

Environmental Management System Summary


Equilibrium Chemical Services Ltd
Solvent Storage and Transfer Facility
Malvern
EPR/BB3900GS/V003

Prepared by:
Sol Environment Ltd

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Sol Environment Ltd | Malvern | Bristol | Edinburgh
enquiries@sol-environment.co.uk | t. +44(0)1684 572727 (Switchboard) | +44(0)117 9372811 (Bristol)

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1 Introduction

This document has been prepared by Sol Environment Ltd on behalf of Equilibrium Chemical Services Limited to provide an Environmental Management System (EMS) Summary in support of an environmental permit application for a 'Normal' variation to their existing bespoke EPR permit at their Solvent Storage and Transfer Facility, to add a solvent distillation processing facility and extend the permit boundary to include Unit 4. The site will be permitted by the Environment Agency and operated in accordance with The Environmental Permitting (England and Wales) Regulations (EPR) 2016 (as amended).

The Equilibrium Chemical Services Limited site is located at Unit 5 Merebrook Industrial Estate, Hanley Road, Welland, Malvern, Worcestershire, WR13 6NP (and will include Unit 4 as part of the permit variation).

The existing Solvent Storage and Transfer Facility is permitted under Permit EPR/BB3900GS/V003. The current permit operations are limited to waste acceptance and storage of hazardous waste (not exceeding 50 tonnes at any one time).

This application to vary the permit will not cause any material changes to the incoming waste materials which are currently stored prior to onward transfer off-site for recycling, nor increase the amount of hazardous waste that will be stored. The addition of the new solvent distillation processing facility will require an update to the operating techniques as well as an extension of the permit boundary to include Unit 4 where the new processing facility will be housed. This application is to vary the following aspects of the site operating techniques:

- Add the treatment of hazardous waste in a small-scale solvent distillation processing facility (in Unit 4) to process the waste solvents that are currently received at the Unit 5 storage and transfer facility. Solvents will be processed in batches using a 2,200L capacity automatic solvent recycling machine, anticipated to include three batches a day; and
- Store the 'clean' solvents prior to reuse.

Equilibrium Chemical Services Limited's site EMS covers the existing Unit 5 and will be extended to cover Unit 4 and the new solvent distillation processing facility also. The EMS includes how the environment will be managed on site in accordance with this environmental permit and is certified to meet the requirements of the International Standard BS EN ISO14001:2015. The EMS explains what happens at the Solvent Storage and Transfer Facility to ensure the following:

- the environment is protected from adverse impacts from the activities;
- the organisation is protected from environmental conditions such as floods or droughts;
- the Permit and environmental legislation are complied with;
- the sustainability of the operations is addressed; and
- environmental information and performance are communicated to relevant interested parties.

Equilibrium Chemical Services Ltd.'s EMS is maintained by Equilibrium Chemical Services Ltd (the operator of the Environmental permit) and will incorporate the changes brought about by this permit variation upon issue.

2 Layout of the EMS

The EMS has been written to ISO 14001:2015 framework, focusing on a 'Plan-Do-Check-Act' cycle of management and control. Each section relevant to the environmental permit is briefly summarised in this document, with reference to the requirements of the EA Guidance for clarity and separated into EMS section headings as follows:

- a) Context
- b) Leadership
- c) Planning
- d) Support
- e) Operation
- f) Performance Evaluation
- g) Improvement

3 Context of the EMS

The EMS Manual gives an overview of the company, with subsections focussing on the structure and scope of the EMS, the environmental policy statement, EMS procedures and how the organisation is structured.

The level of detail and complexity of the EMS will be determined using a life cycle approach based on compliance obligations, interested parties, internal and external issues and other issues and requirements such as the outcome of audits and management reviews.

Risks and opportunities associated with the permit will be identified and recorded under the EMS design in order to prioritise significant environmental risks, consider the benefit of opportunities and have a thorough understanding of the scope of environmental protection required.

4 Leadership / Management of the EMS

Managers of Equilibrium Chemical Services Ltd.'s activities take their responsibility for environmental compliance and sustainability very seriously. Senior management ensure that the responsibilities and authorities for relevant roles are assigned and communicated within the organisation by way of the organisational structure. Senior management has assigned the responsibility and authority to Peter Harris (Equilibrium) and Joe Ellis (outside quality auditor) for ensuring that the environmental management system conforms to the regulatory requirements.

