

ASCO UK LTD

GREAT YARMOUTH SHIP TO SHORE FACILITY

EMS SUMMARY

MAY 2023



Wardell Armstrong

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ASCO UK LTD

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EMS SUMMARY

MAY 2023

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Appendix 1 AIMS - Control of Work at ASCO



1 INTRODUCTION

- 1.1.1 ASCO UK Ltd (ASCO) proposes to develop a waste treatment and storage facility at its 'ship to shore' site on South Denes Road, Great Yarmouth. Wardell Armstrong LLP has been commissioned to prepare an Environmental Management System (EMS) summary confirming that the site will be operated under ASCO's EMS in alignment with the Environment Agency's Guidance.¹
- 1.1.2 As provided in Appendix 1, ASCO has an integrated management system (AIMS) covering Health and Safety, Security, Environmental, and Quality Management Systems. AIMS governs ASCO's operations worldwide through ASCO's repository of policies, procedures, and other supporting documentation for the control of operations and support service areas. ASCO's AIMS is accredited to ISO 45001, ISO 14001 and ISO 9001 standards.
- 1.1.3 This EMS summary applies to ASCO's Great Yarmouth 'ship to shore' specifically, demonstrating that it will be effectively integrated into ASCO's AIMS.

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Develop a management system: environmental permits - GOV.UK (www.gov.uk)



2 INFRASTRUCTURE PLANS

- 2.1.1 The Environment Agency require the site has infrastructure plans in place. There are several plans available showing the layout of the bunding, waste storage tanks and the site drainage, which support the environmental permit application.
- 2.1.2 Additional plans will be developed as necessary to serve the site operations.

2.2 Vulnerable Locations

- 2.2.1 The site is provided with a high level of containment. The most vulnerable area is the quayside adjacent to the bunded storage tanks where waste deliveries and dispatch take place. Specific procedures and drainage arrangements are in place to prevent accidental spillage in this area, as described in the Operating Techniques supporting the permit application.
- 2.2.2 ASCO will develop site-specific operating procedures to use in the event of a spillage, in accordance with its AIMS.

2.3 Drainage

- 2.3.1 EA guidance requires a description of the site drainage. The site drainage is described in the permit application and the plans are available:
 - BM12124-002 Environmental Permit Boundary and Site Layout
 - 16447-004 Storm Drainage

2.4 Water Gas and Electricity

2.4.1 Records will be kept detailing the location of all services and to monitor usage against targets.



3 SITE OPERATIONS

3.1.1 Site operations are described in the Operating Techniques document supporting the permit application. The site will be operated in accordance with a series of standard operating procedures set out under the AIMS. The procedures will give specific instructions regarding each part of the operation, including (but not limited to) waste acceptance, deliveries by ship and tanker, waste storage and treatment, waste dispatch and environmental monitoring.



4 SITE AND EQUIPMENT MAINTENANCE PLAN

- 4.1.1 Procedures will be developed for the planned maintenance of plant and equipment in accordance with the manufacturer's recommendations. All plant will be inspected and serviced on a regular basis.
- 4.1.2 Specific inspection and maintenance programmes will developed for all critical infrastructure in accordance with ASCO's Group Operating Procedure on Maintenance Management (GOP-HSSEQ-059).
- 4.1.3 Records will be kept of all servicing, maintenance and repairs.



5 CONTINGENCY PLANS

- 5.1.1 Should plant or infrastructure break down or become damaged, which may have an impact on the environment, operations will cease until repairs are made by a competent engineer.
- 5.1.2 Procedures will be in place for management of non-conforming waste and plant failure, including a list of contingency facilities that wastes can be diverted to.



