

Omega Proteins Ltd.

Penrith

Submitted to:

Environment Agency

Report Title: Environmental Permit Variation Application – EMS Summary

Permit: EPR/HP3238AF

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1 Summary

1.1 Introduction

The installation has operated to an accredited Environmental Management System (EMS) since November 2013. The Environmental Management System (EMS) for the site is accredited to the ISO14001:2015 standard and therefore includes a policy and programme which:

- Includes a commitment to continual improvement and prevention of pollution
- Includes a commitment to comply with relevant legislation and other requirements to which the organisation subscribes (such as quality schemes)
- Identifies, sets, monitors and reviews environmental objectives and key performance indicators independently of the permit.

In 2019 the site were awarded PAS99:2012 as recognition of the integration of the Health & Safety, Quality and Environmental management systems.

1.2 Environmental Management System Structure

Procedures are documented that cover environmental and operational requirements. All staff undergo induction training prior to starting work and then receive training relevant to their specific tasks. Staff are trained against the relevant Standard Operating Procedures (SOPS) and the training records are held in the employee's files and summarised on an electronic record. These are subject to audit (internally and by third party) and cover environmental, quality and health and safety requirements.

Training requirements and assessment of competence are recorded on the site training database against each employee.

The main areas covered by the EMS are:

- Risk assessments for Environmental Aspects and Impacts, Drainage, Accidents/Incidents and Odour Control
- Key Plant and Equipment (contingency, essential spares, alarms)
- Loading / Unloading Materials
- Spillages and Leaks
- Bio Filter Operation, Maintenance and Testing
- Odour Monitoring
- Emissions Testing
- Infrastructure Monitoring (Tank and Bund Inspections, Building Integrity Reviews, Yards and Roadways)
- Handling Complaints / Notification of Incidents/ Adverse Results
- Training and Awareness

All of the procedures in the existing system will be applied to new plant detailed in the permit variation.

Contractors go through an induction prior to working on site to ensure the instructions and company policy relating to health and safety and environmental concerns are understood.

A management structure detailing key responsibilities under the environmental permit is produced and reviewed as part of the EMS. A copy is displayed on the main noticeboard. This includes the person(s) designated for liaising with the regulator and/or public.

The sections below provide more details as to the structure outlined above.

1.3 Reviews

Audits of the system are carried out annually by a third party in order to maintain the accreditation to ISO14001:2015 and PAS99:2012, in addition to a schedule of internal audits.

Progress on meeting targets and objectives is reviewed at the scheduled management reviews.

A documented preventative maintenance system is in place – with key plant and equipment, alarms and key spares also documented within the EMS. Issues are discussed at the scheduled management review meetings and ongoing tasks are monitored on a tracker system to give visibility of progress.

When new equipment or significant changes are planned, the relevant procedures are also reviewed and changes implemented where required. New procedures will be put in place if the risk assessment and/ or odour management plan highlight a requirement for additional controls.

2 Management System Outline

2.1 Key Management Plans

A number of key management plans are in place to ensure that environmental risk is minimised at the facility. All the plans are regularly reviewed and audited as part of the ongoing ISO 14001:2015 compliance. Key plans with respect to permit compliance include:

- Environmental Risk Assessment
- Incident Prevention and Mitigation Plan
- Odour Management Plan
- Fugitive Emissions Review
- Planned Preventative Maintenance Programme

2.1.1 Environmental Risk Assessment

In line with existing permit requirements, the Environmental Risk Assessment (ERA) contains the following detail:

- Identification of the Hazards;
- Identification of the Risks
- Measures in place to reduce environmental risks from accidents or emergency scenarios;

In the event of an environmental accident on site resulting in impact on sensitive receptors the ERA and associated procedures ensure that Site Management will:

- Instigate remedial action immediately;
- Promptly record the events and actions taken;
- Ensure the regulator is made aware without delay.

Further discussion of the environmental impacts are included in the Risk Assessment document (ERA).

2.1.2 Incident Prevention and Mitigation Plan

The scope of the Incident Prevention and Mitigation Plan is to *'ensure that preventative measures are in place to avoid an incident to each medium, and any incident that does occur is mitigated in the most appropriate manner'*.

The IPMP addresses the main environmental risks associated with the operations on site (as identified in EID 52 Environmental Risk Assessment) and the procedures and actions in place to prevent an incident occurring, or to mitigate the impacts when an incident occurs.

2.1.3 Odour Management Plan

An Odour Management Plan (OMP) is in place and is reviewed at least annually, being amended with site changes and / or required corrective actions. The Odour Management Plan follows available guidance in the form of the H4 guidance. It is intended to act as a summary of the odour identification and control strategy at the Penrith site and to identify potential additional measures to further decrease the risk of odour releases. The document reviews the following areas:

- Operations and processes with the potential for odour emissions
- Characteristics of the odour sources
- Control measures for operation of the facility
- Sensitive receptors and odour monitoring
- Monitoring procedures, critical parameters and corrective actions
- Management structure and training of staff
- Environmental Management System
- Contingency Arrangements
- Communication
- Review

The site OMP also includes the Effluent Treatment Plant.

2.1.4 Fugitive Emissions Monitoring Programme

A review of the potential for fugitive emissions is carried out annually.

