



**APPLICATION FOR AN ENVIRONMENTAL PERMIT
VARIATION UNDER THE ENVIRONMENTAL
PERMITTING (ENGLAND AND WALES)
REGULATIONS 2016 (AS AMENDED)**

ENVIRONMENTAL RISK ASSESSMENT



**ABRIL INDUSTRIAL WAXES LIMITED,
STURMI WAY, VILLAGE FARM INDUSTRIAL
ESTATE, PYLE, BRIDGEND, CF33 6BZ**

**ECL Ref: AIWL.01.01/ERA
August 2024
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ACRONYMS/TERMS USED IN THIS REPORT

Abril	Abril Industrial Waxes Limited
AW	Ancient Woodland
CCTV	Closed Circuit Television
DEFRA	Department for Environment, Food and Rural Affairs
DMW	DataMapWales
EA	Environment Agency
ECL	Environmental Compliance Limited
ERA	Environmental Risk Assessment
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MAGIC	Multi-Agency Geographical Information for the Countryside
NGR	National Grid Reference
NNR	National Nature Reserve
NRW	Natural Resources Wales
Ramsar	The Ramsar Convention on Wetlands of International Importance
SAC	Special Areas of Conservation
SM	Scheduled Monument
SPA	Special Protection Areas
SSSI	Sites of Special Scientific Interest
The Installation	Area contained within the Environmental Permit boundary at Abril Industrial Waxes Limited

1. INTRODUCTION

1.1. Overview

1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Abril Industrial Waxes Limited (“Abril”) to prepare an Environmental Risk Assessment (“ERA”) to form part of the Environmental Permit (“EP”) variation application at their site located at Sturmi Way, Village Farm Industrial Estate, Pyle, Bridgend CF33 6BZ (hereafter referred to as “the Installation”).

1.1.2. An ERA has been undertaken in accordance with Natural Resources Wales (“NRW”) *‘How to Comply with Your Environmental Permit’* (Version 8, October 2014) and the relevant requirements of the current version of the Environment Agency (“EA”) online risk assessment guidance¹ (in the absence of specific NRW guidance), in order to:

- identify potential risks that site operations may present to the environment;
- screen out any insignificant risks;
- assess potentially significant risks in detail; and
- decide on the appropriate control measures.

1.1.3. Accordingly, the assessment has addressed the potential risks relating to the operation of the proposed Installation, namely:

- amenity risks, fugitive emissions to water/sewer, noise, etc.); and
- accidents (e.g. fire, loss of containment, loss of power, vandalism).

¹ EA online guidance – *‘Risk assessments for your environmental permit’*. Available at <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>, updated October 2020, accessed June 2024.

2. IDENTIFICATION OF RECEPTORS

2.1. Site Settings

- 2.1.1. The Installation is located on Sturmi Way, within an industrial estate and heavily industrial site setting area, to the northwest of Bridgend town centre. The Installation occupies an approximate area of 1,200m² and is centred on National Grid Reference (“NGR”) SS 83118 82213.
- 2.1.2. The Site Location Plan (Drawing Reference AIWL.01.01-01) details the EP boundary (outlined in green) and is provided in Section 5 of this application submission.
- 2.1.3. Figure 1 provides the indicative location of the Installation (red outline) within the context of the surrounding environment.

Figure 1: Indicative Site Location



- 2.1.4. The immediate surroundings include industrial units, with residential housing approximately 80m to the north. A railway line lies approximately 350m south of the Installation at its nearest point. The commercial/industrial premises in the immediate surroundings include commercial vehicle rental, clothing hire, a tyre shop and cafes.
- 2.1.5. The nearest residential receptors are located approximately 90m north of the Installation on Cribbwr Square, Kenfig Hill. The Installation boundary is located approximately 365m east of the A48 and approximately 415m west of Cynffig Comprehensive School.
- 2.1.6. The Afon Cynffig is located approximately 815m north-west of the Installation boundary.

2.2. Potentially Sensitive Ecological Receptors

- 2.2.1. A review of the area using Multi-Agency Geographic Information for the Countryside (“MAGIC”)² mapping tool and the DataMapWales³ (“DMW”) shared data platform identified that the Installation is located within 10km of three Special Areas of Conservation (“SACs”), which are shown in Figure 2 and detailed in Table 1.
- 2.2.2. The Installation is not located within 10km of any Special Protection Area (“SPA”) or Ramsar Convention on Wetlands of International Importance (“Ramsar”) site.

Figure 2: SACs identified within 10km of the Installation Boundary

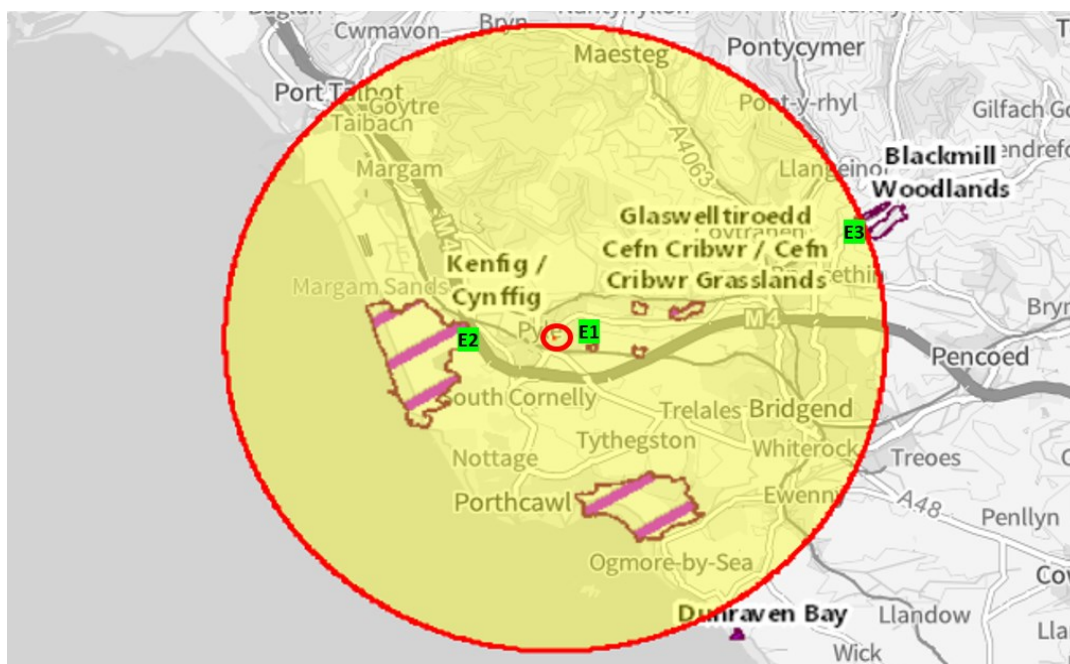


Table 1: SACs, SPAs and Ramsar sites within 10km of the Installation Permit Boundary

