



Airbus Operations Ltd
Environment Team
Chester Road
Broughton
Chester
CH4 0DR

09th November 2018

Our reference: **NRW/EPR/03/2018**

Matthew Kelk
Regulatory Officer
Natural Resources Wales
Chester Road
Buckley
CH7 3AJ

Re: Changes to VOC containing materials

Dear Matthew,

We are writing to you to make you aware of some proposed changes to our coating materials which will impact upon our VOC emissions.

A380 wing variant – VOC reduction

Due to a 'rivet rash' issue, Airbus has been required for a number of years to use PAC33 Etch primer (730g/l VOC) and P99 primer (720g/l VOC) on A380 wings. It is now proposed to replace these materials with SOCOGEL adhesion promoter (VOC free) and SEEEVENAX 313-01 primer (94g/l VOC).

Although this is a substantial reduction in material VOC content, production rates for A380 are currently suppressed and the effect of the material changes on the overall Broughton site VOC data will be less significant.

It is intended that this change will take effect during quarter one 2019

A320 family (Single Aisle) wing variant – VOC increase

Currently we apply an integrated primer/paint scheme to Single Aisle wings, which involves the application of a single layer of chromated primer (281g/l VOC) followed by a topcoat.

Under REACH regulations, when a chromate free alternative material is available, it must be used. In this case the material supplier can provide a suitable chromate free primer (256g/l VOC) as part of the integrated paint scheme.

However, a chromated primer is required to inhibit corrosion and ensure aircraft safety. Therefore, to satisfy both the REACH requirements and provide adequate corrosion protection we will need to apply an additional layer of chromated base primer (311g/l VOC) before applying the chromate free integrated primer/paint scheme.



The A320 family is our highest volume variant and the change to applying two primer layers instead of one will result in a noticeable increase in the Broughton site VOC emission.

This change will take effect before the January 2019 REACH deadline.

If you require further information, we could discuss the above changes during your visit on the 23rd of this month.

Regards

A handwritten signature in blue ink that reads "Andy Denton". The signature is fluid and cursive, with the first name "Andy" and the last name "Denton" clearly legible.

Andy DENTON
Environment Officer
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