6 ACCIDENT PREVENTION AND MANAGEMENT PLAN

- 6.1.1 An accident management and prevention plan will be in place for the site, including procedures for the prevention of emissions to water in the event of a spillage.
- 6.1.2 In accordance with ASCO's Group operating procedure for Environmental Aspects and Impacts (GOP- HSSEQ-013), ASCO will review impacts from the following, including during normal, abnormal (start-up, shut-down) and emergency conditions:
 - Emissions to air
 - Releases to water
 - Releases to land
 - Use of raw materials and natural resources
 - Use of energy
 - Heat, radiation, noise
 - Waste and by-products
 - Physical attributes.
- 6.1.3 The accident plan developed for the site will include details of how ASCO will record, investigate and respond to accidents or breaches of the permit.
- 6.1.4 ASCO's worldwide AIMS system also operates effective online security measures to protect the business against online security threats.
- 6.1.5 The site's entrance notice board will share pertinent site details with the public, including the site's emergency contact name and telephone number and the Environment Agency's telephone number and incident hotline.



7 CLIMATE CHANGE

- 7.1.1 The site does not rely on any water abstraction and a flood risk assessment is included with the application which confirms the the risk of flooding to the internal site area is considered to be low. The impact of Climate Change is anticipated to be minimal and no specific measures are proposed at this time.
- 7.1.2 The EMS will be reviewed on a regular basis and when this occurs consideration will be given as to whether circumstances have changed and specific climate adaptation measures need to be included.



8 COMPLAINTS PROCEDURE

- 8.1.1 Should any complaint be received, this will be recorded in the site complaint log, recording details of the complainant, the nature of the complaint and the time and date that issue was noted.
- 8.1.2 All complaints shall be entered into ASCOs LiveSafe Gateway system for recording and investigation. They will record whether the compliant was substantiated, the likely cause and the mitigation but in place to prevent further issues.
- 8.1.3 The complainant will be informed of the outcome of the investigation and the measures taken, unless they have requested otherwise.
- 8.1.4 Records will be kept for a minimum of 2 years and will be made available to the Environment Agency on request.



9 MANAGING STAFF COMPETENCE AND TRAINING RECORDS

- 9.1.1 All staff employed on site will undergo an induction, including health and safety and environmental awareness. They will be made familiar with the environmental permit and company procedures relevant to their role.
- 9.1.2 In accordance with the AIMS procedure for ASCO's Competence Assurance Management System (GOP-TDC-001), all staff will be competent in their role, for example having appropriate training and qualifications. Records will be kept regarding the qualifications required for each role.
- 9.1.3 Records will be kept regarding the qualifications and training given to each member of staff.



10 KEEPING RECORDS

10.1.1 Records will be kept on ASCO's centralised AIMS repository and will be made available to staff or to the Regulator as required, either as hard copies or in digital format. Back-up copies will also be maintained.

10.1.2 Records will include:

- The permit,
- The management system documents,
- Records of site inspections and audits,
- · Records of complaints and subsequent actions,
- Plant servicing and maintenance,
- Site condition report;
- Abnormal conditions including plant breakdown and the actions taken to prevent pollution or damage, and
- Staff training.



11 MANAGEMENT SYSTEM REVIEW

11.1.1 All documents held within ASCO's AIMS are reviewed in accordance with the specified frequencies in its Document Control GOP (GOP-HSSEQ-010), or in response to legislative changes, industry changes, or where an opportunity for improvement has been realised. Documents relating to the site will also be reviewed where there is any significant change in operation or following an incident.



12 SITE CLOSURE

- 12.1.1 A site condition report was provided with the application providing an environmental baseline at commencement of the operation. Ongoing monitoring is not considered necessary due to the high standard of containment in place.
- 12.1.2 Decommissioning will take place in accordance with written procedures with due consideration of environmental issues. The site returned to a state suitable for its intended use, with no ongoing pollution or harm to human health.



13 MAKE SURE PEOPLE UNDERSTAND WHAT YOU DO

- 13.1.1 All staff will receive training appropriate to their role and to understand their responsibilities under the permit. Staff can access AIMS documents through a company-wide SharePoint.
- 13.1.2 ASCO will share AIMS procedures, plans and documents to authorised officers of the Environment Agency on request.