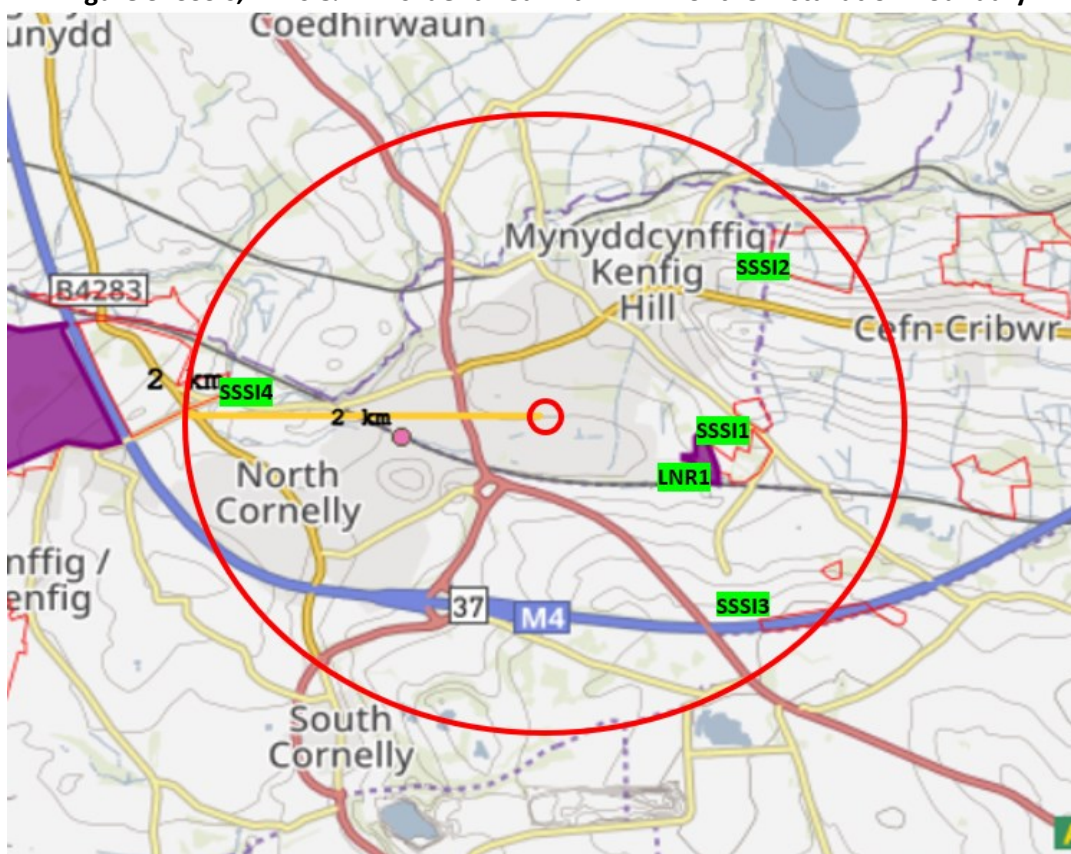
Ref.	Description	Easting (X)	Northing (Y)	Distance from EP Boundary (km)	Direction
E1	Cefn Cribwr Grasslands – SAC (consisting of discrete areas)	284264	181999	0.94	E
E2	Kenfig NNR – SAC (consisting of discrete areas)	280308	181915	2.44	W
E3	Blackmill Woodlands – SAC (consisting of discrete areas)	292575	185406	9.53	NE

- 2.2.3. A search using both MAGIC and DMW was undertaken to identify Sites of Special Scientific Interest (“SSSI”), National Nature Reserves (“NNR”) and Local Nature Reserves (“LNR”) within 2km of the Installation. The location of the identified sites are shown in Figure 3 and detailed in Table 2.

² Magic Map Online Mapping Tool, available at: <https://magic.defra.gov.uk/>, accessed June 2024.

³Welsh Government DMW Online Mapping Tool, available at: <https://datamap.gov.wales/maps/new#/>, accessed June 2024.

Figure 3: SSSIs, LNRs & NNRs identified within 2km of the Installation Boundary



2.2.4. The NGR of the identified ecological receptors are listed in Table 2, together with their approximate nearest distance and direction from the Installation Permit boundary.

Table 2: SSSIs, LNRs & NNRs within 2km of the Installation Permit Boundary

Ref.	Description	Easting (X)	Northing (Y)	Distance from EP Boundary (km)	Direction
LNR1	Frog Pond Wood – LNR	284045	181921	0.82	E
SSSI1	Pen-y-castell, Cefn Cribwr – SSSI	284288	182016	0.94	E
SSSI2	Wuan Cimla) – SSSI	284775	181043	1.53	NE
SSSI3	Stormy Down – SSSI (Consists of discrete areas)	284699	183144	1.70	SE
SSSI4	Kenfig/Cynffig – SSSI	279100	181700	1.71	W

2.2.5. Using the DMW online mapping tool, Ancient Woodland (“AW”) sites were identified within 1km of the Installation boundary. There were two AW sites located within the search radius which are shown in Figure 4 and detailed in Table 3.

Figure 4: Ancient Woodland within 1km of the Installation Boundary

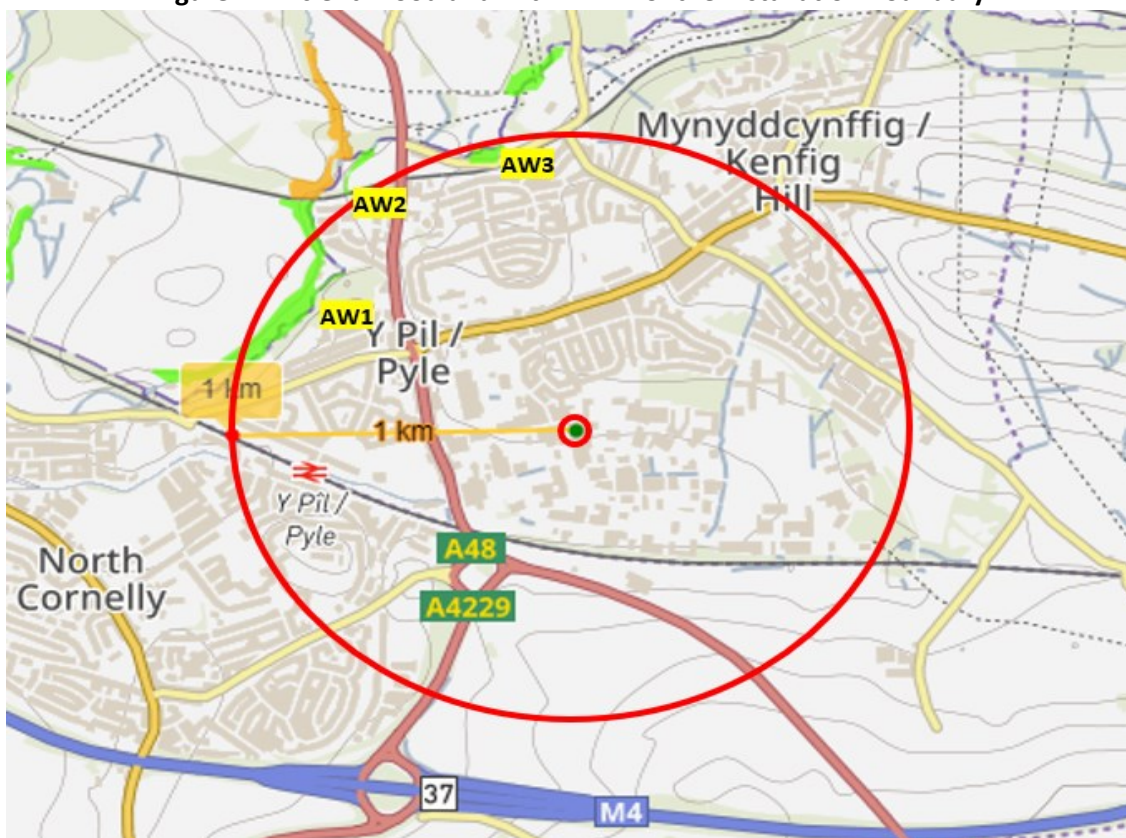


Table 3: AWs within 1km of the Installation Permit Boundary

Ref.	Description	Easting (X)	Northing (Y)	Distance from EP Boundary (km)	Direction
AW1	Ancient Semi-Natural Woodland Unique ID: 15608	282327	182572	0.84	WNW
AW2	Ancient Semi-Natural Woodland Unique ID: 15611	282444	182949	0.97	NW
AW3	Ancient Semi-Natural Woodland Unique ID: 15610	282847	183050	0.84	NNW

2.2.6. The Installation is also located within 2km of thirteen Local Wildlife Sites (“LWS”) according to publicly available documents including the Bridgend SINC Survey⁴ and Bridgend SINC Review⁵. The locations of the LWS sites are shown in Figure 5 and detailed in Table 4.

⁴ Bridgend County Borough Council’s ‘Bridgend SINC Survey; Survey and Report’ undertaken by The Wildlife Trust of South and West Wales’, available at: <https://www.bridgend.gov.uk/media/14799/37-sinc-review-2020.pdf>, published March 2020, accessed June 2024.

⁵ Bridgend Sites of Importance for Nature Conservation Review undertaken by Capita Symonds, available at: <https://democratic.bridgend.gov.uk/documents/s1040/SINC%20for%20DC%20Committee%2029%20May%202014.pdf>, published December 2011, accessed June 2024.

