



CORRECTIVE ACTION TIMING PLAN

BUSINESS UNIT :-
Pontypool Site
CHAMPION :-
Shane Thomas

HSE 0064 & HSE 0065
March 2013

OWNER :-
S. Thomas
Phone :- 4178

SUBJECT :-
Corrective actions ref. ISO 14001 issues 2014

DATE :-
02/01/2014
Last update :-
28/01/2015

No.	ELEMENT	CONCERN	CORRECTIVE ACTION	Resp.	Target Date	Initiated	10%	20%	30%	40%	50%	60%	70%	80%	90%	100%	Action Complete	COMMENTS
						Feb '14	Mar '14	Jul '14	Sep '14	Mar '14	Feb '14	Mar '14	Aug '14	Aug '14	Oct '14	Dec '14		
1	Legislative compliance	Compliance with IPPC permit conditions	Provide annual usage figures for effluent, water waste & energy for 2013 to the EA	ST	Feb '14												Feb '14	Information sent to NRW
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	Mar '14												Mar '14	Information sent to NRW
3	Legislative compliance	Compliance with IPPC permit conditions	IC6 - Undertake an assessment of the energy management improvement measures on site	ST/NJ	Jul '14													Continuous improvement activities to reduce energy usage
4	Legislative compliance	Compliance with IPPC permit conditions	IC7 - Carry out a water efficiency audit of the installation	ST/AE	Sep '14													
5	Legislative compliance	Compliance with IPPC permit conditions	Review OPERA scoring based on actual data for 2013	ST	Mar '14												Mar '14	Information sent to NRW
6	Legislative compliance	Compliance with IPPC permit conditions	Provide EA with completed Annual Pollution Inventory for the site with 2013 data	ST	Feb '14												Feb '14	
7	Energy Management	Water Usage reduction	Replace resin in Zinc plant regen unit & Recommission	AE/ST	Aug '14													Currently in talks with the suppliers of the new effluent plant to correctly specify the correct resin.
8	Energy Management	Water Usage reduction	Replace resin in Anodise plant regen unit & Recommission	AE/ST	Aug '14													Currently in talks with the suppliers of the new effluent plant to correctly specify the correct resin.
9	Energy Management	Water Usage reduction	Investigate costs of closed loop system for zinc nickel process and determine if feasible	BJ	Oct '14													Not currently feasible
10	Energy Management	Energy Monitoring/reduction	Investigate the potential to run zinc plating on the zinc nickel process	BJ	Dec '14													Processes to be kept separate at present
11	Energy Management	Energy Monitoring/reduction	Investigate air leaks throughout the site esp. On low volume equipment	BJ	May '14													Air leaks identified and fixed - on-going process
12	Energy Management	Energy Monitoring/reduction	Change gas meter to prevent it venting to air due to gas pressure	NJ														



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26	Chemical Usage	Chemical reduction	Continue to investigate further potentials for solvent reduction on the dip plant	ST	Jun '14													Alarm to the plant to notify operator if the abatement plant is not working. Tank extractors switched off and the extraction from the abatement plant used.
27	Chemical Usage	Chemicals - MSDS	Develop a site acceptance process for Safety Data Sheet verification in line with the new regulations.	ST	May-14												Mar-14	COSHH procedure updated to include SDS verification process
28	Chemical Usage	Ease of Information	Investigate setting up a site COSHH database with Electronic MSDS	ST	Dec '14													This action is on-going
29	Ground Contamination	Current site contamination from past processes	Continue with the remediation of chlorinated solvent contamination with the TRW Remediation Team Arcadis	ST	Dec '14													2014 planned works completed
30	Ground Contamination	Preventing ground contamination	Inspect interceptor to ensure structural integrity	NJ	Aug '14													Postponed until 2015
31	General	Environmental risk reduction	Conduct process FMEA on the new zinc nickel process to determine any potential issues	BJ	Jun '14													
32	General	Environmental risk reduction	Conduct process FMEA on the new zinc nickel process to identify potential issues	BJ	Jun '14													Repeat of Above issue
33	General	Environmental risk reduction	Check the old steam cleaning area to ensure that it has been decommissioned correctly and that any dead legs supply pipe work has been removed	NJ	Apr-14													
34	General	Hazardous materials management	Document periodic visual inspections carried out on Asbestos Containing Materials.	ST	Apr-14													Visual inspection of ACMs is also now part of the HS&E Weekly walkabout
35	General	Prevent nuisance to local community	Conduct internal and external noise survey	ST	May '14													External noise survey to be conducted
36	General	Housekeeping throughout the site	Continue with the 5C/Housekeeping improvement projects in each business.	All	Dec '14													This action is continuously on-going



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						[Progress bars for each percentage from 10% to 100%]												
37	General	Housekeeping throughout the site	Investigate how to improve keeping equipment stored on shadow boards	MR/AS	Jun '14	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		
38	General	Education/training of employees	Produce a educational leaflet for all employees to inform them of the effect that typical actions such as these have on the environment	ST	Jul '14	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		On-going action
39	General	Management of ISO system - documentation control	Review HSE documents to remove or combine documents which are either no longer used or use/report the same information and add no benefit as individual documents.	ST	Dec '14	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		
40	ISO 14001 Audit	2013 ISO 14001 Audit Observation/OFI	Although spill kit material is available at various locations across the plant, the spill kits could be more clearly identified and be more readily accessible.	ST		[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		This action is on-going
41	ISO 14001 Audit	2013 ISO 14001 Audit Observation/OFI	It could be of benefit to more clearly identify the waste containers with the contents, ie general waste etc. Note: This is a requirement practised in various European companies but has not yet been encompassed in UK legislation.	ST		[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		Action On-going
42	ISO 14001 Audit	2013 ISO 14001 Audit Observation/OFI	Continued treatment of japanese knotweed on site.	NJ	Dec '14	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		2014 Treatment cycle completed.
43	ISO 14001 Audit	2014 ISO 14001 Audit Observation/OFI	It may be beneficial to state a threshold value above which the aspect is considered to have a significant impact.	ST		[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		
44	ISO 14001 Audit	2014 ISO 14001 Audit Observation/OFI	The register is currently being reviewed and reformatted. This should ensure that all relevant legislation is included, correctly referenced and linked to the significant aspects. Revoked or superseded legislation should be clearly identified or removed	ST		[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		
45	ISO 14001 Audit	2014 ISO 14001 Audit Observation/OFI	The skills / training matrix for the a contractor operation (Castrol) was evidenced. It would be beneficial to confirm that the areas identified as 'training planned' are being adequately followed up.	BJ		[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]		
46	ISO 14001 Audit	2014 ISO 14001 Audit Observation/OFI	It was noted that good progress appears to be being made to combat the Japanese Knotweed. The company will need to consider the growth in the neighbouring field.	ST	Apr '14	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	[Green]	Apr '14	Neil James to add this to the current traement programme for 2014. See item 42.