APPENDICES



Title: AIMS - Control of Work at ASCO

DOCUMENT CONTROL				
Doc. Reference	GOP-HSSEQ-002	Function	HSSEQ	
Revision Date	17/11/2022	Group Owner	Group HSSEQ Supervisor	
Rev. Number	1	Group Approver	Group Head of HSSEQ	

APPROVED VARIANCE

There are currently no approved variances for this procedure.

DOCUMENT REFERENCES				
Internal References	• N/A			
External References	HSG (65) Managing for Health and Safety (UK)			

DOCUMENT SCOPE / PURPOSE

This procedure applies to all ASCO Operational sites globally. The requirements of this document apply equally to ASCO staff employees, contractors and visitors engaged in ASCO business or on ASCO operated sites.

REVISION HISTORY					
Rev	Rev Date Comment				
0	12/06/2018	Creation of the procedure			
1	17/11/2022	Transferred onto new template format, and full review of procedure			

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Title: AIMS - Control of Work at ASCO

1.0 Requirements of this Procedure

Wherever ASCO conducts their operations there is the potential for harm to people and the environment and for damage to property and equipment. To control and mitigate against these risks being realised, ASCO has created, maintained, and developed its Health and Safety, Security, Environmental, and Quality Management Systems within the ASCO Integrated Management System (AIMS).

AIMS governs all of ASCO's operations worldwide through ASCO's repository of policies, procedures, and other supporting documentation for the control of operations and support service areas within the business.

This document provides an overview of these arrangements and provides an index of the key operational documents that are used across ASCO globally.

2.0 Responsibility Summary

Group CEO - Has overall accountability for HSSEQ at ASCO and for the delegation of specific responsibilities through the HSSEQ Policy to Regional and Departmental Senior Managers.

Group Head of HSSEQ - Has overall responsibility for the control of AIMS and ensuring that it is legislatively compliant, fit for purpose and certified to the most recent and relevant standards.

Group HSSEQ Administrators - Have the responsibility for all aspects of document control which includes, allocation of unique document numbering, regular document reviews, publishing documents on AIMS and informing the business of all the changes that have been made.

Heads of Department - Have the responsibility to ensure that the documents that are in place for their respective departments are compliant with the most up to date legislation and industry best practice.

Site Manager(s) - Have the overall responsibility for the management of control of work at their site and for feeding back improvements that can be made to AIMS documents.

3.0 Abbreviations & Definitions

AIMS - ASCO Integrated Management System

CEO - Chief Operating Officer

HSSEQ - Health, Safety, Security, Environment and Quality

SID - Service Improvement Document

FPAL - First Point Assessment Limited

4.0 Overview of AIMS

AIMS governs all ASCO operations globally and holds a repository of documented procedures for all operational and support service functions.

AIMS has the following document hierarchy for all operations and business streams:

- Policies
- Group Operating Procedures
- Standards
- Work Aids
- Work Instructions
- Plans
- Forms.

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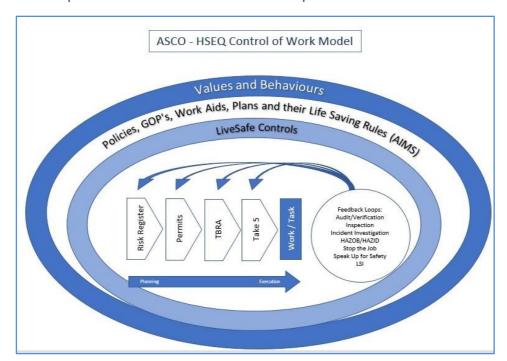
All of the completed documents are concise and are designed to achieve global application wherever this is possible. They are controlled by the ASCO Group HSSEQ Administration team who provide their unique numbering and publish them on AIMS. The specific arrangements for Document Control are set out in GOP-HSSEQ-010.