Figure 5: LWS identified within 2km of the Installation Permit Boundary



Table 4: LWS within 2km of the Installation Permit Boundary

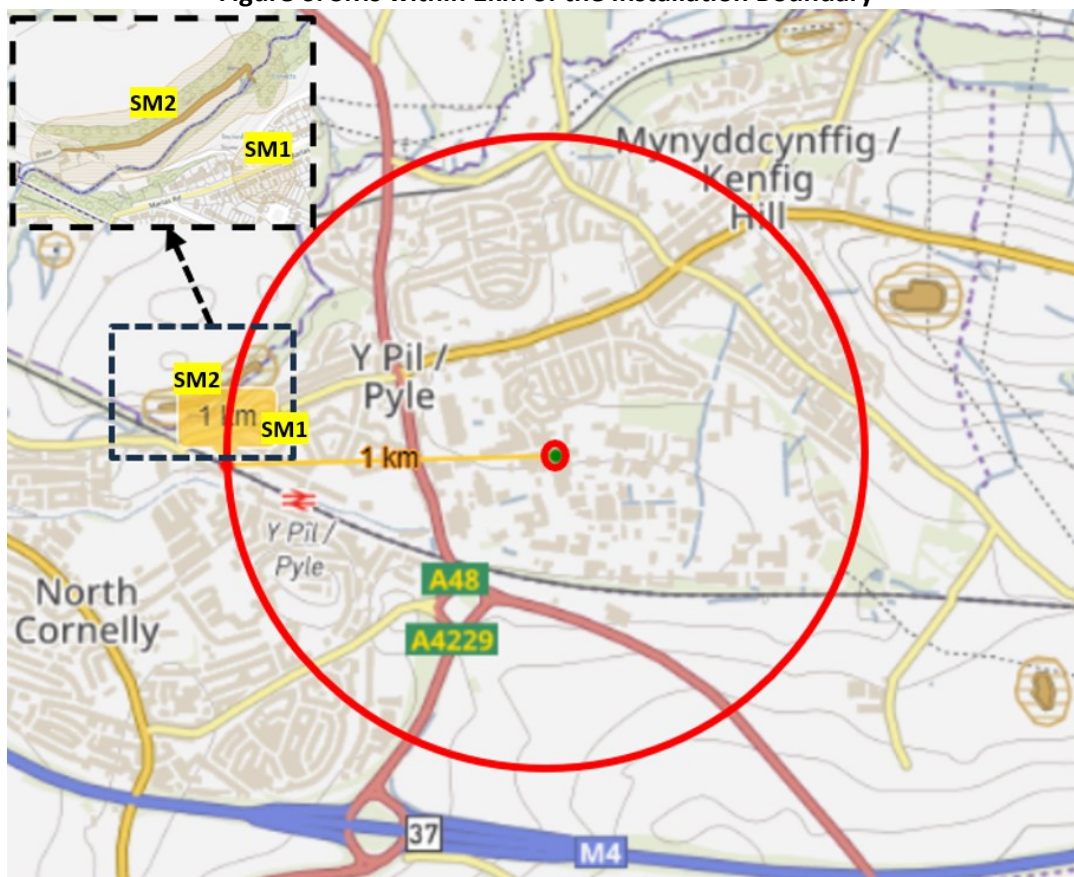
Ref.	Description	Easting (X)	Northing (Y)	Distance from EP Boundary (km)	Direction
LWS1	St James Church Wood	282200	182500	0.96	WNW
LWS2	Frog Pond Wood	284000	181800	0.97	ESE
LWS3	Eastern Frog Pond Wood	284100	181900	1.03	ESE
LWS4	Waunbant Road (north)	284300	182200	1.18	E
LWS5	North of Pyle	283700	183400	1.32	NNE
LWS6	Cefn Hirgoed	283700	183400	1.32	NNE
LWS7	Waunbont Road Triangle	284400	181800	1.35	ESE
LWS8	Old Ballas Wood	283100	180600	1.61	S
LWS9	Afon Cynffig	281500	182200	1.62	W
LWS10	Ty Tanglewyst Wood	282600	180500	1.79	SSW
LWS11	Mynydd Bach	284900	182500	1.80	ENE
LWS12	Bedford Park	284700	183200	1.86	NE
LWS13	North Eastern Dunes	281200	182400	1.93	W

2.2.7. In addition to the SACs, SPAs, Ramsars, SSSIs, NNRs, LNRs, LWSs and AWs, other potentially sensitive land uses within 1km of the Installation were also considered. A review of the area using the DMW tool indicated that none of the following sensitive land uses are located within a 1km radius of the Installation:

- Areas of Outstanding Natural Beauty;
- Groundwater Source Protection Zones;
- Marine Conservation Zones;
- Nitrate Vulnerability Zone; and
- National Parks.

2.2.8. However, two Scheduled Monuments ("SM") were identified within a 1km radius from the Installation, as detailed in Figure 6. These consist of Pyle Incised Stone (labelled 'SM1') and a Leat & Dam at Llanmihangel Mill (labelled 'SM2').

Figure 6: SMs within 1km of the Installation Boundary



2.3. Potentially Sensitive Human Receptors

2.3.1. Ten potentially sensitive human receptors have been identified within 1km of the Installation which are displayed in Figure 7 and outlined in Table 5.

Figure 7: Sensitive Human Receptors Identified within 1km of the Installation



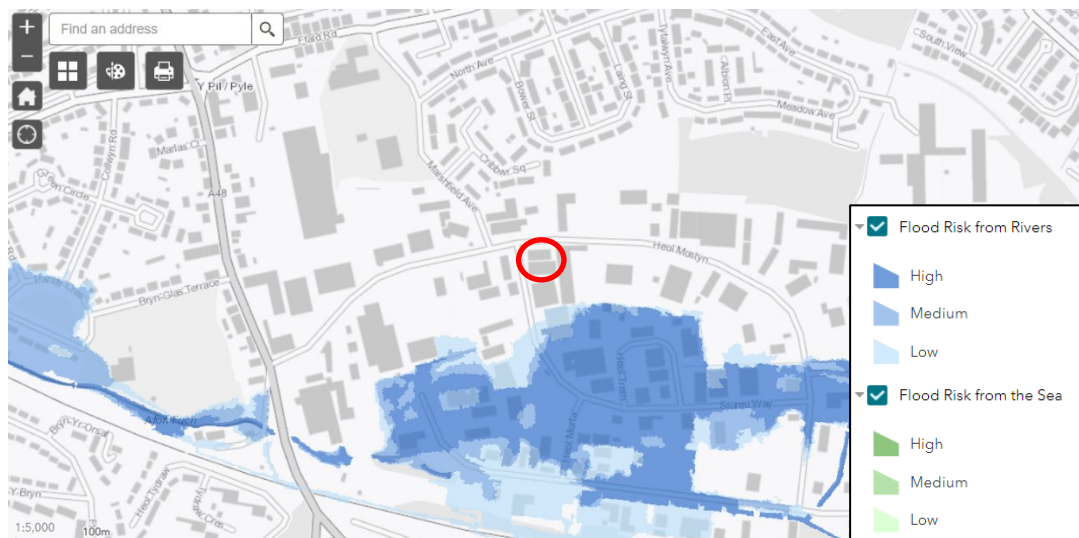
Table 5: Human Receptors within 1km of the Installation Permit Boundary

Ref.	Name	Receptor Type	Easting (X)	Northing (Y)	Distance from Permit Boundary (m)	Direction
H1	Cafe	Recreational/Commercial	283087	182178	47	W
H2	Commercial Vehicle Rental	Commercial	283201	182188	87	E
H3	Cribbwr Square	Residential	283083	182314	107	N
H4	Meadow Avenue	Residential	283342	182404	294	NE
H5	Supermarket store entrance	Recreational/Commercial	282763	182355	382	NW
H6	Properties off Pyle Road	Residential	282710	182125	417	W
H7	Kenfig Hill RFC	Recreational	283258	182699	506	N
H8	Heol Tydraw	Residential	282747	181864	509	SW
H9	Pyle RFC	Recreational	282614	182094	518	WSW
H10	Cynffig Comprehensive School	Educational	283661	182253	544	E

