		Approved by:	S. Maconaghy
Doc #:	SL-WRK-005.007 Ver: 2	Approval date:	December 15, 2017
Determining Environmental Incident Classification		Next review date:	March 8, 2024
		Document owner:	J. Faulstich

Purpose

The purpose of this work instruction is to show how to determine the Environmental Incident Classification (EIC) for an incident.

Applicability

This document applies to all of Solenis sites, services and operations, wholly owned subsidiaries of Solenis and joint ventures where Solenis has more than 50 percent equity in the joint venture and is the managing partner.

Definitions

Minor Off-site Impact – When an incident causes environmental impact offsite that is held to the immediate area of impact.

Moderate Off-site Impact – When there is a noticeable sign of the incident in the environment offsite beyond the immediate area of impact (plume offsite, odor complaint with a known event, etc.).

Other Limited Regulatory Consequence – A violation that does not get a notice of violation (NOV) or enforcement, but does get some formal response by the authorities. In the US air deviations that require self-reporting are also included in this definition.

Repeat Event – When a site exceeds the same discharge parameter more than once within any 90-day period.

Reportable Quantity (RQ) – A release that exceeds the threshold for reporting per US EPA regulations at 40 CFR 302. US RQ reporting thresholds are to be compared to only the amount of the release that gets to the environment. Releases to the environment include the following: evaporation to air, release to the ground or a waterway, release that exits the site in a wastewater discharge or air emission release. However, discharges or releases specifically permitted do not count towards an RQ.

Reportable Sheen – A release of oil that gets to public waters, creates a sheen and triggers reporting to authorities.

Serious Violation – A violation that triggers a formal enforcement action such as a consent order or decree or other significant agency action.


Significant Negative Attention – Negative media coverage or public attention at a regional or national level.

Significant Off-site Impact – When an incident causes any actual damage to environment off-site (e.g., fish kill, distressed vegetation, offsite shelter in place, etc.).

Primary Containment – Site vessels intended for containment of chemicals, such as drums, totes, tanks, reactors, rail cars, tankers and the piping connecting them.

Total Cost – The cost of materials lost, any on-site / off-site clean up, and any penalty due to the incident.

Urgent Response – Immediate deployment of offensive measures by the site or an outside emergency response contractor to mitigate an off-site release or to prevent the released material from going off-site.

		Approved by:	S. Maconaghy
Doc #:	SL-WRK-005.007 Ver: 2	Approval date:	December 15, 2017
Determining Environmental Incident Classification		Next review date:	March 8, 2024
		Document owner:	J. Faulstich

Instructions

Determine the Environmental Incident Classification in the following way:

1. For a Release -
 - 1.1. Determine the severity level for the incident in each of the following columns of Table 1:
 - 1.1.1. **Spill / Release Quantity** – Sites shall use the most restrictive of any national, regional, or local release reporting requirements that apply to define a reportable release or RQ. If none exists, sites shall use the US Reportable Quantity reporting values.
 - 1.1.2. **Spill / Release Impact**
 - 1.1.3. **Media / Public Attention**
 - 1.1.4. **Total Cost**
 - 1.2. Take the highest of the individual severity levels on Table 1 to be the incident's EIC.
2. For a Violation -
 - 2.1. Determine the severity level for the incident in each of the following columns:
 - 2.1.1. **Violation**
 - 2.1.2. **Media / Public Attention**
 - 2.1.3. **Total Cost**
 - 2.2. Take the highest of the individual severity levels on Table 1 to be the incident's EIC.
3. Sites should set an incident's EIC within 72 hours of the incident. However, the classification will be updated if circumstances change (i.e., a violation that receives enforcement months after it happens, or a release that receives delayed significant media coverage).
4. If an incident's EIC changes, a site representative will need to contact their Corporate EHS representative to have the incident updated in the Solenis EHS Dashboard.

References

The following documents apply to this standard:

Document Number	Document Title	Document Type
Pending	Incident Management	Procedure
40 CFR 302	Designation, Reportable Quantities, and Notification	US Regulation



		Approved by:	S. Maconaghy
Doc #:	SL-WRK-005.007 Ver: 2	Approval date:	December 15, 2017
Determining Environmental Incident Classification		Next review date:	March 8, 2024
		Document owner:	J. Faulstich

Table 1: Solenis Environmental Incident Classification (EIC)

Severity Level	EIC Points	Spill / Release Quantity	Spill / Release Impact	Violation	Media / Public Attention	<u>Total Cost</u>
Significant¹	5	(1) Exceeds a <u>Reportable Quantity (RQ)</u>	<u>Significant off-site impact</u>	Environmental incident that is a <u>serious violation</u>	<u>Significant negative attention</u>	>\$50,000 US
Moderate¹	3	(1) > 50 % of <u>RQ</u> or (2) > 2272 kg (5000 lbs) from <u>primary containment²</u>	(1) <u>Moderate off-site impact</u> , or (2) Requires <u>urgent response</u>	Results in (1) possible fine / penalty or (2) notice of violation / non-conformance (with an administrative fine of no more than \$1,000 US)	N/A	\$25,000 - \$50,000 US
Minor	1	(1) Between 25% and 50% of <u>RQ</u> , (2) 450 - 2272 kg (1000 - 5000 lbs) from <u>primary containment</u> or (3) Oil that generates a <u>reportable sheen</u>	<u>Minor off-site impact</u>	(1) Waste or storm water discharges that (a) exceed permitted limits by more than 25 percent or 1 pH unit, or (b) are <u>repeat events</u> , or (2) <u>Other limited regulatory consequences</u>	N/A	\$10,001 - \$25,000 US
Minimal	0	All other	All other	All other	All other	All other

¹ The moderate and significant classifications trigger the requirement for site to conduct a Root Cause Analysis (RCA).

² The total amount of material that escapes primary containment is counted, even if all of it is held in the area and collected in sumps, dikes, or other types of secondary containment.

		Approved by:	S. Maconaghy
Doc #:	SL-WRK-005.007 Ver: 2	Approval date:	December 15, 2017
Determining Environmental Incident Classification		Next review date:	March 8, 2024
		Document owner:	J. Faulstich

.....Revision Log.....

Version No.	Revision for Change	Date
1	Initial issue.	12/15/2014
2	Added EIC Points on Table 1, added revision record, added Applicability section, Item 4 under "Instructions" updated for who to contact to change EIC score.	3/8/2021