Huntingdonshire
DISTRICT COUNCIL

Application for a Permit for a Standard Part B Installation

Local Authority Pollution Prevention and Control
Pollution Prevention and Control Act, 1999
Environmental Permitting (England and Wales) Regulations 2010 as amended

When to use this form
This environmental permitting regime is known as and referred to as Local Authority Pollution Prevention and Control ('LAPPC'). Installations permitted under this regime are known as Part 'B' installations. Use this form if you are sending an application for a 'Part B' permit to a Local Authority under the Environmental Permitting (England and Wales) Regulations 2007 ("the EP Regulations").

Before you start to fill in this form
You are strongly advised to read relevant parts of the Defra general guidance manual issued for LA-IPPC and LAPPC, republished in 2008 and available at http://www.defra.gov.uk/environment/ppc/localauth/pubs/guidance/manuals.htm. This contains a list of other documents you may need to refer to when you are preparing your application, and explains some of the technical terms used. You will also need to read the relevant Process Guidance note as relevant The EP Regulations can be obtained from The Office of Public Sector Information, or viewed on their website at: http://www.legislation.gov.uk/.

Which parts of the form to fill in
You should fill in as much of this form as possible. The appropriate fee must be enclosed with the application to enable it to be processed further. When complete return to:

Environmental Protection Officer, Environmental Health Department, Huntingdonshire District Council, Pathfinder House, St. Mary's Street, Huntingdon PE29 3TN or e-mail: envhealth@huntingdonshire.gov.uk.

If you require any help or advice on how to set out the information we need please contact us at the above address or telephone 01480 388363.

Other documents you may need to submit
There are number of other documents you will need to send us with your application. Each time a request for a document is made in the application form you will need to record a document reference number for the document or documents that you are submitting in the space provided on the form for this purpose. Please also mark the document(s) clearly with this reference number.

Using continuation sheets
In the case of the questions on the application form itself, please use a continuation sheet if you need extra space; but please indicate clearly on the form that you have done so by stating a document reference number for that continuation sheet. Please also mark the continuation sheet itself clearly with the information referred to above.

Copies
Electronic submissions are Huntingdonshire District Council's preferred method of submitting the application. If you are submitting the application in hard version no extra copies are required.

A - Introduction

A1.1 Name of the installation

Encocam Limited

A1.2 Please give the address of the site of the installation

5 Stukeley Business Centre. Blackstone Road. Huntingdon. Cambridgeshire

Postcode: PE29 6EF

Telephone: 01480435302

Ordnance Survey national grid reference *8 characters, for example, SJ 123 456*

T	L	2	3	4	7	3	3

A1.3 Existing authorisations:

Please give details of any existing LAPC or IPC authorisation for the installation, or any waste management licences or water discharge consents, including reference number(s), type(s) and local authority:

Doc Reference A 1.3.1 Consent with Anglian Water to the discharge of trade effluent issued pursuant to water industry act 1991 – Reference: ADW 314, dated on 1st June 2012

Doc A 1.3.2 Hazardous Waste Registration for Encocam Limited – Blackstone – Reference: NAA462

Please provide the information requested below about the "Operator", which means the person who it is proposed will have control over the installation in accordance with the permit (if granted)

A2.1 The Operator – Please provide the full name of company or corporate body

Dr. Mike Ashmead

Trading/business name (if different): Encocam Ltd

Registered Office address: 5 Stukeley Business Centre. Blackstone Road. Huntingdon.

Cambridgeshire Postcode: PE 29 6EF

Principal Office address (if different)……

……Postcode:…… ……

Company registration number: 1944904

A2.2 Holding Companies

Is the operator a subsidiary of a holding company within the meaning of Section 736 of the Companies Act 1985?

No ☒ Yes ☐

A3.1 Who can we contact about your application?

It will help is to have someone who we can contact directly with any questions about your application. The person you name should have the authority to act on behalf of the operator. This could be an agent or consultant rather than the operator.

Name: Judit Betancor Rivero

Position: Environment Project Engineer

Address: 5 Stukeley Business Centre, Blackstone Road, Huntingdon

Postcode: PE29 6EF

Telephone number: 01480 415059

Fax number: 01480 450181

E. Mail address: judit.betancor@encocam.com

B About the installation

Please fill in the table below with details of all the current activities in operation at the whole installation.

In **Column 1, Box A**, please identify all activities listed in Schedule 1 to the EP Regulations that are, or are proposed, to be carried out in the stationary technical unit of the installation.

In **Column 1, Box B** please identify any directly associated activities that are, or are proposed, to be carried out on the same site which:

* have a technical connection with the activities in the stationary technical unit
* could have an effect on pollution

In **Column 2, for Boxes A and B** please quote the Chapter number, Section number, then paragraph and sub-paragraph number as shown in Part 2 of Schedule 1 to the EP Regulations [For example, *Manufacturing glass and glass fibre where the use of lead or any lead compound is involved*, would be listed as Chapter 3, Section 3.3, Part B(b)].

B1.1 Installation table for new permit application

COLUMN 1a	**COLUMN 2a**
Activities in the Stationary Technical Unit	**Schedule 1 References**
Storage in tanks of more than 1 tone of HF 50%	Chapter 4, Section 4.8, Part B (a) (iv)
COLUMN 1b	**COLUMN 2b**
Directly associated activities	**Schedule 1 References**

B1.2 Why is the application being made?

☐ The installation is new

☒ The installation is existing, but changes to the installation or to the EP Regulations means that an LAPPC Part B permit is now required.

B.1.3 Site Maps

Please provide:-

* A suitable map showing the location of the installation clearly defining extent of the installations in red

Doc Reference B 1.3.1 Encocam Limited, B 1.3.2 Location of the installation & B 1.3.3 HF storage

* A suitable plan showing the layout of activities on the site, including bulk storage of materials, waste storage areas and any external emission points to atmosphere

Doc Reference: B 1.3.4 Plan layout activities

B2 The Installation

Please provide written information about the aspects of your installation listed below. We need this information to determine whether you will operate the installation in a way in which all the environmental requirements of the EP Regulations are met.

B2.1 Describe the proposed installation and activities and identify the foreseeable emissions to air from each stage of the process (this will include any foreseeable emissions during start up, shut down and any breakdown/abnormal operation)

Doc Reference B 2.1 Installation description

B2.2 Once all foreseeable emissions have been identified in the proposed installation activities, each emission should be characterised (including odour) and quantified.

Atmospheric emissions should be categorised under the following

i. point source, (e.g. chimney / vent, identified by a number and detailed on a plan)
ii. fugitive source (e.g. from stockpiles / storage areas).

If any monitoring has been undertaken please provide the details of emission concentrations and quantify in terms of mass emissions. If no monitoring has been undertaken please state this.

(Emission concentration = e.g. milligrams per cubic metre of air; mass emission = e.g. grams per hour, tonnes per year)

B2.3 For each emission identified from the installations' activities describe the current and proposed technology and other techniques for preventing or, where that is not practicable, reducing the emissions into the air. If no techniques are currently used and the emission goes directly to the environment, without abatement or treatment then this should be stated.

Doc Reference B 2.3 Preventative techniques

B2.4 Describe the proposed systems to be used in the event of unintentional releases and their consequences. This must identify, assess and minimise the environmental risks and hazards, provide a risk-based assessment of any likely unintentional releases, including the use of historical evidence. If no assessments have been carried out please state.

Doc Reference B 2.4.1 Chemical Spill Emergency Plan, B 2.4.2 Chemical Spill Procedure, B 2.4.3 Spill Inspection Check List

B2.5 Describe the proposed measures for monitoring all identified emissions including any environmental monitoring, and the frequency, measurement methodology and evaluation procedure proposed (e.g. particulate matter emissions, odour etc). Include the details of any monitoring which has been carried out which has not been requested in any other part of this application. If no monitoring is proposed for an emission please state the reason.

Non-monitoring is carrying out because it is not necessary for the activities and emissions above described.

B2.6 Provide detailed procedures and policies of your proposed environmental management techniques, in relation to the installation activities described.

Doc Reference B 2.6.1 Major Accident Prevention Policy & B 2.6.2 Major Accident To The Environment They need to be signed

B3 Impact on the Environment

B3.1 Provide an assessment of the potential significant local environmental effects of the foreseeable emissions (e.g. is there a history of complaints and/or is the installation in an air quality management area?)

No history of complaints and no significant environmental affects foreseen.

B3.2 Are there any sites of special scientific interest (SSSIs) or European protected sites that are within either

- 2 kilometres for an installation which includes Part B combustion, incineration (but not crematoria), iron and steel, and non-ferrous metal activities, or
- 1 kilometre for Part B mineral activities and cement and lime activities, or
- ½ a kilometre for all other Part B activities 2 kilometres of the installation?

No ☐ Yes ☒

Great Stukeley Railway Cutting

Doc Reference: B 3.2 Huntingdon SSI's

B3.3 Provide an assessment of whether the installation is likely to have a significant effect on such sites and, if it is, provide an assessment of the implications of the installation for that site, for the purposes of the Conservation (Natural Habitats etc) Regulations 1994 (see appendix 2 of Annex XVIII of the General Guidance Manual).

