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BEST AVAILABLE TECHNIQUE ASSESSMENT

Environmental and sustainability solutions provided to

PLATER CHEMICALS GROUP LTD

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1.0 INTRODUCTION

WRM have been tasked by Plater Chemicals Group Ltd (hereon referred to as 'Plater Chemicals') with undertaking a Best Available Techniques Assessment (BAT) for a permit variation for their Plater Chemicals Manufacturing Facility, High Street West, Glossop, Derbyshire, SK13 8ES (the 'Site'). This forms part of Plater Chemicals' application to vary an environmental permit to include changes to specific activities and emission points that have changed since the original Environmental Permit (EPR/AP3737GA) was issued. The BAT standards contained within the Reference Document on Best Available Techniques for the Production of Speciality Inorganic Chemicals 2007 (BREF) document, has been consulted in order to ensure this BAT Assessment meets the requirements of legislation.

1.1 Legislative Background

The latest Best Available Techniques (BAT) Reference Document for Production of Speciality Inorganic Chemicals 2007 (BREF) previously underwent a review across the European Union before being published in 2007.

The Environmental Permitting (England and Wales) Regulations 2016 (as amended) require that activities identified under Schedule 1 be subjected to an assessment to demonstrate that the technology/technique proposed can be considered to be the 'Best Available' at the time the permit application is being made.

In order to undertake this BAT Assessment, guidance from the Environment Agency (EA) has been consulted with, in conjunction with the BREF document to ensure the site meets the required standards of compliance. These documents are displayed below and have been produced by the EA from IPPC regulations to give guidance to site operators in accordance with the BREF document:

- *Best Available Techniques (BAT) Reference Document for Production of Speciality Inorganic Chemicals 2007 (BREF).*

2.0 BEST AVAILABLE TECHNIQUES

2.1 Definition of Best Available Techniques

The Industrial Emissions Directive (IED) defines BAT as *"… the most effective and advanced stage in the development of activities and their methods of operation which indicates the*

practical suitability of particular techniques for providing the basis for emission limit values and other permit conditions designed to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole".

Article 3, Definitions, of the IED further defines the component parts of BAT as:

- "Best" – *"means most effective in achieving a high general level of protection of the environment as a whole"*.
- "Available techniques" – *"means those developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the costs and advantages …".*
- "Techniques" – *"includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned".*

BAT may be demonstrated by either:

- Compliance with the sector-level, indicative BAT performance described in the Sector Guidance Notes (SGNs) produced by the Environment Agency and in the European Commission BREF; or
- By conducting an installation-specific options appraisal of candidate techniques.

3.0 BEST AVAILABLE TECHNIQUES ASSESSMENT

3.1 Best Available Techniques Assessment Process

The BAT Assessment process is undertaken throughout the following sections of this report. BAT Conclusions which are not considered to be relevant or applicable at Plater Chemicals Manufacturing Facility due to Site-specific permitted activities have been excluded from the table. As stated within the Commission Implementing Decision (EU) 2018/1147, the scope (e.g. level of detail) and nature of how the Site addresses the BAT conclusions will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have (determined also by the type and volume of wastes processed).

The tables below present each of the relevant areas of the BAT conclusions grouped together and then assess information from the relevant section of the management system or other Site documents against the relevant BAT Conclusions and guidance. The management system as well as other key documents, forming the permit management system, have been consulted with in order to undertake this BAT Assessment.

All non-site-specific information contained within the Commission Implementing Decision (EU) 2016/902, containing the BAT conclusions, has been scrutinised but is not mentioned within this document to eliminate any potential confusion.