2.5. Risk of Flooding

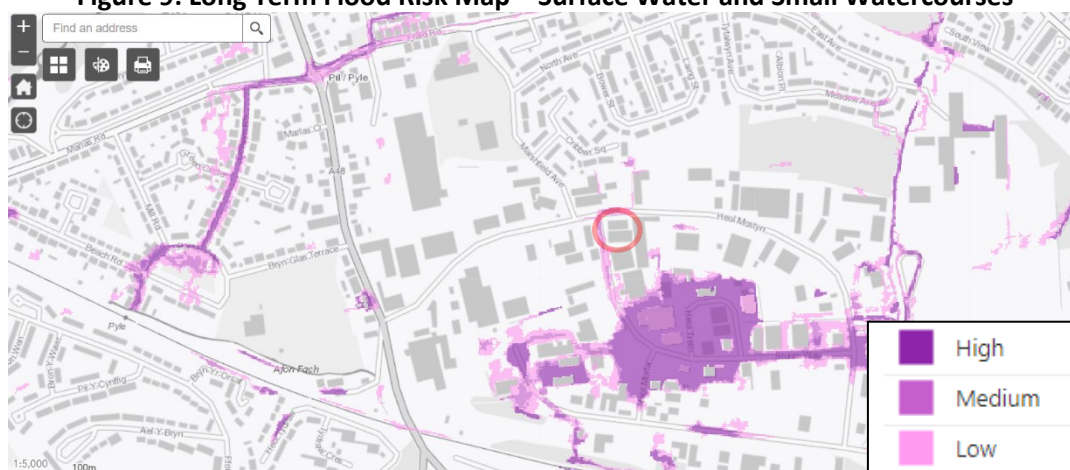
- 2.5.1. The nearest watercourse to the Installation is the Afon Cynffig, located approximately 815m north-west of the Installation boundary.
- 2.5.2. As shown on NRW's flood risk mapping service⁶, the Installation is not covered by a flood risk category for rivers or the sea and is therefore deemed to have a very low probability of flooding – meaning that the potential of flooding from rivers or the sea is less than 0.1% each year.
- 2.5.3. Similarly, the vast majority of the Installation is not covered by a flood risk category for surface waters (and is therefore deemed to have a very low probability of flooding). Where there is a flood risk from surface waters (i.e., on the western and northern boundaries of the Installation), these are categorised as low (meaning that the potential of flooding from surface waters is between 1 in 1,000 (0.1%) and 1 in 100 (1%)) and medium (meaning that the potential of flooding from surface waters is between 1 in 100 (1%) and 1 in 30 (3.3%)).
- 2.5.4. Figures 8 and 9 have been provided to reproduce the information displayed in NRW's mapping service for rivers and the sea and for surface waters, respectively. In Figures 8 and 9, the approximate location of the Installation has been depicted by the red circle.

Figure 8: Long Term Flood Risk Map – Rivers and Seas



⁶ NRW Flood Risk Map, available at: <https://flood-risk-maps.naturalresources.wales/?locale=en>, accessed July 2024.

Figure 9: Long Term Flood Risk Map – Surface Water and Small Watercourses



3. IDENTIFICATION OF THE RISKS

3.1. Amenity Risks

- 3.1.1. Taking into account the nature of the activities that will be undertaken at the Installation, the main amenity risks identified are as follows:
- point source emissions to air;
 - fugitive emissions to air;
 - point source emissions to sewer;
 - fugitive emissions to water/sewer; and
 - noise.
- 3.1.2. Fugitive releases to land will be prevented by conducting all operations in areas sealed with an impervious barrier to prevent a pathway for migration to land. Consequently, no further assessment has been undertaken.
- 3.1.3. Only uncontaminated surface water run off (i.e. rainfall) will be discharged to surface water drains, consequently, no further assessment has been undertaken for the point source emissions to water.

3.2. Accident Risks

- 3.2.1. The main potential accident risks have been identified as:
- fire;
 - loss of power/system failure;
 - loss of containment of potentially polluting materials; and
 - vandalism.

4. ASSESSMENT OF RISKS

4.1. Methodology

- 4.1.1. The risk assessments have been undertaken using the following approach for amenity and accident risks:
- identification of hazards associated with the risk that have the potential to cause harm;
 - identification of potential receptors i.e. what is at risk (for the purposes of this assessment, typical potential receptors have been identified)?;
 - pathway i.e. how can the hazard get to the receptor?;
 - risk management measures employed to reduce the risk to an acceptable level;
 - probability of exposure i.e. how likely is this contact?;
 - consequence i.e. what is the harm that can be cause?; and
 - assessment of overall risk.
- 4.1.2. The assessments for the amenity and accident risks identified above are presented in Tables 6 and 7 respectively.

Table 6: Amenity Risk Assessment

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Emissions to Air						
<i>Point Source Emissions to Air</i>						
Point source emissions from proposed emission point A15.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air – windblown dispersion in atmosphere.	The H1 Air Emissions Risk Assessment (AIWL.01.10/H1), which is contained in Section 6 of this application, concluded that the emissions arising will not have a detrimental impact on local air quality.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Air Pollution.	Not significant if risk management measures are strictly adhered to.
<i>Fugitive Emissions to Air</i>						
Fugitive emissions from the local exhaust ventilation ("LEV") and the carbon filter equipment associated with proposed emission point A15.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air – windblown dispersion in atmosphere.	The equipment is visually checked with records kept on daily shift logs. These will be reported at the frequency required by NRW. Equipment maintenance is carried out in accordance with the manufacturer's recommendations. The LEV is tested annually and the carbon filter is replaced when necessary.	Low Risk management measures should prevent unauthorised releases from reaching the identified receptors.	Air Pollution.	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Emissions to Water						
<i>Point Source Emissions to Water – Foul Sewer</i>						
Process effluent and contaminated surface water	Welsh Water Effluent Treatment Plant and subsequently, controlled waters.	Via foul drainage and surface water drainage system.	<p>The effluent discharged at the Installation is subject to a Trade Effluent Consent. The existing Dŵr Cymru Welsh Water Trade Effluent Consent, and confirmation this will also be applicable to the proposed process, may be found as Appendix I.</p> <p>Waste effluent is captured via the Installation's effluent system until it reaches circa 1,000 litres. The effluent is then tested to ensure it complies with the Trade Effluent Consent before being released to sewer. Any out of specification effluent is treated to bring the effluent within specification before being released.</p> <p>Hard standing is present all around the site which acts as an impermeable barrier. Emissions to water are controlled via bunded zones.</p> <p>The proposed activity does not involve discharging any hazardous chemicals or elements to sewer or surface water nor will it generate any additional effluent. A H1 assessment is therefore not required.</p>	Low	Contamination of Welsh Water Effluent Treatment Plant and subsequent contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.
<i>Fugitive Emissions to Water – Foul Sewer and Surface Water</i>						
Process effluent and contaminated surface water	Welsh Water Effluent Treatment Plant and subsequently, controlled waters.	Via foul drainage and surface water drainage system.	<p>The activities undertaken by the Installation are conducted in a controlled manner. Hard standing is present all around the site which acts as an impermeable barrier. Furthermore, emissions to water are controlled via bunded zones on the ground and bunds are also present around the raw materials and effluent tanks to help minimise any fugitive emissions.</p> <p>All site personnel will be trained in the correct use of the equipment and refresher training will be undertaken annually.</p>	Low	Contamination of Welsh Water Effluent Treatment Plant and subsequent contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.

Table 6: Amenity Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Noise						
Noise emissions from site operations.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air. Installation is close enough to human sensitive receptors for noise to be potentially audible.	<p>The Installation is located within an industrial setting and is surrounded by industrial units and premises. The site operations are conducted within a building, thus helping to mitigate and attenuate any noise generated by the site's activities.</p> <p>The maintenance requirements of site equipment will be contained in Abril's Environmental Management System ("EMS"). The maintenance regime will be devised in accordance with the manufacturer's handbook and recommendations to ensure all plant and equipment is in good working order.</p> <p>In the event of elevated noise being experienced at the Installation, the Incident Report Form will be completed (a copy of which has been provided as Appendix II). An investigation will be undertaken to establish the root cause and implement corrective actions. The relevant risk assessment will also be updated where necessary.</p>	Low/Medium The risk management measures should prevent noise reaching the identified receptors.	Possible noise nuisance.	Not significant if risk management measures are strictly adhered to.

Table 7: Accident Risk Assessment

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fire						
Fire at the site.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to air – windblown dispersion in atmosphere.	<p>As part of Abril's EMS, the Installation has an Emergency Plan in place which details the procedures to report and effectively manage incidents and potential emergency situations including fire.</p> <p>Emergency drills will be undertaken annually to ensure all staff are aware of the emergency procedures. Any findings and actions will be documented.</p> <p>Fire extinguisher will be located in strategic locations and inspected and maintained periodically. All employees are made aware of the location of fire-fighting equipment and are conversant with their appropriate usage.</p> <p>General fire-prevention and protection measures will be implemented in accordance with the Installation's Fire Risk Assessment ("FRA") which is reviewed annually. The FRA will be reviewed by competent personnel to include the new activities.</p> <p>Preventative maintenance on all equipment will be undertaken to prevent any faults occurring as detailed in the manufacturer's manual and handbook.</p> <p>Designated smoking areas are in place away from the proposed activities.</p>	<p>Low</p> <p>The risk management measures should prevent any release from reaching the identified receptors.</p>	Combustion gases (smoke) and localised nuisance.	Not significant if risk management measures are strictly adhered to.