It is believed that the site will not have any effects on these sites.

B4 Environmental Statements

B4.1 Has an environmental impact assessment been carried out under The Town and Country Planning (Environmental Impact Assessment)(England & Wales) Regulations 1999/293, or for any

other reason with respect to the installation? If there has been no such assessment, have there been any screening opinions or directions?

No ☒ Yes ☐

No environmental impact assessment has been carried out, neither screening opinions nor directions have been necessary.

B5 Additional information

Please supply any additional information that you would like us to take account of in considering this application.

Doc Reference .....

C - Fees and Charges, Information Handling, and Declaration

C1 Fees and Charges

The enclosed charging scheme leaflet gives details of how to calculate the application fee. Your application cannot be processed unless the application fee is correct and enclosed.

C1.1 Please state the amount enclosed as an application fee for this installation:

For the local authority

£ 1,579 (cheques should be made payable to **Huntingdonshire District Council**)

We will confirm receipt of this fee when we write to you acknowledging your application.

C1.2 Please give any company purchase order number or other reference you wish to be used in relation to this fee.

CON0038415

C2 Annual subsistence charges

If we grant you a permit, you will be required to pay an annual subsistence charge, failure to do so will result in revocation of your permit and you will not be able to operate your installation.

C2.1 Please provide details of the address you wish invoices to be sent to and details of someone we may contact about fees and charges within your finance section.

5 Stukeley Business Centre – Blackstone Road – Huntingdon - Cambridgeshire

Lisa Waldron (Accounts)

Postcode: PE29 6EF

Telephone: 01480 415041

C3 Confidentiality

C3.1 Is there any information in the application that you wish to justify being kept from the public register on the grounds of commercial or industrial confidentiality?

No ☒ Yes ☐

Please provide full justification, considering the definition of commercial confidentiality within the EP Regulations.

Doc Reference

C3.2 Is there any information in the application that you believe should be kept from the public register on the grounds of national security?

No ☒ Yes ☐

Do not write anything about this information on the form. Please provide full details on separate sheets, plus provide a copy of the application form to the Secretary of State/ Welsh Ministers for a direction to exclude information on grounds of national security.

C4 Data Protection

The information you give will be used by the local authority to process your application. It will be placed on the relevant public register and used to monitor compliance with the permit conditions. We may also use and or disclose any of the information you give us in order to:

- consult with the public, public bodies and other organisations,
- carry out statistical analysis, research and development on environmental issues,
- provide public register information to enquirers,
- make sure you keep to the conditions of your permit and deal with any matters relating to your permit
- investigate possible breaches of environmental law and take any resulting action,
- prevent breaches of environmental law,
- offer you documents or services relating to environmental matters,
- respond to requests for information under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (if the Data Protection Act allows)
- assess customer service satisfaction and improve our service.

We may pass on the information to agents/ representatives who we ask to do any of these things on our behalf.

It is an offence under regulation 38 of the EP Regulations, for the purpose of obtaining a permit (for yourself or anyone else), to:

- make a false statement which you know to be false or misleading in a material particular,
- recklessly make a statement which is false or misleading in a material particular
- intentionally to make a false entry in any record required to be kept under any environmental permit condition
- with intent to deceive, to forge or use a document issued or required for any purpose under any environmental permit condition.

If you make a false statement

- we may prosecute you, and
- if you are convicted, you are liable to a fine or imprisonment (or both).

C5 Declaration: previous offences (delete whichever is inapplicable)

I/We certify

EITHER

No offences have been committed in the previous five years which are relevant to my/our competence to operate this installation in accordance with the EP Regulations.

OR

The following offences have been committed in the previous five years which may be relevant to my/our competence to operating this installation in accordance with the regulations:

Doc Reference .....

Signature.....

Name.....

Position.....Date.....

C6 Declaration

C6.1 Signature of current operator(s)*

I/We certify that the information in this application is correct. I/We apply for a permit in respect of the particulars described in this application (including supporting documentation) I/We have supplied.

Please note that each individual operator must sign the declaration themselves, even if an agent is acting on their behalf.

For the application from: Environmental Permit Part B Installation - Storage in tanks of more than 1 tone of Hydrofluoric Acid 50%.

Installation name: Encocam Limited

Signature.....

Name: Mike Ashmead

Position: Managing Director Date 05th March 2014

** Where more than one person is defined as the operator, all should sign. Where a company or other body corporate – an authorised person should sign and provide evidence of authority from the board of the company or body corporate.*

anglianwater

NOTICE OF DIRECTION VARYING THE CONDITIONS ATTACHING TO A CONSENT TO THE DISCHARGE OF TRADE EFFLUENT ISSUED PURSUANT TO: WATER INDUSTRY ACT 1991 (AS AMENDED)

to Encocam Limited
5 Stukeley Business Centre
Blackstone Road
Huntingdon
Cambridgeshire
PE18 6EF
Company No. : 01944904
('the trader')

in relation to a premises known as: Encocam Limited
5 Stukeley Business Centre
Blackstone Road
Huntingdon
Cambridgeshire
PE18 6EF
('the premises')

SEE NOTE 2 ANGLIAN WATER SERVICES LIMITED ('Anglian Water') under their powers in the above Act hereby direct that as from the 1 June 2012 the conditions attaching to the Consent given on 24 May 1994 shall cease to apply and the Consent to discharge trade effluent from the premises into a public sewer shall be subject to the following conditions:

Nature and Composition

1. The trade effluent discharged shall be of the following nature and composition ('the trade effluent'):

   Rinsewater liquors from acidic and alkaline cleaning of aluminium.

Monitoring Point and Receiving Sewer

2. The trade effluent shall pass through the monitoring point situated at the grey plastic discharge pipe at the rear of the factory ('the monitoring point') and shall only be discharged into the public foul sewer situated at Blackstone Road ('the sewer').

Maximum quantity to be discharged in any 24 hour period

3. The volume of trade effluent shall not exceed 24.0 cubic metres in any period of 24 hours.

Maximum rate of discharge

4. The rate of discharge of trade effluent shall not exceed 4.0 cubic metres per hour.

Matters to be eliminated prior to discharge to the sewer

5. (a) There shall be eliminated from the trade effluent prior to the monitoring point and before the trade effluent is discharged to sewer:

(i) Petroleum spirit and other volatile or flammable organic solvents.

(ii) Calcium carbide.

(iii) Sludges arising from the pre-treatment of the trade effluent.

(iv) Waste liable to form viscous or solid coatings or deposits on or in any part of the sewerage system through which the trade effluent is to pass.

(v) Any substance which is likely to give rise to the production in the receiving sewerage system or sewage treatment works of fumes, gases or odours which are inflammable or obnoxious, or prejudicial to health or a nuisance within the meaning of section 79 of the Environmental Protection Act 1990.

(vi) Halogenated hydrocarbons unless specified in 5(b).

(vii) Halogen substituted phenolic compounds unless specified in 5(b).

(viii) Thiourea and its derivatives unless specified in 5(b).

(ix) Any substance or combination of substances likely to affect prejudicially the sewerage system, the effective and economic treatment of sewage at the receiving sewage treatment works or the lawful disposal of effluent or sludge arising from that works.

(x) Substances listed in Schedule 1 of the Trade Effluents (Prescribed Processes and Substances) Regulations 1989; at a concentration greater than the background concentration (see Appendix I to this Direction for the listing of Prescribed Substances) unless specified in section 5(b) below.

Matters to be eliminated prior to discharge to the sewer. (Continued)

5 (b) The trade effluent when passing through the monitoring point shall not exceed any of the composition or quality standards set out below:

Chemical oxygen demand (after one hours quiescent settlement)	500 mg/l
Sulphate (expressed as SO4)	1000 mg/l
Fat, oil & grease (expressed as non-volatile filtered matter extractable by 40°/60°C petroleum ether)	250 mg/l
Suspended solids	1000 mg/l
Aluminium	100 mg/l
Copper	2.5 mg/l

mg/l = milligrammes per litre
ug/l = microgrammes per litre

Temperature

6. The trade effluent shall have a temperature not higher than 45° Celsius.

Acidity or Alkalinity

7. The trade effluent shall have a pH value not less than 6.0 or greater than 10.0.

Payment

8. The trader shall pay to Anglian Water in respect of the discharge of trade effluent authorised under this consent, charges fixed in accordance with the charges scheme made from time to time by Anglian Water under Section 143 of the Act.

Entry and samples

9. The trader shall permit Anglian Water's duly authorised representatives to inspect, examine, take readings from and test at any time any works and apparatus installed in connection with the trade effluent and to take samples of the trade effluent.