All documents held within AIMS are reviewed in accordance with the specified frequencies in the above Document Control GOP, or in response to legislative changes, industry changes, or where an opportunity for improvement has been realised.

5.0 ASCO - HSSEQ Control of Work Model

The ASCO - HSSEQ Control of Work model shown below includes within its illustration:

- An overview of the AIMS structure
- The stages of planning and execution of work activities at ASCO
- The feedback process which is used for the continuous improvement of AIMS.



This model provides a quick reference point for the overall structure of AIMS and how ASCO seek to develop and maintain the system.

As ASCO organise for HSSEQ, consideration is given to the following four key areas:

<u>Controls</u> - these are within the organisation for example, the role of managers / supervisors, defined standards, provision of instruction, acceptance of accountability and responsibility.

<u>Co-operation</u> - between operatives, their health and safety representatives and managers / supervisors through active consultation and involvement.

<u>Communication</u> - making it effective globally, through visible behaviour, written material, and face-to-face discussions.

<u>Competence</u> - of individuals through recruitment and selection, training, coaching, specialist advice and measuring competency.

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6.0 Control of Work Documents

This section provides an index of all the most relevant documents held in the AIMS repository that are essential for the effective control of work at ASCO. The documents can be accessed directly by clicking on the hyperlink that is provided or by going to https://ascogroup.sharepoint.com/sites/aims.

*If any numbers or hyperlinks are not working then please report this to AIMSRequests@ascoworld.com.

<u>HSSEQ Documents</u> - these documents set the minimum HSSEQ requirements for the delivery of ASCO's work activities.

GOP-HSSEO-063 - Adverse Weather **GOP-HSSEQ-025** - Business Continuity Planning GOP-HSSEQ-058 - Business Risk Management GOP-HSSEQ-009 - Chemical Management System GOP-HSSEQ-003 - Clear Desk-Energy Saving GOP-HSSEQ-004 - Control of Dangerous Substances and Explosive Atmospheres GOP-HSSEQ-005 - Control of Noise at Work GOP-HSSEQ-006 - Control of Records GOP-HSSEO-007 - Control of Use of Knives on ASCO Sites GOP-HSSEQ-008 - Control of Vibration at Work GOP-HSSEQ-010 - Document Control GOP-HSSEQ-011 - DSE Risk Assessment GOP-AUS-HSSEQ-004 - Electrical Safety - Australia GOP-HSSEQ-012 - Emergency Response Planning GOP-HSSEQ-013 - Environmental Aspects and Impacts GOP-HSSEQ-015 - Equipment Inspection by Insurance Company GOP-HSSEQ-017 - External Audit GOP-HSSEQ-061 - Fatigue Management GOP-HSSEQ-020 - Fire Fighting and Prevention GOP-HSSEQ-021 - First Aid at Work GOP-HSSEQ-001 - Global Travel Safety & Security GOP-HSSEQ-045 - Health, Safety and Environmental Legislative Compliance GOP-HSSEQ-027 - HSSEQ Management Review GOP-HSSEQ-029 - HSSEQMS Interfacing GOP-HSSEQ-031 - Incident Management GOP-AUS-HSSEQ-016 - Injury Management Plan - Australia GOP-HSSEQ-032 - Internal Audit GOP-HSSEQ-022 - Life Saving Rules GOP-HSSEO-034 - LiveSafe HSSEO Scorecard and Reporting Guidelines GOP-HSSEQ-035 - LiveSafe Intervention GOP-HSSEQ-056 - Lone Working Procedure GOP-HSSEQ-059 - Maintenance Management GOP-HSSEQ-036 - Management of Change GOP-HSSEQ-037 - Management of Contractors GOP-HSSEQ-038 - Manual Handling Risk Assessment GOP-HSSEQ-053 - Mobile Phones / Devices whilst Driving GOP-HSSEQ-039 - Monitoring and Measurement GOP-HSSEQ-041 - Permit to Work GOP-HSSEQ-042 - Planned Inspections GOP-HSSEQ-022 - Planning a Lifting Operation

