ENVIRONMENTAL MANUAL

(ISO 14001:2004)
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Appendix 1 Statement of Policy & Authorisation
1. INTRODUCTION

This Manual explains how Oceaneering Umbilical Solutions Rosyth (OUS-R), will put into practice its Environmental policy.

OUS-R’s Environmental Management System complies with the International Standard BS EN ISO 14001.

2. REFERENCES

- BS EN ISO 14001: Environmental Management Systems – Specifications with guidance for use
- HS0004: Permit to Work Procedure
- S0323: Internal Audit Procedure
- S0200: Document Control Procedure
- HS0021: Chemical Management Procedure
- S10659: Training Procedure
- EM0002: Identification and Register of Environmental Aspects and Impacts
- EM0003: Waste Management Procedure
- EM0004: Resource Management Procedure
- EM0005: Control of Pollution Incidents
- EM0007: Environmental Objectives and Targets
- S0332: Management Review of Systems Procedure
- HS0022: Corrective & Preventative Actions
- D-0552776: Environmental Complaints Log
- S0236: Control & Calibration of Inspection

3. DEFINITIONS

HAZARD: Anything with potential to cause harm

Environmental Aspect: Elements of organisations activities, products or services that can interact with the environment

Environmental Hazard: Any situation which in particular circumstances could lead to the degradation directly or indirectly of the environment in the short or long term.

Environmental Impact: Any change to the environment whether adverse or beneficial wholly or partially resulting from an organisation’s activities products or services.

Environmental Risk: A measure of the potential threats to the environment, which combines the probability that events will cause, or lead to degradation of the environment and the severity of that degradation.

Environmental Performance: Measurable results of the EMS related to an organisation’s control of its environmental aspects based on its environmental policy objectives and targets.

Environmental Management: Systematic and documented verification process of objectively obtaining and evaluating evidence of whether an organisation’s EMS conforms to the EMS audit criteria set by the organisation and for communication of the results of this process to management.
EMS Documentation Structure

The Table of Contents starting at page 2 of Section 1 lists the titles of the separate sections and clauses of the EMS Manual, corresponding to the sections and clauses of BS EN ISO 14001-2004.

Issue and control of the EMS Manual, and subsequent revisions, shall be in accordance with the Documentation Numbering, Issue and Control Procedure S0200.

4. ENVIRONMENTAL MANAGEMENT SYSTEM

4.1. General Requirements

OUS-R will operate and maintain procedures to promote the effective use of raw material and utilities and to ensure that environmental harm through discharges and waste will be as low as reasonably practical. The protocols for managing the EMS are described in sections 4.3 to 4.6 of this document.

4.2. Environmental Policy

OUS-R’s environmental policy is detailed in Appendix 1 to this document.

4.3. Planning

4.3.1. Environmental Aspects

OUS-R will examine the design of its products to review the utilisation of material and resources.

Environmental Aspects and Impacts will be identified through the analysis of material inputs and outputs. Procedure EM0002, Identification and Register of Environmental Aspects and Impacts, deals with the identification and analysis of aspects and impacts.

OUS-R will examine the waste generated by its operations to ensure that it is reduced or recycled where possible.

OUS-R will ensure that all waste is disposed of in an appropriate manner. EM0003 details the waste management procedure.

OUS-R will ensure that spillages will not enter the environment. Ref: EM0005, Control of Pollution Incidents.

4.3.2. Legal and Other Requirements

The HSE Representative will ensure that OUS-R is kept up to date with environmental legislation and other requirements that affect its aspects, by using various means including Net Regs updates, IEMA publications, SEPA website, Environmental Health publications and IOSH publications. OUS-R will also use a third party contractor when the need arises.

OUS-R’s Aspects and legal Register along with the Aspects and Procedure Register can be located via OUS-R Intranet.

The HSE Representative will, in conjunction with Engineering and Sales, review client requirements and other requirements and how they may impact on OUS-R activities. The HSE rep will inform clients, through Project Managers, of OUS-R environmental risks.
Suppliers via questionnaires will inform OUS-R of their environmental policies and procedures and any other considerations. If any areas are highlighted as risk to OUS-R, OUS-R will aid the vendors to improve environmental awareness or not utilise them.

4.3.3. Objectives, Targets and Programme(s)

OUS-R’s objective and target programmes will be set by, but not exclusively:

- Reviewing its aspects and impacts (EM0002).
- Non-conformances found during either, internal or external audits.
- Reviewing legal and other requirements.
- Continues improvement for significant aspects.

Environmental procedure EM0007, Environmental Objectives and Targets, details the procedures for setting environmental objectives and targets.

OUS-R’s objectives and targets are managed via EM0007 Environmental Objectives & Targets procedure.

4.4. Implementation and Operation

4.4.1. Resources, Roles, Responsibility and Authority

The responsibility for EMS rests primarily with Department Management, but also with the individuals actually performing the work.