3.2 General BAT Conclusions

Overall Environmental Performance		
BAT No.	**BAT Guidance**	**Permit Documents**
01	**Raw and auxiliary materials supply, storage, handling and preparation** *BAT is to:* • reduce the amount of packaging materials disposed of by, e.g. recycling 'hard' and 'soft' used packaging materials (see Sections 4.2.1 and 4.2.2), unless safety or hazard considerations prevent it.	Only a small amount of material delivered to site is encased in packaging as the site largely accepts liquid which is pumped directly from vehicles into sealed storage tanks. Any delivery of drums to site are designated to recycling or reuse. **BC01 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
02	**Synthesis/reaction/calcination** *BAT is to:* reduce emissions and the amount of residues generated by implementing one or more of the following measures: a) using high purity feedstock (see Section 4.3.1) b) improving reactor efficiencies (see Section 4.3.2) **c)** improving catalyst systems (see Section 4.3.3).	High purity feedstock is sourced and utilised to minimise the presence of impurities that could lead to increased emissions and residues. All suppliers are required to provide certificates of analysis (CoAs) for their materials, ensuring that only high-purity feedstock is used in our processes. Reactors are designed for optimal efficiency, featuring precise control of temperature, pressure, and mixing conditions to ensure maximum reaction efficiency and minimal by-product formation. They contain • baffles in the reactors

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		• suitable rpm motor for the agitator • different mixing blade designs • impellers • pump recirculation • adding feed streams at a point in time closer to the ideal reactant concentration Process monitoring and control to continuously oversee reactor conditions are employed, allowing for real-time adjustments to maintain optimal efficiency. **BC02 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.

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03	For discontinuous processes, BAT is to: • optimise yields, lower emissions and reduce waste by sequencing the addition of reactants and reagents (see Section 4.3.4).	The site uses systems which monitor the process continuously and respond quickly and accurately. This system of operation can bring the process to a stable condition quickly, minimising the generation of off specification products. **BC03 Status: Compliant** – It is the operator's view that they are compliant with this BAT conclusion.
04	For discontinuous processes, BAT is to: • minimise cleaning operations by optimising the sequences for addition of raw and auxiliary materials (see Section 4.3.4).	As above. **BC04 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
05	**Product handling and storage** *BAT is to:* • reduce the amount of residues generated e.g. by using returnable product transportation containers/drums (see Section 4.2.1).	Only a small amount of material delivered to site is encased in packaging as the site largely accepts liquid which is pumped directly from vehicles into sealed storage tanks. Any drums and bags delivered to site are designated to recycling or reuse.

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		BC05 Status: Compliant – It is the operator's view that they are compliant with this BAT conclusion.
06	**Waste gas emissions abatement** *BAT is to:* minimise emissions of total dust in off-gases and achieve emission levels of 1 - 10 mg/Nm^3 by using one or more of the following techniques: a. cyclone (see Section 4.4.2.1.2) b. fabric or ceramic filter (see Section 4.4.2.1.5) c. wet dust scrubber (see Section 4.4.2.1.3) d. ESP (see Section 4.4.2.1.4). The lower end of the range may be achieved by using fabric filters in combination with other abatement techniques. However, the range may be higher, depending on the carrier gas and particle characteristics (see Section 4.4.2.1). Using fabric filters is not always possible e.g. when other pollutants have to be abated (e.g. SOx) or when the off-gases present humid conditions (e.g. presence of liquid acid).	A variety of emission controls are used across site on the processing vessels. This includes carbon filters, bag filters and wet scrubbers. The natural gas boiler that produces steam across site does not contain any abatement system as is normal for a natural gas fired boiler. However, there is a control system which automatically runs the burning process through setting upper and lower temperature of boiler water, controlling primary and secondary air fans, dosing screw, hydraulics etc. Optimum ratios of temperature, air and turbulence in boiler operations are remotely monitored by the boiler. There shall only be an emission limit value for NOx with this figure standing at 200mg/Nm^3. Servicing and periodic monitoring of the emissions from the boiler shall ensure continued compliance with the emission limit value. The cooling tower shall only emit water vapour.

