

FINCH SEAMAN ENFIELD GROUP LIMITED

INTEGRATED ENVIRONMENTAL PLAN FOR FINCH SEAMAN ENFIELD GROUP LIMITED Foundry Works

Details :-

Name: Finch Seaman Enfield Group Limited.

Address :- 11 Swinborne Drive
Springwood Industrial Estate
Braintree, Essex

Post Code :- CM7 2YP

Plan Approval:

FSEG Limited	Haze and Safety
Name :- David Bisset	Name :- John Ballard
Signature :-	Signature :-
Date :-	Date :-
Title :- Health and Safety Officer	Title :- Director

**Prepared by
John Ballard**

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FINCH SEAMAN ENFIELD GROUP LIMITED

SECTION 1.0

INTRODUCTION

1.1 Contract Plan

This Plan is written to explain how Finch Seaman Enfield Group (FSEG) Limited, has established and will maintain a Management System to ensure that the service to its Clients meets the conditions for health, safety and environmental issues.

This Plan seeks to satisfy Client's requirement for:

- an environmental plan
- a health and safety plan

This Plan takes an integrated approach to satisfying the requirements of the above plans, in explaining the FSEG Limited polices, documents and practices in place.

This Plan describes the way in which FSEG Limited have in place a system, which conforms to the ISO 14001 conditions manual and the Local Authority Environmental Health Departments regulations.

The Management System described in this Plan has been specifically developed to provide a safe and efficient service to Clients, using the years of experience gained providing Foundry processes and associated works delivery.

In addition the Management System described in this Plan satisfies the requirements of relevant health, safety and environmental legislation. The procedures of the Management System do not prejudice any other legislation that may be in force.

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SECTION 2.0

POLICY STATEMENTS

2.1 Company Policy Statements

The following FSEG Limited policy statements are kept in the Health and Safety Policy:

- Legal Undertaking Policy Statement
- Health and Safety Policy Statement
- Environmental Considerations Policy Statement
- Disabled Discrimination Act Policy Statement
- Health and Safety Philosophy Statement
- Equal Opportunities Policy Statement

These policies have been developed by FSEG Limited using the experience and services of consultants and considering the requirements of what is expected of it's Clients own policy statements and contract requirements.

In order to implement the FSEG Limited policies, a programme of objectives and targets is developed. The implementation of the policies is subject to continual review as part of the Management System.

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SECTION 3.0

ORGANISATION

3.1 Organisational Chart

This section shows the structure of FSEG Limited's staff specifically involved in the QA system. The interfaces with Clients and Contractors are shown on this chart which can be found in the Policy.