Equilibrium Chemical Services Ltd are keen to identify opportunities to prevent or mitigate adverse environmental impacts and enhance beneficial environmental impacts, particularly those with strategic

implications, to remain effective at environmental protection. Environmental management is therefore integrated into the project development plans and decision making, aligning it with other business priorities.

5 Planning

5.1 Risks and Opportunities

Equilibrium Chemical Services Ltd has established, implemented, and continues to maintain the processes needed to meet requirements. All planning considers internal and external issues along with interested parties and consideration of the scope of the environmental management system.

Risks and opportunities are determined relating to environmental aspects, compliance obligations, and issues as identified by external and internal interested parties to give assurance that the environmental management system can achieve its intended outcomes and prevent or reduce undesired effects.

Equilibrium Chemical Services Ltd have an Environmental Risk Assessment and Aspects Register (RA 001) in place including the environmental aspects of its activities, products, and services that it can control and those that it can influence, and their associated environmental impacts. Equilibrium Chemical Services Ltd has considered any potential changes, abnormal conditions and reasonably foreseeable emergency situations when determining the environmental aspects.

5.2 Environmental Objectives

Equilibrium Chemical Services Ltd has established environmental objectives at relevant functions and levels, considering significant environmental aspects, associated compliance obligations, and risks and opportunities. Objectives and targets are consistent and relevant within the aspects and impacts and environmental policy, measurable (where possible), monitored, communicated, and updated as appropriate.

Whilst planning how to achieve environmental objectives, Equilibrium Chemical Services Ltd has determined what actions, resources, responsibilities, timeframes, and evaluations will be required.

Objectives and impacts are reviewed on a quarterly basis.

6 Support

6.1 Resources

Equilibrium Chemical Services Ltd has determined and provides the resources needed for the establishment, implementation, maintenance, and continual improvement of the environmental management system.

6.2 Competence

A training matrix (TR 001) is in place to ensure that each member of staff that can affect the environmental performance of the permit is competent based on their training, education, and

experience as appropriate. Records of training sessions and qualifications will be maintained as part of the EMS.

The training matrix details who is responsible for various environmental procedures and which staff roles are relevant to the conditions of the Environmental permit.

Where applicable Equilibrium Chemical Services Ltd take action to acquire the necessary competence by the provision of training, mentoring of staff, or the reassigning staff as necessary, or using contractors ensuring the supply of competent persons only.

The Technically Competent Manager for the site has obtained the appropriate WAMITAB certification.

6.3 Awareness

Equilibrium Chemical Services Ltd has procedures in place to ensure that persons doing work under the organisation's control are aware of the environmental policy, the significant environmental aspects and related actual or potential environmental impacts associated with their work.

6.4 Communication

Communication with relevant interested parties will be determined based on the information that needs to be communicated and the associated circumstances. Different types of communication will be considered in order to promote understanding of the EMS and engagement with interested parties at all levels.

Relevant staff will have access to the EMS and are required to understand their duties and responsibilities as part of induction and ongoing training.

Equilibrium Chemical Services Ltd communicates its significant environmental aspects among the various levels and functions of the organisation as appropriate via training, toolbox talks and updating of Standard Operating Procedures.

Complaints will be managed and recorded in accordance with the Complaints Procedure that lays out how complainants should be communicated with and how their complaint must be investigated.

6.5 Documented Information

The environmental management system includes documented information required by this International Standard.

Documents are created and maintained through an electronic database. When creating and updating documented information, each document is given a title, date, and reference number. Documents are reviewed and approved for suitability and adequacy.

All the following activities are addressed in controlling documentation: distribution, access, retrieval and use, storage, and preservation (electronically), including preservation of legibility, version control, retention, and disposition.

Equilibrium Chemical Services Ltd maintains documented information of its compliance obligations on the Legal register.

Records required by the environmental permit will be managed according to processes described in the EMS, including a list of their retention times.

7 Operation

7.1 Operational Planning and Control

Equilibrium Chemical Services Ltd has established and maintains processes needed to meet environmental management system requirements, and to implement the actions identified in the 'Planning' section. Equilibrium Chemical Services Ltd will review the consequences of any changes, taking action to mitigate any adverse effects as necessary.

