SIMEC Uskmouth Power Station Environmental Management System

MANAGEMENT REVIEW FOR 2019

The Management Review of the Environmental Management System at SIMEC Uskmouth Power by Senior Managers, Engineers and the Environmental Management Team on 21st January 2020.

Present:

Required:		Plant Manager
		Operations Manager
		Commercial Director
		Environmental Officer
		Environmental Support
		Project Support 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-enforce the non-accredited EMS currently available and to determine whether there is an advantage to striving for formal accreditation.

SIMEC Atlantis Energy (SAE) has taken over ownership of the Uskmouth Power Station in 2018. SIMEC Uskmouth Power (SUP) the power station is a wholly owned subsidiary of SIMEC Atlantis Energy.

The major environmental milestones/issues for 2019 were;

- Change of ownership and associated administrative updating of permits and licencing – Permit AN0285201 updated to reflect Ownership change.
- Environmental Planning and Permitting continued for Energy Pellet conversion Project to enable the plant to mill and burn the energy pellet as main fuel.
- Electrical Grid connection re-established in April 2019 limiting the use of diesel generators

The major environmental milestones/issues for Q1 2020 are;

- December 2019 monthly emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 28th January 2020)
- Quarter 4 2019 emissions reports (EPR/LP3131SW Schedule 4, table S4.4 NRW due 28th January 2020)
- 2019 annual emissions report (EPR/LP3131SW Schedule 4, table S4.3 NRW due 28th January 2020)
- Annual environmental report on performance and activities ((EPR/LP3131SW Condition 4.2 Reporting 4.2.2, NRW due 31st January 2020)

- EU ETS stage 2 verification (Lucideon due 28th January 2020) completed
- EU ETS update Registry with Verification Report (NRW due 31st March 2020)
- EU ETS Surrender allowance to EU Registry account (EU Registry 2448 allowance need to be purchased prior to 30th April 2020)
- Pollution Inventory report (NRW 31st March 2020)

The major Project milestones/issues for 2020 are;

- Fuel pellet development (density, particulate size and pellet manufacturing Plants).
- Environmental Planning and Permitting (EPP) – Conversion
- Environmental Permit Variation Determination with NRW
- Combustion System Design
- Project Financial decision.

Management System Review

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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 policy has been reviewed and remains fit for purpose. Will be reviewed in light of conversion		
Improvements: None Required	Action: Complete	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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: Emergency response team in place to cover all site emergencies Needs to be reviewed		
Improvements: Review Environmental Responsibilities and distribute to all at SIMEC Uskmouth Power Station. Review the Emergency response procedure	Action: Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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**
Other Issues: All site documents (LMI's, Ops 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.		
Improvements: 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. Review and update the Uskmouth server structure and electronic document control	Action: Project Support Engineer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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: IMS will replace the EMS Manual with 4 documents based on ISO 14001:2015.		
Improvements: Complete the review of the 4 documents and implement	Action: Environmental Manager and Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: LEGAL AND OTHER REQUIREMENTS	**OK**	**Improve**
Procedure	Y	
Relevant and up to date		**Y**
Communicated internally as appropriate	Y	
Includes compliance	Y	
Other Issues: All needs to be reviewed in light of conversion with new legislation that may apply to the station.		
Improvements: The Register will be assessed by External company after the Permit variations are complete and a new register will be issued	Action: Environmental Manager	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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: All needs to be reviewed in light of conversion Some of the legislation stated in significant environmental aspects is out of date.		
Improvements: To be reviewed after final design for the conversion is completed and all Fuels and reagents are known.	Action: Environmental Manager and Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: EXTERNAL COMMUNICATION	**OK**	**Improve**
Procedures established	Y	
Communication documented	Y	
Responses documented	Y	
Effective tracking	Y	
Public reporting	Y	

Comments:

All needs to be reviewed in light of the conversion project

Regular communication in place with our statutory regulators, contractors, Severn Power, NGC, EMC and local community.

Stakeholder engagement procedure lists SIMEC Uskmouth Power personnel responsible for communicating with various stakeholders.

Comments:	Action:
Review Stakeholder engagement procedure and see if it is still valid	Environmental Manager

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**		**DATE: 21/01/2020**	
REVIEW ISSUE: INTERNAL COMMUNICATION		**OK**	**Improve**
Between Levels-	Relevant	Y	
	Effective	Y	
	Responsive	Y	
Between Departments-	Relevant	Y	
	Effective	Y	
	Responsive	Y	
Comments: All needs to be reviewed in light of conversion project The monthly SHE meeting incorporates Environmental section, and representatives from all site departments and site term contractors are required to attend and participate. Risk boards in place at various areas on site but needs to be updated.			
Improvement: Place Posters and Environmental information on the risk boards to inform personnel of relevant information. Include waste segregation and skip compound management.		Action: Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**		**DATE: 21/01/2020**	
REVIEW ISSUE: 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: All needs to be reviewed in light of new fuel and conversion 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.			
Improvement: Specific Environmental Training to be developed for the Power station and training done with personnel to cover Roles & Responsibilities, Consequence if we do not comply with permit conditions. More in depth training on Environmental management for the Management team.		Action: Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**		**DATE: 21/01/2020**
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:

All needs to be reviewed in light conversion

Uskmouth Power Station achieved high standards of performance in Safety Health and Environmental management. The Organisational review will incorporate 14001 into the IMS system.

Improvement:	Action:
Uskmouth Power Station Environmental Steering Group to be established. A meeting schedule to be set up to discuss, set and track objectives on a regular basis.	Environmental Officer

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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: All needs to be reviewed in light of new fuel and conversion		
Improvement: None Required	Action: None Required	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: 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: All needs to be reviewed in light of new fuel and conversion. Audit Schedule is established, and audits planned.		
Improvement: Lead Auditor Training to be provided in future.	Action: Environmental Manager and Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
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: All needs to be reviewed in light of conversion		
Improvement: Review the Emergency preparedness procedure. Evaluate if equipment provided are still valid Evaluate the number of Incident/emergency exercises and schedule some	Action: Environmental Manager and Environmental Officer	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: MONITORING AND MEASUREMENT	**OK**	**Improve**
Present position	Y	
Documented	Y	
Planned	Y	
Recorded	Y	
Comments: All needs to be reviewed in light of conversion Reviewed and deemed to be effective.		
Improvement: None Required	Action: None Required	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: RECORD KEEPING	**OK**	**Improve**
Method of holding record		**Y**
Appropriate, relevant and up-to date	Y	
Available	Y	
Comments: All needs to be reviewed in light of conversion Documents are currently held in a number of formats on site.		
Improvement: Review methods and formats of storing documents The Server needs improvement as well as electronic document storage formats	Action: Compliance, Audit & Performance Steering Group	

REVIEWED BY: **MANAGERS AND MEMBERS OF USKMOUTH POWER STATIONS ENVIRONMENTAL TEAM**	**DATE: 21/01/2020**	
REVIEW ISSUE: ISO 14001 STANDARD	**OK**	**Improve**
Is EMS Compliant with standard		**Y**
Has standard been revised	Y	
Comments: SUP wish to re-establish a formal EMS but it will be incorporated into IMS EMS was based on the 2004 standard, this will be revised the latest version being ISO 14001:2015		
Improvement: Review EMS in view of ISO 14001:2015	Action: Project Support Engineer and Environmental Officer	