

Determining Environmental Incident Classification (EIC)		Approved by:	Joel Hornberger
		Approval date:	October 1, 2026
Doc #:	SL-WRK-005.007 Ver: 6	Next review date:	October 1, 2031
		Document owner:	Christer Sunesson

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Table 1 must be updated in EHS Dashboard (Velocity)

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 USEPA 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.

Serious Violation – A violation that triggers a formal enforcement action such as a consent order or decree, other significant agency action, or an administrative fine exceeding \$10,000 USD.

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 offsite (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 offsite release or to prevent the released material from going offsite.

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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 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. Sites shall document the basis for the EIC determination. For EIC-related Minor, Moderate and Significant incidents (EIC events), the Excel tool (SL-WRK-005.015 EIC PSE Scoring) shall be completed, and the completed scoring file shall be attached in the EHS Dashboard (Velocity) under the same incident record. The documented basis and scoring shall be reviewed as part of the incident investigation to confirm whether the initial EIC remains appropriate or requires revision.
5. 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
SL-PRO-005.079	Post-Emergency Incident Management	Procedure
SL-REF-005.057	Guidance for Reporting EIC	Reference
40 CFR 302	Designation, Reportable Quantities, and Notification	US Regulation

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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 serious violation, including administrative fines exceeding \$10,000 USD	<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 containment</u> ²	(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 \$10,000 USD)	N/A	\$25,000 - \$50,000 US
Minor	1	(1) Between 25% and 50% of <u>RQ</u> , or (2) 450 - 2272 kg (1000 - 5000 lbs) from <u>primary containment</u> ²	<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 sites 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.

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

Version No.	Change Summary	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
3	Reviewed document for accuracy and completeness. No substantive content revisions were made. Updated version number and date. Transferred ownership to Arturo Pena Medina, who also approved the document.	March 8, 2024
4	Updated approver and document owner; clarified requirement to update the electronic copy on Solenis.com.	March 15, 2025
5	Clarified requirements to document the EIC determination, complete the SL-WRK-005.015 EIC PSE Scoring tool, and attach the completed Excel file in the EHS Dashboard (Velocity) for EIC-related incidents.	December 15, 2025
6	Revised EIC classification criteria by increasing the administrative fine threshold from USD 1,000 to USD 10,000 and removing the "oil that generates a reportable sheen" release classification criterion.	October 1, 2026