Relevant staff and other interested parties will have access to all the documents they need and understand how to operate compliantly.

The operational controls consist of procedures, work instructions, physical controls and use of competent personnel. Types of control are based on the skills and experience of the people carrying out the monitoring, and its complexity and environmental significance.

The controls will be monitored to check they continue to be effective, and action is taken if there are changes or improvements to be made.

A contingency plan in the form of a Disaster Plan is in place for a robust response to minimise the impact on the environment of enforced shutdowns and any other changes in normal operations, for example due to flooding or other extreme weather based on climate change knowledge and trends.

7.2 Emergency Preparedness and Response

To ensure a comprehensive response to any emergency, consideration will be given to the initial environmental impact and the secondary environmental impact that could result.

Equilibrium Chemical Services Ltd has established and maintains processes needed to prepare for, and respond to, potential emergency situations. The site has assessed the potential for accident hazard upon the environment as part of the permit application and the legal requirements of The Dangerous Substances and Explosive Atmospheres Regulations 2002 (SI2002/2776). The permit Accident Management Plan together with the Emergency Management Plan, highlight potential sources of risk and detail mitigation and emergency response measures. These documents form the basis of the site's emergency response, mitigation, and remediation protocols for uncontrolled releases to the environment.

All environmental incidents are recorded and investigated with corrective and/or preventive actions implemented in order to minimise reoccurrence. These are recorded and investigated using the NCR procedure. Equilibrium maintains documented information to the extent necessary to have confidence that the processes are carried out as planned.

8 Performance Evaluation

8.1 Monitoring and Measurement

Environmental risks, compliance obligations and operational controls are considered when determining how monitoring and measurement will be carried out and how it will be recorded and communicated. Results are used to look at performance trends and find opportunities for improvement.

The new distillation plant will be monitored and controlled using a control centre mounted on the machine with separate PLC touch screen controls. Touch screen PLC controls allow the operator to set operating parameters and view data.

There are no monitoring requirements associated with the current Environmental Permit. Should this change in the future, a Monitoring and Measurement Plan will be put into place to analyse and evaluate the environmental performance of the site in accordance with permit requirements.

Equilibrium Chemical Services Ltd ensures that equipment is calibrated and maintained in line with manufacturers recommendations and the Contractor / Calibration Log.

Equilibrium Chemical Services Ltd retains appropriate documented information as evidence of the monitoring, measurement, analysis, and evaluation results for use in management review, and communicates the findings to the appropriate interested parties accordingly.

8.2 Internal Audit

Equilibrium Chemical Services Ltd conducts internal audits at planned intervals to provide information on whether the environmental management system conforms to requirements of the permit, International Standard, and other regulatory compliance, and that the EMS is effectively implemented and maintained. The internal audit schedule is reviewed every year by the environmental advisor.

Equilibrium Chemical Services Ltd has defined the audit criteria and scope for each audit, selected auditors and conducts audits to ensure objectivity and the impartiality of the audit process and ensures that the results of the audits are reported to relevant management.

8.3 Management Review

Top management review the Equilibrium Chemical Services Ltd EMS at planned intervals to ensure its continuing suitability, adequacy, and effectiveness.

Management reviews will be held at least annually to check compliance with the Environmental permit and EMS. Each management review has a fixed agenda to review the year's environmental compliance, suitability of the procedures, and the adequacy and effectiveness of the EMS in achieving environmental improvements.

The EMS will be additionally reviewed and updated if changes are made to the site operations or equipment, after any accident, complaint, or breach of permit, and after identification of a new environmental problem or issue with new control measures.

A record of changes to the EMS will be kept, including the implementation of significantly new or different control measures.

9 Improvement

Improvement opportunities will be identified from the following EMS processes:

- Communication with interested parties including staff, customers, and the authorities;
- Analysis of data and information relating to environmental performance;
- Evaluation of compliance obligations;
- EMS audits; and
- Management reviews.

The detection of non-conformities such as potential Permit breaches or procedures not being followed is critical to improvement.

In the event of a non-conformity, an investigation will be carried out to determine where the EMS needs improving, and action will be taken to make the appropriate changes and eliminate the cause where possible so the incident will not re-occur. Changes are communicated to relevant staff.

Improvement findings from all sources will be fed back into the Plan-Do-Check-Act cycle for continual improvement.