

Airbus UK Ltd
Environment Team
Chester Road
Broughton
Chester
CH4 0DR

Our reference: **NRW/EPR/02/2014**

30th January 2014

Beth Voice
Regulatory Officer
Natural Resources Wales
Chester Road
Buckley
CH7 3AJ

Re: IR/13/04 Part B response

Dear Beth,

As promised in my e-mail earlier today, please find attached the signed Part B response, and associated PPS, for incident IR/13/04.

Should you have any further questions please do not hesitate to contact me.

Yours sincerely,

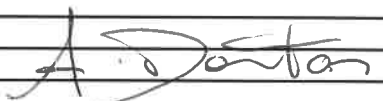
Andy Denton
Environment Officer
Airbus Operations, Broughton
Tel: 01244 524252

	INITIALS	DATE
OK FOR PUBLIC REGISTER	☒	18.4.14
COPIED TO PUBLIC REGISTER	JB	EDm

IR/13/04

PART B

Any more accurate information on the matters for notification under Part A	As Part A
Measures taken, or intended to be taken, to prevent a recurrence of the incident	See attached PPS
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the installation in the preceding 24 months	26-Apr-2012

Name	Andy Denton
Post	Environment Officer
Signature	
Date	30th January 2014

FOR THE ATTENTION OF Beth Voice

Practical Problem Solving

Reference Number

SMC PPC 23-12-13

Use of PPS1

- As soon as the problem has taken place, proceed to analyse it after putting in place customer protection.
- It is important to collect the maximum information, especially if it is not possible to resolve the problem at the station.

1

Date	23/12/2013	Equipment	SMC EFFLUENT PLANT
Location	Bu149	Raised by:	PAUL BOLD
Reoccurrence	NO	Frequency	FIRST EVENT OF THIS NATURE
Brief Description of issue	BREACH OF OUTFALL CONSENT LIMIT IN SMC EFFLUENT PLANT		
Concept Number			

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IMPACT

Safety :	BREACH OF PERMIT CONSENT LIMIT - REPORTABLE EVENT
Quality :	
Cost :	
Delivery (e.g. hrs)	
People	
Cause Code	

2

Problem Description/Topic (Incl. information about drawing number, PN, existing NC's)

Following treatment of process waste, a sample is taken prior to the start of the outfall to confirm that the treatment batch is within consent limits (500ppb). On this occasion the sample measured was 120ppb. Outfall was initiated - Batch outfall normally takes approximately 3-4 hours. While this batch was outfalling a sample was taken by the Environment team to verify operational controls. This sample was measured by a third party at 1080ppb. Operations were suspended at the time of the breach for the Christmas shutdown projects. Part of the maintenance programme was to empty tank 11 and process the waste as normal rinse waste. This was being pumped from the treatments tank to the waste holding tanks 30T1 & 30T2 at the same time the batch was in outfall.

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Immediate Countermeasure (Current product)

Owner:	Paul Bold / Veolia
When:	02-Jan-14

Containment (Customer Protection for following product(s))

IMMEDIATELY SUSPEND MULTIPLE DESTINATION PUMPING WHILE THERE IS A BATCH OUTFALLING TO SEWER - ALL PARTIES TO ACKNOWLEDGE THIS INSTRUCTION.

5 Why?	Why?	Additional information (e.g. photograph)
BREACH OF CONSENT LIMITS	DESIGN OF VALVE LOCKING MECHANISM ALLOWED OPERATOR TO LEAVE THE VALVE IN A PARTIALLY OPEN POSITION	BYPASS VALVE MV005 SPRING LOADED LOCKING RING
Why?	Why?	
RAW EFFLUENT PUMPED INTO THE BATCH TANK WHILE IT WAS IN OUTFALL	LACK OF ATTENTION TO DETAIL	
Why?	Why?	
FAULTY LOCKING MECHANISM ON MANUAL ISOLATION VALVE MV005 IDENTIFIED AS CONTRIBUTING TO RAW EFFLUENT BEING PUMPED TO THE TREATED BATCH	IMPORTANCE OF ATTENTION TO DETAIL AND CONSEQUENCE OF INCORRECT OPERATION NOT REINFORCED	
Why?	Why?	
DESIGN OF LOCKING MECHANISM ALLOWED OPERATOR TO LEAVE THE VALVE IN A PARTIALLY OPEN POSITION.		
Why?	Why?	
ERROR IN OPERATION NOT RECOGNISED AS NO MEANS OF IDENTIFICATION OF FLOW IN THE PROCESS LINE TO THE BATCH TANK. VALVE LOCKING MECHANISM FAULT NOT IDENTIFIED		

6

Explain the root cause

INVESTIGATION CONCLUDED THAT THE VALVE SEATS, WHILE WORN, WERE INTACT, AND WHILE THERE WAS A FAULTY LOCKING MECHANISM ON THE MANUAL VALVE, IT IS MOST LIKELY THAT THE VALVE WAS NOT PROPERLY CLOSED; THIS ALLOWED RAW EFFLUENT TO BE PUMPED INTO THE BATCH TANK WHILE THE TREATED BATCH WAS BEING DISCHARGED.

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Solutions:

	Who	When	Status	Escalation
REMOVE THE VALVE AND CAP OFF THE LINE - IDENTIFY AND CHECK SERVICABILITY OF ALL VALVES OF SIMILAR CONSTRUCTION IN BOTH PLANTS -	Paul Bold	09-Jan-14	☒	
CARRY OUT COMMUNICATION TO ADVISE OF THE NATURE OF THE EVENT - ALL OPERATORS AND MAINTENANCE PERSONNEL TO BE ADVISED ON THE CORRECT OPERATION OF THIS TYPE OF VALVE AND THE CONSEQUENCES OF NOT PAYING ATTENTION TO DETAIL.	Paul Bold	21-Jan-14	☒	
INTRODUCE DAILY PRESTART CHECK TO CONFIRM POSITION OF MANUAL VALVES ON CHEMICAL PROCESSING LINES - INCLUDE AS SHIFT CHECK IN DAILY LOG	Paul Bold	21-Jan-14	☒	
INTRODUCE DOUBLE ISOLATION POINTS ON MANIFOLD LINES WHERE THERE IS A RISK OF A SIMILAR EVENT OCCURRING.	Paul Bold	Easter Shutdown 2014	☐	

- ☒ 1. Action Identified
☐ 3. Action Embodied

- ☐ 2. Action planned (future start date) or in progress (start date in the past)
☒ 4. Action closed and Successful