Table 7: Accident Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Fire (Cont.)						
Releases of potentially contaminated firewater.	Human and ecological sensitive receptors population in surrounding area (see Section 2.2 and 2.3 of this ERA). Welsh Water Effluent Treatment Plant and controlled waters.	Via foul water drainage network or overland flow.	Emissions to water are controlled via bunded zones on the ground. Depending on the location of the fire and following advice and instruction from the Fire Rescue Service, drain mats and firewater booms, for example, will be provided and deployed by Abril personnel to prevent any firewater from entering the drainage system and leaving site. The contained potentially contaminated firewater will be tested prior to disposal off-site to an appropriately licenced facility or installation.	Low Risk management measures should prevent any release from reaching the identified receptors.	Contamination of Effluent Treatment Plant and/or contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.

Table 7: Accident Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Spillage of Potentially Polluting Substances						
Loss of containment during unloading and processing of potentially polluting substances.	Welsh Water Effluent Treatment Plant and controlled waters.	Via site drainage network or via overland flow.	<p>The Installation benefits from impermeable surfacing to prevent any downward migration of potentially pollution substances entering the ground or groundwater.</p> <p>The Site Manager is responsible for ensuring Team Leaders supervise deliveries and unloading at all times and storage vessel levels are checked prior to unloading to prevent overfilling. Bunds are present around the raw material and effluent tanks providing 110% capacity of the largest container or 25% of the total contents within the bund, whichever is greater to help minimise any loss of containment.</p> <p>A spill management procedure (a copy of which may be found in Appendix III) is in place as part of the Installation's EMS. All staff are trained in the spill management procedure and the appropriate deployment of spill kits contents.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors.</p>	Contamination of Effluent Treatment Plant and/or contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.
Fuel leak from delivery vehicles.						

Table 7: Accident Risk Assessment (cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Loss of Power						
Major system failure/loss of process control.	Welsh Water Effluent Treatment Plant and controlled waters.	Via site drainage network or overland flow.	<p>Abril personnel are present at all times to supervise operations. The process equipment benefits from alarms and controls which enable any malfunctions to be identified immediately. Additionally, emergency stop buttons can halt the process immediately in case of serious failure or faults occurring. The Installation is capable of identifying, holding and preventing the release of any materials should equipment fail.</p> <p>The documented planned maintenance regime will detail the required maintenance and inspection of all process equipment to ensure good working order to reduce the risk of complete system failure.</p> <p>All operations are designed to possess fail-safe mechanisms (for example, should a major system failure or loss of power occur). Faults will be addressed, and repairs undertaken where necessary using specialist contractors. Competent personnel will then check all areas prior to recommencing operations.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors.</p>	Contamination of Effluent Treatment Plant and/or contamination of controlled waters.	Not significant if risk management measures are strictly adhered to.
Vandalism						
Any of the above.	Any of the above.	Any of the above.	<p>The Installation is secured by perimeter fencing and, via closed-circuit television ("CCTV"), is remotely monitored out of hours by an external security contractor. In addition, the site is also monitored by alarms 24/7.</p> <p>All visitors must sign in and staff are trained in site security procedures and are encouraged to report unidentified or unknown visitors.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors.</p>	Any of the above.	Not significant if risk management measures are strictly adhered to.

5. SUMMARY

5.1. Results of the Assessment

- 5.1.1. The results of both the amenity and accident risk assessments (Tables 6 and 7) indicate that none of the risks relating to proposed variation will be significant if the Installation is operated and managed in accordance with the risk management measures detailed.

5.2. Conclusion

- 5.2.1. The risks in terms of accident and amenity risk can be considered not significant providing all risk management measures are implemented and strictly adhered to.

APPENDIX I TRADE EFFLUENT CONSENT & CORRESPONDENCE

Direction N° 3 of SW74

(2018)

DWR CYMRU CYFYNGEDIG
THE WATER INDUSTRY ACT 1991
NOTICE OF DIRECTION VARYING A CONSENT
TO DISCHARGE TRADE EFFLUENT INTO A PUBLIC SEWER

To: ABRIL INDUSTRIAL WAXES

The owner and occupier of the trade premises (hereinafter called 'the occupiers'), whose registered office is situated at **Munday Industrial Estate, 58-66 Morley Road, Tonbridge, Kent, TN9 1RP.**

- (1) A consent ("the consent") to discharge trade effluent into the public sewer subject to conditions was issued by **DWR CYMRU CYFYNGEDIG** ("the Undertaker") (or its predecessors) on 30TH June 1995 from trade premises at **Abril Industrial Waxes, Unit 17A, Strumi Way, Village Farm Industrial Estate, Pyle, Bridgend, CF33 6BZ.**
- (2) Notices of Direction ("the previous Directions") were given in respect of the said discharge on the **10th January 2000, 12th October 2012 and 11th February 2016** by the Undertaker.
- (3) Except in so far as they are varied by this Direction the conditions and provisions of the Consent and previous Direction shall remain in force and shall apply to the discharge.

The Undertaker hereby gives Notice of its Direction that the conditions attached to the Consent shall be varied with effect from the **13th April 2018** by:-

- (I) the revocation of the conditions contained in the Consent, and subsequent directions and;
- (II) the substitution for those conditions of the following conditions.

DWR CYMRU CYFYNGEDIG ("the Undertaker") in the exercise of its powers under Section 121 of the Water Industry Act 1991, and thinking it fit to impose conditions as hereinafter appear, **GIVES ITS CONSENT** to the discharge of trade effluent for the said trade premises into the Undertaker's public sewers, **SUBJECT TO THE FOLLOWING CONDITIONS AND NOT OTHERWISE**

- (1) The public sewer into which the trade effluent may be discharged is the **225 mm** more particularly identified by means of a line coloured RED drawn on the plan attached hereto and marked "B".
- (2) The discharge of trade effluent shall be made at the point marked "X" on the said plan and the said trade effluent shall enter into the public sewer shown on the said plan at the point marked "Y" thereon and not otherwise. Further, no connection, linkage, conduit, pipe, channel or other communication whatsoever shall be made to the said sewer between the said points "X" and "Y" without the prior approval in writing of the Undertaker.
- (3) The trade effluent to be discharged shall consist solely of that which is specified in the Trade Effluent Notice or application to discharge in respect of which the Consent was given as varied by any application made for the purpose of this Direction and derived exclusively from **Manufacture of Industrial Waxes**.
- (4) Without prejudice to condition 3 above, the nature and/or composition of the trade effluent which may be discharged is as specified in the FIRST SCHEDULE hereto.
- (5) The Trade Effluent shall not include any substances or properties listed in the SECOND SCHEDULE hereto in concentration greater than stated therein.
- (6) The maximum quantity of trade effluent discharged on any day (being any continuous 24 hour period) shall not exceed **1.0** cubic metres.

- (7) The highest rate at which trade effluent may be discharged shall not exceed **1.0** Cubic Metres per hour at a rate of no more than 0.3 Litres per second.
- (8) The trade effluent can be discharged into the public sewer at any time.
- (9) No uncontaminated condensing water shall be discharged.
- (10) There shall be eliminated from the trade effluent before it is discharged the matters listed below:
 - (a) Effluent with a temperature in excess of 43 degrees Celsius (110 degrees Fahrenheit);
 - (b) Petroleum Spirit within the meaning of Section 111 of the Water Industry Act 1991 and/or the Petroleum Act 1928, save as otherwise permitted herein;
 - (c) Other material forming a constituent of the trade effluent, whether alone or in combination with other materials, specified hereby as that which is explosive;
 - (d) Any other substance forming a constituent of the trade effluent which is hereby specified as that which is likely to injure the sewers or to interfere with the free flow of their contents or to affect prejudicially the treatment and disposal of their contents;
 - (e) Any other substance forming a constituent of the trade effluent which is hereby specified as that which in its pure state or in combination with other materials in the contents of the sewer ("the sewage") is capable of producing toxic or flammable vapours.
- (11) No trade effluent shall be discharged the pH value of which is less than **6.0** or greater than **11.0**.
- (12) No trade effluent shall be discharged the nature or composition of which includes a

matter, substance, property or matters, substances or properties which would constitute the trade effluent as Special Category Effluent within the meaning of Section 138 of the Water Industry Act 1991.

