

**E F WESTAWAY LTD**  
**ENVIRONMENTAL MANUAL**  
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February 2018

# E F WESTAWAY LTD

## MONTHLY HEALTH AND SAFETY SURVEILLANCE

### Fire

### Action

- Fire equipment and signs acceptable
- Alarm system tested and working

### First Aid

- First Aid Box contents acceptable
- Eye wash Stations operative
- Safety Shower operative

### Work Area

- Housekeeping good/satisfactory/poor
- Walkways clear
- Exits clear
- Refuse bins available

### Chemicals

- Chemicals identified correctly
- Incompatible chemicals segregated

### Equipment

- Chains and Slings acceptable
- Lifting Racks acceptable
- Machine guards adequate

### People

- Appropriate PPE worn
- PPE in stock (gloves, glasses, masks etc)

### Health and Safety Documentation

- Health and Safety Policy available
- Risk Assessments available
- Safety Manual available
- Fire and Evacuation Procedure posted
- COSHH Manual available

Signed:

Date:

# E F WESTAWAY LTD

## ENVIRONMENTAL STATEMENT

E F Westaway Ltd is a major supplier of metal finishing processes to the engineering and manufacturing industries and acknowledges that its activities can have an effect on the environment.

The Company is committed to protection of the environment and recognises the importance of incorporating environmental considerations into its business activities.

The Company will:

1. Design and operate an Environmental Management System specific to the operations of the Company.
2. Identify pollution risks arising from our activities and introduce measures to control them.
3. Promote the efficient use of energy and materials
4. Provide training for all employees to enable them to work in a manner which is compliant with the Environmental Management System.
5. Reduce waste where possible and ensure that its disposal is carried out in accordance with current legislation.
6. Undertake an assessment of any new products used by the Company

Signed 

Position Director

Date 15/06/2012

## TRAINING

### 1. PURPOSE

All personnel need to be aware of the environmental impact of their actions and this procedure details the way in which the company ensures that its employees possess adequate awareness to enable them to perform their duties with the minimum adverse effect on the environment.

### 2. RESPONSIBILITIES

The Managing Director is responsible for ensuring that this procedure is effectively carried out.

Quality Director — Environmental Awareness Training

### 3. LIST OF KNOWLEDGE EXPECTED

- a. Familiarity with chemicals used on site and their environmental effect
- b. Familiarity with movement and storage of chemicals
- c. Familiarity with Accident Response & Management Plan
- d. Familiarity with Environmental Non-Conformance Reporting Procedure

### 4. RECORDS

- a. Training Records are retained in the individual Training Progress Record
- b. Individuals are required to sign entries in their Training Progress Record to indicate that they have received and understood their training
- c. Training records are maintained for the length of time the employee is with the Company
- d. Training records will incorporate appropriate notes on the evaluation of training provided

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PREPARED BY



APPROVED BY



ISSUED BY



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## ACCIDENT RESPONSE AND MANAGEMENT PLAN

### 1. PURPOSE

Small leaks and spillages are unlikely have an impact on the environment, because of the containment measures, such as bunds, walls and containment kerbs, which are in place. The purpose of this plan is to provide a response to an unexpected emergency incident which may threaten the environment and to take measures to limit its impact to a minimum. Examples of such incidents may be a sudden rupture of a tank, or fracture of chemical transfer pipework, where the volumes released are significantly greater.

### 2. RESPONSIBILITY

Works personnel reporting to management

### 3. PROCEDURE

- a. Identify cause of incident
- b. Take immediate action to contain incident such as:
  - i. Close relevant valves and associated pumps
  - ii. Use auxiliary containment measures (e.g. sand bags) to provide additional protection at all entry/exit points within the vicinity of the incident
  - iii. Direct spillage into floor sumps and pump to effluent holding tank
- c. Record incident in Environmental Incident Book  
Notify Yorkshire Water and/or Environment Agency if the spillage is not Contained

### 4. REVIEW

Entries in "Environmental Incident Book" will be analysed and discussed at Corrective Action Meetings with a view to identifying areas of improvement to avoid a recurrence. Any proposed actions will be minuted and the progress of their implementation will be monitored at subsequent meetings

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PREPARED BY

*D. Lyneston*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*

## ENVIRONMENTAL NON - CONFORMANCE

### 1. PURPOSE

This procedure deals with the way the company reports, records and responds to deficiencies in items of plant, equipment or processes, which may create a potential hazard to the environment.

### 2. RESPONSIBILTIES

The Production Manager shall ensure that the procedure is followed.

### 3. SCOPE

Non conforming items originating from any source, examples of which may be:-

- a. Inspections of tanks, pipework, retaining walls, bunds etc.
- b. Recorded environmental incidents
- c. Environmental Complaints

### 4. PROCEDURE

- 4.1 The Works Manager, or other delegated personnel, will make an entry in the Environmental Non Conformance Book of any reported deficiencies or incidents of environmental concern.
- 4.2 The entry will be reported to a director and the problem investigated.
- 4.3 Corrective action will be taken within a set time frame depending on the severity of the non conformance.
- 4.4 After rectification has been completed, the Works Manager will sign off the entry with the date of completion.

### 5. REVIEW

Entries in the Environmental Non — Conformance Book will be analysed and discussed at Corrective Action Meetings

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PREPARED BY



APPROVED BY



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## ENVIRONMENTAL AUDITS

### 1. PURPOSE

This procedure details the way in which internal Audits are carried out to monitor the Company's environmental performance as laid down in the Environmental Manual

### 2. APPLICABILITY

Each aspect of the Environmental Procedures will be audited at least once per year, or more frequently at the discretion of the Managing Director, taking into account the nature of the activity and the results of previous audits.