2.1.5 Planned Preventative Maintenance Programme

A Planned Preventative Maintenance management plan is in place for the site and is managed by the engineering department. Certain aspects that cover environmentally critical items are also referenced in the EMS. The programme provides a key equipment list identifying environmentally critical process and abatement equipment whose failure could impact on the environment. This ensures that effective operational and maintenance systems are employed on all aspects of the installation whose failure could impact on the environment.

2.2 Environmental and Operating Procedures

2.2.1 General Procedures

All procedures developed as part of the assessment and control of environmental risk form part of the EMS. Operational procedures are in the format of Standard Operating Procedures and these are compiled and reviewed with the assistance of the Environment Officer, Health and Safety Manager and Quality Manager to ensure that all critical points have been covered. These procedures include, but are not limited to:

- Delivery and Collection Procedures;
- Materials Storage Procedures;
- Communication and Complaints Procedure;
- Procedure for investigating environmental incidents and near misses and identifying corrective actions;
- Procedures for dealing with spills and leaks
- Procedures for taking and testing samples
- Monitoring and maintenance of Bio Filters

2.2.2 Internal Monitoring & Recording Forms

All internal inspection forms developed in order to reduce the risk of items of equipment or process failures that have the potential to impact on the environment are part of the EMS. These include the following

- Incident & Corrective Action form;
- Infrastructure Inspection forms;
- Odour Monitoring
- Bio Filter Assessment

2.2.3 External Reporting Forms

The Environmental Permit requires the following reports to be submitted – emissions to air and water, biofilter efficiency, water and energy usage. The details are contained in Schedule 4 of the permit.

2.2.4 Environmental Training Documents

Each employee is given training commensurate with their work activity. Induction training covering basic environmental issues is provided. All training records, assessments and training materials related to the Environmental Management System are recorded. Training for all relevant staff includes:

- Awareness of regulatory implications of the Permit for the operation and how this relates to them;
- Awareness for the need for reporting deviations from the permit and who to report to;
- Actions to be taken to prevent and mitigate accidental emissions.

A training needs analysis is carried out to identify specific training needs for key posts. This analysis includes contractors, where relevant, and those responsible for purchasing materials and equipment.

2.2.5 Plans and Drawings

Site plans showing sampling and emission points and site drainage layout are documented as part of the EMS and subject to the same system of document control.

The permit also has the installation boundary and emission points in Schedule 7.

Plans are kept under review to accommodate site changes, each has a date and reference number when received.

2.2.6 Records

All records (including procedures, forms and completed work) are kept securely on site in indexed folders or in electronic format on the IT system. Retention of documents is as per legislative or customer requirements. Examples include – documents relating to the Environmental Permit for 6 years, information relating to environmental incidents or off site impacts for the lifetime of the permit, documents relating to EU-ETS for 10 years, raw material movement documents for 2 years.

2.2.7 Management Structure and Responsibility

All staff have clearly defined roles and responsibilities. The site operates to an organogram implemented as part of the EMS and training requirements will reflect the various levels of responsibility. The organogram is documented and made available to all staff members to clarify the extent of each level of employee's responsibility with regard to the control of the process and its environmental impacts.

Responsibility will be designated to a management representative for ensuring site operations are carried out in accordance with the Environmental Permit, to liaise with the Environment Agency as required and to liaise with the public with regard to complaints. A suitably qualified deputy is also appointed to cover for sickness and absence.

The potential environmental risks posed by the work of contractors is assessed and instructions provided to contractors about protecting the environment while working on site.

2.3 EMS Summary

Table 1.1 below outlines the procedures and policies in place at the site to minimise the potential for environmental risk and form part of the Environmental Management System as summarised above.

Table 1.1 – EMS Summary	
Procedures / Policies Identified in ERA	Justification for Use to Minimise Environmental Risk
Emergency and Incident Procedures	These procedures identify potential for and respond to environmental emergency and incident situations, in order to prevent and mitigate the environmental impacts.
Delivery and Collection Procedure	Control of deliveries and collections at site to ensure that if an environmental incident such as a spill occurs it is cleaned up appropriately and not left to become a potential odour source and / or required abatement is in use.
Materials Storage	Review the storage of materials (chemicals, raw materials, waste etc) on site to minimise the potential for environmental accidents.
Monitoring of Key Abatement Equipment	Procedures to monitor the performance of the abatement equipment by automated continuous monitoring equipment, laboratory testing and visual assessments.
Bund Management Procedure	The cleaning and maintenance of bunded areas to ensure that they are fit for purpose in the event of an environmental accident.
Fugitive Emissions Monitoring	The site infrastructure monitoring programme provides for control of fugitive emissions from processing areas, ancillary equipment and associated ducting
Communication and Complaints System	Communication with regulatory authorities and environmental complaints from third parties is covered by this procedure so that the relevant corrective action can be undertaken in the event of a complaint. The system is designed to deal with environmental issues including odour and noise.
Spill Procedure	Appropriate clean up of spills / leaks and a review mechanism to reduce or eliminate the causes of such incidents.
Planned Preventative Maintenance	Scheduling of maintenance of environmentally critical equipment will ensure it is maintained to prevent breakdown and minimise the potential for environmental incidents. This is controlled by the site engineer and monitored through tracking documents and regular review meetings.