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GOP-HSSEQ-054 - Powered Mobile Plant including Forklifts



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GOP-HSSEQ-024 - PPE Standard
GOP-HSSEQ-044 - Provision and Use of Work Equipment
GOP-HSSEQ-050 - Safe Havens on Sites / Bases
GOP-HSSEQ-046 - Service Improvement Process
GOP-HSSEQ-060 - Spill Control
GOP-HSSEQ-016 - Spotter & Vehicle Banksman
GOP-HSSEQ-047 - Task Based Risk Assessment
GOP-HSSEQ-048 - Toolbox Talk
GOP-HSSEQ-033 - Verification
GOP-HSSEQ-051 - Visitor Site Induction GOP-HSSEQ-052 - Work at Height
GOP-HSSEQ-026 - Working with Ionising Radiation
<u>Procurement</u> - these documents are used for the selection and procurement of external services.
GOP-PRO-001 - Procure-To-Pay-Process
GOP-PRO-002 - Supplier Selection and Review
GOP-PRO-003 - Supplier Tender Process
<u>Transport</u> - these documents are used to control work activities associated with ASCO Transport.
GOP-TR-003 - Administration
WA-GOP-TRAN-003.05 - Chain of Responsibility
GOP-TR-001 - Control
GOP-TRAN-002 - Drivers
GOP-AUS-TR-005 - In Vehicle Monitoring (IVMS)
GOP-TR-004 - Maintenance
Operational Support - these are used to control work activities associated with ASCO's core activities.
GOP-OS-004 - Fuelling of Plant & Equipment
GOP-OS-001 - Shipping Container Ventilation Pre-Removal of Goods
GOP-OS-003 - SIMOPS
<u>NORM Solutions</u> - these documents are specific to NORM Solutions and provide the necessary controls for their
activities.
COR NORM 030. Comparting Process for LLW Draws
GOP-NORM-030 - Cementing Process for LLW Drums
GOP-NORM-031 - Charging of BA Cylinders using a HP Compressor
GOP-NORM-015 - Clean Equipment Packaging for Return to Client
GOP-NORM-015 - Clean Equipment Packaging for Return to Client GOP-NORM-020 - Drum Operations
GOP-NORM-015 - Clean Equipment Packaging for Return to Client GOP-NORM-020 - Drum Operations GOP-NORM-013 - Drum Waste Compactor Operations
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GOP-NORM-015 - Clean Equipment Packaging for Return to Client GOP-NORM-020 - Drum Operations GOP-NORM-013 - Drum Waste Compactor Operations GOP-NORM-016 - Facility and Yard Housekeeping GOP-NORM-011 - Generation of Client Work Packs GOP-NORM-002 - Health Physic Surveys of Facility & Yard GOP-NORM-003 - Health Physics Monitoring of Cleaned Equipment GOP-NORM-005 - Inventory, Measurement, Monitoring and Marking of Receipted Tubulars GOP-NORM-004 - Jetting Bay Operations
GOP-NORM-015 - Clean Equipment Packaging for Return to Client GOP-NORM-020 - Drum Operations GOP-NORM-013 - Drum Waste Compactor Operations GOP-NORM-016 - Facility and Yard Housekeeping GOP-NORM-011 - Generation of Client Work Packs GOP-NORM-002 - Health Physic Surveys of Facility & Yard GOP-NORM-003 - Health Physics Monitoring of Cleaned Equipment GOP-NORM-005 - Inventory, Measurement, Monitoring and Marking of Receipted Tubulars GOP-NORM-004 - Jetting Bay Operations GOP-NORM-032 - Local Rules for Working with Ionising Radiations
GOP-NORM-015 - Clean Equipment Packaging for Return to Client GOP-NORM-020 - Drum Operations GOP-NORM-013 - Drum Waste Compactor Operations GOP-NORM-016 - Facility and Yard Housekeeping GOP-NORM-011 - Generation of Client Work Packs GOP-NORM-002 - Health Physic Surveys of Facility & Yard GOP-NORM-003 - Health Physics Monitoring of Cleaned Equipment GOP-NORM-005 - Inventory, Measurement, Monitoring and Marking of Receipted Tubulars GOP-NORM-004 - Jetting Bay Operations GOP-NORM-032 - Local Rules for Working with Ionising Radiations GOP-NORM-017 - Local rules fir Working with NORM in the Offshore Environment
GOP-NORM-015 - Clean Equipment Packaging for Return to Client GOP-NORM-020 - Drum Operations GOP-NORM-013 - Drum Waste Compactor Operations GOP-NORM-016 - Facility and Yard Housekeeping GOP-NORM-011 - Generation of Client Work Packs GOP-NORM-002 - Health Physic Surveys of Facility & Yard GOP-NORM-003 - Health Physics Monitoring of Cleaned Equipment GOP-NORM-005 - Inventory, Measurement, Monitoring and Marking of Receipted Tubulars GOP-NORM-004 - Jetting Bay Operations GOP-NORM-032 - Local Rules for Working with Ionising Radiations