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	The particulate matters recovered/removed are recycled back into production when this is feasible. The scrubbing medium is recycled when this is feasible.	**BC06 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
07	*BAT is to:* Reduce HCN emissions and achieve emission levels of <1 mg/m3 by scrubbing with an alkaline solution. The scrubbing medium is recycled when this is feasible (see Section 4.4.2.2.5).	There are wet scrubbers across site in the High Purity shed, Lime shed and at Spray Dryer 9 and 11. The scrubbing solution within these scrubbers are changed when necessary. **BC07 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
08	*BAT is to:* reduce NH3 emissions and achieve emission levels of <1.2 mg/m3 by scrubbing with an acidic solution. The scrubbing medium is recycled when this is feasible (see Section 4.4.2.2.5).	There are wet scrubbers across site in the High Purity shed, Lime shed and at Spray Dryer 9 and 11. The scrubbing solution within these scrubbers are changed when necessary. **BC08 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.

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09	*BAT is to:* reduce HCl emissions, e.g. by wet gas scrubbing under alkaline conditions (see Section 4.4.2.2.4). If HCl is the main pollutant to be treated and alkali scrubbing is used, BAT is to achieve 3 – 10 mg/Nm3 HCl.	There are wet scrubbers across site in the High Purity shed, Lime shed and at Spray Dryer 9 and 11. The scrubbing solution within these scrubbers are changed when necessary. **BC09 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
10	**Waste water management and water emissions abatement** *BAT is to:* allocate contaminated wastewater streams according to their pollutant load. Inorganic wastewater without relevant organic components is segregated from organic waste water and ducted to special treatment facilities (see Section 4.4.1 and Figure 4.1).	The site operates an effluent treatment plant solely for the materials produced on site. This treatment plant discharges into the foul sewer operated by United Utilities. **BC10 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
11	For rainwater, BAT is to: minimise pollution to receiving watercourses by applying all of the following measures: a. minimising the contamination of rainwater from activities carried out at the installation in particular by applying measures for reducing fugitive and diffuse emissions (see BAT 5.12 and BAT 5.13 and BAT 5.17)	The site is fully contained and features local containment with sumps and pumps to handle rainwater. Storage tanks are stored in bunded areas and only sealed IBC's and drums are stored outside of buildings and solid raw material and products are stored in a designated warehouse, thus minimising the likelihood of rainwater contamination. The site also contains an effluent treatment plant with a capacity of 200,000 litres

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	b. ducting and storing rainwater (see Section 4.7.4) expected to be contaminated from activities carried out at the installation and treating it if necessary. Other rainwater may be directly discharged (see Section 4.7.4) c. monitoring the discharge of this other rainwater as outlined in Section 4.7.4. Rainwater found to be contaminated is treated as in b. above (see Section 4.7.4). In some cases, the use of rainwater as process water to reduce fresh water consumption may be environmentally beneficial.	which treats all liquid effluent prior to discharge off site into the foul sewer. **BC11 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
12	**Infrastructure** For diffuse emissions, BAT is to: minimise diffuse dust emissions where dust may arise (in particular from the storage and handling of materials/products) by applying one or more of the following techniques: a. storing materials in closed systems (e.g. silos, see Section 6.3.4.1) b. using covered areas protected from rain and wind (see Section 6.3.4.1)	Materials are stored in closed systems with solid raw material / product being stored in a designated warehouse. Building roofs are routinely checked for holes / damage. Only sealed IBCs and drums are stored outside of buildings. Chemical production equipment within the buildings use hooding and ducting to capture dust emissions. Fabric filters are used on the required equipment with a lowest pore size of 1 micron. The production equipment also use abatement such as carbon filters on tanks and wet scrubbers.

