



# Sterling Chemical Malta Ltd


## PROCEDURE:

## ENVIRONMENTAL MONITORING AND EVALUATION OF COMPLIANCE

### REVISION HISTORY

Revisione Date	Revisionn Number	Sections affected	Change description
21.02.2014	00		First issue

Procedure number: <b>MPA_4.5.1</b>	Edited by: <b>RDOC</b>	Revision by : <b>RSGA</b>	Approved by: <b>Top Management</b>
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## 1. PURPOSE

This procedure describes the overall requirements for monitoring and measurement as part of Sterling's HSE system requirements to ensure that there is adequate control on significant environmental aspects, compliance with legal and other requirements, and to achieve objectives and targets.

## 2. SCOPE

This procedure applies to all Significant HSE Aspects, HSE Instructions and Programmes established by Sterling Chemical Malta Ltd.

## 3. REFERENCE DOCUMENTS

- UNI EN ISO 14001
  - MP\_4.3.2, Legal requirements and other requirements;
  - MA\_4.6-A Results of management review;
  - MRA\_4.3.3 Environment objectives and targets Register;
  - MM\_4.4.3-C Meeting minutes of the EHS Committee meeting ;
  - MRA\_4.5.1-A Environmental monitoring register;

## 4. DEFINITIONS

- RSGA – Environmental Management Representative
- RDOC – Responsible for documentation and communication
- HSE Committee – Environmental Management System Committee

## 5. RESPONSIBILITY


### 5.1 Environmental Management Representative

The Environmental Management Representative (RSGA) shall work with the HSE Committee to define the monitoring requirements and evaluation of compliance, and have the overall responsibility for ensuring that the requirements of this procedure are implemented.

### 5.2 Function / Departmental Manager

The Function / Departmental Manager shall ensure that the operational control procedures / instructions relevant to their teams are followed by their staff, that all monitoring requirements are implemented properly, and that all nonconformities are reported to the RSGA

## 6. PROCEDURE

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**6.1** The RSGA, in consultation with the HSE Committee and the relevant Function / Departmental Manager(s) if necessary, shall establish monitoring criteria in the following areas:

- ✓ The achievement of environmental objectives and targets and the progress of programmes.
- ✓ The effectiveness of operational control procedures for controlling the significant environmental aspects of project activities including the control and monitoring of contractors' environmental performance. (Refer to respective EI).
- ✓ The conformity of environmental legislation and other requirements related to sterling's environmental aspects.

**6.2** Monitoring criteria shall include the monitoring / measuring frequency, methods, responsibilities and records or reports that shall be kept. The monitoring criteria shall be documented or integrated into the respective operational control procedures (refer to RSGA). The responsible Function / Departmental Manager shall ensure that the monitoring requirements are carried out and report any environmental nonconformities to the RSGA.

**6.3** The HSE Committee shall hold regular meetings (approximately *every 3 months*) and maintain records to :


- discuss and review the achievement of the objectives and targets and the progress of relevant programmes;
- review the monitoring data (e.g. inspection checklists) to check whether the monitoring and operational control procedures are implemented properly;
- review information to evaluate whether Sterling's activities comply with applicable environmental legislation (section 4.5.2.1) and other requirements (section 4.5.2.2) to which we subscribes;
- review any environmental nonconformities, and the corresponding corrective action and preventive action.

**6.4** In case of nonconformities, the relevant Function / Departmental Manager shall investigate the causes of nonconformities and establish appropriate corrective and preventive actions. The corrective and preventive actions shall be verified by the Function / Departmental Manager and endorsed by the RSGA

**6.5** The monitoring criteria shall be reviewed and revised according to changes in legislative requirements and the practical situations of Sterling Chemical Malta ltd as a result of continual improvement of environmental performance.

**6.6** Whenever necessary, calibration of measuring equipment shall be defined clearly in terms of calibration methodology, calibration frequency, acceptance criteria and responsible personnel.

**6.7** Sterling Chemical Malta ltd shall record the results (and maintain the records) of the periodic evaluation of compliance and shall be considered at the management review.

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## 7. RECORDS

<b>Record Description</b>	<b>Record Location/ Retention Responsibility</b>	<b>Minimum Retention Time</b>
MRA_4.5.1-A Environmental monitoring register	HSE office/RSGA-RDOC	3 years
Meeting minutes of the EHS Committee meeting MM_4.4.3-C	HSE office/RSGA-RDOC	3 years
Relevant records demonstrating the progress and achievement of objectives, targets and programmes.	Relevant person-in-charge of the respective programmes	3 years
MMA_4.6-A Results of management Review	HSE office/RSGA	3 years
MRA_4.3.3 Environment objectives and targets Register;	HSE office/RSGA-RDOC	3 years