### 3. RESPONSIBILITIES

The Quality Director shall be responsible for the operation of the auditing system. He shall be responsible for selection of auditors, formulation and maintenance of audit schedules, review of findings and completion of corrective action and follow up audits.

### 4. AUDIT PROCEDURE

The auditor shall follow the following procedure:-

- 4.1 Agree with the Quality Director a suitable date within the scheduled month, on which to carry out the audit.
  - 4.2 Read the Environmental Manual and the Procedures within it.
  - 4.3 Check previous audit reports to highlight any areas requiring special attention
  - 4.4 Conduct the audit to ensure that the system is current and that there is adherence to all procedures
  - 4.5 Follow Audit Check List, but use only as a guide, retaining a flexible approach
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PREPARED BY

*D. Lytlekaray*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*

## ENVIRONMENTAL MONITORING & INSPECTION

### 1. PURPOSE

This procedure details the way in which environmental controls and condition of plant are monitored, inspected and recorded.

### 2. RESPONSIBILITY

The Works Chemist is responsible for scheduling and recording results

### 3. SCOPE

Areas affected are:-

Tanks, sumps, effluent transfer pipework, sumps and bunds, waste storage containers  
chemical storage integrity.

### 4. PROCEDURE

The Works Chemist, or other designated personnel, will complete the check lists in EP5 App  
Any item found to be in non conformance will be entered in the Environmental Non  
Conformance Book, including comment upon the severity of the deficiency. Action to rectify  
any deficiency will be taken in accordance with the Environmental Non Conformance  
procedure described in EP3

### 5. REGULARITY

Inspections will be made monthly and results recorded.

### 6. REVIEW

Results will be reviewed at scheduled management meetings

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PREPARED BY

*D. Dylkes*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*



ENVIRONMENTAL PROCEDURE

MONTHLY PLANT INSPECTION

ITEM	SOUND Y/N	IF NO, LIST DEFECT	ACTION
PROCESSING TANKS + I/D			
EFFLUENT TRANSFER PIPEWORK			
SUMPS AND BUNDS			
BULK WASTE TANKS			
CHEMICAL STORAGE CONTAINERS			

DATE

PREPARED BY

*D. Lyndeston*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*

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## ENVIRONMENTAL COMPLAINTS

1. PURPOSE

This procedure details how the Company records and reacts to environmental complaints

2. RESPONSIBILITIES

The Managing Director is responsible for ensuring that this procedure is effectively carried out.

3. PROCEDURE

3.1 All complaints are recorded in the Environmental Complaints form EP6 App A

3.2 All complaints are investigated by management to establish cause and any action required is recorded in EP6 App A

3.3 Verbal complaints may be acknowledged verbally

3.4 Written complaints are to be acknowledged in writing

4. REVIEW

All complaints will be discussed at Corrective Action meetings

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PREPARED BY

*D. Plestovany*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*

ENVIRONMENTAL PROCEDURE

ENVIRONMENTAL COMPLAINT FORM

NAME AND ADDRESS OF COMPLAINANT
NATURE OF COMPLAINT
INVESTIGATION
ACTION TO CORRECT COMPLAINT
ACTION TO PREVENT RE-OCCURRENCE

SIGNED

DATE

PREPARED BY

*D. Greston*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*

ENVIRONMENTAL PROCEDURE

ENVIRONMENTAL ASSESSMENTS

RISK	ENVIRONMENTAL CONSEQUENCE	CONTROL
Leaking tanks	Escape of contents causing damage to fabric of building	EP 5 App A
Defective sumps	Escape of rinsewaters causing damage to fabric of building and possible contamination of watercourses	EP 5 App A
Defective bunds	Escape of rinsewaters causing damage to fabric of building and possible contamination of watercourses	EP 5 App A
Effluent transfer pipework	Leaks could result in spillages	EP 5 App A
Chemical movements	Failure to follow procedures could result in issue of incorrect chemicals and/or spillages	WP 8
Inadequate training	Could result in employees causing threat to environment and fellow employees	EP 1
Chemical spillages	Could lead to damage to fabric of building and possible contamination of watercourse	EP App A
Incorrect effluent treatment	Could lead to breach of Y W A consent and damage to public sewer	WP 7

PREPARED BY

*D. Westaway*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*

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SITE CLOSURE PLAN

In the event of a cessation of activities, the site will need to be cleared for any future purpose.

Closure of site will include following actions:

1. Disposal of all process solutions and waste chemicals in storage by authorised waste disposal contractors
2. Cleaning of plant and equipment, including all process tanks for dismantling or disposal
3. Dismantling and disposal of transfer pipework and valves
4. Re-instatement of floor by infilling of sumps and removal of bunds
5. Dismantling and making safe of redundant electric cabling
6. Removal of any accumulated refuse in accordance with environmental legislation
7. Tidy site

PREPARED BY

*D. Gyllestovans*

APPROVED BY

*[Signature]*

ISSUED BY

*[Signature]*



Administered by PRI

*This certificate is granted and awarded by the authority of the Nadcap Management Council to:*

## **EF Westaway Ltd**

Arden Works, Jessell Street  
Sheffield, S9 3HY  
United Kingdom

*This certificate demonstrates conformance and recognition of accreditation for specific services, as listed in [www.eAuditNet.com](http://www.eAuditNet.com) on the Qualified Manufacturers List (QML), to the revision in effect at the time of the audit for:*

## **Chemical Processing**

**Michael J. Hayward**  
Executive Vice President & Chief Operating Officer

Certificate Number: 4960187787  
Expiration Date: 30 April 2022  
Accreditation Length: 24 Months

Performance Review Institute (PRI) | 161 Thorn Hill Road | Warrendale, PA 15086-7527