Inspection chamber

10. In addition to the monitoring point referred to in condition 2 above, the trader shall provide and maintain if required by Anglian Water a further monitoring point or points in a suitable position(s) in connection with each pipe through which the trade effluent is being discharged and such inspection chamber(s) or manhole(s) shall be so constructed and maintained by the trader as to enable duly authorised representatives of Anglian Water readily to take samples at any time of the trade effluent passing into the sewer from the premises and to take readings from any apparatus located in such an inspection chamber or manhole.

Measurement and determination of discharge

11. The trader shall provide and maintain if required by Anglian Water a notch gauge and continuous recorder and/or some other approved apparatus suitable and adequate for measuring and automatically recording the volume, rate of discharge and nature of the trade effluent to the satisfaction of Anglian Water in connection with every pipe through which trade effluent is being discharged.

Calculation of charges if measuring and recording apparatus fails to measure correctly

12. If the said measuring and recording apparatus ceases to register or measure correctly then, unless otherwise agreed, the quantity of trade effluent discharged into the sewer during the period from the date on which records of the volume of the trade effluent discharged into the sewer were last accepted by Anglian Water as being correct up to the date when the said measuring and recording apparatus again registers correctly shall for the purpose of any payment to be made to Anglian Water be based on the average daily volume of the trade effluent discharged during the period of one month preceding the date on which the said records were last accepted as aforesaid, or during the month immediately after the said measuring and recording apparatus has been corrected, which ever is the higher.

Records

13. The trader shall provide records in such form as Anglian Water may require of the volume, rate of discharge, nature and composition of trade effluent discharged into the sewer and these shall be available at all reasonable times for inspection by duly authorised representatives of Anglian Water. Copies of such records shall be sent to Anglian Water on demand.

Material Changes

14. The trader shall give not less than 20 days notice in writing to Anglian Water before making any material change which:

(a) may alter the nature or composition, volume or rate of flow of the trade effluent to be discharged from the premises unless the trade effluent to be discharged following such material change will still comply fully with all Conditions of this Consent; or

(b) may include the inclusion of, or any increase in, any Dangerous Substance (as listed in Appendix II).

For the avoidance of doubt, whether or not notice has been given under this condition, the trader shall at all times ensure that the trade effluent to be discharged from the premises complies fully with all other Conditions in this Consent.

Cessation or Material Reduction

15. The trader shall notify Anglian Water as soon as reasonably practicable of a cessation of the trade effluent discharge or a material reduction which is likely to last for more than two years.

Dangerous Substances

16. No substance listed in the list of Dangerous Substances (see Appendix II) shall be discharged except as permitted by another Condition in this Consent or unless Anglian Water has previously notified the trader that the presence or volume of such substance in the trade effluent discharge is not specified in this Consent for the discharge from these premises because it is regarded as immaterial.

Appendices

17. The Appendices to this Consent shall form part of this Consent for all purposes and the terms of the Appendices shall be complied with accordingly.

Definitions

18. References to the Act are to the Water Industry Act 1991, as amended, and references to any Act, Regulations or Order include any amendment or replacement. Except where a contrary intention is intended, any term defined in the Act shall be given the same meaning in this consent.

Duly authorised to sign on this behalf:

Signed.....

Industrial Wastewater Scientist

Dated this 26TH day of MARCH 2012

Reason for Variation
This consent variation has been issued to reflect a change of trader details and a full review of consent conditions resulting in amendment to/addition of a number of numeric limits.

Right of Appeal
Your attention is drawn to the right to appeal to the Water Services Regulation Authority ("WSRA") conferred by Section 126(1) of the Act which reads as follows:

'The owner or occupier of any trade premises may -
(a) within two months of the giving to him under subsection (5) of section 124 of a notice of a direction under that section; or
(b) with the written permission of the WSRA, at any time,

appeal to the WSRA against the direction.'

Objectives of Trade Effluent Control
This consent document has been issued for the following reasons:

- to allow you to use our trade effluent service
- to define the level of service offered by Anglian Water
- to protect public health and that of our employees
- to protect the environment
- to protect our infrastructure, processes and product
- to ensure compliance with the regulatory regime.

You must comply with the consent conditions at all times. Failure to do so may lead to enforcement action being taken against you by Anglian Water.

Contact Details
You can contact Anglian Water by calling our Helpline on 08457 145145 or via our website at www.anglianwater.co.uk

Consent History
The following represents a listing of consent documents associated with this discharge:

WCF 37 - 24/05/1994 - Cellbond Composites Ltd - Original consent
ADG 09 - 20/01/1995 - Cellbond Composites Ltd - Variation
ADJ 19 - 12/02/1998 - Cell Bond Composites Ltd - Variation
ADP 43 - 05/07/2004 - Cellbond Composites Ltd - Variation
ADW 314 - 26/03/2012 - Encocam Limited - Variation

APPENDIX I

Trade Effluents (Prescribed Processes and Substances) Regulations 1989

Prescribed Substances - Schedule 1

Mercury and its compounds
Cadmium and its compounds
gamma-Hexachlorocyclohexane
DDT
Pentachlorophenol and its compounds
Hexachlorobenzene
Hexachlorobutadiene
Aldrin
Dieldrin
Endrin
Carbon tetrachloride
Polychlorinated biphenyls
Dichlorvos
1,2-Dichloroethane
Trichlorobenzene
Atrazine
Simazine
Tributyltin compounds
Triphenyltin compounds
Trifluralin
Fenitrothion
Azinphos-methyl
Malathion
Endosulphan

APPENDIX II

Dangerous Substances

Aldrin
Atrazine
Bentazone
Bisphenol-A
Carbon tetrachloride
Chlorfenvinphos
Chlorotoluron
Cyanide
Cyromazine
Demeton
2,4-Dichlorophenol
Dichlorvos
Dimethoate
Endosulfan
Fenthion
Hexachlorobenzene
Iron
High-Cis Cypermethrin
Malathion
Mercury
Nickel
Omethoate
Parathion
Permethrin
Simazine
Toluene
Trichlorobenzene
Trichloroethylene
Vanadium

Amitraz
Azinphos-ethyl
Benzene
Boron
Chloroform
Chloronitrotoluenes
Chromium
Cyfluthrin
DDT
Diazinon
2,4-D (ester)
Dieldrin
Dioxins
Endrin
Flucofuron
Hexachlorobutadiene
Isodrin
Lead
MCPA
Mevinphos
Nonyl phenol
PCSD's
Parathion-methyl
Polychlorinated biphenyls
Sulcofuron
Triazophos
1,1,1-Trichloroethane
Trifluralin
Xylene

Arsenic
Azinphos-methyl
Biphenyl
Cadmium
4-Chloro-3-methyl-phenol
2-Chlorophenol
Copper
Cypermethrin
Deltamethrin
1,2-Dichloroethane
2,4-D (non ester)
Di-ethylhexyl phthalate
Diuron
Fenitrothion
Flumethrin
Hexachlorocyclohexane
Isoproturon
Linuron
Mecoprop
Naphthalene
Nonyl phenyl ethoxylate
PAHs
Pentachlorophenol (PCP)
Propetamphos
Tetrachloroethylene
Tributyltin compounds
1,1,2-Trichloroethane
Triphenyltin compounds
Zinc

Hazardous Waste Registration Report

Batch Number: I641294
Report Date: 12-08-2013

Details of the company (or individual) providing hazardous waste registration details