The contractors expected to be used in our foundry are as follows :-

Electrical Works

Mechanical Works

Gas Bottle Supplier

Sand Supplier

Waste Collector – General

Waste Collector – Special

Filters and equipment service and spares

General building works

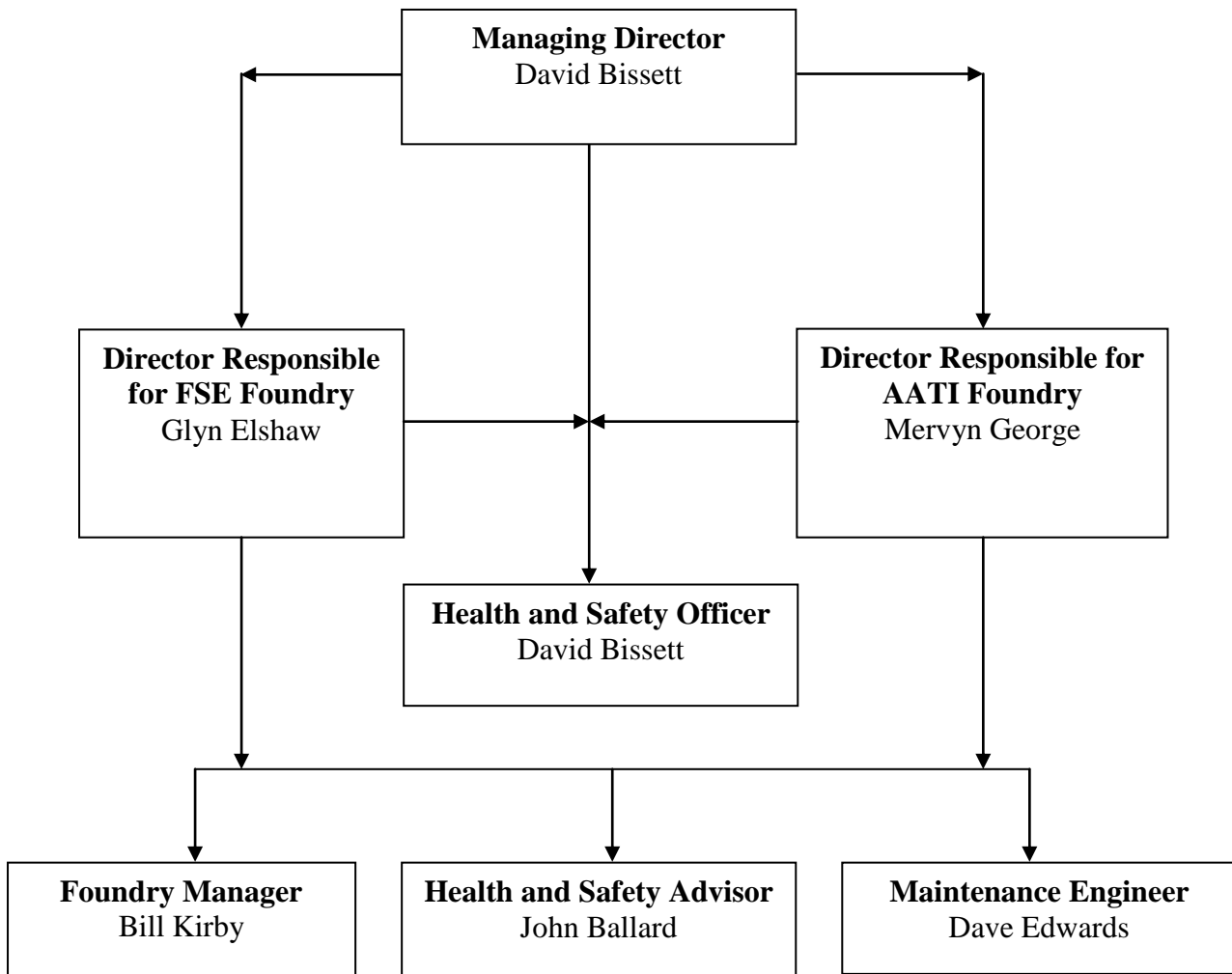
PPE Supplier

All of the above contractors have been working with us for a period of time and are all considered to be competent for their respective works.

The contractors for these services may change, or other contractors may be used for other services. In either of these instances FSEG Limited will update this list as required.

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ORGANISATION CHART



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SECTION 4 RESPONSIBILITIES

4.1 Introduction

The responsibilities for FSEG Limited staff are detailed below by job title, as listed on the organisation chart in Section 3 of this Plan.

In the event of change of personnel, the responsibilities as detailed in this section should remain unaltered.

4.1.1 Managing Director – David Bissett

- Holds overall management responsibility for health and safety and environmental issues arising for the foundry works, including policy review.
- Identifies and implements areas for improvement within the works.
- Manages the business within the management system.
- Client liaison and policy review.
- Securing of resources and equipment as required by the works and business.
- Staff recruitment and selection.
- Attends Director's meetings.
- Managerial and administrative staff appraisal and discipline.
- Health, Safety and Environmental Plan approval.

4.1.2 Director (FSE) – Glyn Elshaw

- Holds overall management responsibility for health and safety and environmental issues arising for the FSE foundry works, working closely with the Health and Safety Officer.
- Identifies and implements areas for improvement within the works.
- Manages the business within the management system.
- Client liaison.
- Securing of resources and equipment as required by the works and business.
- Staff recruitment and selection for FSE foundry.
- Attends Director's meetings.
- Responsible for the QA systems, technical services, hygiene and labour.
- Monthly review of training requirements.
- Review of personnel hours.

