

Present

Supply Chain Manager
EH&S Manager
EH&S Manager
Manufacturing Manager
Site Leader
Maintenance Manager
Site H&S Specialist

1) Minutes of the last Meeting (May 2013)

Accepted as a true record.

2) Actions arising

Progress on actions from the previous meeting is as follows:

Action	Progress Nov 2013
Discuss possibility of carrying out a study of the source of mixed chemical waste and ways to reduce it. Also set an appropriate target (6 sigma project?)	On-going considerations to reduce waste
Provide details of the mechanism for the creation of bio-sludge in the bio plant	Complete - See Appendix 1
Include a discussion of redoing our carbon footprint study on the agenda for the next review meeting	Delayed due to EH&S resource transition – To be considered in 2014
Update the current permit and review our improvement plan by year end.	Permit amendment in the next variation. Improvement plan being progressed
The topic of combining some of the Quality and Environmental procedures was discussed. This will be reviewed.	Complete - some commonality already exists
BSP 1.01 was revised in April 2013 and is now the Corporate Global EHS Policy. There are several references in this document to the control of impacts on the environment. No changes currently required.	Complete - A local (UK) version is not required, however a UK H&S booklet which will have environmental information included is being looked at
Electricity usage versus the budgeted figure is to be reviewed	On-going

Action	Progress Nov 2013
The budget figure for mixed waste versus actual also needs reviewing	On-going
A review of the operation of the scrubber during “upset conditions” (e.g. failure of a fan) is required as this can lead to emissions to atmosphere.	Complete
A failure of boiler #2 to light on oil has not been recorded in Gensuite and should be classified as a near miss.	On-going

3) Review of EMS

a) DNV Audits.

One external audit carried out by DNV since last (May) meeting. One opportunity for improvement raised - Potentially there could be more robust records generated from the Evaluation of Compliance process. The corporate compliance audit and recent internal audit have tended to focus more on compliance with the Environmental Permit. There is little evidence available to support that the business is compliant with all applicable legislation E.g. The F-Gas Regulations 2009, Hazardous Waste Regs 2005 and subscribed requirements such as CIA reporting.

One Observation recorded - The company training matrix would benefit from review. e.g. Environmental Management Skills have not been completed for the Environmental Technician. The matrix has not been completed for the Process Technician's training.

Next visit planned for 6th Feb 2014 with new auditor. Agenda to be confirmed but suggestion from August visit is Evaluation of Compliance and Process Changes / Project Approval.

b) Internal audits.

- i) Management Review completed in September.
 - (1) No non-conformities identified & 6 observations raised. 5 closed out. Remaining recommendation is to check that other recommendations have been effective.
- ii) Implementation & Operation was due in October but carried out on 12th November – report being prepared.
- iii) Planning & General Requirement audits due before year end.

4) Opportunities for Improvement

- a) A 6-sigma project to establish whether the effluent can be discharged to sea by syphoning rather than pumping is underway. This has the

potential to reduce energy usage.

5) Environmental Policy Review

BSP 1.01 April 2013 version still applicable. No changes required.

6) Objectives

No IPPC permit limits exceeded in Q4 2012 to date.

The 2013 EH&S plan has been reviewed throughout the year currently rev 5 (see below) and posted on site noticeboards as well as discussed at site EH&S meetings. Preparation of the 2014 plan is scheduled for the 19th November.

Type	YTD Sept	2013 Target
Violations or Notice of Violation (EAW)	1	0
Spills/external releases with offsite impact	0	0
Spills or external releases reported to the regulator or authorities	0	0
Permit exceedances	0	0
External complaints (Helpline)	0	0
Total Steam Use (000lbs)	17288	**27,200
Total Towns (Potable) Water Use (000gals)	2,804	5,740
Total Site Electricity Use (GWhs)	4.06	5.63
Distillate Disposed Of (t)	29	621

Type	YTD Sept	2013 Target
Bio Sludge Disposed Of (t)	949	2,184
Mixed Chemical Waste Disposed of (t)	72	140
Proportion of off-site waste recycled (%)	3%	1%

7) Performance (Suitability / Effectiveness)

Many of our customers ask for ISO 14001 certification. It is also a management tool to demonstrate our EMS to the regulators.

8) Plant Calibration

The weighbridge continues to be closely monitored and retains its' 6 monthly calibration frequency.

MCERTS audit on the management system for the sea-line effluent meter by SIRA is due in March 2014.

No other changes are required.

9) Internal Non-Conformance

There has been no further recordable incidents since the formalin spill in August 2012.

At the beginning of November an IBC of non-hazardous resin was overfilled resulting in spill of about 500 kgs to grade. This is currently under investigation but is not externally reportable.

10) Corrective / Preventative Actions

A shut off valve has been installed in the scrubber line following the upset condition.

The sea-line project has been completed and the necessary commissioning report has been sent to Natural Resources Wales (NRW) who have been informed of the status of the project. Some checks on the cathodic protection will be carried out next year as well as a proposal that

the 2014 dye test will be the last one providing the protection checks are satisfactory.