ENCOCAM LTD
5 BLACKSTONE ROAD
STUKELEY MEADOWS INDUSTRIAL ESTATE
HUNTINGDON
CAMBRIDGESHIRE
PE29 6EF

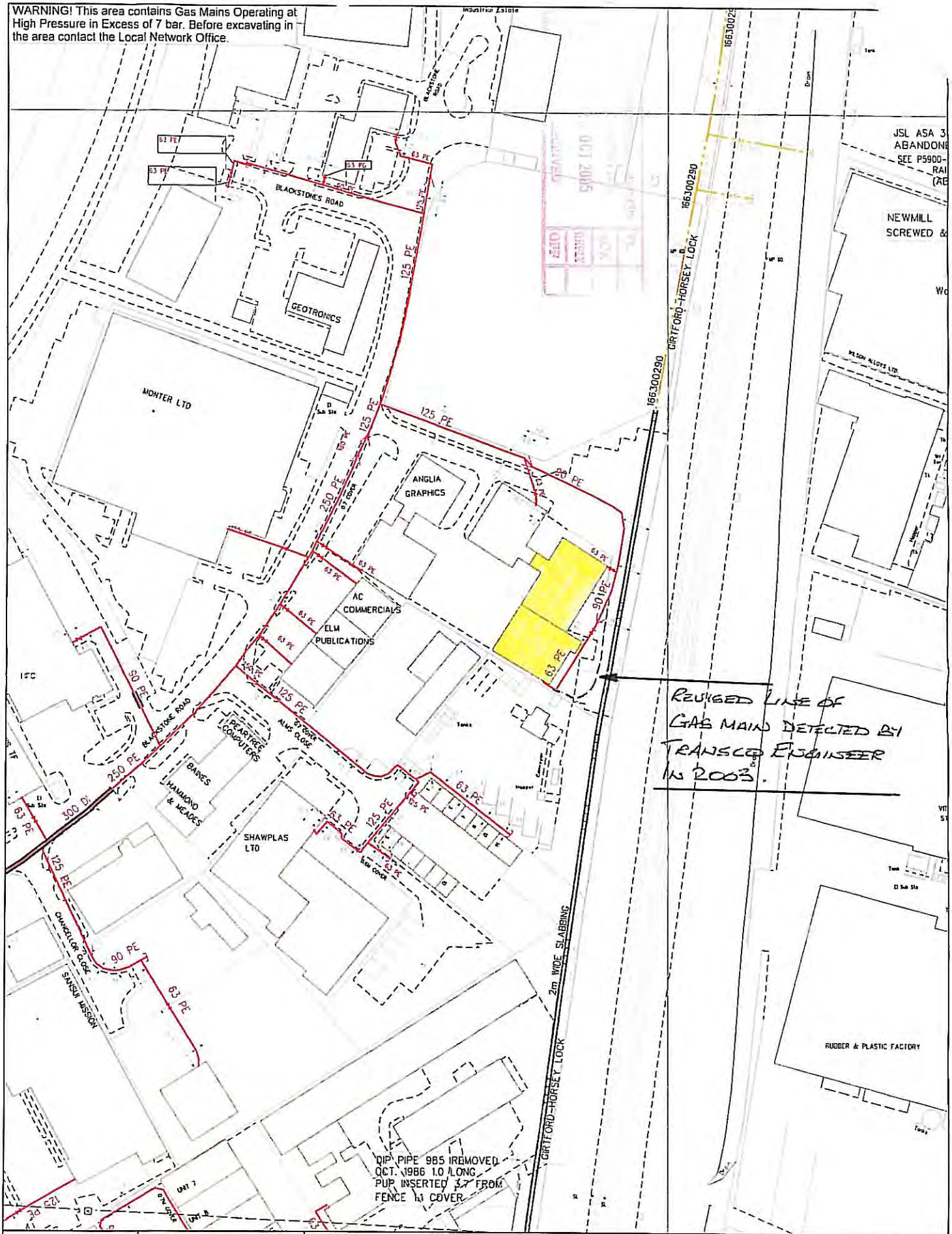
Contact Name: Mr Malcolm Byers
Telephone: 01480 435302
Fax: 01480 450181
Email: purchasing@encocam.com

Expected Payment:			£18.00
Payment Type:	CCARD	**Payment Made:**	£18.00
Total Payments:			£18.00
Difference in Expected Payment and Required Payment:			£0.00
Number of sites successfully registered:			1
Number of sites failed registration due to processing errors:			0

Sites successfully registered *(Previous Registration Numbers which could not be validated are shown in brackets - you must use the new registration numbers given from the start dates shown)*

Registration Number	Producer Name	Customer Reference	Address from Application	Start Date	Expiry Date
NAA462	ENCOCAM LTD		5 BLACKSTONE ROAD STUKELEY MEADOWS INDUSTRIAL ESTATE HUNTINGDON CAMBRIDGESHIRE PE29 6EF	12-08-2013	11-08-2014

Encocam Ltd - 5 Stukeley Business Centre, Blackstone Road, Huntingdon, CAMBS. PE29 6EF



SCALE: 1 : 1250	LP MAINS
USER ID: wd001	MP MAINS
DATE: 12/10/2005	IP MAINS
NRSWA RESPONSE	LHP MAINS
GRID REFERENCE : 523429, 273310, TL2373	NHP MAINS

0m 50m
Approximate scale 1 : 1250 printed on A3 Colour Portrait

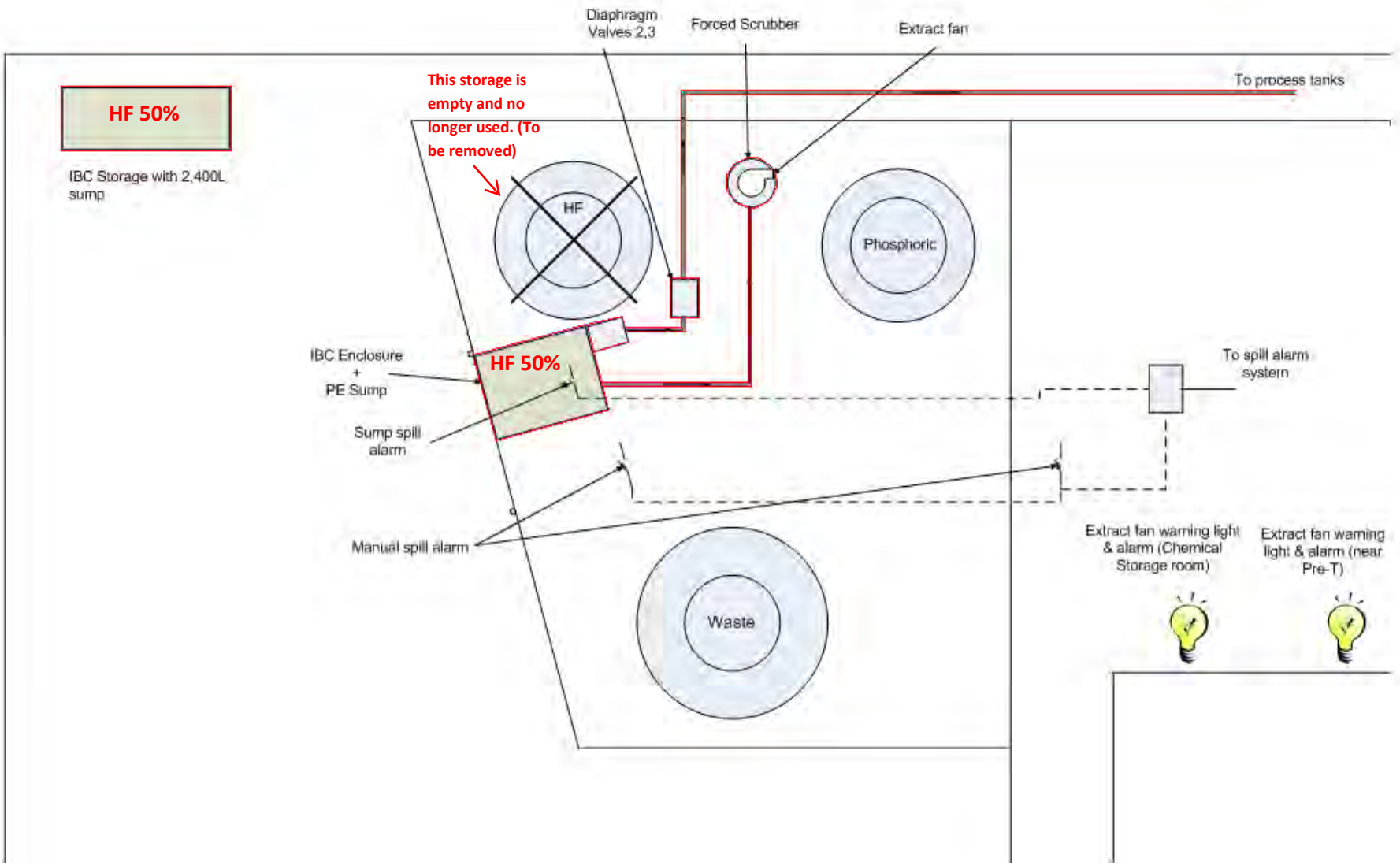
Some examples of Plant Items: Valve, Depth of Cover, Syphon, Diameter Change, Material Change

This plan shows those pipes owned by Transco plc or the relevant Gas Distribution Network in their roles as Licensed Gas Transporters (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Transco plc, the relevant Gas Distribution Network, or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

