

27 JAN 2015



Air Products (BR) Limited
Queensway, Spencer Works,
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27th January 2015.

Natural Resources Wales
Rivers House
St Mellons Business Park
St Mellons
Cardiff
CF3 0EY

Attention: Mr Tony Leakey.

Re IPPC Permit number BL 2459.

Dear Mr Leakey

Please find enclosed:

Environmental Management Report for year ending December 2014.

Yours sincerely

A handwritten signature in blue ink that reads "T C Ryan". The signature is written in a cursive, slightly slanted style.

T C Ryan
Plant Manager

Registered in England Number 2532186
Registered Office Hersham Place Molesey Road Walton-on-Thames Surrey KT12 4RZ

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Natural Resources Wales
Rivers House
St Mellons Business Park
Fortran Rd
St Mellons
Cardiff
CF3 0EY

Attention: Mr T Leahey.

Re IPPC Permit number BL 2459. Permit condition 4.1.4

Dear Mr Leahey.

From previous meeting (28-04-2003) with the IPPC Inspector it was confirmed that Air Products had a management system, but would not apply for 3rd party accreditation.

This was followed up with communications to Dr G Richards and accepted by him on 19th December 2003
The following is an extract from the letter sent to the IPPC inspector 01-11-2003

Llanwern Hydrogen Installation Management Systems

Objective

This report contains a review of the management systems of the installation to address improvement item 9.1, namely.

"A report shall be sent to the Agency on establishing an Environmental Management System having regard to section 2.1 of the relevant IPPC Sectorial or other Technical Guidance. The report shall include any proposals to implement such a programme."

General

The plant is 13 years old, being first commissioned in April 2002 and the management systems were documented in the PPC application V3145 section 2.1. The plant management systems structures have not changed significantly during the period of plant operation.

Two formal reviews of the management systems were completed at the start of plant operation. In January 2003 the plant completed its OPRA self-assessment and In August 2003 there was a review (audit) of the plant management systems operation, based on the plant EHS self-assessment.

Two OMA audits have been carried out by the EA, the first in in 2003, the second in 2008.

The relationship between Air Products management system and ISO 14001, and how we demonstrate compliance, is documented in our procedure 01-12-01 Environmental Management systems. The site operating personnel are trained in the requirements of the EHS management system.

EHS Audit

An audit was carried out against the Air Product management system requirements. An individual independent of the business line management carried out the audit. The plant scored 86% against Air

Products Procedural requirements and there were no major identified environmental non-conformances for the hydrogen plant. This also indicates conformance to the ISO 14001 requirements.

EP OPRA

The OPRA system is a self-assessment against the Environment Agency's criteria for management systems. The plant EP OPRA (attached) shows an overall 'A' rating for the plant management systems.

Third Party Assessment

The site forms part of Air Products EN ISO 9001 certification for European Operations and all EH&S and Quality critical documents are controlled accordingly. The management system is in accordance with the requirements of ISO 14001 and Chemical Industries Responsible Care ® systems. End of extract

Please also see below the Llanwern site specific KPI's for 2014 with target results

	Goal or Objective	Responsible Person.	Due By	Measure
1.	Safety Management System Audit Findings Compliance: Follow up and close out all audit action items.	Plant Manager	Ongoing	Zero C-E APSAM NCR's overdue Zero A-B APSAM audit NCR's > 3mo overdue without response.
2.	Fully engage with the Basic Safety Process within our operating Facilities. Fully compliant Focus on Behavioural safety	Plant Manager & all staff	Ongoing	Score min 95% compliance for the year Summary sheets fully filled in and correctly tally chart scored
3.	Analyse all serious Incidents. I.e. ensure Apollo Root Cause Analysis (ARCA) is carried out and follow up on all recordable incidents and those near miss incidents allocated a high potential for fatality.	Plant Manager	As required	Forward to Line Mgrs to review RCA's Notify Mgt in 24 hrs All incidents and High PFA near misses to be RCA within 1 month.
4.	EH&S Training to achieve the Vol 2 minimum standards	Plant Manager	Ongoing	Ensure 100% compliance of all site personnel
5.	Achieve or beat statistical performance targets as defined by Corporate EH&S targets	Plant Manager & all staff	Ongoing	Zero Contractor and zero Employee Recordable incidents
6.	APSAM compliance score. Monthly action review for quarter on quarter improvement	Plant Manager & all staff	Ongoing	Maintain > 95% compliance.
7.	Environmental Incidents	Plant Manager	Ongoing	Zero reportable Environmental incidents
8.	Encourage Near Miss/ Incident Reporting Improvements Close out all associated action items by target date	Plant Manager & all staff	Ongoing	Continue to report near misses using Incident Tracking. Approved <3 months
9.	Complete all Preventative Maintenance Safety tasks.	Plant Manager & all staff	Ongoing	PSV's to be re-tested before SAP compliance date.
10	Crisis management. Complete all data entry	Plant Manager	Ongoing	Reviewed in September 2014..

From the meeting after start up the following points were noted and acted upon

Objective	Target	Date	Actions	Areas
Maintain compliance with permit conditions	Zero non compliances, air emissions line line with design	01/10/2004	Complete improvement items, run and maintain plant to design	All
Review Water emissions	Report to review emission since start up and BAT	31/12/2003	Complete BAT report	Water
Review Energy use	Report to set targets	30/05/2004	Complete	Gas
Incident prevention	Zero incidents	01/10/2004	Operate and maintain to design	Emergency
Noise	Report to review emissions since start up and BAT	01/01/2004	Complete	Noise
APSAM Audit and assessment Score	>85%	01/10/2004	on going	All

I hope that the above satisfies the requirement of section 4.1.4 of the permit.
If you require further information, please do not hesitate to contact me

Yours sincerely

T C Ryan.
Plant Manager

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