- (13) The Occupier shall give to the Undertaker prior written notice of any change in the process of manufacture, materials, or other circumstances howsoever arising capable of altering the nature and/or composition of the trade effluent. No new substances or properties shall be discharged until the Undertaker has agreed thereto, either with or without imposing a limit and thereafter the said substance(s) and/or property(ies) shall be deemed incorporated into the SECOND SCHEDULE.
- (14) An inspection chamber or manhole shall be provided and maintained by the Occupier in a suitable position and/or at the point marked "X" on the plan annexed hereto in connection with each pipe through which the trade effluent is discharged and such inspection chamber or manhole shall be constructed and maintained in accordance with the Undertaker's reasonable requirements as from time to time notified in writing to the occupier so as to enable a person readily at any time to take samples of the trade effluent being discharged.
- (15) A notch gauge, continuous recorder or some other apparatus suitable and adequate to the Undertaker for measuring and automatically recording the volume and rate of trade effluent so discharged shall be provided, such apparatus to be tested and maintained in accordance with the Undertaker's reasonable requirements as from time to time notified in writing to the Occupier.
- (16) Apparatus capable of accurately determining, measuring and recording the nature and/or composition of the trade effluent discharged shall be provided, such apparatus to be tested and maintained in accordance with the Undertaker's reasonable requirements as from time to time notified in writing to the Occupier.
- (17) The Occupier shall keep records of the volume, rate, nature and/or composition of the trade effluent discharged into the sewer at all times available for inspection by any authorised officer of the Undertaker and copies of such records shall be sent to the Undertaker on demand.

- (18) (a) The Occupier shall pay to the Undertaker charges for the reception, conveyance, treatment and disposal of the trade effluent and the costs of sampling, measuring and/or analysis of the same under the Undertaker's trade effluent's functions, which charges shall be determined as set out below, and all sums payable under this condition shall be payable upon demand;
- (b) The charges under (a) above shall be calculated in accordance with Undertaker's Scheme of Charges as from time to time amended;
- (c) For the avoidance of doubt, the charge shall be payable by any person who is or was the Occupier of the said trade premises during the period of discharge of the trade effluent or at the time payment is due.
- (19) If the notch gauge, meter, recorder or other apparatus ceases to record or is suspected of not recording and/or measuring accurately, the quantity of trade effluent discharged into the sewer during the period from the date and/or time at which the records were last accepted by the Undertaker as being correct up to the date when the notch gauge, meter, recorder or other apparatus again registers accurately shall for the purpose of any payment to be made under these conditions be based on the average daily volume of trade effluent discharged during the preceding period over which the records were last accepted by the Undertaker as being accurate or during the month immediately after the notch, gauge, meter, recorder or other apparatus or means of measurement and recording has been accurate whichever is the higher.

YOUR RIGHT OF APPEAL

Section 126 of The Water Industry Act 1991 provides that:-

The Owner or occupier of any trade premises may within 2 months of this Notice of Direction (or with the written permission of the Director General of Water Services at any later time) appeal to the Director against the Direction.

The Director has the power to annul the Direction and to substitute for it any other Direction wherever more or less favourable to the appellant.

The address of the Director for the purpose of an appeal is (Centre City Tower, 7 Hill Street, Birmingham, B5 4UA)

FAILURE TO COMPLY WITH CONDITIONS

If in the case of any trade premises a condition of the Consent or this Direction is contravened, the occupier of the premises will be guilty of an offence and liable on conviction by a Magistrates' Court to a fine not exceeding the statutory maximum or on conviction by the Crown Court to an unlimited fine

METHOD OF ANALYSIS

Compliance with the conditions herewith shall be ascertained by reference to the method of analysis as from time to time employed by the Undertaker, its servants, agents or contractors, save where the said condition(s) otherwise expressly provide(s)

DATED 13th February 2018

For and on behalf of the Company

Rob Jenkins

Senior Waste Water Process Scientist SW Wales

Dwr Cymru Cyf
Pentwyn Road
Nelson
Treharris
Caerphilly

SCHEDULE ONE

Nature and composition

The Trade Effluent may contain the following substances:-

1. Water (including such elements, compounds and organisms normally present in water at trace or harmless levels and not exceeding such level as may be imposed by any Regulations for the time being regulating the quality of drinking water).
2. Free and/or emulsified oil and grease
3. Stearic Acid
4. Ethylene bis stearamide
5. Ethylene diamine
6. Monoethanolamine
7. Amine/amide soap of stearic acid .

SCHEDULE TWO

1. The chemical oxygen demand of the trade effluent after one hour quiescent settlement at pH 7 shall not exceed 20000 milligrams per litre.
2. Total free and/or emulsified Oils and Grease shall not exceed 150 milligrams per litre.
3. Total suspended solids shall not exceed 400 milligrams per litre.
4. Total ammoniacal nitrogen , (expressed as N), shall not exceed 1000 milligrams per litre.

SCHEDULE THREE

N/A

From: Mike Hughes <Mike.Hughes@dwrcymru.com>
Sent: 28 March 2024 11:09
To: Robbins Kenneth
Cc: Mattsson Gunilla; Karlsson Emil
Subject: RE: Abril effluent consent query

Good morning Ken ,

I have looked at the new material mentioned, and I confirm that it will be within your consent conditions .

Thanks for letting me know.

Kind regards

Mike Hughes
Trade Effluent Officer South West
Tel 07778559954
mike.hughes@dwrcymru.com

*Safely leading collaborative investigations for
maintaining compliance and researching
innovative techniques for the benefit of the
environment and our customers*



From: Robbins Kenneth <KRobbins@abril.co.uk>
Sent: Thursday, March 28, 2024 11:04 AM
To: Mike Hughes <Mike.Hughes@dwrcymru.com>
Cc: Mattsson Gunilla <Gunilla.Mattsson@hoganas.com>; Karlsson Emil <Emil.Karlsson@hoganas.com>
Subject: Re: Abril effluent consent query

***** External Mail *****

Hello Mike,

I am Ken the Plant Chemist and Sam's replacement at Abril. I am getting up to speed with all the things Sam was dealing with and I am wondering how far she got with you around the new material Sam mentioned below.

The question still stands: will we need to make any changes to our discharge consent due to this different amine in the effluent?

Kind Regards,

Ken Robbins

Plant Chemist

Abril Industrial Waxes Ltd

From: Denyer Samantha <SDenyer@abril.co.uk>

Sent: 20 March 2024 3:19 PM

To: Mike.Hughes@dwrcymru.com <Mike.Hughes@dwrcymru.com>

Cc: Mattsson Gunilla <Gunilla.Mattsson@hoganas.com>; Karlsson Emil <Emil.Karlsson@hoganas.com>; Robbins Kenneth <KRobbins@abril.co.uk>

Subject: Abril effluent consent query

Hi Mike,

Hopefully you can advise on this matter.

We have a project to make system changes for a new material to be produced at Abril, we will be using a new di-amine and effluent will be produced. The quantity of effluent should not differ as it is an alternative production rather than an additional production.

I have attached the SDS for the di-amine we will be using.

The question is: will we need to make any changes to our discharge consent due to this different amine in the effluent?