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GOP-NORM-018 - NORM Contaminated Tubulars & Equipment
GOP-NORM-025 - NORM Operations on External Sites
GOP-NORM-019 - Offloading and Loading of Tubulars
GOP-NORM-006 - Offloading, Inventory and Storage of NORM Contaminated Equipment
GOP-NORM-021 - Operation of Pallet Truck and Drum Trolley
GOP-NORM-007 - Receipt into Facility and Dismantling of Contaminated Equipment
GOP-NORM-009 - Return of Rejected Health Physics Monitored Equipment
GOP-NORM-036 - Scale Recovery
GOP-NORM-037 - Sentencing and Disposal of General Solid Low Level Waste
GOP-NORM-014 - Source Checks on all Monitoring Equipment & Air Sample Change Out
GOP-NORM-022 - Start Up Procedure for Water Treatment Facility
GOP-NORM-001 - Strip Down Area Operations
GOP-NORM-038 - Surface Water Monitoring
GOP-NORM-039 - Tubular Cleaning Process
GOP-NORM-010 - Tubular End Caps Cleaning
GOP-NORM-040 - Tubular Monitoring
GOP-NORM-008 - Use of Evolution 180 + 230 Metal Cutters
GOP-NORM-041 - Ventilation System Filtration Change Out
GOP-NORM-024 - Water Filtration Filters Change Out
<u>Pipeyards</u> - these documents are used to control work associated with ASCO's pipeyard activities.
GOP-PY-001 - Facilities - Guidance
GOP-PY-002 - Pipeyard Storage Stowage and Transportation
GOP-PY-003 - Pipeyard Receipts
GOP-PY-005 - Pipeyard Well Prep Operations
GOP-PY-006 - Pipeyard Inbound Backload
GOP-PY-007 - QA Inspection and Preservation
Quayside Operations - these documents are used to control the works involved with ASCO's quayside activities.
<u>quayside operations</u> - these documents are used to controt the works involved with ASCO's quayside activities.
GOP-QS-001 - Gantry Cargo Inspection Outbound and Inbound
GOP-QS-006 - Gun and Ammunition Restriction under Section 1 of the Firearms Act 1968
GOP-QS-007 - Methanol-Industrial Methylated Spirits-H2S Scavenger Loading
GOP-QS-008 - Mooring-Unmooring of Vessels
GOP-QS-005 - Operational Control
GOP-QS-009 - Potable Water Systems - Written Scheme of Control
GOP-QS-004 - Underdecks
GOP-QS-003 - Vessel Loading
GOP-QS-002 - Vessel Unloading
GOT-Q3-002 - Vesset Untodding
<u>Warehouse</u> - these documents are used to control the works involved with ASCO's warehouse activities.
GOP-WH-001 - Warehouse Receipts
GOP-WH-002 - QA Inspection
GOP-WH-003 - Putaway
GOP-WH-004 - Issues and Dispatch
GOP-WH-005 - Inventory Management
GOP-WH-006 - Inbound Backload
GOP-WH-007 - Construction of Wooden Shipping Crates
GOP-WH-008 - Stock Preservation

