

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

16th January 2017

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.*

The current EMP has been updated on an on-going basis to reflect incremental improvements. Since the last emergency plan review submitted at the end of 2014, the following actions have been executed to improve the overall effectiveness of the plan and key highlights are also summarised below:

- Since the last review was submitted, the Barry Site has have not had any major incidents that would have initiated a major emergency response. There have been no significant events.
- Emergency Preparedness Training was delivered in Q1 of FY17 by Falck Fire Services UK. Participants included the site Incident Bronze Controllers, their nominated deputies and the Cabot Senior Leadership Team. The aim of the course was to help the Site Incident Controllers to further understand their roles and responsibilities in the event of an emergency and to appreciate the importance of good communications and record keeping. Also the site plan to introduce a new methodology known as METHANE; a mnemonic for remembering the key information which should be conveyed immediately as part of declaring a Major Incident (actual or 'standby').

In summary METHANE stands for:

- Major Incident Declared,
- Exact location,
- Type of incident,
- Hazards,
- Access,
- Number and type of casualties, and
- Emergency services present and required.

(See attached template p.3&4).

Cabot Barry plan to introduce the METHANE methodology and integrate into the EMP in Q2 FY17 Training on the implementation of this methodology is also planned as part of the integration process.

Site Wide Evacuation Drills

We have continued to carry out various site wide evacuation drills involving involving all employees, visitors and contractors and reviewed them for effectiveness. On 25th August 2015 we held a heightened Emergency exercise on site. The exercise was planned to primarily serve two goals: firstly, to continue improving our relationship with the external emergency services and secondly to test the effectiveness of the Cabot Site Emergency Response plans. The scenario was based on a major toxic HCL gas release which left the site boundary. The simulated incident resulted in casualties on site and missing persons. A call was made to the Fire and Rescue Service to attended site. Two observers were appointed and a review meeting held. A number of improvement opportunities were identified as an outcome. One of the Shift Teams is working on a "Grab Document" which is essentially a condensed version of the Site Emergency Plan for use by the Fire Service. This is due to be issued in Q3 FY17.

Contractor Induction

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).

Chemical Complex Meetings

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.

Plant Deluge System

Activation of the deluge system continues to form part of the site shut down so that effectiveness of the system can be verified on an on-going basis.

Cabot has been proactive in continually improving the Emergency Management Plan and is confident that the current plan is fit for purpose and 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,



Paula Lloyd

Environmental Manager

Tel: +44 1446 709606

Incident Notification Form

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Time of Call	Date.....
Company	
Contact Telephone	
Site Incident Controller	
Name of caller (if not SIC)	

Category	Guidance	Information
Is this a Major Emergency?	Major incident declared? (include date & time of declaration)	
Exact Location	Exact location/ geographic area of incident	
Type of Incident	Flooding/ Fire/ Utility Failure/ Hazmat etc.	
Hazards Present	Present or suspected	
Access Routes	Routes that are safe to use, any inaccessible routes and RVP's	
Numbers	Number of missing personnel, those that are casualties, numbers, type and severity	
Emergency Services Required	Present and those required	

Local Emergency Services Numbers	Called?	Time of call	Signature
Fire Rescue Service	☐	hrs	
Police Service	☐	hrs	
Ambulance Service	☐	hrs	

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