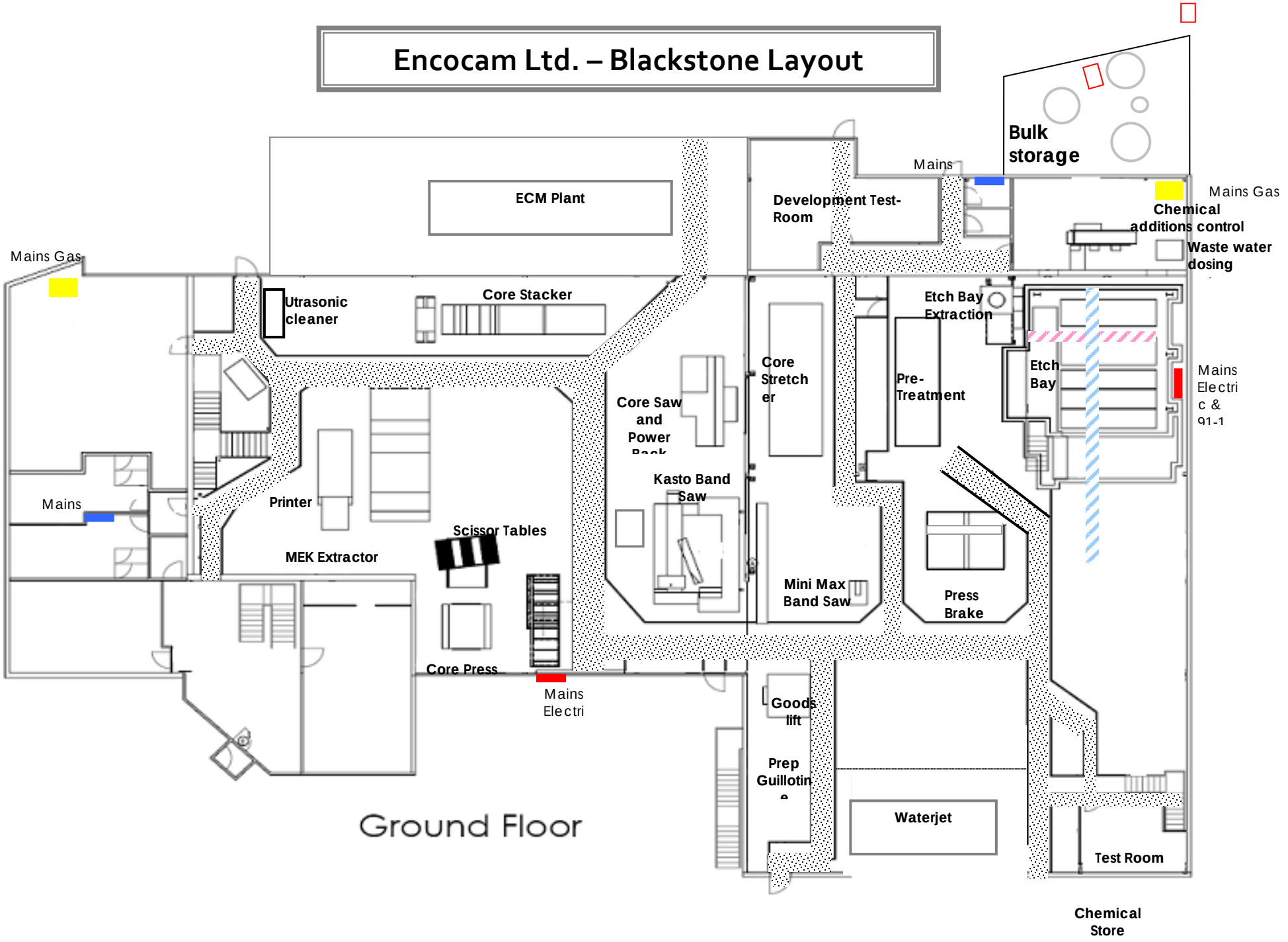
Desktop MAPS Version 4.3.0

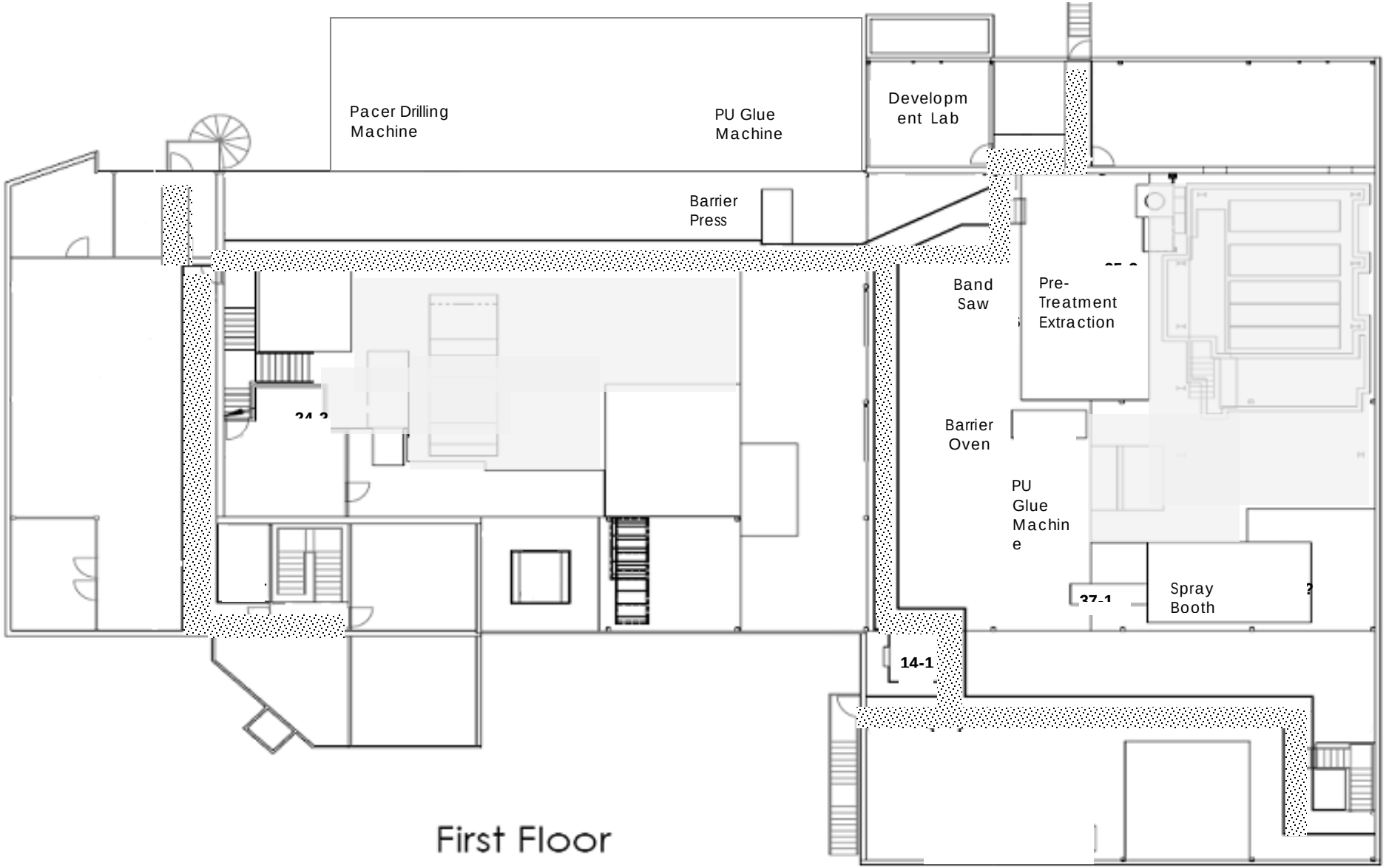
East Area

Encocam Ltd. – Hydrofluoric Acid Store



Encocam Ltd. – Blackstone Layout




Pacer Drilling Machine
PU Glue Machine
Developm ent Lab
Barrier Press
Band Saw
Pre-Treatment Extraction
Barrier Oven
PU Glue Machin e
Spray Booth
14-1
First Floor

B 2.1 INSTALLATION DESCRIPTION

Encocam Limited main activity is the manufacture of aluminium honeycomb for use as energy absorbent material to determine the crash test worthiness of new cars.

Hydrofluoric acid is necessary to carry out the chemical etching process to reduce the strength of the aluminium honeycomb.

The hydrofluoric acid is stored in a bulk storage area outside of the factory but just next to the Etch Bay area. In this bulk area, which is fenced delimited, there is an IBC (864 litres) of hydrofluoric acid 50%. This IBC is connected to the Etch Bay process tanks through a line which is regulated through two diaphragm valves and a pumping system to pump it into the Etch Bay tanks in a secure way. The IBC enclosure is connected to an extract fan with a forced scrubber and to a spill alarm system to protect the security of the employees and of the surrounding areas in case of an accident. The Etch Bay installation is also connected to this spill alarm system.

We also store maximum of 4,000 litres hydrofluoric acid 50% in maximum 4 IBCs located outside of this fenced area. The IBCs are safely located inside purpose built safety containment and inside an area delimited with walls from the neighbourhood.

Hydrofluoric acid can emit some fumes when its concentration is over 40% or, if the concentration is lower, when it is heated.

In spite of the fact that in Etch-Bay tanks, the hydrofluoric acid is used diluted, at approximately 3-5%, some possible fumes from hydrofluoric acid are foreseeable to be emitted in this place, since the maximum working temperature of those tanks is 43°C. To remove possible fume emissions, and above all, as a preventative measure in case an accident happens; there is an extraction system/equipment. The operations are monitored by the use of portable detection equipment which measures the HF fumes and will give an audible warning if the lower and upper exposure limits are breached.

In the bulk storage area no fumes emissions to the atmosphere are foreseeable due to the hydrofluoric acid being inside a sealed IBCs and the supplying IBC is connected to an extract fan with a forced scrubber to remove any possible fumes.

The whole plant and equipment are subject to routine preventative maintenance and daily/weekly checks by the operators. The system has both automatic and manual alarm systems connected to beacons and sounders throughout the factory to enable safe movement of employees etc to the safe area.