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	c. having production equipment, e.g. conveyors, totally or partially enclosed (see Section 2.2) d. having equipment designed with hooding and ducting to capture diffuse dust emissions (e.g. during loading into storage) and abating it (e.g. using a fabric filter, see Section 6.3.4.1) e. carrying out housekeeping regularly, e.g. by vacuuming (see Section 4.7.6).	**BC12 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
13	*BAT is to:* minimise fugitive gaseous and liquid emissions by applying (according to the substances that may require controlling) one or more of the following techniques: a. having periodic leak detection and repair programmes (see Sections 4.7.1 and 2.6.6) b. operating equipment at slightly below atmospheric pressure (see Section 6.3.4.16) c. replacing flanges by welded connections (see Section 2.6) d. using seal-less pumps and bellow valves (see Section 2.6)	Tank and pipe maintenance is completed a mixture of daily and monthly to ensure there are no faults and therefore no unwanted release of liquid or gas. All external pipework is insulated reducing the impacts of extremely cold or hot weather conditions. In periods of hot weather, daily inspections are carried out on the external storage areas and the associated tanks and vessels. Good housekeeping is maintained in the form of daily site inspections. All tanks on site have secondary containment in the form of a concrete bund. **BC13 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.

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	e. using high performance sealing systems (e.g. effective gaskets and flanges, valves and pumps with high integrity packing, see Section 2.6) f. carrying out housekeeping regularly (see Section 4.7.6).	
14	For new installations, BAT is to: use a computerised control system to operate the plant (see Section 4.5.2). However, this does not apply where safety issues do not permit automatic operations (e.g. in the production of SIC explosives).	The site uses a well-established computerised control system to operate the plant which has been in operation for a number of years. **BC14 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
15	For installations where solid hazardous compounds can build up in pipelines, machines and vessels, BAT is to: have in place a closed cleaning and rinsing system (see Section 4.5.1).	**BC15 Status: Not applicable –** It is the operator's view that this condition is not for this type of installation.

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16	**Energy** *BAT is to:* reduce the consumption of energy by optimising plant design, construction and operation, e.g. by using pinch methodology, except if safety issues prevent it (see Section 4.6.1).	Plater Chemicals hold ISO 14001, 9001 and 45001 accreditation. Environmental Planning is a continual process, required to ensure that they have all the necessary means that are defined in their objectives. These needs are constantly changing and therefore require continual adjustment to meet our objectives The Production KPI Dashboard is maintained and issued on a regular basis to illustrate Company performance inclusive of Customer Complaints, Safety (Accident Rate, Lost Time), Spray Dryer Utilisation etc. Internal Environmental Audits and their findings are reviewed at each Quarterly Environmental Meeting, Monthly Management Meeting and at Management Review, actions are implemented and maintained. Actions, corrective and preventative, are placed on the company Action Tracker with responsibilities and time-scales; this is then reviewed at each Quarterly Environmental Meeting, Monthly Management Meeting and Management Review. Continuous improvements are noted and discussed at both the Quarterly Environmental and OH&S Meetings, Monthly Management Meeting and

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		at Management Review; any improvements to be made are discussed and documented from these meetings. The Management of PLATER GROUP Ltd defines key objectives with measurable targets, responsibilities and timescales. These are reviewed for effectiveness and when completed new objectives met. Key objectives include reducing energy consumption. **BC16 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
17	*BAT is to:* minimise soil and groundwater pollution by designing, building, operating and maintaining facilities, where substances (usually liquids) which represent a potential risk of contamination of ground and groundwater are handled, in such a way that material escapes are minimised (see Section 4.7.1). This includes all of the following: a. having facilities sealed, stable and sufficiently resistant against possible mechanical, thermal or chemical stress. This is particularly important for	The site is fully contained and features local containment with sumps and pumps to handle rainwater, firewater and any process water spillages. Storage tanks are stored in bunded areas and only sealed IBC's and drums are stored outside of buildings and solid raw material and products are stored in a designated warehouse, thus minimising the likelihood of rainwater contamination. The site also contains an effluent treatment plant with a capacity of 200,000 litres which treats all liquid effluent prior to discharge off site into the foul sewer.

