



Cabot Carbon Limited

EPR/BU2110IS

Outline Site Closure Plan

V2.0

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1. Introduction

This document has been prepared to satisfy the requirements of Cabot Environmental Permit EPR/BU2110IS, permit condition 2.11.1.3.

The plan describes how Cabot will maintain the facility during its operational lifetime and how all buildings, plant and associated infrastructure will be decommissioned in a safe and environmentally responsible manner prior to the final surrender of the operating permit to Natural Resources Wales (The Regulator) at the end of production operations.

2. General Information

The Cabot fumed metal oxide facility was constructed in 1989 and started initial production in 1992. During its lifetime the plant has undergone modification and expansion.

In order to communicate the requirements of the site environmental permit conditions and environmental management system, all employees, visitors and third-party contractors receive a full induction covering these and other safety related matters. This is further supported by employee continuation training and regular site re-qualification inductions for contractors.

There are a number of boreholes on site which are capped and protected. These have been used to provide baseline reference data as part of the original application site condition report and for on-going monitoring in line with the planned monitoring schedule as part of the site SPMP program.

Should the plant be decommissioned and demolished at a future date; reference will be made to the original site condition and periodic monitoring reports when assessing if remedial work is required as a result of Cabot's activities to return the land to its original condition.

It should be noted that Cabot has conducted a full asbestos survey of the facility and no asbestos containing materials (ACMs) are incorporated into the fabric of any buildings. In the event of total site demolition ACMs will not present a risk to the health and safety of third-party contractors, near neighbours or to the local environment.

3. Facility Operation

The facility is operated in line with the requirements of its environmental permit, ISO 14001:2015 environmental management system and both local and corporate operating procedures for the protection of the environment and people.

Cabot operates the facility based on the lifetime approach i.e. the prevention of pollution, rectification where such events occur and the recording of all relevant information by means of an extensive monitoring and reporting program.

The facility will maintain and make available to the regulator any and all records deemed appropriate to demonstrate the safe operation of the facility without causing harm to the local environment and surrounding sensitive environmental receptors.

4. Operational Phase

Cabot will ensure that the plant is maintained in a safe and efficient state so that it does not present a risk of harm to the environment, people or the surrounding population.

a. Preventative Maintenance

During planned maintenance activities Cabot will ensure that it takes all measures necessary to prevent pollution or harm to the environment.

Examples of current measures in common use on site include the use of protective sheeting on unmade ground for the laydown and temporary storage of equipment under maintenance and extensive use of below and above ground bunds to prevent contamination in the event of a spillage or process vessel failure.

The facility has a comprehensive suite of risk assessments, standard operating procedures and work instructions to ensure the site is operated safely and without risk of harm to the environment.

Contractors must abide by site rules and procedures for protection of the environment and the safe disposal of all wastes.

b. Modification and Improvement

When planning for plant modification or process improvement Cabot will ensure that consideration is given to opportunities that may be available to re-locate sub-surface infrastructure or perform minor remediation activities where there is evidence that such remediation is required as part of the plant modification project.

Environmental impacts will be assessed and captured for future reference. Significant environmental effects may be added to the environmental impacts and aspects register as part of the ISO14001 environmental management system.

Project planners are responsible for ensuring that any wastes generated as part of any project are disposed of in accordance with established local procedures and relevant statutory requirements. This duty extends to the removal of decommissioned plant and equipment during the operational lifetime of the facility.

5. Decommissioning phase

At this moment in time the Barry production facility continues to make a positive contribution to the Cabot global organisation.

Future market demand and strategic business decisions taken at Board level by Cabot or Dow Performance Silicones (Dow) may one day mean that a corporate decision is made to close the site.

This section outlines the actions Cabot will take during plant decommissioning prior to site demolition should this be the only practical option for the site once decommissioning is complete.

a. Staffing

We anticipate that there will be a phased reduction in staffing levels as planned works progress. Cabot will ensure that it retains sufficient technically competent staff at all levels to ensure the safe decommissioning and final demolition of the site prior to permit surrender.

b. Raw Materials

The Barry facility has a symbiotic relationship with its fence line neighbour Dow. Cabot will ensure that prior to cessation of operations all available feedstock is supplied to Dow to support its production requirements thereby avoiding the generation of hazardous waste requiring specialist disposal.

Any residual feedstock which is beyond recovery for supply to Dow will be removed from the site storage vessels and disposed of in line with regulatory requirements.