4.1.3 Director (AATI) – Mervyn George

- Holds overall management responsibility for health and safety and environmental issues arising for the AATI foundry works, working closely with the Health and Safety Officer.
- Identifies and implements areas for improvement within the works.
- Manages the business within the management system.
- Client liaison.
- Securing of resources and equipment as required by the works and business.
- Staff recruitment and selection for AATI foundry.
- Attends Director's meetings.
- Responsible for the QA systems, technical services, hygiene and labour.
- Monthly review of training requirements.
- Review of personnel hours.

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SECTION 4 RESPONSIBILITIES continued

4.1.4 Health and Safety Officer – David Bissett

- Responsible for QA, Environmental and Health & Safety.
- Reviews reports of all accidents and co-ordinates statutory reporting for RIDDOR 2002.
- Establishes and manages safe systems of work through risk and COSHH assessments.
- Investigates incidents on the work, and implements any changes.
- Responsible for all technical services and hygiene.
- Controls waste disposal.
- Regular review of this Plan.
- Chairs the monthly Safety Committee Meetings.

4.1.5 Health, Safety and Environmental Advisor – John Ballard - Consultant

- Provides specialist HSE advice.
- Ensures that requirements relating to relevant new or existing safety legislation are brought to the attention of the Health and Safety Officer.
- Carries out a safety audit of the foundries H&S system at least annually.
- Attends the safety committee meeting every month.
- Runs training courses and advises on all health and safety training needs.
- Ensures that accident / incidents are reported and investigated thoroughly.

4.1.6 Foundry Manager – Bill Kirby

- Responsible for the smooth running of the foundry.
- Keeping of foundry records
- Keeping and issuing copies of COSHH assessments.
- Responsible for first aid room and stocks.
- Identifies and implements areas for improvement within the works.
- Helping with the securing of resources and equipment as required by the works.
- Responsible for the QA systems, technical services, hygiene and labour on the shop floor.
- Monthly review of training requirements along with the Directors.
- Review of personnel hours.
- Controls waste disposal from the shop floor.
- Attends the monthly Safety Committee Meetings.
- Ensuring sand deliveries are checked for discharge to atmosphere and keeping of records.

4.1.7 Maintenance Engineer – Dave Edwards

- Responsible for keeping all machinery running and in good order.
- Keeping of machinery records
- Keeping of building fabric in good order.
- Identifies and implements areas for improvement within the works.
- Helping with the securing of resources and equipment as required by the works.
- Attends the monthly Safety Committee Meetings.

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4.2 Qualifications, Training and Experience

Personnel employed by this company will be suitably experienced, trained, and qualified. Nobody will be allowed to carry out any operation, use and machine or do any works that they are not fully qualified to do.

All Directors, managers and supervisors are experienced and fully trained in their respective operations.

Training of staff will be reviewed monthly and maintained to the high standards required.

4.3 Contractors

The qualifications and training of any contractors used will be obtained as necessary, and kept on file by the Health and Safety Officer.

4.4 Employee Consultation

FSEG Limited have regular safety meetings with personnel to discuss health, safety, and environmental matters. These meetings are minuted and kept on file.

These meetings are made up of a Director, Health and Safety Officer, Health and Safety Advisor, Foundry Manager, Maintenance Engineer and from the shop floor, one person from AATI and two people from FSE.

4.5 Disciplinary Procedures

Any disciplinary issues associated with safety or environmental performance will be handled initially by the Foundry Manager and passed to Director level if no solution can be found.

Any issues, which are considered to be items of gross misconduct or have significant impact for safety or the environment, will be handled by the Managing Director. (See our disciplinary procedures in section 28 of book 2 of our Procedures Manual).

SECTION 5 WORK SCOPE, HAZARDS AND RISKS

5.1 Hazard and Risk Identification

FSEG Limited reviews the services it provides to its Clients to consider the environmental, safety and health hazards associated with these activities. Using the FSEG Limited risk assessment process (for environmental, health and safety issues) the hazards of these services are documented (including consideration of COSHH) to record the initial control measures.

A list of risk assessments can be found in the office. The consideration of hazardous substances used as part of the service delivery is detailed in the COSHH assessment book in the office. An analysis of PPE requirements has been made as part of the risk assessment process, and the need for its use is documented in the various risk assessments.

