

# Environmental Management System (EMS) Summary

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Submitted to:

Environment Agency

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# 1. Introduction

## 1.1 Introduction

An Environmental Management System (EMS) is being developed for implementation on site following the ISO14001:2015 standard. Some parts of the EMS already exist but the rest of the EMS will be developed and completed during the determination of the Environmental Permit application. Site management will ensure the EMS suitability covers all operations included as part of the future Environmental Permit.

## 1.2 Environmental Management System Structure

The Environmental Management System has been organised using the following structure:

- Index
- System Documents and Management Plans
- Environmental Procedures
- Internal Monitoring and Recording Forms
- External Report Forms
- Environmental Training Documents
- Schedules and Timetables
- Plans and Drawings
- Records

The sections below provide more details as to the structure outlined above. A copy of the proposed EMS Index is provided within Appendix 1.

## 1.3 Management System Outline

### 1.3.1 Index, System Documents and Management Plans

This section of the system will contain relevant reports that will be produced as part of the permit application process for the Environmental Permit and will form the core of the installation’s EMS. This section will for example contain specific management plans such as the Environmental Accident Management Plan. The Environmental Policy will also be held within this section of the management system.

The Environmental Accident Management Plan (EAMP) contains the following detail:

- Identification of the Hazards
- Identification of the Risks
- Measures in place to reduce environmental risks from accidents

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In the event of an environmental accident on site resulting in impact on sensitive receptors, Site Management will:

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

A copy of the Environmental Accident Management Plan has been submitted as part of the Environmental Permit application.

### 1.3.2 Environmental Procedures

All procedures developed as part of the assessment and control of environmental risk are stored in this section of the EMS. This will include both the system and operational procedures. These procedures will include, but not be limited to:

- A Delivery and Collection Procedure for control of delivery and collection of potentially hazardous materials and wastes
- Hazardous Materials Storage Procedure that details how materials that are potentially hazardous to the environment will be controlled on site
- Communication and Complaints Procedure that details how complaints will be dealt with including investigating, communicating reporting and implementation of appropriate actions
- Procedure for investigating environmental incidents and near misses and identifying corrective actions
- Procedure for dealing with spills and leaks

Further detail with regards to these procedures has been detailed in Section 1.5 below.

### 1.3.3 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 stored in this section of the system. The section includes, but not limited to, the following:

- Incident & Corrective Action form
- Site infrastructure inspection form

### 1.3.4 External Reporting Forms

All external reporting forms will be stored in this section. These forms are focussed on the reporting requirements of the Environmental Permit, including the EA's Schedule 5 reporting form contained within the Permit.

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### 1.3.5 Environmental Training Documents

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

- 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
- Spill control

A training needs analysis is carried out to identify specific training needs for key posts. This analysis will include contractors, where relevant, and those responsible for purchasing materials and equipment. As the EMS is developed, relevant staff will continue to be trained in the required elements, according to the training needs matrix.

### 1.3.6 Schedules and Timetables

Schedules and timetables will be held as part of the EMS and/or in related systems (e.g. Maintenance systems). The schedules will include, but not be limited to, waste schedule, raw materials schedules and emergency contact lists. Where relevant, schedules will link to site drawings showing, for instance, storage locations on potentially hazardous materials.

### 1.3.7 Plans and Drawings

This element of the Environmental Management System will contain all relevant site plans and drawings referenced within the EMS. This will include the Emission Points, Installation Boundary and the Drainage Plan.

### 1.3.8 Records

This section of the EMS will contain all records that are required to be stored by the Environmental Permit such as those required by the Site Closure Plan and Fugitive Emissions Management Plan.

## 1.4 Management Structure and Responsibility

All staff will have clearly defined roles and responsibilities. The site will operate to an organogram implemented as part of the EMS and training requirements will reflect the various levels of responsibility. The organogram will be 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 the liaise with the public with regards to complaints.

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

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## 1.5 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.

<b>Table 1.1 – EMS Summary</b>	
<b>Procedures/Policies</b>	<b>Justification for Use to Minimise Environmental Risk</b>
Environmental Policy	This policy outlines the organisations commitments to the environment and meeting the standards of ISO14001 Management Systems.
Aspects and Impacts Procedure	Defines the procedure for the identification and evaluation of environmental aspects arising from ITM Powers activities, products and services. The procedure shall determine which aspects have or can have a significant impact on the environment.
Adverse Event Investigation Procedure	This procedure details the process for identifying and investigating environmental incidents and near-misses. This enables the identification of root-cause and the implementation of preventative actions to prevent recurrence and protect the environment for the future.
IBC Management (Hazardous effluent Storage and Bund management Procedure)	Control the storage of hazardous substances on site and the respective storage facilities to minimise the potential for environmental accidents.
Waste Management Procedure	The purpose of this procedure is to ensure the management of waste produced at ITM sites is carried out appropriately and in such a way as to deliver legal compliance and to avoid harm to health of the environment or people for the management of all types of waste streams (solid, liquid, gaseous and hazardous) produced at ITM sites by staff, visitors and contractors.
Emergency Spill Control Procedure	Control, mitigate, clean-up of spills and / or leaks of potentially hazardous materials on site to ensure they are cleaned up appropriately minimising potential impacts on the environment and identified sensitive receptors.
Internal Audit and Non-conformance Process	The purpose of this procedure is to set out a framework for continually monitoring the organisation’s conformance to ISO 14001 standards, as well as compliance to legal framework. Audits will be both operational and systems-based and will be carried out in accordance with a pre-determined audit schedule. The procedure also deals with non-conformance and corrective action planning.
Workplace Inspections	The workplace inspection programme provides a robust mechanism that ensures the identification of environmental risks and opportunities and the implementation of corrective actions and improvement plans.
Communication and Complaints Form	Communication with regulatory authorities and environmental complaints from third parties is covered by this form 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.