Work has progressed between the NRW, the Highways Agency and Momentive to resolve the flooding issues on Hayes Road & Sully Moors Road. This could lead to a dividing of the U39 pit with a separate pump to transfer rainwater from Hayes Road out to sea rather than through the sites' effluent system. The NRW are arranging a tripartite review meeting.

11) Supplier Non-conformance

Biffa have been replaced on site by Veolia who meet the needs of Momentive better than Biffa. Bailed sacks as bales now go to Veolia. A new improved dry mix through Veolia is progressing..

12) Environmental Evaluation of Compliance

a) IPPC Breaches

- i) None since formalin spill in August 2012.

b) Improvements:

- i) Groundwater studies with ExCal have continued. Work continues to produce a baseline review for the IPPC permit before the end of January 2014.
- ii) Lagoons- four boreholes have been installed around the two lagoons to confirm their integrity. Another round of tests is due in early 2014 but initial results indicate no significant issues.
- iii) The COMAH Safety Report Section 6 and Environmental Risk Assessment have been updated and submitted to the Competent Authority to address the environmental impact of issues such as lagoon wall collapse and environmental pathways.

c) Complaints

- i) There have been no Helpline complaints attributable to Momentive Specialty Chemicals (MSC) since the last review (none for > 1 year).

13) Environmental Communications with External Parties

Our NRW site inspector has left the NRW and has been temporarily replaced by an interim inspector who is retiring in March 2014 so will change again.

Work continues on the actions on the MSC action plan.

Item	Due date	Revised deadline	Requirements/Actions and notes	Priority (1 high-5 low)
Flooding	30/06/2013	Ongoing	Investigate flooding issues as detailed in CAR report ref: A/130122/PP3238LX. Discussed at meeting 29/07/2013. NRW to respond to risk assessment and organise meeting between Momentive/VofG/NRW	1
Sealine CP project	Ongoing		Consent application is with EA flooding team. Various correspondences with EA, most recently NPA on 04/04/2011 on CAR A/110404/PP3238LX. CAR re-issued 20/12/2012	1
SPMP/SCR update	30/06/2013 Review every 4 years.	31/1/2014	Redraft reference data as per Action 7 in CAR A/130122/PP3238LX.	<u>1</u>
IC11 & OMA 315-12-79/80	30/03/2011 (OMA required 4-yearly)	31/12/12	OMA for air and water during Feb/Mar 2014 . MCerts certificates required for personnel. Reduced in priority to allow focus on flooding. Check data as follow-up action from phenol data reporting issue.	2
IC4 305-12-00077	30/03/2011 Revised to 30/03/2013	Completed in part	Need to submit a concluding report including a revised H1 using current effluent loading. There has been at least 1 submission however the figures used were from prior to the closure of Ineos and Momentive's key production areas (prior to 2006) and isn't appropriate. The revised report addressed this however phenol levels are potentially breaching EQSs, which have been revised since the original assessment. There are problems with the emission limits in general as they do not meet BAT and are not in line with Zeon's limits, which are closer to BAT. This could be an issue for IED and at least need aligning as they are the same sector and also share a discharge line to the estuary. Last correspondence was from EA on Report ID: PP3238LX/0185712. No actions were assigned as further discussion is necessary. <u>This is a priority issue</u> . IC4 is not signed off as further modelling may be required, or a change to emission limits. In addition, 3	2

			of the 4 bullet points have not yet been addressed.	
Table S1.4. Fugitive Emissions Management Plan 305-12-00081	06/06/2008 revised to 01/06/2013	31/12/2013	Momentive to complete a fugitive emissions management plan as required by Table S1.4 in permit (Page 11). Submission was received on 21/01/09 however we required further information. See CAR form RDR100205/PP3238LX.	3
Actions from audit A/110126/PP3238LX 305-12-00088 (refers to reviewing sludge handling)	Various		Review and report on progress with actions as many refer to improvement conditions noted above, I've only included the additional items.	-
	~~30/01/2013~~ 31/03/2014		~~Confirm whether road tanker is still used as temporary storage for sludge and whether sludge bund is installed (part of IC4). N~~ Revised action to review sludge handling facilities.	~~1~~ 2

14) Environmental changes in legal / other requirements

The NRW are raising concerns about effluent BAT between Zeon & Momentive. There are problems with the emission limits in general as they do not meet BAT and are not in line with Zeon's limits, which are closer to BAT. This could be an issue for IED and at least need aligning as they are the same sector and also share a discharge line to the estuary. (See 13 above)

15) Resource requirements

The EH&S Manager is retiring at the end of the month and his replacement joined in October ensuring a smooth transition and will need to be ISO14001 auditor trained. The QA Lab Technician is also ISO 14001 trained and is being used to carry out the internal audits. **Action:**
EHS Manager

16) Date of Next Meeting

To be arranged for April 2014.
Manager

Action: EHS

21st November 2013

Appendix 1