As a part of this risk identification process consideration has been given to compliance with relevant environmental, safety and health legislation

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SECTION 5 WORK SCOPE, HAZARDS AND RISKS Continued

The environmental aspects relevant to these works are as follows. The list of hazards and risks will be reviewed as a part of the Management System maintenance, and following any change in the scope of the works or method of operation.

- Working in a foundry environment.
- Moulton metals in use.
- Use of high pressure air lines – blowing out.
- Sand deliveries – discharge of sand particles to air.
- Hot furnaces - fumes.
- Pattern Makers shop – Saw dust, paint residue / vapours / fumes.
- Use of lead.
- Emissions to air.
- Pollution.
- Noise.
- Possible asbestos in the building

Working in a foundry environment.

The foundry environment is hot and noisy. With the furnaces heating up the different metals, the extracts going all the time the heat and noise can become normal, and the workers get so used to these that over time they pay no attention to the risk.

Management have to keep an eye on these problems and ensure talks are given as reminders. Constant training and supervision are enforced. These items are under discussion at the monthly safety meetings.

Here at FSE Group, the majority of the workforce have been with us for a number of years and understand these problems and they help us to help them to maintain a safer environment to work in.

Moulton metals in use.

When moulton metals are in use in the foundry we have a system of all concerned in pouring wearing an orange hi-vis jacket. This tells everyone in the foundry that moulton metal is being moved around the foundry to the pouring points and gives them notice and time to clear the route so only the pouring team are working in that area.

High pressure air lines.

These air lines are used to blow out any sand residue from the moulds as well as to set the sand in the moulds. The people using these wear eye and face protection and only blow out towards a wall, not towards other people.

Sand deliveries

These are monitored on arrival. A visual inspection is carried out at the start and periodically during the tank filling as well as at the end. The results are entered into the log book.

The old sand is stored in an enclosed bunker and removed as and when required. This is also monitored with the findings entered into the log book.

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SECTION 5 WORK SCOPE, HAZARDS AND RISKS Continued

Hot furnaces.

From these furnaces comes the fumes from the different metals that are being melted. Extracts take these fumes out into the open. Along the extract route filters remove any particles to ensure safe emissions. All persons involved undergo regular medicals especially for the lead works. So far all are well within the limits.

Pattern makers shop.

All machines in this shop have vacuums attached which load the saw dust into plastic bags. We also have a Hoover with a HEPA filter to collect up any residue left in the shop. This workshop also has extracts to remove any fumes from the various paints and coatings used.

Use of Lead.

All persons involved in lead work are given periodical medicals and have samples of blood and sometimes urine taken for analysis. So far, all have been within the limits.

Emissions to air.

We use a contractor who takes readings from various areas of the foundry and the area outside and all meet with the local authority environmental health specifications. All relevant valves and taps are checked weekly by a competent person and the findings are entered into the log book.

Pollution.

No pollution has been found to have occurred to date. Readings are taken regularly by ourselves and the environmental officer.

Noise.

A full noise survey has been carried out and is renewed annually by our consultants. All of the foundry is a hearing protection zone. The wearing of which is mandatory and is rigorously enforced.

Possible asbestos in the foundry.

An asbestos survey is about to be undertaken and the results will be attached.

SECTION 6 PROCEDURES, SITE RULES AND INSTRUCTIONS

6.1 Introduction

- 6.1.1** The risk assessment process considers relevant legislation and codes of practice. Any changes to legislation will be fed into the risk assessment process and with changes made to the operational arrangements as required.
- 6.1.2** The documented work methods are controlled by FSEG Limited's Management System, which control the support functions to the service provision such as equipment maintenance and purchasing.
- 6.1.3** The Management System procedures are managed as controlled documents as part of the FSEG Limited's Quality system. Relevant Client codes of practice and technical or safety documents are also managed as controlled documents.

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- 6.1.4 Training of operational personnel is kept under continual review and updated as necessary to ensure that personnel are suitably qualified and trained.
- 6.1.5 In addition to personnel being suitably trained, personnel are also required to be medically fit and to comply with our policy requirements for substance abuse.
- 6.1.6 Contractors are audited, prior or during use, to check whether they will follow our procedures or have their own documented standard to meet the requirements. The use of suppliers is approved by the Directors. This approval process includes assessing the environmental suitability of processes or materials used by contractors or suppliers, if necessary via supplier audit.