Department Managers are responsible for providing the control procedures and work instructions required to adequately control those activities relevant to their department’s scope of work. Department Managers are responsible for ensuring that their staff are familiar with and understand such procedures and work instructions.

Specific responsibilities are as follows:

The General Manager has the ultimate responsibility for the effective operation of the EMS, and is the final arbiter for environmental related concerns.

The Quality Assurance Manager, reporting to the General Manager shall be responsible for the administration of documentation associated with the EMS.

HSE Representative, reporting to the General Manager shall be OUS-R’s appointed Management Representative for environmental matters. The HSE Representative is required to:

- Act as the focal point within OUS-R for environmental matters
- Liaise with Operations personnel on environmental issues
- Liaise with clients/ suppliers on environmental issues
- Conduct environmental audits as required
- Generate and circulate reports on the operation of the EMS

OUS-R’s HSE organisation chart can be found on Oceanet.

4.4.2. Training, Awareness and Competence

Department Managers have responsibility for the adequacy of the personnel operating in their areas. Therefore, they are to ensure that:
• Personnel are aware of the importance of their activity and its impact on achieving OUS-R’s EMS objectives. Face to face communications at the time of giving particular job instructions, process instructions, and general communications all play a part.

• Appropriate personnel are aware of the requirement of COSHH Regulations and the maintenance of risk assessments on the storage, use and disposal of substances hazardous to health.

• Appropriate records are kept of individual training and levels of competence within the Learning Management System.

• Identification of training needs and the implementation of training programmes shall be in accordance with the Procedure for Personnel and Training, S10659.

The site contact (e.g. engaging member of staff) will act as the focal point for contractor activity on behalf of OUS-R and will:

• Check the contractor’s method statement and risk assessment so as to confirm that the contractor will not affect any of OUS-R’s aspects. HS0004 Contractor and Sub-contractor controls at OUS-R set out the procedures to be followed.

• Also check supplied competency statements so as to confirm that contractor employees are environmentally aware.

4.4.3. Communication

HSE notices, HSE bulletins and departmental meetings are the vehicles for provision of environmental information to all employees. Employees are encouraged to contribute where they believe environmental improvements can be made. Any OUS-R employee can raise a safety or environmental issue using the observation card programme.

OUS-R will review its aspects and impacts as per EM0002. If during the review any aspect or impact is deemed to be significant then procedures will be generated to inform 3rd parties proactively.

A Communications log shall be implemented and maintained by the HSE Manager for all interactions with local authorities, Environmental Complaints and any other interactions deemed suitable for addition to the log. Form no. D-0552776 shall be used to log these interactions.

4.4.4. EMS Documentation

Environmental documentation is part of the overall Management System. EMS Manual and procedures are accessed electronically via OUS-R’s Intranet site.

4.4.5. Document Control


National and International Standards shall also be subject to control in accordance with the same procedure.

Change to documents shall be by the Change Advice Note system detailed in the Document Numbering, Issue and Control Procedure, S0200, and all revised documents shall be reviewed and approved by the same level of authority that performed the original review and approval.

4.4.6. Operational Control
The following stages shall be used to establish and maintain the necessary operational controls.

- Departmental Managers will identify current operations/activities that have potential environmental harmful aspects, and where practical take appropriate measures. They will also ensure that when risk assessments are carried out environmental impacts are considered.
- Procedures shall be put in place, which ensures new operations, activities, and substances, which also have potential environmental harmful aspects, are identified and highlighted prior to introduction.
- At the Management Review targets and objectives are set, and the policy reviewed with the aim of eliminating or minimizing the potential damage.
- Operating procedures involving any of the identified entities shall describe the actions and precautions necessary to measure (where practical), and minimise the environmental damage. Each procedure shall set acceptance criteria in line with OUS-R's policy, targets and objectives.
- Environmental audits and reviews monitor the procedures and their effectiveness.
- OUS-R shall extend its scope of influence to its suppliers and contractors, reflecting the required minimum standards; through such documentation as normally pass between the organizations.
- Waste generated by OUS-R processes will be managed in accordance with procedure EM0003, Waste Management Procedure. The Procurement Manager is responsible for waste removal from the OUS-R site.
- Raw and manufactured materials will be handled with due diligence. This will prevent materials from being scrapped. EM0004, Resource Management Procedure details the procedure for the storage and handling of material.
- The site contact for the contractor will ensure that, prior to producing a permit to work (HS0004); the documentation supplied by the contractor has considered the task’s environmental impact. All contractors will be authorized prior to starting work. The permit to work is the authorization to work.

### 4.5. Emergency Preparedness and Response

From a review of OUS-R’s aspects and impacts it is envisaged that the following may cause significant spillages to the environment:

- Fire.
- Rupturing of IBC.
- Accidental release of fluid during testing, flushing or filling of an umbilical.
- Waste fluid transfer.

Operational and maintenance procedures, along with appropriate environmental risk assessments will detail the actions on discovery of a release of fluid into the environment.