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Aluminium ist wiederverwertbar
Aluminium is recyclable

B 2.3 PREVENTATIVE TECHNIQUES

The IBC which contains hydrofluoric acid is connected to an extract fan with a forced scrubber to recycle fumes. In the Etch-Bay area there is an extraction system for possible fumes emissions of this acid and the chemical etching process.

The operations are monitored by the use of portable detection equipment which measures the HF fumes and will give an audible warning if the lower and upper exposure limits are breached.

There are plans to replace the portable detection equipment with a permanent fixed system.

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EP-003	CHEMICAL SPILL EMERGENCY PLAN		
Revision No:	3	Sheet:	1 of 2
Prepared By:	Quality Co-ordinator	Approved By:	QSHEF Manager
Issued By:	Quality Co-ordinator	Issue Date:	14 Aug 09
To Be Reviewed	Aug 2014	To make changes to this work instruction a Change Request must be raised	

CHEMICAL SPILL EMERGENCY PLAN

ACTION FOR ALL PERSONNEL ON DISCOVERING A CHEMICAL SPILL / LEAK OR HEARING THE CHEMICAL ALARM / AIR HORN

ON DISCOVERING A CHEMICAL SPILL/LEAK

Sound the spill alarm and or air horn to warn other personnel of the spill / leak.
EVACUATE AREA IMMEDIATELY. DO NOT TAKE PERSONAL RISKS

ON HEARING THE CHEMICAL SPILL ALARM, AIR HORN OR OBSERVING THE FLASHING BEACON

ALL SHOP FLOOR PERSONNEL

Stop any machinery you are using with the emergency stop.
Take the SHORTEST ROUTE to the upstairs general office.
Switch off evaporative cooling, close any vents, windows or doors that you can on route without delaying your own evacuation.
Assemble in the upstairs general office with your team.
Await the roll call.

FORK TRUCK DRIVERS

Park your truck off the gangways and leave the keys in the ignition.
Take the SHORTEST ROUTE to the upstairs general office.
Switch off evaporative cooling, close any vents, windows or doors that you can on route without delaying your own evacuation.
Assemble in the upstairs general office with your team.
Await the roll call.

FRONT OFFICE PERSONNEL

Take the SHORTEST ROUTE to the upstairs general office picking up the visitors book.
Switch off evaporative cooling, close any vents, windows or doors that you can on route without delaying your own evacuation.
Assemble in the upstairs general office with your team.
Await the roll call.

PERSONNEL IN THE UPSTAIRS GENERAL OFFICE

Stay in the office.
Close all windows, doors. Evaporative cooling must be switched off.
Await the roll call.

VISITORS AND CONTRACTORS

Assemble in the upstairs general office and stay with your host.

ANYONE IN OUTSIDE AREAS

Take the SHORTEST ROUTE to the upstairs general office.
Switch off evaporative cooling, close any vents, windows or doors that you can on route without delaying your own evacuation.
Assemble in the upstairs general office with your team.
Await the roll call.

ALL PERSONNEL ARE TO

ASSEMBLE IN THE 1ST FLOOR GENERAL OFFICE

DO NOT RUN.
DO NOT STOP TO COLLECT PERSONAL POSSESSIONS.
DO NOT USE MOBILE OR BT TELEPHONES WITHOUT PERMISION FROM INCIDENT CONTROLLER.
DO NOT LEAVE THE MAIN OFFICE UNTIL INSTRUCTED TO DO SO BY THE INCIDENT CONTROLLER.

CONDUCT AT ASSEMBLY POINT

The senior director or manager present at the assembly point is to assume the role of Incident controller and wear the incident controller's vest.

INCIDENT CONTROLLER IS TO:

Nominate a manager to carryout a check of the nominal role and visitor's book to ensure all personnel are accounted for.
Refer to Incident controllers check sheet EP-005.
Ensure First Aid is administered as required EP-004.

DIRECTORS, MANAGERS AND TEAM LEADERS

Directors, managers and team leaders are to maintain discipline at the assembly point keeping personnel quiet to ensure that the roll call is undertaken quickly and efficiently to establish if all personnel, including any visitors to the site, are accounted

for, and not allowing anyone (including visitors) to leave until the Incident controller gives the all clear.
They are also to restrict the use of Mobile and BT telephones.

EP-008	CHEMICAL SPILL PROCEDURE

Revision No:	5	Sheet:	1 of 3
Prepared By:	Environment Project Engineer	Approved By:	QSHEF Manager
Issued By:	QSHEF Manager	Issue Date:	14 Aug 2009
To Be Reviewed	Nov 2014	To make changes to this work instruction a Change Request must be raised	

Purpose: To identify the procedure for dealing with chemical spills.

Applicability: To all employees, contractors and visitors to Blackstone Road Site.

Responsibility: QSHEF Manager has responsibility for control and development of this procedure.

Associated Documents: F-HS-072
ISO14001:2004 Environmental Management System
P-010 Environmental Management System; 13, Emergency preparedness and response

NOTE: **1. THIS PROCEDURE APPLIES TO A MAXIMUM OF 25 LITRES IF THESE CHEMICALS ARE CONCENTRATED (STRAIGHT FROM BULK STORAGE OR IBC'S)**
2. THESE INSTRUCTIONS ARE TO BE IMPLEMENTED BY THOSE WHO HAVE BEEN FORMALLY TRAINED IN EMERGENCY SPILLAGE RESPONSE ONLY.

This procedure applies to the spillage of any of the following, and to these chemicals only:

- NOVOX 5100 Phosphoric acid
- NOVOX 5101 Hydrofluoric acid
- NOVOX 302 Acid Desmut (Nitric/Sulphuric acid)
- Any mixture or solution of the above.
- Sulphuric Acid
- MEK
- Acetone
- Additive 180
- Bonderite 1455
- Novaclean 177D
- Hydrochloric Acid <5%
- Sodium Hydroxide 1M (1N)
- Potassium Permanganate

DO NOT APPROACH SPILLAGE WITHOUT FULL PPE

On discovering a suspect chemical spillage – (Puddle, Unidentified Liquid, Unidentified leak, "Spray" Leak) you are to:

Revision No:	5	Sheet:	2 of 3
Prepared By:	Environment Project Engineer	Approved By:	QSHEF Manager
Issued By:	QSHEF Manager	Issue Date:	14 Aug 2009
To Be Reviewed	Nov 2014	To make changes to this work instruction a Change Request must be raised	

Identify liquid as acid, alkali or neutral using litmus paper.
Initiate an evacuation of the shop floor and surrounding area if the leak is significant by sounding the alarm above the etch bay spill kit or by the entrance to the filter room.

There is PPE for three people in the etch bay spill kit, all others personnel in the area should be evacuated to a safe distance.

There are two spill kits available.
1. In a yellow bin near the etch bay contains a small quantity of absorbent materials and respiratory PPE.
2. In the bulk storage compound and contains a larger quantity of absorbent materials.

Spill Team put on all PPE. This means Chemical suit, chemical gloves & respirator/breathing apparatus.
Check each other for correct fit.
Team members are to:

Block pedestrian access to the affected area
Fetch and carry absorbent compounds from the main spill kit
If safe to do so, isolate source of spillage, eg close valve, turn off pump, plug leak etc.
Contain the spill. Where possible prevent the spill from spreading. Try and ensure that chemical does not enter drainage system.
Clean up the spill using the absorbent pads and pillows contained within the spill kit.
The spill kit also contains three bags of lime for neutralising acid.
The spillage should be ringed with lime and gradually soaked up with further neutralising agent, sand or earth.
WARNING – THERE WILL BE A VIOLENT REACTION WHEN LIME AND ACID MIX.
Do not allow lime to enter the drainage system.
Collect solid residues and place in polythene bags and then into 200 litre Universal Blue waste drum/s; refer to a specialist waste contractor for safe disposal.

During this time the shop floor should have evacuated if deemed appropriate action and the incident controller will send two people kitted out in PPE to identify the cause of the spill alarm and assist. They will report back to incident controller with a situation report.

Work Instructions EP-001 to EP-007 and EP-012 are to be followed.

Revision No:	5	Sheet:	3 of 3
Prepared By:	Environment Project Engineer	Approved By:	QSHEF Manager
Issued By:	QSHEF Manager	Issue Date:	14 Aug 2009
To Be Reviewed	Nov 2014	To make changes to this work instruction a Change Request must be raised	

PROCEDURE FOLLOWING A SPILL

After the spill has been cleaned up or emergency services have taken over all PPE is to be thoroughly cleaned and then inspected for serviceability. Any deficiencies are to be reported to QSHEF Manager.

A list of used absorbent material is to be produced and passed to QSHEF Manager.

A written incident report F-HS-072 of actions taken by individuals involved and witness statements is to be completed and passed to H&SW.

EP-010	SPILL INSPECTION CHECK LIST		
Revision No:	3	Sheet:	1 of 4
Prepared By:	Quality Co-ordinator	Approved By:	QSHEF Manager
Issued By:	Quality Co-ordinator	Issue Date:	13 Aug 10
To Be Reviewed	Aug 2014	To make changes to this work instruction a Change Request must be raised	

Purpose: To identify the Spill Inspection Check List.