SECTION 7 TRAINING

7.1 Training Needs Analysis

An analysis of the training for personnel under these works has been made by reviewing legislation and by our consultants. The training needs from this, and the Company's operational training needs, are documented for each post.

7.2 Induction

All new employees are subject to an induction, which will cover the requirements of the FSEG Limited Management System relevant to their role, and the scope of our Policies and Rules.

7.3 Training Records

A matrix is maintained for all employees used on these works to record training as needed by our training needs analysis, and to check the expiry dates of certificates and medicals. This matrix is used during work scheduling to ensure that only qualified employees are used.

7.4 Contractor and Visitor Control

The training of contractors is checked to ensure that they have adequate qualifications, knowledge, or experience to complete the task as required by our systems, or have specialist knowledge for the service provided.

Contractors are inducted in the same way as our own staff, and abide by our Policies and Rules whilst on site.

Records are kept of contractor training which is checked as work is scheduled or during supplier audits.

Visitors who visit the site are also inducted if they need to walk around and visit the main areas.

7.5 Training Review

The effectiveness and requirements for training are examined as part of the regular review of the Management System.

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SECTION 8 EMERGENCY PROCEDURES

8.1 Emergency Planning

Preparation for environmental or health and safety incidents is considered as part of the risk assessment process, with the contingency measures documented in the Q A Manual. A disaster recovery plan has also been implemented and is ready to be put into action if required.

8.2 Emergency Preparedness

In the event of an emergency, the evacuation procedures are as per the notices on show around the site. Prior to persons starting work with the company, FSEG Limited instruct all personnel in the emergency procedures and what to do. The muster point for this site is outside the main entrance gate by the hedge.

8.3 Emergency Reporting

The requirement for the reporting of environmental incidents, accidents, emergencies or near misses is defined in FSEG Limited's Procedures Manual. Copies of reports are submitted to the Environmental Health Inspector and the HSE, if reportable, within 10 days.

SECTION 9 MONITORING AND INSPECTION

9.1 Monitoring of the Works

These checks are conducted during the work and on its completion, to check that the work activities are being conducted in a safe and efficient manner as required by Q A system. The records of all checks are recorded in the Manual.

9.2 Incident Investigations

Should there be a near miss or other incident during the course of the work, a report will be completed. The report will be submitted to the Director and the Health, Safety and Environmental Consultant.

Dependent on the nature and scale of the incident, the investigation will determine the cause, corrective action and preventive action to be taken.

9.3 Safety Inspection

FSEG Limited senior management will carry out walk around safety inspections periodically. Their findings will be passed on to the relevant managers and talked about at the monthly safety meetings.

9.4 Vehicle Inspections

FSEG Limited's vehicles are inspected and maintained by outside contractors, the paperwork is kept in the transport office.

9.5 Plant and Equipment Tests

Equipment and plant used on this site is all maintained in good working order by our own maintenance department and by outside contractors. All paperwork is kept in the Office.

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SECTION 9 MONITORING AND INSPECTION Continued

9.6 Working Hours

The working hours of all personnel will be monitored to ensure that they do not exceed the requirements of the Working Time Directive.

The operational hours of goods vehicles will be monitored to ensure that they do not exceed the requirements of the tachograph regulations.

SECTION 10 ACCIDENT\INCIDENT REPORTING AND INVESTIGATION

10.1 Reporting

Reporting requirements for accidents, dangerous occurrences, near misses and environmental incidents are detailed in FSEG Limited's procedures.

In summary reporting of incidents will be as follows: -

- on site notification to management personnel
- personal injuries will be recorded in the accident book BI510.
- other incidents, completion of incident report form as specified in the relevant procedure
- reportable accidents as defined by RIDDOR, will be reported to the HSE.
- any environmental incident, which requires notification to the Environment Agency, will be completed.
- copies of these reports will be sent to FSEG Limited senior management within 24 hours.

10.2 Responsibilities

Emergency reporting and investigation responsibilities are specified in the Procedures Manual.

