

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

November 30th, 2020

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 in November 2018, the Barry Site has not had any incidents that initiated a 'major' emergency response. The current EMP is reviewed on an on-going basis to reflect incremental improvements and since the last emergency plan review was submitted, the following actions have been executed to improve the overall effectiveness of the plan and the key highlights are also summarised below.

The EMP document underwent a full review in September 2020 with support from a 3rd party service. Following the review, several changes have been made to the plan with the intent of improved navigation within the document for the emergency response teams and improved clarity on several scenarios.

Procedural Updates

Details of Silver and Gold command have been added to the emergency plan

Gold Control - Strategic

- South Wales Police headquarters, Cowbridge Road, Bridgend, Mid Glamorgan CF31 3SU (Tel. No. 01656 655555)
- South Wales Fire & Rescue Service Headquarters, Business Park, Forest View, Llantrisant, Ynysmaerdy, Pontyclun CF72 8LX (Tel. No. 01443 232000)

The Gold Commander is in overall command of the incident and responsible for providing the strategy, resourcing the incident and liaison with Gold Commanders from partner organisations.

Silver Control - Tactical

- Barry Police Station, Gladstone Road, South Glamorgan CF63 1TD (Tel. No. 029 2022 2111)
- Barry Fire & Rescue Service, Port Road West, Barry CF62 3AZ (Tel. No. 01443 232000)

The Silver Commander is responsible for delivering the strategy set by Gold, by providing a tactical plan. Note: An alternative location may be required by the Police, but Silver control will only be set up in the Admin Building at Cabot Carbon Ltd with the permission of the Police Incident Officer.

Bronze Control - Operational

The Bronze Commander (The Duty Shift Manager) is responsible for implementing the tactical plan on the ground.

- Main Conference Room, Admin Building, Cabot Carbon Ltd, Sully Moors Rd, Barry, CF64 5RP (Tel. No. ext. 612)

Emergency Response Centre Resources

The resources required in Emergency Response Centre (Conference Room) were checked and new signage to Emergency Response Cabinet.

Roll Call Checks

Weekly PMs for roll call print outs have presented concerns over reliability of the system/failure to print on several occasions in the last quarter. Whilst the system is functioning as expected, a new site security system is currently being scoped as part of Capital Investment in 2021.

Breathing Apparatus Training

Due to COVID-19 and face to face training restrictions in Lock Down, Breathing Apparatus/rescue refresher training was delivered to 12 employees in Maintenance and Operations teams. The plan going forward is to deliver full re-training to all Bronze Control team members in Q1 of CY21.

Contractor and Visitor Induction

The contractor induction training programme continues to ensure all contractors and visitors on site undertake annual induction training that covers emergency response that includes Toxic Gas Release and Main Site Assembly Alarm (Fire). The system has been digitised and anyone wishing to attend site must read the PDF file by email then answer a series of SHE questions developed in Microsoft Forms. Upon completion of the digital form the SHEQ manager is notified by email where results are reviewed. Contractor or visitor details are uploaded automatically and can be viewed by the reception team and an access badge is issued. Understanding of emergency response and personal responsibilities for safety, health and the environment are checked and verified through a series of daily audits/ Management by Walk About (MBWA).

Chemical Complex Meetings

Regular meetings continue to take place through a virtual medium with the local chemical sites in the Barry Complex and any emergency planning and response concerns can be raised at this forum.

IOR

The South Wales Police 'IOR' document was reviewed on July 27th, 2020 with PC Phil Dutfield to ensure its continued fitness for purpose. Following the review several updates were made to SDS information. A follow up review is planned for summer 2021 with South Wales Police.

Plant Deluge System

The Plant Deluge System was activated in early November to verify effectiveness of the system on an on-going basis. A meeting with Insurers FM Global is planned for December 2020 where deluge performance is a key agenda item.

Site Wide Evacuation Drills

We have continued to carry out various site wide evacuation drills involving all employees, visitors and contractors and reviewed them for effectiveness so far as practicable under the Cabot Covid-19 Business Continuity program. Cabot have regularly communicated emergency response plans through our weekly site wide calls to employees and meetings with resident contract teams. In addition, the actions to take in an emergency is well documented in inductions and understanding of correct response is routinely verified through jobs stops, audit and safety conversations. The site COVID-19 risk assessment covered the necessity to ensure the 2M distance at the outside muster point and in the event of a gas release where typically indoors the site would muster in the open admin building. Surgical masks are mandatory at the Barry facility.