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	highly toxic substances – e.g. cyanides, phosphorus compounds b. providing sufficient retention volumes to safely retain spills and leaking substances in order to enable treatment or disposal c. providing sufficient retention volume to safely retain fire fighting water and contaminated surface water d. carrying out loading and unloading only in designated areas protected against leakage run-off e. storing and collecting materials awaiting disposal in designated areas protected against leakage run-off f. fitting all pump sumps or other treatment plant chambers from which spillage might occur with high liquid level alarms or having pump sumps regularly inspected by personnel g. establishing programmes for testing and inspecting tanks and pipelines including flanges and valves h. providing spill control equipment, such as containment booms and suitable absorbent material i. testing and demonstrating the integrity of bunds j. equipping tanks with overfill prevention	Materials are stored in closed systems with solid raw material / product being stored in a designated warehouse. Building roofs are routinely checked for holes / damage. Only sealed IBCs and drums are stored outside of buildings. Chemical production equipment within the buildings use hooding and ducting to capture dust emissions. Fabric filters are used on the required equipment with a lowest pore size of 1 micron. The production equipment also use abatement such as carbon filters on tanks and wet scrubbers. Tank and pipe maintenance is completed a mixture of daily and monthly to ensure there are no faults and therefore no unwanted release of liquid or gas. All external pipework is insulated reducing the impacts of extremely cold or hot weather conditions. In periods of hot weather, daily inspections are carried out on the external storage areas and the associated tanks and vessels. Good housekeeping is maintained in the form of daily site inspections. All tanks on site have secondary containment in the form of a concrete bund

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	storing materials/products in covered areas to keep rainfall out.	**BC17 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
18	*BAT is to:* have a high level of education and continuous training of personnel (see Section 4.7.2). This includes all of the following: a. having personnel with sound basic education in chemical engineering and operations b. continuously training plant personnel on the jobs c. regularly evaluating and recording the performance of personnel d. regularly training personnel on how to respond to emergency situations, health and safety at work, and on product and transportation safety regulations.	Members of staff and other interested parties receive appropriate training during their employment for or on behalf of the Organisation. This includes the Management System(s) Policy and individual roles and responsibilities within the operation of the Management System(s) and the achievement of relevant Objectives. Appropriate training methods and aides are used that may include: ● Induction training – Commencement of Employment ● Internal training by more experienced staff ● External training. Evidence of qualifications, training certificates, licences, skills and competencies of prospective employees where specialist skills are

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		required is obtained and recent previous employment references are requested. Training and competency requirements may be identified as a result of: ● Performance reviews ● New personnel ● New equipment and/or technology ● Revised legal and/or regulatory requirements (e.g. Health & Safety) ● Revised industry standards ● Management Reviews ● Employee request. Details of all OH&S training are recorded on the individual staff member training record. Records of safety training are kept in accordance with the process described in Section 7.2, in the Organisation's ISO 9001 Quality Manual. OH&S training records include such details as: ● Trainee's name ● Trainee's job title ● Course title/content

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		• Date • Expiry. A detailed Training Matrix is in place for site-based staff showing the following information: • Course attended • Date attended • Outcome of training • Renewal date **BC18 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
19	*BAT is to:* apply, if available, the principles of an Industry Code (see Section 4.7.3). This includes all of the following: a. applying very high standards for safety, environmental and quality aspects in the production of the SIC substances carrying out activities such as auditing, certification, training of plant personnel (related to BAT number 5.18 and 5.22).	Plater Chemicals hold ISO 14001, 9001 and 45001 accreditation for Environmental Management System, Quality Management System and Occupational Health & Safety respectively. **BC19 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.