Best,
Samantha

Samantha Denyer
Quality Manager
Abril Industrial Waxes Ltd

T- 01656 744896
F- 01656744897
W- www.abril.co.uk

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Abril Industrial Waxes Ltd
Registered Office: Hoganas UK, Tonbridge
Reg. No: 04646926

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For information on how Höganäs treats personal data regarding any individuals interacting with us, please see Höganäs

Höganäs AB
Registered Office: Höganäs
Reg. No: 556005-0121

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APPENDIX II INCIDENT REPORT FORM

Höganäs incident report



Contact:	Dep:	MIA#:
Date:	Site:	

Background summary:

Incident in summary:

Containment actions:

Causes according to initial assessment:

Results of root cause analysis:

Report to Global Safety Manager within 24 hrs

Report to GSM within
5 working days

Höganäs incident report



Contact:	Dep:	MIA#:
Date:	Site:	

Corrective actions:	Resp.:	Deadlines:

Number of lost work days:

Describing pictures, charts, etc: (Photos of injured co-workers not to be shared)

Report to Global Safety Manager within 5 working days

Quick guide for use

- First point of entry for further information
- Date, Department and Site of incident
- Number in MIA

- Short description of the site, the work task, the co-workers(s) and any other background relevant for the incident

- Summary of What, Where, When and Who

- Actions taken to prevent further spread of problem

- Initial assessment of why the incident happened

End of initial report

- Brief summary of results from root cause analysis

- Number of days of absence from work due to incident

- Decided corrective actions including date of implementation

Höganäs incident report

Contact:	Dep:	MIA#:
Date:	Site:	

Background summary:

Incident in summary:

Containment actions:

Causes according to initial assessment:

Results of root cause analysis:

Report to Global Safety Manager within 24 hrs

Report to GSM within 5 working days

Number of lost work days:

Describing pictures, charts, etc: (Photos of injured co-workers not to be shared)

within 5 working days

APPENDIX III SPILLAGE PROCEDURE



Document type: Procedure	Issue no.: 1	Valid from: 2023-02-21	ID no.: HOGANAS-998572568-14
Valid for: Abril/Engineering; Abril/Management; Abril/Production			Issuer: Denyer Samantha
Title: Chemical Spillage Procedure			Approver: Denyer Samantha

Introduction

This procedure outlines the actions to be taken where a chemical spillage is encountered.

Scope

This procedure covers small, medium and large spillages.

Definitions

Small spillage is defined as a liquid chemical spill of **5 litres or less**

Medium spillage is defined as a liquid chemical spill of **more than 5 litres but less than 200 litres**

Large spillage is defined as a liquid chemical spill of **more than 200 litres**

A spillage of EDA over 25 litres is classed as a large spillage.

Preliminaries

Spill kits

Spill kits are stored in the warehouse adjacent to the roller shutter doors and inside the production area beside the fire escape and in WH3 by the fire escape.



Spill kit 1 (Production Warehouse)



Spill kit 2 (Plant)



Spill kit 3 (WH3)



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Emergency Cupboard

The Emergency cupboard is located in the warehouse adjacent to spill kit 1.



Emergency Cupboard (Production Warehouse)



No smoking sign



Wet Floor Sign

All emergency equipment is subject to regular checks to ensure all necessary items are present and in good working condition.

Procedure for Reaction to Spillage

What to do if you locate a spill:

1. Inform the Shift Supervisor, or nominated deputy, who will co-ordinate the spill control.
2. Assess the size of the spill. Is an evacuation required? Is the fire brigade required? See section 'Evacuation' on page 3.
3. Ensure no further entry into the area.

NOTE: If in any doubt that a situation is not normal, get a second opinion.

Order of actions:

1. Protect yourself and others- PPE/ cordon off an area/evacuate
2. Identify what has spilled.
3. Once safe to do so, contain the spill- create a barrier around the spill/ cover drains/ stop the spill at the source.
4. Clean up the spill- use absorbent materials to soak up the spill and once removed clean affected surfaces/equipment.



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Title: Chemical Spillage Procedure			Approver: Denyer Samantha

5. Report the spill to the Operation Manager and on MIA with as much detail as possible.
Record waste on 'Abril Hazardous Waste Log'.

Protecting Yourself

All spills must be considered the 'worst case scenario' until otherwise identified, therefore your PPE should reflect this and assume the spill is EDA until otherwise identified.

As per the PPE matrix PPE required on identification of a spill is:

- full face chemical mask with gas vapour filters (3M 6000 series class 1 full face mask with 3M 6099 gas and vapor filters). Operators must be clean shaven, disposable razors are available in the emergency cupboard.
- type 1 gloves (PVC Chemical gauntlet)
- Chemical suit
- Chemical boots

A work instruction detailing how to 'Don PPE for EDA and other fuming chemicals' is available with a copy on the front of the emergency cupboard.

Wherever possible you should use your own PPE to ensure the correct size and fit. If it cannot be accessed or is not suitable, PPE from the emergency cupboard or spill kit should be used.

Once the spill has been identified then PPE can be amended in line with the PPE matrix for the chemical that has spilled, if in doubt do not remove the 'worst case' PPE until the whole process is complete.

Evacuation

Dependant on the size of the spill, where the spill occurred and if it is suspected to be an EDA, either the area should be evacuated and cordoned off or the whole building should be evacuated.

Small spill of EDA or other fuming materials (<5L) = evacuate the area

Medium/large spill of EDA or other fuming materials (>25L) = evacuate the building

Small (<5L) /medium (5-200L) /large (>200L) spill of non-fuming materials = evacuate the area

Display the 'no smoking or naked flames' sign in the vicinity of the spill. Ensure adequate ventilation by opening doors/windows.

Identifying the Spill

It is important to know the identity of the material that has spilled so that it can safely be cleaned up. Consider-

- The location of the spill and what is used in that area
- Is there any packaging in the immediate area?
- Is there an odour?



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What colour is the spill?

What consistency is the liquid? Is the liquid solidifying as it cools?

pH papers can be used to identify if the spill is acidic or alkaline, these are attached to the inside lid of the spill kit.

A degree of operator experience will be required for this identification.

Containing the Spill

Consider location-based risks where environmental conditions, hot/cold conditions and naked flames may present a danger.

E.g.

Confined space?

Inside the hot oven?

Beside a drain?

Near the shrink wrap area?

NOTE: Fire extinguishers are located around the building, a specific alcohol resistant fire extinguisher is available for use with EDA. EDA vapours can accumulate in low areas and form explosive concentrations.

The size of the spill will determine the procedure for tackling it:

Small spillage

1. Assess the spillage – what is the chemical? How much is spilled? Where is the spill coming from? Can the spill be stopped?
2. Put on PPE ('worst case' PPE until otherwise identified)
3. Stop the spill at the source by righting overturned containers, closing/plugging a valve or isolating a line etc.
4. Prevent liquids entering the drain using drain covers and by creating a barrier using socks/booms from the spill kit.
5. Ensure adequate ventilation in the area by opening doors and windows.
6. Display the 'no smoking or naked flames' sign to ensure no ignition risk in the area.
7. Contain the spillage with materials from the spill kit (see appendix 2)
8. Clean the spillage using absorbent material from the spill kit.
9. Using a dustpan and brush collect the absorbent granules into a hazardous waste bag and add any other soiled absorbents. Cable tie the bag, swan necking if possible, and store in a suitable container as per work instruction 'Waste and Recycling' HOGANAS-998572568-4.
10. Clean the floor using plenty of warm water (see section below). Display a 'wet floor' sign until there is no longer a slip hazard. A degreaser may be required dependent on material, refer to the material MSDS for details.



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11. Report the spill to the Operation Manager and onto MIA. Report waste onto the 'Abril Hazardous Waste Log'.

Medium/Large spillage/spillage

1. Assess the spillage – what is the chemical? How much is spilled? Where is the spill coming from? Can the spill be stopped?
2. **WHERE THE SUBSTANCE IS EDA AND THE QUANTITY IS OVER 25 LITRES THE FIRE MARSHALL MUST BE INFORMED – THE FIRE AND RESCUE SERVICE MUST BE INFORMED OF THIS SPILLAGE**
3. Notify the Shift Supervisor or their deputy (the Shift Supervisor is the Fire Marshall)
4. Evacuate the area or building, ask for help from others if required. **See section 'Evacuation' on page 2.**
5. Put on PPE ('worst case' PPE until otherwise identified)
6. Stop the spill at the source by righting overturned containers, closing/plugging a valve or isolating a line etc.
7. Prevent liquids entering the drain using drain covers and by creating a barrier using socks/booms from the spill kit.
8. Ensure adequate ventilation in the area by opening doors and windows.
9. Display a 'no smoking or naked flames' sign to ensure no ignition risks in the area.
10. Contain the spillage with materials from the spill kit (see appendix 2)
11. Once the spill is no longer active and spreading, clean the spillage using absorbent materials from the spill kit.
12. Using a dustpan and brush collect the absorbent granules into a hazardous waste bag and add any other soiled absorbents. Cable tie the bag, swan necking if possible, and store in a suitable container as per work instruction 'Waste and Recycling' HOGANAS-998572568-4.
13. Clean the floor using plenty of warm water (see section below). Display a 'wet floor' sign until there is no longer a slip hazard. A degreaser may be required dependent on material, refer to the material MSDS for details.
14. Report the spill to the Operation Manager and onto MIA. Report waste onto the 'Abril Hazardous Waste Log'.

