power Plant (EPR/LP3131SW). The facility is currently permitted as a large combustion plant (LCP) as defined by articles 28 and 29 of the Industrial Emissions Directive (IED). The facility is currently permitted as a coal fired generator with the capability to burn a small amount of biomass. The plant consists of three steam driven alternator sets each fed from a dedicated radiant type natural circulation boiler with a rated thermal input of 330 MWth served by both, individual and commonly associated plant. The permit variation seeks to permit a change in the permitted fuel. SUP intends to combust fuel pellets derived from waste; these fuel pellets will have similar calorific value to coal. SUP proposes to convert two of the existing three combustion units; units 13 (110 MWe net) and 14 (110MWe net) to operate on fuel pellets derived from non-recyclable waste and biomass rather than coal and biomass. Where possible the existing infrastructure and equipment will be reused or reconfigured to accommodate the combustion of this new type of fuel.

Planning Permission – The planning application was called in by Welsh Ministers on 24th March 2021

The focus of Uskmouth personnel has been to complete permit variation application submission, engage in permit call in process and to maintain ongoing station compliance ahead of conversion. In 2021 Uskmouth Power Station achieved significant Project milestones in 2021;

- SUP completed all technical questions and schedule 5 notices to the satisfaction of NRW.
- NRW sent the draft final environmental permit application to SUP for the operators review, ahead of public consultation.
- The NRW public consultation was not conducted as WG called in the permit variation application.
- SUP are engaged with Planning, Evidence and Decisions Wales (PEDW) to facilitate the call in process.

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 2021 monthly emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 31st January 2022
 - Quarter 4 2019 emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 31st January 2022.
 - 2021 annual emissions report (EPR/LP3131SW Schedule 4, table S4.3 NRW due 31st January 2022.
 - Annual environmental report on performance and activities (EPR/LP3131SW Condition 4.2 Reporting 4.2.2, NRW due 31st January 2022.
 - EU ETS stage 2 verification Lucideon (due 31st March 2022)
 - EU ETS update Registry with Verification Report (NRW due 31st March 2022)
 - EU ETS Surrender allowance to EU Registry account (EU Registry 2448 allowance need to be purchased prior to 30th April 2020)

- PRTR - Pollution Inventory report (NRW 31st March 2022)

The major Project milestones for 2022 are;

- Engage with Welsh Minister in the call in process ahead of FiD and conversion process

The Management System Review following documents were reviewed on 24th January 2022 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. The Environmental Policy will be reviewed ahead of the conversion and return to service phase.		
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, Uskmouth personnel have focussed upon Project deliverables to acquire permit variation and maintaining ongoing station compliance ahead of the conversion and return to service phase.		
Improvements: None required, SUP will review KEY RESPONSIBILITIES post FiD during the conversion phase	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.		
Improvements: SUP will review document control post FiD during the conversion phase.	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.		
Improvements: SUP will review EMS post FiD during the conversion phase, it is anticipated the updated EMS will be based on ISO 14001:2015.	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.		
Improvements: The Legal Register will be assessed by an external company after the Permit Variation is granted and redrafted to reflect the revised legislation.	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.		
Improvements: SUP will review ENVIRONMENTAL ASPECT EVALUATION post FiD during the conversion phase in line with permit variation.	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. Regular communication in place with our statutory regulators, contractors, Severn Power, NGC, EMC. Stakeholder engagement procedure lists SUP personnel responsible for communicating with various stakeholders.

Comments: Review Stakeholder engagement procedure post FiD during the conversion phase

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 comms have improved by setting up weekly Environment Management Team (EMT) meetings and monthly site audits. Quarterly EMT are conducted .

Improvement: During the conversion and return to service phase SUP intends to conduct monthly SHE meetings to incorporate an Environmental update with representatives from all site departments and site term contractors.	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.			
Improvement: Specific Environmental Training to be developed for the converted Power station including investigating WAMITAB training. Personnel will be trained to operate the converted power station in line with the permit variation and associated planning permission.		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, objectives in 2022 are focussed on the requirements of the project to acquire planning and permitting to facilitate FiD and initiate an 18- month conversion whilst maintaining ongoing station compliance. Uskmouth Power Station achieved high standards of performance in Health & Safety and Environmental disciplines in 2020.		
Improvement: During the conversion and return to service phase SUP intends to conduct monthly SHE meetings to incorporate an Environmental update with representatives from all site departments and site term contractors.	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 2020		
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.		
Improvement: Auditor Training to be provided in line with future operation of the converted station.	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 was reviewed for 2021 and circulated internally. Ongoing and routine evaluation of equipment provided are still valid.		
Improvement: Planned revision of Incident/emergency response exercises and schedule, to be revised during return to service and conversion	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.		
Improvement: None Required, to be assessed in line with the varied environmental permit	Action: None Required	
RECORD KEEPING	OK	Improve
Method of holding record		Y
Appropriate, relevant, and up-to date	Y	
Available	Y	
Comments: Improvement to record keeping in 2020. .		

Improvement: During conversion record keeping and document control will be revised to be fit for purpose for the converted power station.	Action: Environmental Management Team
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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. During conversion SUP intend to re-establish a formal EMS to in line with the latest version ISO 14001:2015		
Improvement: Review EMS in view of ISO 14001:2015	Action: Environmental Management Team	

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