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20	*BAT is to:* carry out a structured safety assessment for normal operation and to take into account effects due to deviations of the chemical process and deviations in the operation of the plant (see Section 4.7.5).	Plater Chemicals have a Crisis Management Manual in place to ensure that Plater Group can respond effectively in a rapid and controlled manner to an actual or potential major incident which could seriously threaten its business. The business recovery/contingency plan will be to move any processing, packing or distribution to a partner business of Plater Group in the event of an emergency. There is also an Accident Management Plan in place. **BC20 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
21	In order to ensure that a process can be controlled adequately, BAT is to: apply one individual or a combination of the following techniques (without ranking, see Section 4.7.5): a. organisational measures b. concepts involving control engineering techniques c. reaction stoppers (e.g. neutralisation, quenching) d. emergency cooling e. pressure resistant construction	Plater Chemicals have a Standard Operating Procedure for every chemical product that they produce. These clearly state what steps to follow for the safe and correct production of each product. Plater Chemicals have a Crisis Management Manual in place to ensure that Plater Group can respond effectively in a rapid and controlled

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	pressure relief.	manner to an actual or potential major incident which could seriously threaten its business. **BC21 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.
22	A number of environmental management techniques are determined as BAT. The scope (e.g. level of detail) and nature of the EMS (e.g. standardised or non-standardised) will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have. BAT is to: implement and adhere to an Environmental Management System (EMS) that incorporates, as appropriate to individual circumstances, the following features (see Section 4.7.6): a. definition of an environmental policy for the installation by top management (commitment of the top management is regarded as a precondition for	Plater Chemicals demonstrate a proactive approach towards maintaining high environmental and overall business Furthermore, Plater Chemicals hold ISO certification to ISO9001, ISO 14001 and ISO 45001 to add a further layer of robustness to their management approach. **Senior Management Commitment** As part of the continuous improvement of the business and compliance, Senior Management attend annual management reviews. Similarly, an annual EMS management review takes place covering the implementation and overall compliance against the Environmental Permitting Regulations. In addition, all management system documents are produced or at least reviewed and authorised by a Director of Plater

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	the successful application of other features of the EMS) b. planning and establishing the necessary procedures c. implementation of the procedures, paying particular attention to: i. structure and responsibility ii. training, awareness and competence iii. communication iv. employee involvement v. documentation vi. efficient process control vii. maintenance programmes viii. emergency preparedness and response ix. safeguarding compliance with environmental legislation d. checking performance and taking corrective action, paying particular attention to: i. monitoring and measurement (see also the Reference Document on General Principles of Monitoring) ii. corrective and preventive action iii. maintenance of records	Chemicals or his delegate, to ensure there are commitments written into the document can be implemented on site. **Continual Improvement** Plater Chemicals are committed towards the continual improvement of their environmental performance of the business, this has been documented in their environmental policy. The policy will be reviewed by Company Directors no less than annually during the management review. **Improvement Programmes** The integrated management system is supported by several procedures to facilitate and structure progress in a number of areas of the business, these procedures can be found within the Integrated SOPs document (V13, November 2022). To guide improvements across the business, the Operator has implemented a general complaint procedure, which is detailed in Section 11.3 of the Integrated SOPs. The objective of this system is to ensure that all customer complaints, complaints about the site operations and/or its impact on the environment made by third

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	iv. independent (where practicable) internal auditing in order to determine whether or not the environmental management system conforms to planned arrangements and has been properly implemented and maintained e. review by top management. Three further features, which can complement the above stepwise, are considered as supporting measures. However, their absence is generally not inconsistent with BAT. These three additional steps are: f. having the management system and audit procedure examined and validated by an accredited certification body or an external EMS verifier g. preparation and publication (and possibly external validation) of a regular environmental statement describing all the significant environmental aspects of the installation, allowing for year-by-year comparison against environmental objectives and targets as well as with sector benchmarks as appropriate h. implementation and adherence to an internationally accepted voluntary system such as EMAS and EN	parties are dealt with in a manner that ensures the operator acts in a responsible way and maximises customer satisfaction (customer complaint only). Also, to ensure that, as far as is practical, corrective and preventive action is taken to eliminate the causes and the potential causes of customer complaints, complaints about the site operations and/or its impact on the environment made by third parties. **Corrective Action** Plater Chemicals has also developed a procedure to help facilitate corrective and preventative actions. This details how the Company determines actions to eliminate the causes of potential batch failures and non-conformities in order to prevent their occurrence. As a result, Plater Chemicals can implement any required improvements to the business in order to facilitate high quality products and continual improvement of the onsite operations. **Organisation Structure, Training & Competency** Plater Chemicals have a clearly defined organisational structure to maintain control over the integrated and permit management system

