



Ms Brigid Armstead
Natural Resources Wales,
Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

29th November 2024

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

Dear Ms. Armstead

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, Cabot has not had any incidents that would have initiated a 'major' emergency response.

There were three incidents that resulted in a measured response by our operations team in line with the emergency plan

1. Loss of containment of HCl to a waste treatment effluent pit. During a plant out outage an issue was discovered with high Chloride in our waste effluent pit, upon investigation a reverse flow from a storage tank was found to be discharging through a drain point into the pit. There were no injuries, no pollution potential, no offsite releases or exposure during or following the event and the event was brought under control quickly.
2. Neighbouring site sounded offsite release alarm. Toxic gas alarm sounded by neighbour site resulted in the on-site team enacting the shelter in place protocols. The team initiated the scribe protocol, contacted on call management team and monitored the situation closely for any impact to our own operations. There was no impact on Cabot as a result of this event and all staff were given the all clear to return to duties.
3. HCl gas release from a vent breather. During a startup process an infield HCl detector alarmed. Upon investigation the team found a small AHCl leak from a vent breather. The process was shutdown and leak contained. There were no injuries, no pollution potential, no offsite releases or exposure during or following the event and the event was brought under control quickly.

In each of these cases a formal review was undertaken with a number of improvement actions identified. These actions will be tracked through our Intalex incident management system and feed in to our planned Emergency Management Plan Reviews.

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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

Cabot regularly communicate emergency response plans through our annual employee and contractor inductions, updates can also be given through weekly site wide calls and eLearning tools to both employees and resident contract teams. In addition, the actions to take in an emergency are well documented in the EMP and understanding of correct response is routinely verified through jobs stops, audit and safety conversations. We have continued to carry out various site wide evacuation drills involving all employees, visitors and contractors and reviewed them for effectiveness. We have a rolling programme to practice a variety of emergency response scenarios some examples of those that have been executed in the last two years are provided in the appendix below.

Contractor Induction

The contractor induction training programme continues to ensure all contractors working on site undertake annual induction training that covers emergency response. The induction pack includes information on Toxic Gas Release and Main Site Assembly Alarm (Fire). We continue to utilise our digital delivery of the safety induction; however, we have raised some questions about how engaging this format is for people. During the lead up to our annual maintenance outage we decided to return to a face-to-face delivery of our safety message for key contractors, we found that this allowed us to be clearer on our expectations and message.

Understanding of emergency response and personal responsibilities for safety, health and the environment are still checked and verified through a series of daily audits/ Management by Walk About (MBWA).

Chemical Complex Meetings

The Joint sites Meetings continue to take place with the local chemical sites in the Barry Complex these meetings allow for collaboration and best practice sharing in regard to emergency response both at a site level and extending to the Vale of Glamorgan's local authority's off-site emergency plan. In response to the offsite release from our neighbour site there is an increased focus in these meetings on the Silver and Gold command level offsite response.

Plant Deluge System

Activation of the deluge system continues to form part of the annual site shut down to verify effectiveness of the system. The deluge test was witnessed by our operations team: it activated as expected when called upon and gave complete coverage of the acid processing area.

Flood Protection

In conjunction with local council and NRW flood risk team we have completed works to dredge the water overflow culvert that runs through the Cabot site. We also identified that several sub-surface drains on the entry road to Cabot were non-functional and a capital project was completed to replace this drain to enable complete surface water run-off. Having this water overflow course clear and functional has helped to reduce to likelihood of a major flood incident, in addition to removing the problems with localised flooding on the entry road during periods of heavy rain.

Bronze Control Training

The Bronze control teams on site have received both theoretical and practical training in EMP responsibilities throughout the year. We partnered with Mines Rescue Service in order to deliver best practice confined space entry training. This was supplemented with separate and site specific self-contained breathing apparatus training (SCBA).

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a set of scenario-based exercises have been developed to test this training. These scenario exercises are being executed throughout 2022/23 with an example provided in the appendix below.

Cabot has been proactive in continually improving the Emergency Management Plan and is confident that the current plan 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.



Quality & Environmental Manager

Cabot Corporation



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