

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

27th November 2014

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

Dear Mr. Kemp,

In accordance with Cabot's Environmental Permit, please find below our formal response as required by Permit Condition (PC) 2.8.1 (Permit number: 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.'*

We refer our 'Emergency Management Plan' (EMP) as the equivalent to the 'Accident Management Plan' described in 2.8 of our permit. This name change is purely to prevent confusion at the Cabot Barry site, as personnel have a tendency to relate the word 'accidents' with Health and Safety and not the Environment. Cabot Barry Emergency Management Plan (EMP) has been updated and reformatted and resides on the site electronic Sharepoint System as BA-SHE-002, version 1, dated August 2014. Hard copies of the Emergency Management Plan (EMP) are also readily available being located in the Control Room and in the 'Emergency Response Equipment Cabinet' in the Barry admin building.

The current EMP includes minor changes as shown in the table below. Drills have been critiqued and a process applied to ensure improvement recommendations are incorporated into the site EMP along with any actions arising from formal Emergency Response Training in 2014 and through the audit processes.

The emergency response procedures are as follows:

Emergency Plan	EP No.
Personal Injury	EP1
Fire	EP2
Flammable Gas Release	EP3
Toxic Gas Release	EP4
Spill	EP5
Flood	EP6
Site 11 KV Electricity supply/Utility Failure	EP7
Civil Disturbance	EP8
Suspect Package	EP9
Bomb Threat	EP10
Roll Call	EP11
Pipeline Failure (e.g. chlorosilane)	EP12
Incident involving neighbouring plants	EP13
Firewater Management	EP14
Major Weather Impact	EP15
Freezing temperatures	EP16
Security Break-Ins	EP17
Loss of Information Systems	EP18

Chart EP4 -Toxic Gas Release includes the Acid Area Sprinkler System /HCL detectors.

Introduced within EP5 a contact number for an external company to attend to site for Spill Response (if required).

Clarified actions arising from electrical power failure covered under EP7.

Since the last emergency plan review submitted in 2012, the following key updates, learnings and improvements executed to improve the overall effectiveness of the plan are listed below:

- The Barry Site has have not had any major incidents that would have initiated a major emergency response since the last review was submitted.
- We delivered ½ day refresher training specifically on Spill Response for all shift team personnel and other relevant staff.
- We have continued to carry out numerous site wide evacuation drills involving involving all employees, visitors and contractors and reviewed them for effectiveness.
- As part of a 2 day Training Plan the Operations Team received refresher training in the August 2014 update of Emergency Management Plan along with practical response in firefighting, toxic release and First Aid.
- The contractor induction training programme ensures all contractors on site undertake annual induction training that covers emergency response that includes Toxic Gas Release and Main Site Assembly Alarm (Fire).
- In May 2014 the On-Call Management Team received Emergency Response training from Witt O'Briens (formerly Link Associates). Table top exercises involved three realistic scenarios and relevant procedural updates and actions were assigned as an outcome of the training.
- A new Spill Kit system was implemented in September 2014 following a formal risk assessment by an external specialist vendor. Dedicated Emergency Kits are now placed around the site in fixed locations. Stocks are under regular inspection with auditable records available. For events such as maintenance activities, mobile spill kits are taken out in the field leaving fully stocked emergency kits available at all times.
- In October 2014 five members of the Cabot Barry Management team received formal training on media and crisis communications, consistent with Cabot's Standard and the Site's Emergency Response procedures. A 1 day training program was set up in for all Crisis Management Coordinators in EMEA. Crisis Communication Training was delivered by an outside consultant (Edelman). The program consisted of a half day of formal training followed by a half day event scenario role plays; where everyone applied the training to practical situations. Goals for the session were:
 - Examine risks & benefits of consistent, clear & transparent communications in a crisis
 - Confirm process for handling crisis communications
 - Clarify roles & responsibilities at corporate, regional & local levels
 - Provide practical tips & techniques for handling crisis communications
 - Offer insights & practical experience to conduct media and other interviews
- Continued site visits by the local South Wales Fire Service have taken place to discuss various aspects of our Emergency Plan.
- Meetings continue to take place with the local chemical sites in the Barry Complex to review the Vale of Glamorgan's local authority's off-site emergency plan. A major Emergency Exercise took place on the morning of 23rd September, testing the Chemical Complex Off -Site Emergency Response Plan (host site Dow Corning). Feedback from the exercise shall be presented at the next meeting.
- During September 22nd- 26th 2014 a facility SH&E audit was conducted at the Barry site by the Corporate SH&E Audit Management organization (including external AECOM consultants). The time period covered by this audit was the date of the last audit (June 2010), through to September 26, 2014.

The audits included, as appropriate, an evaluation of physical factors and conditions, procedures, and practices utilised at the facility level to ensure sustainable compliance with local, state, provincial, and country SH&E regulations, internal company policies and procedures, management systems and industry best practices and standards. The functional topics included in the scope of each SH&E audit performed fell into four main categories and included, but not limited to the regulatory requirements and Cabot Global SH&E Standards. In addition the audit team also determined whether facilities have reviewed and considered the requirements included in the following SH&E Guidelines:

- Event Response
- Office Safety
- Facility Security & Protection (in North America only until a corporate Security Standard is developed)

The following table provides an overall summary of the Barry Corporate Audit Results. The low number of total findings, combined with the low significance of all the findings, reflects strong SH&E programmes.

<u>Programs Audited</u>	<u>Rating</u>
Safety <i>(Cabot life safety standards and associated regulatory requirements)</i>	●
Process Safety Management (PSM) <i>(includes Cabot Standards and regulatory requirements for pressure vessels and explosive atmospheres)</i>	●
Health <i>(Includes Cabot IH Standards and IH regulatory requirements)</i>	●
Environmental <i>(Includes Cabot Standards and environmental regulatory requirements)</i>	●
SH&E Self-Assessment <i>(Cabot Standard)</i>	●

Meets or Exceeds ●

Requires Improvement ▼

Requires Significant Improvement ◆

Meets or exceeds governmental and/or internal requirements: This opinion applies when, based on the audit team's review, the facility is judged to be in compliance with all (or virtually all) of the applicable regulatory and/or Cabot internal requirements and generally in conformance with good management practices included in the audit scope (the number of exceptions is extremely low). In addition to meeting all or virtually all of its compliance obligations, the plant benefits from well -developed and fully implemented programs capable of ensuring compliance on a consistent basis over time, the programs are best characterized as strong.

We consider Cabot has been proactive in continually improving our Emergency Management Plan and believe the current plan is fit for purpose and demonstrates Cabot's commitment in ensuring that we place due regard to safety and the environment in our emergency preparedness plans. I trust that the above satisfies the requirements of Permit Condition 2.8.1 of our permit BU2110IS. If you should have any further questions arising from the above, please do not hesitate to contact me.

Yours sincerely,

PS Lloyd

Paula Lloyd

Environmental Manager

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