Applicability: To all employees, contractors and visitors to Blackstone Road Site.

Responsibility: QSHEF Manager has responsibility for control and development of this procedure.

Action	Instruction	**Check**	Comments/Notes
Dress in full chemical PPE, Suit, Hood, Respirator, Gloves, Radio and Torch	Check each other to ensure correctly dressed in PPE.		Check Radios are on same channel and are working
Leave Office by door nearest Accounts and proceed into factory via reception area.	Check doors close fully after you.		
Proceed through factory to etch bay area	Check roller and other doors are closed		
Check radio transmission	Call to partner and control		

Check if power failure to Micromech panel far end of gantry	Report power failure Yes/No to control, then continue with rest of inspection.		

Action	Instruction	**Check**	Comments/Notes
Person 'A'	1. Check: a. Etch Bay manual alarm b. Bunded area c. Filter Room manual alarm 2. Call control and report findings 3. Close all doors and windows in vicinity		When checking bunded area look for signs of chemical spill Reset alarm push buttons by pulling button out, if this doesn't cancel alarm proceed to next button
Person 'B'	1. Check: a. Pre-treatment manual alarm b. Bunded area c. Prep manual alarm 2. Call control and report findings 3. Close all doors and windows in vicinity		When checking bunded area look for signs of chemical spill Reset alarm push buttons by pulling button out, if this doesn't cancel alarm proceed to next button

Person 'A' and 'B' proceed to filter room	Check bulk storage automatic alarm panel warning lights		Panel located on wall between entrance doors and roller door.
Panel warning lights 'ON'	Look through filter room windows to look for any obvious damage. Report findings to control.		
Panel warning lights 'OFF'	Look through filter room windows to look for any obvious damage. Report findings to control.		

Action	Instruction	**Check**	Comments/Notes
If no obvious damage can be seen open roller door and proceed outside			
Check tanks, bunds, pipes and valves for signs of leaks	Report findings		
Check inside tank 1&2 bunds	Climb fixed steps for tanks 1&2, remove circular cover and look inside bund for signs of leaks. Report findings to control		
Check inside	Remove circular cover		

tank 3 bund	and look inside, report findings to control.		
If no leakage detected	Push manual alarms and reset If alarm is still active and you are confident there are no signs of leakage apparent then report false alarm to control		
If any spill is evident	DO NOT RETURN TO MAIN OFFICE UNTIL FULL DECONTAMINATION HAS BEEN ACHIEVED.		WASH DOWN PROTECTIVE CLOTHING BY EMERGENCY SHOWER, WALK BACK TO RECEPTION AREA AND THEN REMOVE PROTECTIVE CLOTHING.

B.2.6.1

MAJOR ACCIDENT PREVENTION POLICY (MAPP)

November 2013

Issue 9

1. Introduction

The company is committed to achieving high standards of safety and environmental performance and, as such, will ensure that all necessary resources are made available to achieve these standards.

We recognise that the nature of material used for pre-treatment and chemical etching processes may give rise to major accident hazards for employees, contractors, visitors, members of the public and the natural and built environment. We therefore have obligations to all these stakeholders to reduce the risks associated with such hazards to levels as low as is reasonably practicable.

In order to meet our obligations to our employees, customers, neighbours and other stakeholders, the company will provide and maintain Safety, Health and Environmental Management Systems. This includes working within the arrangements for the prevention of major accidents in accordance with the Control of Major Accident Hazards (Amendment) Regulations 2005.

Encocam Ltd operates this MAPP under Chemical operations as it has de-notified under the requirements of COMAH regulations however still maintains its commitment to the essence of the regulations as a good preventative measure to protect the environment around the installation.

The Company's aim in implementing this system is to reduce the risks associated with a major accident hazard to as low as reasonably practicable.

2. Organisation, Personnel & Training

The company will ensure that:

- The organisational structure is appropriate to minimise the risk of a major accident and to minimise the consequences should one occur.
- All employees are made aware of the potential for major accidents and are trained, where relevant, in procedures needed to ensure that policy objectives are met. In addition, all contractors' employees are made aware of the potential for major accidents and their responsibilities in relation to them and are trained, where relevant, in procedures needed to ensure that policy objectives are met.
- All employees are aware of their responsibilities in the management of major accidents and are selected and trained to ensure that they have the necessary skills and experience to perform their duties. The responsibilities of management and employees for major accident prevention are set out in written procedures.
- All the company's employees have access to safety information, Material Safety Data Sheets, COSHH and RISK assessments.

- Feedback from employees is encouraged on major accident issues in the course of training and safety inspections. The company employees are also encouraged to make suggestions and raise specific major accident concerns, which they may identify during operational activities.
- The necessary resources are made available for training of management and employees in the prevention of accidents, including major accidents.
- Responsibility for setting training schedules for employees and contractors lies with the Managing Director or his nominee and is responsible for ensuring that training is carried out in accordance to the training schedule.

3. Identification & Evaluation of Major Hazards

The company's policy objectives are to ensure that:

- The levels of risk are reduced to 'as low as reasonably practicable' (ALARP).
- Major hazards arising from operations are identified and their likelihood and severity assessed.
- The identification and evaluation of hazards covers all phases of our operations including storage, product transfer and control of emissions to the environment.
- Identification of major hazards, their possible consequences and prevention and control measures are detailed in the written procedures.
- The results of such risk assessments are analysed and areas for improvement identified, prioritised and scheduled.
- The responsibility for managing the process of hazard identification and risk assessment lies with the Managing Director.

4. Operational Control

The company's policy is to ensure that:

- The risk of incidents with the potential for accidental damage to people or the environment is minimised, by exercising control over all aspects of the company's operations.
- Operating Procedures including maintenance are adopted and implemented.
- Operating Procedures and Works Instructions are reviewed on a regular basis.
- Operating Procedures and Works Instructions are developed in co-operation with the employees who are required to follow them.

Responsibility for implementation of these systems lies with the Managing Director.

5. Planning for Emergencies

The company's policy is that:

- Operations are carried out in a manner, which serve to protect the community and the company employees from injury or illness and which avoids damage to the environment.
- An on-site emergency plan has been prepared and maintained, which details the required response of the company personnel in the event of a major accident.
- The emergency plan includes arrangements for contacting the emergency services and those people in the surrounding environment that might be affected.
- The relevant personnel are trained in their emergency response duties under the on-site plan, together with first aid fire fighting.
- The emergency plan is tested by means of regular exercises and other appropriate means.

- The company co-operates fully with the local Fire Authority and other emergency services for emergency planning.
- The on-site emergency plan is reviewed periodically to ensure its continued effectiveness.
- The Managing Director is responsible for ensuring that the testing and training schedule involving site personnel is completed.

6. Monitoring Performance

The company's policy objectives are to ensure that:

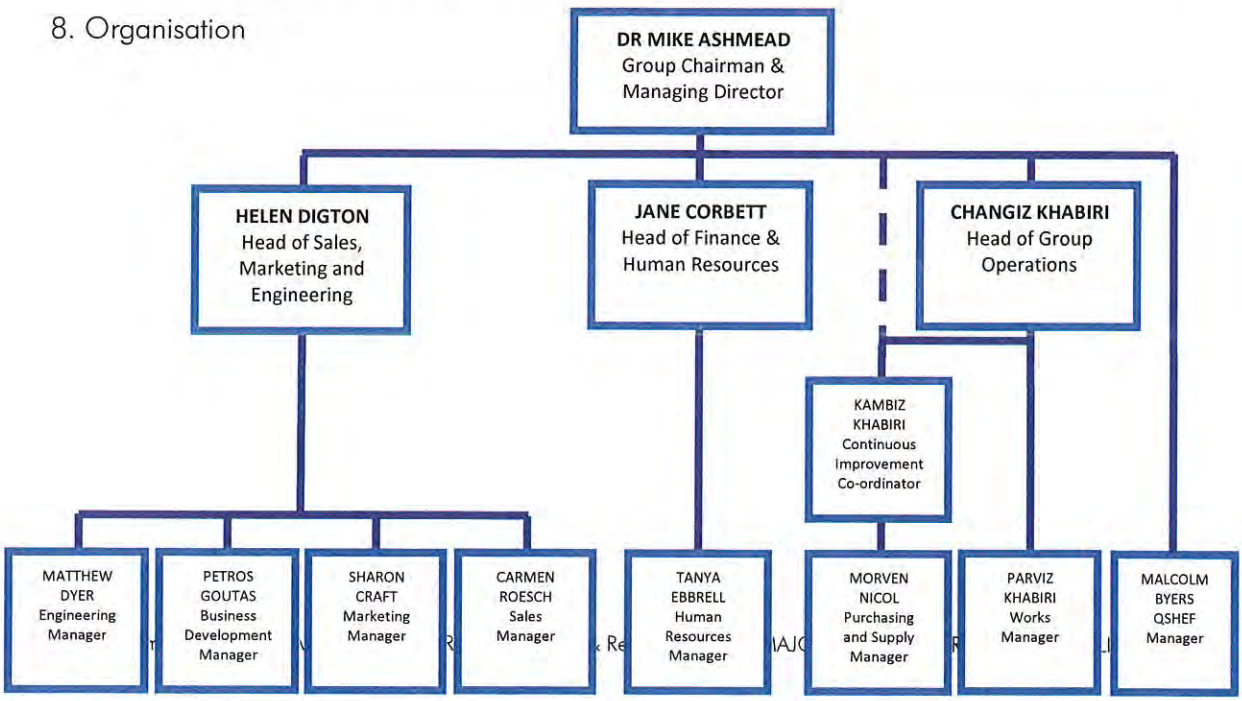
- Procedures are developed, implemented and maintained which actively monitor adherence to all safety procedures adopted in order to minimise the risk from major accident hazards. Active monitoring includes inspections of safety critical plant, equipment and instrumentation as well as checking compliance with training, instructions and safe working practices.
- All accidents and incidents capable of leading to a major accident are systematically reported and investigated. Investigations examine both the immediate cause of an incident and any underlying causes such as failure of procedures to protect against the occurrence.
- Corrective/preventative action determined by such investigations are recorded and implemented to a set deadline.
- The relevant manager holds responsibility for the completion of plant and vehicle checks and for the reporting of all incidents or "near misses". It is the responsibility of the manager to complete incident report forms, establish the causes of incidents and decide on possible actions.