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	ISO 14001:1996. This voluntary step could give higher credibility to the EMS. In particular EMAS, which embodies all the abovementioned features, gives higher credibility. However, non-standardised systems can, in principle, be equally effective provided that they are properly designed and implemented. Specifically for the SIC sector, it is also important to consider the following potential features of the EMS: i. the environmental impact from the eventual decommissioning of the unit at the stage of designing a new plant j. the development of cleaner technologies where practicable, the application of sectoral benchmarking on a regular basis, including energy efficiency and energy conservation activities, choice of input materials, emissions to air, discharges to water, consumption of water and generation of waste.	with the integrated SOPs containing a dedicated 'Roles and Responsibilities' section to define key tasks that must be undertaken at different levels of the organisation. The operator has detailed their comprehensive approach towards upholding a good level of staff competency in Section 11.1: Training within the Integrated SOPs document. This procedure details a clear approach Plater Chemicals maintains to ensure that all members are competent within their roles and carrying out their role in a safe and responsible manner. The required training to satisfy the needs of each operator is provided either in house or via a third party and the training is recorded within individual training records and in the Plater Chemicals IMS Training Matrix, which indicates when individual refresher training is due. Action is taken to ensure that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the quality, environmental and health & safety objectives through informal conversations with site management. The key mechanisms within the training and competence process will be the company

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		appraisal system, with the effectiveness of training to be reviewed within the annual Management Review. **Communication and Employee Involvement** Clear and coherent communication is fundamental to the effective process operation on site. Directors and Managers are responsible for ensuring that internal communications take place. Plater Chemicals communicate information using a variety of media, including, but not limited to team meetings, toolbox talks and training records, shared file server and notice boards. The electronic Shared File Server is the key method of communication and is updated on a regular basis. **Effective Process Control** Plater Chemicals are able to maintain high levels of process control through the combination of various different operational procedures and monitoring of the systems. The regular monitoring and measurement of site processes and any environmental impacts such as odour, noise, litter and pests are recorded and available for inspection, should it be

Overall Environmental Performance		
BAT No.	**BAT Guidance**	**Permit Documents**
		requested. Plater Chemicals also conduct and record daily, weekly and monthly site checks to assess a number of variables including within the environmental permit documents, including, but not limited to site security, odour, litter, pests and drainage systems. The effectiveness of individual site procedures is regularly evaluated through various meetings, such as internal and external audits and management reviews. **Maintenance** As detailed within the Environmental Permit Management System, Plater Chemicals operates a strict maintenance regime and equipment used is of sufficient capacity to allow down time for routine maintenance, calibration and servicing as recommended by the manufacturer. Daily checks of various parts of the plant are undertaken across the site by the maintenance staff/site manager. The results of these checks are recorded on the daily check sheet and if any faults are identified they too are recorded on the daily issues raised record sheet. Routine maintenance is recorded, and in addition operator pre-use checks will be

Overall Environmental Performance		
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		completed to assess the general condition of the machines and identify any defects. **Emergency Preparedness and Response** The operator's diligent approach to managing accidents onsite is documented within the site's Accident Management Plan, completed in line with Environment Agency requirements. This document lists key emergency contact details and has comprehensively evaluated a range of hazards and how they are monitored and mitigated on site. The Accident Management Plan is supported by a range of procedures, such as the Fugitive Releases Plan and Environmental Risk Assessment to minimise the potential occurrence of accidents on site. Plater Chemicals have a Crisis Management Manual in place to ensure that Plater Group can respond effectively in a rapid and controlled manner to an actual or potential major incident which could seriously threaten its business. **BC22 Status: Compliant –** It is the operator's view that they are compliant with this BAT conclusion.