## Appendix 1: Environmental Management System, System Index

ITM Power	Environmental Management System		
	System Index		
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## System Structure

EMS Section Reference	Element
00	Index
01	System Documents and Management Plans
02	Environmental & Operating Procedures
03	Internal Monitoring and Recording Forms
04	External Report Forms
05	Environmental Training Documents
06	Schedules and Timetables
07	Plans and Drawings
08	Records

## INDEX

EMS Reference	ITM BMS Reference	Document Title	Version	Issue Date
<a href="#">EMS 00</a>		EMS Index	1	DRAFT
<a href="#">EMS 01-001</a>	PLCY-HSE-003	Environmental Policy	Rev C	03/01/2023
<a href="#">EMS 01-002</a>		Environmental Accident Management Plan	1	
<a href="#">EMS 01-003</a>		Fugitive Emissions Monitoring Programme	1	DRAFT
<a href="#">EMS 01-004</a>	SP-HSE-02	Aspects and Impacts Procedure	Rev A	22/06/2023
<a href="#">EMS 02-001</a>		Document Control Procedure	1	DRAFT
<a href="#">EMS 02-002</a>	SP-HSE-01	Adverse Event Investigation Procedure	4	28/06/2023
<a href="#">EMS 02-003</a>	BP-HSE-017	Emergency Response Spill Process	Rev B	03/08/2021
<a href="#">EMS 02-004</a>		Communications and Complaints Procedure	1	DRAFT
<a href="#">EMS 02-005</a>	BP-HSE-026	Waste Management Process	Rev A	10/11/2021
<a href="#">EMS 02-006</a>		Delivery and Collection Procedure	1	DRAFT
<a href="#">EMS 02-007</a>	WI-OPER-020	IBC Management Procedure	Rev A	14/12/2022
<a href="#">EMS 02-008</a>		Hazardous Substance Storage Procedure	1	DRAFT
<a href="#">EMS 02-009</a>		Permit Reporting Procedure	1	DRAFT
<a href="#">EMS 02-010</a>	WI-HSE-028	Workplace Inspections Procedure	Rev A	03/04/2023
<a href="#">EMS 02-011</a>	SP-HSE-04	Internal Audit/Review Procedure	Rev A	13/07/2023
<a href="#">EMS 03-001</a>		Incident and Corrective Action Report Form	1	DRAFT
<a href="#">EMS 03-002</a>		Environmental Inspection Form	1	DRAFT
<a href="#">EMS 03-003</a>		Audit/Review Form	1	DRAFT
<a href="#">EMS 03-004</a>		Trade Effluent Analysis Record Sheet	1	DRAFT
<a href="#">EMS 03-005</a>	F7.01	Environmental Complaint Form	Rev C	16/03/2016
<a href="#">EMS 04-001</a>		EA Schedule 5 Notification Form	1	DRAFT
<a href="#">EMS 04-002</a>		Permit Reporting Forms	1	DRAFT
<a href="#">EMS 05-001</a>		EMS Training Schedule / Matrix	1	DRAFT
<a href="#">EMS 05-002</a>		Environmental Induction & Permit Awareness Training	1	DRAFT

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EMS 05-003		Waste & Duty of Care Training	1	DRAFT
EMS 05-004		Spill Control Training	1	DRAFT
EMS 06-001		Sensitive Receptor Schedule	1	DRAFT
EMS 06-002		Emergency Contact List	1	DRAFT
EMS 06-003		Raw Materials Inventory	1	DRAFT
EMS 06-004		Waste Schedule	1	DRAFT
EMS 06-005		Permit Reports Schedule	1	DRAFT
EMS 07-001		EP installation Boundary Plan	1	DRAFT
EMS 07-002		Sensitive Receptor Plan	1	DRAFT
EMS 07-003		Drainage Plan	1	DRAFT
EMS 07-004		Site Layout & Air Emission Point Plan	1	DRAFT
EMS 07-005		Waste Storage Plan	1	DRAFT
EMS 07-006		Raw Materials Storage Plan	1	DRAFT
EMS 08-001		Environmental Permit Records	Continual Records	
EMS 08-002		Incident and Corrective Action Records	Continual Records	
EMS 08-003		Environmental Inspection Records	Continual Records	
EMS 08-004		Environmental Complaints Records	Continual Records	
EMS 08-005		Internal Audit / Document Review Records	Continual Records	
EMS 08-006		Permit Reporting Records	Continual Records	
EMS 08-007		EA Compliance Assessment Report Records	Continual Records	
EMS 08-008		Effluent records and discharge consent	Continual Records	
EMS 08-009		Environmental Permit applications	Continual Records	