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<u>Legal and Compliance</u> - these documents are used to ensure that ASCO achieves or exceeds the minimum legal standards for the Business.

GOP-LC-001 - Gifts and Hospitality

GOP-LC-002 - Whistleblowing

GOP-LC-003 - Anti - Bribery and Corruption

GOP-LC-004 - Contracting Protocols

GOP-LC-005 - Anti-Slavery Human Trafficking

<u>Training</u>, <u>Development and Competence</u> - these documents are used to set the minimum standards for the training and competence of ASCO staff.

GOP-TDC-001 - Competence Assurance Management System

GOP-TDC-002 - Educational Training and Funding

7.0 Control of Subcontractors and Suppliers

ASCO accepts that it will be necessary to engage subcontractors and suppliers who will assist in the delivery of the services that we provide to our clients. This is effectively controlled and monitored through the utilisation of the Supplier Management Database (UK) which is web-based software that is used to evaluate, track, manage and approve ASCO suppliers, and act as a repository for all supplier information. All of the specific arrangements for subcontractor and supplier control are set out in GOP-PRO-001, GOP-PRO-002, and GOP-PRO-003.

8.0 Client, Contractor, and Third-Party Interfacing

Delivering ASCO's work activities and controlling work activities on ASCO sites in compliance with our HSSEQ Control of Work arrangements, does have the potential to become confused if it is not effectively controlled.

Situations that are known to exist include working to a client specific instruction and where third parties have been engaged to work on ASCO sites. To ensure that these are effectively controlled, interface arrangements shall be put in place to clearly demonstrate who is in control, and what documentation takes primacy for the control of the activities.

The arrangements that shall be followed are set out in GOP-HSSEQ-029, HSSEQMS Interfacing.

9.0 AIMS Assurance

It is essential that ASCO has the necessary assurance that AIMS is fit for purpose and that it remains a world class system. To achieve this, the ASCO Group HSSEQ Manager will ensure that the system continually meets or exceeds the requirements of ISO 45001, 14001 and 9001 through the engagement of an external certification body.

ASCO HSSEQ also have many other active and reactive monitoring techniques that will ensure the effectiveness of AIMS which include, but are not limited to:

- First Point Assessment Limited (FPAL)
- Workplace Inspections, Audits and Verification
- Business Risk Management
- Incident Investigation and Application of Industry Best Practice
- Leadership Site Visits and Worksite Engagement

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All types of non-conformance and non-compliance that are identified will be recorded within the ASCO HSSEQ Database as a Service Improvement Document (SID). From here, they will have remedial actions assigned to owners who will make the necessary improvements to the system to prevent any reoccurrence in a timely manner.

10.0 Stop the Job

The ultimate control of work at ASCO is to "Stop the Job". ASCO empowers all of its personnel, contractors, and visitors to "Stop the Job" any time they see something that appears to them to be unsafe.

Everyone who visits ASCO are given the following messages at their induction:

- You have the authority and the responsibility to intervene and report all incidents, unsafe actions, or substandard conditions
- Have the courage to intervene, it could save others unnecessary pain or suffering
- All incidents or near misses must be reported to ASCO Management as soon as possible after they have occurred
- · All incidents and near misses will be thoroughly investigated.

ASCO will never respond negatively to anyone who genuinely "Stops the Job" where they believe that it is being done unsafely, or that an unsafe condition has developed.

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