



Mr. Andi Kemp
Natural Resources Wales,
Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

26th November 2018

Ref: Permit BU2110IS – Permit Condition 2.8 Accident prevention and control

Dear Mr. Kemp,

Please find below our formal response as required by Permit Condition 2.8.1 in accordance with site Environmental Permit BU2110IS. Permit Condition 2.8.1 states: *The Operator shall maintain and implement when necessary the accident management plan submitted or described in Section 2.8 of the Application. The plan shall be reviewed at least every 2 years or as soon as practicable after an accident, whichever is the earlier, and the Agency notified of the results of the review within 2 months of its completion.*

Since the last review was submitted, the Barry Site has not had any incidents that would have initiated a 'major' emergency response. There was one event in April 18 where the site gas alarm was activated through a release caused by a fracture in 19% HCL line. The site HCl detectors activated and an HCl cloud was detected within the tank farm area around the 19% HCl storage tanks. The release stopped after approximately 15 minutes and was contained within the Acid Area structure and site boundary. A full RCA was undertaken and root cause identified. Corrective actions included replacement of pipework with new PTFE lined Carbon Steel. (Please note full details of this event and RCA shall be submitted as part of the Fugitive Release report due March 2019). For the purposes of this report the site emergency response was excellent. There were no injuries or exposure, no offsite effects. The Operations team responded very well and controlled the incident in a timely manner which meant that the HCl fume was contained to a local area within the site.

The current EMP is reviewed on an on-going basis to reflect incremental improvements. Since the last emergency plan review was submitted, the following actions have been executed to improve the overall effectiveness of the plan and key highlights are also summarised below:

Site Wide Evacuation Drills

We have continued to carry out various site wide evacuation drills involving involving all employees, visitors and contractors and reviewed them for effectiveness. A variety of practice emergency response scenarios have been executed and some examples are provided below. The "Grab Document" (condensed version of the EMP) referenced in the last report to NRW was issued to Fire Service.

Contractor Induction

The contractor induction training programme continues to ensure all contractors on site undertake annual induction training that covers emergency response that includes Toxic Gas Release and Main Site Assembly Alarm (Fire). Cabot has made some improvements to the delivery of the site safety induction. In September 2018 Cabot introduced a new interactive induction programme by way of multiple-choice question using a keypad voting system. There is now a far greater level of engagement and response through the new delivery process and discussion. Answers are

immediate thereby allowing the opportunity to check that the information is understood. The clear advantage is that everyone in the induction is engaged so it enables reinforcement of pertinent information e.g. what actions to take when emergency gas klaxon or fire alarm is activated.

Chemical Complex Meetings

Meetings continue to take place with the local chemical sites in the Barry Complex to review the Vale of Glamorgan's local authority's off-site emergency plan.

Plant Deluge System

Activation of the deluge system continues to form part of the site shut down to verify effectiveness of the system on an on-going basis.

Cabot has been proactive in continually improving the Emergency Management Plan and is confident that the current plan is fit for purpose and demonstrates our commitment in ensuring due regard is placed to safety and the environment in emergency preparedness plans. I trust that the above satisfies the requirements of Permit Condition 2.8.1 of permit BU2110IS. If you should have any further questions arising from the above, please do not hesitate to contact me.

Yours sincerely,



STOP, THINK, ACT

Nothing we do is worth getting hurt for.

.....
Paula Lloyd
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