Cleaning Up After a Spill:

Once the spill has all been absorbed use the dustpan and brush within the spill kit to clean up absorbent granules. If necessary, replace sodden absorbents with new and repeat until there is no spillage remaining. Collect all absorbent materials in a hazardous waste bags and cable tie the bag, swan necking if possible, store the hazardous waste bags in a suitable container as per work instruction 'Waste and Recycling' HOGANAS-998572568-4.



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Title: Chemical Spillage Procedure			Approver: Denyer Samantha

Mop the floor with a new mop head using warm water. No detergent is necessary. Use fresh lots of water until no residue remains. A degreaser may be required dependent on material, refer to the material MSDS for details. Dispose of the mop head with the absorbents. All washings must be treated as hazardous waste, collect all washings in a suitable receptacle as per work instruction 'Waste and Recycling' HOGANAS-998572568-4. for hazardous waste disposal.

Wipe down any surfaces/ handles using blue roll or absorbent pads and warm water that could have become contaminated during the clean-up process. These materials must then be disposed of with the absorbent waste.

Solid and liquid waste must be kept separate. Ensure all waste containers are clearly labelled.

Display the wet floor sign until the area no longer presents a slip hazard.

Actions to Take Following a Spill:

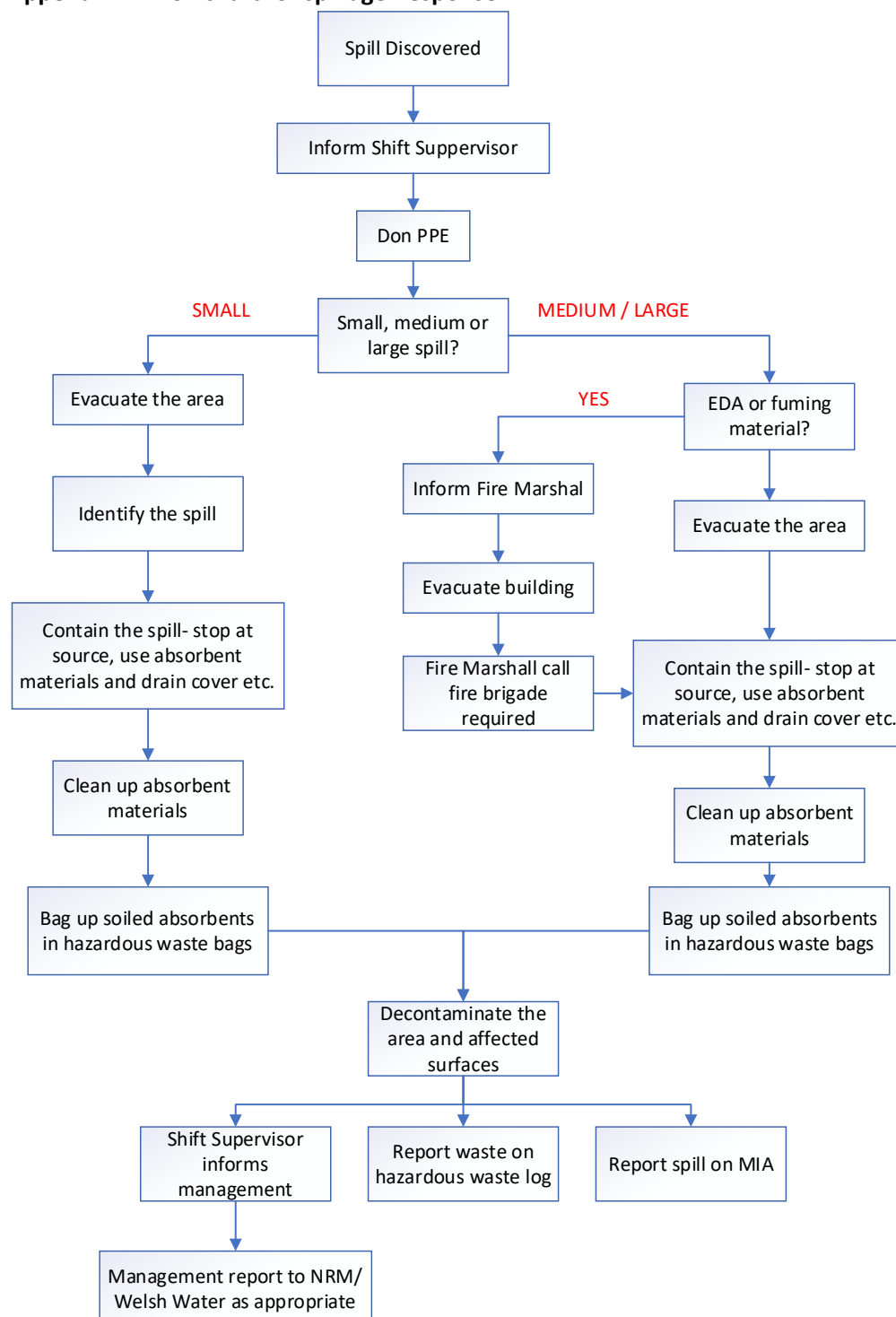
Once all clean-up has been complete:

- Inform the Operation Manager.
- Report to Natural Resource Wales (NRW) and Welsh Waster as appropriate.
- Report the incident on MIA with as much information as possible.
- Report the waste on the 'Abril Hazardous Waste' log stating the approximate quantity and the identity of the spill.
- Ensure all contents of the spill kit and emergency cupboard are replaced and the spill kits re-sealed.
- Access if your PPE requires replacement following exposure to the spill and report to the Purchasing Manager if necessary.



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Valid for: Abrii/Engineering; Abrii/Management; Abrii/Production			Issuer: Denyer Samantha
Title: Chemical Spillage Procedure			Approver: Denyer Samantha

Appendix 1 - Flowchart for spillage Response:





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Appendix 2-

Spill Kit absorbent materials and their uses-

Colour coded: General- Grey (can be used to contain any hazardous liquid)

Chemical- Yellow (for aggressive chemicals)

Oil and Fuel – White (for oils and fuels- water repellent)

Absorbent Pads- good for wiping up smaller spills and wiping surfaces



Grey = General Purpose

Yellow = Chemical

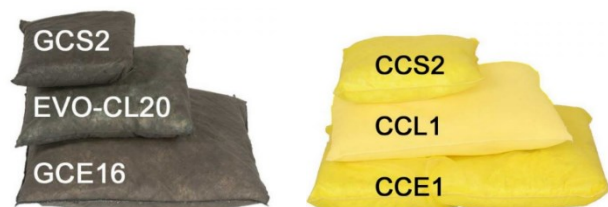
Socks and Booms- good for containing and absorbing a spill. Booms are larger in diameter than socks and are generally used outside.



Grey = General Purpose

Yellow = Chemical

Absorbent Cushions- good for tight spaces or under persistent drips



Grey = General Purpose

Yellow = Chemical

Bagged Absorbent Material- highly absorbent and good for soaking up spills

Dammit Paste- paste that can be used to plug holes in containers

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Appendix 3- Summary Sheet

1. On identification of the spill alert the Production Supervisor or nominated deputy
2. Evacuate area/ whole building if necessary. Consider location baes risk e.g. confined space, in the oven whilst hot. Display 'no smoking or naked flames' and 'wet floor' signs.



Wet floor sign



no smoking or naked flames sign

3. Don 'worst case' PPE until spill identified.
 - Full face 3M mask with gas and vapor filters
 - PVC Chemical Suit
 - Chemical boots
 - Type 1 PVC chemical gloves

4. Contain the spill/ stop at source



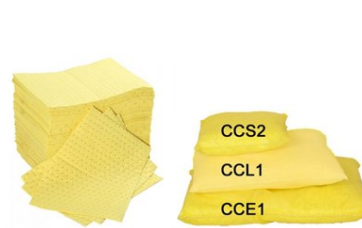
drain covers



socks/booms



pads



pillows

5. Identify the spill based on: location, what materials are in use at time of spill, colour, odour and if necessary, pH papers. **Work instruction 'Use of pH papers for determining pH of a liquid' HOGANAS-807006448-11**
6. Clean up the spill using absorbent materials. Pick up absorbent materials using dustpan and brush in the spill kit. Store all materials in hazardous waste bags within suitable containers for waste disposal as per **work instruction 'Waste and Recycling' HOGANAS-998572568-4.**
7. Report to Operation Manager and on MIA. Report waste on 'Abril Hazardous Waste Log'