Several further improvements have been planned following the drills that were carried out (See p.4-6). A renewed focus on Muster Point Co-ordinator Duty and the erection of visual displays at the Muster Points.

Emergency Scenario Training and Drills 2021

Plans are in place to develop a phased training program in practical Emergency Response, Exercise Drills and Assessments for the Scenarios in the next 12 months:

1. Major Chlorosilane release, 2. Major HCl release, 3. Hydrogen fire, 4. Medical Emergency, 5. Electrical fire, 6. Environmental spill, 7. Flood, 8. Suspicious parcel / bomb threat. 9. Site shutdown and evacuation.

	BARRY SITE			
	FIRE EVACUATION DRILL REPORT			
BA-SHE-J00X/ISSUE 1	REVISED BY	P. Lloyd	APPROVED BY	FGM

Scheduled Drills should be carried out twice yearly. Please record full details each time an evacuation occurs, even false alarms.

Date & Time	Weds 28th 2019 10: 25am		
Drill Initiated By:	Paula Lloyd & Steve Butler	False Alarm?	
Location of Fire Alarm Activation (Scenario)		Please give reasons	
Positive Observations			
At the muster point: Quick response and badge in by all employees, Roll Call Co-ordinator executed duty well Shipping Administrator checked the visitor record and accounted for personnel All clear was well communicated Good communication between Bronze Controller Team			
Deficiencies Observed			
Slow response (5 mins) by ISOFAB contractors: they didn't hear the alarm in the compound area. Carl Morgan, David Jones, Christian Hambli did not muster- they didn't hear the alarm in compound cabins One employee was in possession of 2 access badges: Temporary badge used to enter site at start of day: employee, then badged at Muster with employee card. Temporary employee card then flagged up as missing person. The steam sparge was on so Process Building alarm was less audible From Control Room Log: 1032: Roll Call - no response from roll call co-ordinator ⁽¹⁾ 1037: No roll call confirmation - further communication issues ⁽²⁾ 1040: Alarm reset issues. Alarm muted on control room panel ⁽³⁾ Grab bag document instructions are out of date			
Recommendations for Improvement			
All clear time was 11min 5sec, this can be improved by ensuring everyone can hear the alarm			

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Control Room Log

1025: Fire alarm sounded - admin building. DOW informed.

1027: 5 people at hot work area informed to muster.

1030: No fire found in the admin building.

1030: Full sweep requested internal/external. No sign of fire.

1032: Roll Call - no response from roll call co-ordinator ⁽¹⁾

1032: Process technician sent to quickly verify/establish contact.

1033: Roll call co-ordinator contacted and informed that there is no sign of fire.

1034: I/E Technician requested to turn off the alarm.

1037: No roll call confirmation - further communication issues ⁽²⁾

1038: Staff returning to work.

1040: Alarm reset issues. Alarm muted on control room panel ⁽³⁾

1040: Roll Call co-ordinator reports that 3 people were missing off the list but had subsequently been accounted for.

1041: All clear.

Stuart Kendall: Laboratory Technician (Communications Controller)

Record Drill in Intelex with identified Corrective Actions:

Working with Steve Buter Training and Permit Co-ordinator to develop training plans with Muster Point Co-ordinator refresher. E&T aware of sounders issue in compound. Grab bag document instructions require updating.

Close out Date	Sept 17 th 2019
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Next Scheduled Drill	TBD
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Drill August 14th, 2020 (Site operating under COVID-19 controls, reduced staffing levels)

A fire alarm was activated in the WHS building leading to the Shift Manager sounding the site evacuation alarm to allow a complete roll call to be conducted.

The following observations were made during this drill.

1. Whilst the evacuation alarm was sounded via the control room the alarm bells did not sound in the administration building delaying response to the required evacuation. Action to fix sounder completed.
2. There initially seemed to be a level of confusion at the muster point with regards to roles and responsibilities for liaising with the bronze controller, undertaking the roll call and communicating with those mustered in the area. Action: refresher training provided to engineers who act as muster point coordinators. The two key personnel typically taking responsibility for drills had left the company. Whilst transfer of duty was completed early in 2020 this was the first event where the muster point co-ordinator practiced a live drill.
3. Once the roll call was conducted and all clear given it was apparent that everybody at the muster point needed to badge back in to site in the reception area potentially causing social distancing issues Action: Decision made to open the main sliding gate and create a one -way system through the reception area to allow personnel to badge back in. EMP has been updated.

If I can provide you with any further information in support of our response, please do not hesitate to contact me 07764 627511

Yours sincerely,



STOP, THINK, ACT

Nothing we do is worth getting hurt for.

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