Emergency response to a spillage is dealt with in EM0005, Control of Pollution Procedure. Emergency preparedness will be dealt with by carrying out, pollution prevention training followed by emergency response scenarios.

Emergency response scenarios will be programmed. Results from the practices will be reviewed and fed back into the training programmes and test scenarios.

### 4.6. Checking

#### 4.6.1. Monitoring and Measurement
OUS-R will carry out monitoring and measuring activities dependant on its significant aspects and impacts as defined in EM0002. As well as the significant aspects and impacts, OUS-R will monitor and measure other objectives and targets set during environmental management reviews. EM0007, Environmental Objectives and Targets, is the procedure to be used to document them.

The following list sets out, but not exclusively, areas where monitoring and measurement will be carried out:

- Significant Aspects and Impacts.
- Internal Audits.
- Corrective and preventative actions.
- The extent to which the objects and targets have been met.
- Training.

It is envisaged that there will not be any significant changes to OUS-R’s aspects and impacts. However if there is and calibrated monitoring equipment is required then its control will be as per S0236, Control and Calibration of Inspection, Measuring and Test Equipment.

4.6.2. Evaluation of compliance

Compliance will be confirmed by legal compliance audits and regular HSE safaris.

4.6.3. Non-conformance, Corrective and Preventative Action

If a process is found not conforming to proscribed procedures a corrective action request is to be generated. This will be managed via HS0022.
4.7. Control of Records

The control of EMS records, including their identification, collection, indexing, access, filing, storage, maintenance and disposition, shall be in accordance with the individual department operating procedures.

OUS-R shall retain EMS records for a minimum period of 3 years, unless a longer period has been agreed for a particular reason.

Prior to EMS documents being discarded, they shall be reviewed to ensure that there is no other overriding reason for their retention.

4.8. Internal Audit

A programme of internal audits shall be implemented and performed at least once per annum by trained auditors, to verify the requirements of the standard, BS EN 14001, and to ensure the continued effectiveness of the EMS.

Results of the audits shall be documented, and any identified and agreed non-compliance with resulting corrective action shall be processed in accordance with section 4.6.3 of this manual.

The implementation of internal environmental audits, including reporting, and as appropriate, corrective action, shall be in accordance with the Procedure for Audit of Quality Assurance Systems, S0323.

Internal audit will review all current EM documents.
Management Review

The General Manager in conjunction with Departmental Managers shall review the EMS at least annually; this is to ensure its continued suitability, effectiveness and adequacy. The review will also include an assessment of opportunities for improvement.

The review of the EMS shall normally take place prior to or in conjunction with the review and setting of environmental objectives and targets under the Management by Objectives Plan.

Input to the management review shall include:

- Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which OUS-R subscribes
- Communications from external interested parties, including complaints.
- The environmental performance of OUS-R.
- The extent to which the objectives and targets have been met.
- Status of Corrective and preventative actions
- Follow up actions from previous management reviews
- Changing circumstances, including developments in legal and other requirements related to its environmental aspects.
- Recommendations for improvement.

The results of the management review will include any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the EMS, consistent with the commitment to continual improvement.

Environmental Core Process will be reviewed periodically at the HSE Management review (held weekly).
Appendix 1

Oceaneering Umbilical Solutions Rosyth (OUS-R) is committed to continuing to improve our environmental performance, minimising our environmental impact and making resource efficiency a core requirement of all our operations. We will seek to promote good practice by others.

Energy
OUS-R will monitor and manage its consumption and use of energy. We will work to reduce the consumption of energy and to reduce our contribution to emissions of gases and other pollutants which are believed to contribute to climate change.

Waste
OUS-R will work to reduce the volume of waste within its buildings and estate, by wherever possible:
1. reducing consumption of
2. repairing
3. re-using
4. recycling
All materials used within its buildings and estates both in daily operations and in construction and other projects.

Procurement
OUS-R will use local suppliers where appropriate and will encourage its suppliers to commit to improving environmental performance.

Legislation
Utilising the best available techniques not entailing excessive costs (BATNEEC) OUS-R will comply with the requirements of existing and future legislation, and ensure those working on our site meet the same standards.

Our staff
We recognise the responsibility that our staff have in contributing to good environmental management. OUS-R will seek to harness and channel the enthusiasm and interest shown by staff and will provide appropriate information and support to ensure that all staff exercise their environmental responsibility.

Our Sub Contractors
OUS-R will seek to raise awareness amongst our Sub Contractors of the impact their activities can have and what they can do to reduce their impact while conducting their operations.

OUS-R will incorporate the principles set out in this environmental policy into its day to day operations developing appropriate:
1. Procedures for day-to-day operations
2. Annual objectives and targets
3. Action plans
The annual objectives and targets and action plan will be reviewed quarterly, and the targets will be reported annually.

Gary Cochrane
General Manager
Date 19/08/2013