10.3 Emergency Contact

The arrangements for emergency contact are specified in the Procedures Manual.

SECTION 11 AUDITS

11.1 Internal Audits

The Health, Safety and Environmental Consultant and the will conduct audits of the Management System, procedures and activities for this company.

An agreed schedule is agreed between the Consultant, H & S Officer and the Directors dependent on the results of previous audits, and the performance of the site. Nonetheless these audits will be at least annual.

The audits follow up the results of previous audits, if a closeout audit has not been completed between scheduled audits.

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SECTION 11 AUDITS Continued

The findings of the internal audits will be reported to the H & S Officer and a review of the findings will be available for discussion at the monthly directors meeting.

11.2 Incident Investigations

If a situation occurs that requires an exceptional investigation, this will be arranged by the Directors and the H & S Officer. The reports will be submitted to the Directors for action.

Dependent on the nature and scale of the incident, the investigation will determine the cause, corrective and preventive actions.

11.3 Supplier and Subcontractor Audits

Audits of suppliers is conducted either prior to their use depending on their supply history and ISO9001 certification status, or as part of a regular programme of auditing suppliers to check the environmental and safety impact of goods and services used or supplied. A member of the operational team and an auditor conduct these audits at the supplier's premises. Suppliers are also checked as part of the monitoring and inspection above. A record of audit scope and findings is kept, with a plan to address any deficiencies identified by the audit.

11.4 External Audits

Consultant audits are arranged to ensure the continued effectiveness of the Management System. Reports are provided to the Directors for action.

SECTION 12 ENVIRONMENTAL ASPECTS

12.1 Introduction

The environmental aspects for this site have been reviewed as part of a combined approach to risk assessment for health, safety and environmental issues.

The environmental aspects considered in the assessment are listed below. These environmental aspects are then assessed as relevant to the type of activity on the risk assessment.

The additional conditions of the Procedures Manual have been considered when reviewing environmental aspects. Relevant legislation has also been considered as part of the risk assessment.

12.1 Environmental Review

A summary of the services provided is detailed at the start of this plan. The risk assessment process, as described in Section 6 and 7, has reviewed the activities and identified the following environmental aspects:

- Emission from foundry / plant \ vehicles;
- Noise from foundry / plant / vehicles;
- Waste management;
- Housekeeping; and

A detailed review of the risks with these aspects, including relevant legislation is listed below.

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SECTION 12

ENVIRONMENTAL ASPECTS Continued

12.1.1 Emissions from Foundry / Plant \ vehicles

Emissions from the foundry and plant are covered above.

No relevant environmental legislation applies to vehicles. There is a potential to breach transport legislation.

To comply with transport legislation, and in order to minimise particulate or noxious fumes emission, the plant and vehicles will be regularly maintained.

12.1.2 Noise from Foundry / Plant / vehicles

Noise from the foundry and plant are covered above.

There could be a potential for plant or vehicles to cause a statutory nuisance of noise. There could be a potential for vehicles to breach transport legislation for noise. This will be minimised by regular checks and test.

Plant and vehicles are provided with silencing equipment to minimise noise and would be located to minimise noise to the neighbourhood.

All silencing equipment will be checked as part of the maintenance programme.

12.1.3 Waste Management

The relevant legislation to the handling of waste is:

- Environmental Protection Act 1990;
- Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991;
- Environmental Protection (Duty of Care) Regulations 1992.

The Company uses a Registered Waster Carrier and it is not anticipated that waste collection will be a problem.

The waste transfer notes are completed as part of the work scheduling process to ensure that they are adequately completed.

Special Waste handled on this site is correctly assessed, notified and the waste handled using appropriately trained staff and equipped vehicles.

12.1.4 Housekeeping

No relevant environmental legislation applies to this aspect.

To ensure that the work site is left tidy and the property left unaffected the foundry manager checks the site prior to departure.

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SECTION 12

ENVIRONMENTAL ASPECTS Continued

12.1.5 Summary

The environmental impact of providing the services on this site is considered not to be significant.

It is FSEG Limited's intention to implement an Environmental Management System (EMS). This will further ensure that adequate management control is in place for environmental issues. During this process further consideration will be given to the activities undertaken, and whether the environmental impact can be further reduced.