Finished end product (fumed silica) will be transferred to the external distribution centres for onward sale.

Packaging materials held on site and by the local external warehousing provider will, wherever possible, be returned to the supplier for credit or transferred to the European FMO facility for consumption. Disposal of redundant packaging materials via site waste streams will only be considered if no viable alternative means of disposal is available at the time of decommissioning.

c. Buildings & Structures

Decommissioning of buildings and structures will take place in several distinct phases. Buildings will be decommissioned following removal of redundant plant and equipment. Cabot will ensure that coolers and chillers are decommissioned in line with regulatory requirements by appropriately licenced third-party contractors.

All wastes generated during the phased decommissioning of buildings and structures will be segregated and prepared for re-use or recycling where such opportunities exist. All wastes will be sent for recycling or disposal using appropriately licensed service providers.

Suitable arrangements will be put in place to identify areas where additional cleaning may be required prior to demolition to prevent the release of material or residues to the environment.

d. Plant & Equipment, Utilities

All redundant plant and equipment including supporting infrastructure will have any potentially hazardous materials removed prior to decommissioning using industry recognised best practice.

Plant and equipment with remaining serviceable life will be transferred to other Cabot facilities if this is deemed to be the best practicable financial option at the time of removal or it will be sold on the open used equipment market.

Equipment at the end of service life will be prepared for recycling and either sold as scrap, recycled or disposed of in line with regulatory requirements in force at the time of decommissioning.

Suitable arrangements put in place for disconnection of utilities and discontinuation of services (gas, electricity, nitrogen, hydrogen, effluent transfer to Dow, potable water)

e. Offsite Impacts

Cabot is fully aware that closure of the Barry facility will have off site impacts that will affect not only fence line neighbours but other businesses in the locality.

At this time the only reasonably foreseeable event that would lead to site closure and decommissioning would be a decision taken by Dow to close the operations at its Barry facility. This would mean there is no longer a supply of raw materials to allow continued operation of the plant.

Closure under these conditions would not have an effect on Dow.

External warehousing, transport services and packaging suppliers would be negatively impacted by a decision to close the facility. Cabot would provide as much advance notification as possible to these companies so that the impacts from loss of business could be minimised.

It is believed that the impact to third party contracting companies would be minimal given the large scale of their operations outside of the Cabot facility.

6. Demolition Phase

As required by The Construction (Design and Management) Regulations 2015 Cabot will ensure that the Health and Safety Executive are informed of any demolition activities by means of submitting an F10 notification to the Executive.

Cabot will appoint a suitably qualified Principal Designer to ensure a comprehensive demolition phase plan and safety plan is in place prior to any demolition works commencing.

Natural Resources Wales will be fully consulted regarding any relevant matters during the development of the demolition phase plan.

Cabot will ensure that demolition contractors use recognised dust suppression techniques such as sheeting and damping down to prevent release of nuisance dusts to the surrounding environment and local receptors.

All non-hazardous demolition wastes will be prepared for off-site recycling using third party service providers. Hazardous wastes will be removed and disposed of in line with the regulatory requirements in force at the time of demolition.

7. Surrender Site Condition Report

Cabot will prepare and make available to the regulator a surrender Site Condition Report (SCR) which will describe the condition of the land and groundwater at the facility at the point at which we apply to surrender environmental permit EPR/BU2110IS.

8. Final Surrender

The SHEQ Manager will contact Natural Resources Wales (NRW) to inform them of the intended closure of the facility, in accordance with the relevant permit requirements.

Cabot will make a formal application for permit surrender in line with the requirements of regulation 25, 25(2) and part 1 of schedule 5 of The Environmental Permitting Regulations 2016.

The SCR as discussed in section 7 of this outline plan will be submitted at the formal surrender application stage to demonstrate to the regulator that Cabot have taken the necessary measures to

avoid a pollution risk resulting from the operation of the facility and that they have returned the site of the facility to a satisfactory state.

Additionally, CIABATA will be informed of the discontinuation of involvement with the Climate Change Agreement

VALPAK will be informed of the facility closure in order to discontinue obligations under the Packaging Waste Regulations.

The following will be informed of the closure of the facilities:

- Natural Resources Wales
- Vale of Glamorgan Local Authority
- Dow Chemicals

Any remediation necessary will be based on the requirements for Permit Surrender agreed with NRW and any further requirements for lease surrender.

Cabot remains committed to be compliant with all UK environmental legislation during the lifetime of its Environmental Permit up to and including site closure.