7. Audit & Review

The company's policy objectives are to ensure that:

- The MAPP and SMS are systematically reviewed for effectiveness and suitability.
- Regular internal audits are conducted.
- Procedures are developed, adopted and maintained to audit the achievement of MAPP objectives.
- In particular, all relevant procedures are reviewed following any major accident or incident with the potential to escalate into a major accident.

8. Organisation



9. Responsibilities in respect of Chemical Operations

The **Managing Director** has overall responsibility for implementation of this policy.

Head of Group Operations are responsible for ensuring adequate resources are provided for effective implementation of this policy.

Head of Finance & HR are responsible for ensuring adequate resources are provided for effective implementation of this policy.

The **Human Resources Manager** is responsible to the Finance & HR Director for the selection of new personnel, helping to identify training needs and determining competency levels of operational staff.

The **QSHEF Manager** is responsible to the Directors for the development of the Safety & Environmental Management systems, ensuring that suitable and sufficient risk assessment is carried out and that emergency arrangements are effective.

The **Maintenance Team Leader** is responsible for developing and implementing a programme of preventative maintenance.

The **Team Leaders** are responsible for monitoring work practices on a daily basis and bringing any hazards or incidents to the attention of management.

All **Employees** are required to contribute to overall safety arrangements, in particular by observing safety requirements and sharing information and recommending improvements.

HENKEL, product supplier, is contracted to supply materials, assist with development and control of processes and specialist training.

Mike Ashmead
MANAGING DIRECTOR

Changiz Khabiri
HEAD OF GROUP OPERATIONS

Jane Corbett
HEAD OF FINANCE & HR

Helen Digton
HEAD OF SALES & MARKETING
& ENGINEERING

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ENVIRONMENTAL RISK ASSESSMENT ON MATTE SCENARIOS

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Revision Status

Version	Date	Change Description	Page Number
0	November 2013	New Issue	N/A

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Environmental Risk Assessment on MATTE scenarios.

Major accident prevention policy

To demonstrate Encocam's responsibility the Directors have signed a policy statement that is reviewed annually or when there are changes to regulations or equipment.

Bulk Storage area

An overview of the bulk storage area can be found at Work Instruction HS-86.

Reduction of Inventory of Toxic Chemical

Throughout 2013 a project had been running to reduce the Toxic inventory from up to 15,000 litres to a maximum of 4000kg in 4 IBCs. This has increased the number of deliveries from 4 to 9 and the HF concentrate from 35% to 50% solution.

Choice of Material

Forbes Technologies Ltd and Encocam Ltd (Formally Cellbond Composites Ltd) consulted over the intended use of the bulk storage system for storage of Phosphoric acid and waste/emergency containment with the following results.

'The thermoplastic (PP) inner of the tanks and bunds were selected for chemical resistance to fresh and waste products. All pipe work, pumps and valves were specified for resistance to tank contents, i.e. 'standard' glass reinforced polypropylene valves were replaced with PP due to the potential for attack on the glass fibres by the HF'.

Subject to routine maintenance and inspection a 20 Year in-use life was placed on the tanks and associated equipment. Installation was during 2003 therefore the tanks would be life-ex 2023.

HF acid is now stored and used direct from IBCs which include a quick release sealed coupling, CDS, connection to ensure that the operators do not come into contact with HF at 50% solution. All pipe work, pumps and valves were specified for resistance to IBC contents. The area of IBC and connection is all on the suction line so operators are not exposed to risk of spray from pressure.

COMAH (now 'Chemical Operations')

Encocam Ltd is no longer within COMAH Regulation limits and has de-notified as required by HSE as of 21st October 2013. However Encocam Ltd will maintain the safe systems and documentation already in place.

The area covered under the Lower Tier COMAH regulations was Tank1, the Scrubber, Tank 1 fill point, external and internal pumps, valves and pipe work connecting Tank 1 to the Scrubber fill point, pipe work along rear of building and internal control rack above the process tanks.

Note; Tank 1 and associated pipework, valves and pumps etc have now been decommissioned, blanked and are awaiting a decision on disposal.

Low Tier COMAH area also covers Tank 3, waste tank which has been improved to include a scrubber so that it can be used as an emergency tank should anything unforeseen occur to Tanks 1 & 2.

Note; Tank 2 and 3 are still being used.

Chemical Operation risks

Risk assessment can be found at Risk-0033 and covers both the internal and external perceived significant risks.

Service supplies.

Gas – enters the building at two locations one at the NE corner of the building entering via the canteen area, the other is through the SE corner of the building via the Chemical Store Room.

Electricity – One feed enters the SE rear of the building behind the Etch Bay process tanks, the other enters via the yard on the west side of the building.

Water – two supplies are available one to the N coming into the building via the gent's toilets, the other through the SE toilets near the bulk storage area.

Site drainage

The car park to the rear of the factory adjacent to the raised railway embankment drains towards the bulk storage area. There are surface water drains outside the bulk storage area adjacent to the raised concrete plinth.

Foul sewage drainage is also adjacent to the concrete plinth and incorporates an oil-separator (cleaned out Aug 2007). Discharge consent has been granted for the neutralised waste process water from the chemical plant. The discharge is monitored by Encocam Ltd and by East Anglian Water on a regular basis.

The site drainage survey in Aug 2007 identified that the gully and outlet drain within the internal bunded area have been sealed off internally. The seal has been further reinforced by sealant applied to the bund floor.

Chemical deliveries

HF is delivered under stringent controls, only trained and authorised operators are allowed to carry out the delivery and or act as safetyman. Routine maintenance checks are required before a delivery takes place and there are instructions to be followed during the delivery, which once complete have to be signed for. Records of these checks are maintained for all deliveries and changeover of IBCs.

Delivery/changeover instructions include WI-HS-96, WI-HS-97, WI-HS-107 and WI-HS-108 for operating the Forklift Truck.

Environmental impact

There are two areas of environmental importance within the local area. To the North; Stukeley Railway Cutting and to the South; Port Holme. The risk to either area is low as one is on higher ground and the other is some distance away from the site and detection and preventative actions would be taken thereby minimising the affect.

Emergency procedures

Encocam has developed emergency procedures and safety equipment is deployed as required. The emergency equipment being placed both in the immediate area of the Chemical operations, chemical process plant and also in the designated safe area – first floor main office.

All Encocam employees undergo emergency procedure training and are encouraged to put forward improvement suggestions. The emergency procedures are written down and held electronically and hard copy in several locations within the factory.

Major incident

If a major incident was to happen the areas considered to be highest risk are;

Internal process tanks,

The tanks are contained within a bunded area with automatic pumping system to transfer fluid from the bund to Tank 3 in the Bulk storage area.

Full operating procedures and safe systems of work are in place.

The system is also connected to an alarm so that during normal working hours factory personnel can move quickly and safely to the designated safe area.

After hours and during periods of factory shut down the same alarm will send a text message to the duty engineer.

There is also a CCTV system to monitor the hazardous areas from the safe area.

External bulk storage tanks or 50% HF IBC,

If there is a failure of an external tank or IBC they have individual integral bunds complete with warning alarm system.

Full operating procedures and safe systems of work are in place.

The tanks, IBC and bunds are inspected on regular basis.

The bunds are connected to high and low level alarm system which sounds in the factory and text's the duty engineer.

Failure during transfer.

During transfer there could be a failure of the IBC and several litres of acid could be lost.

Full operating procedures and safe systems of work are in place.

During transfer minimum number of employees are on site. To reduce risk further transfers are completed on a Saturday when possible. Only trained and authorised operators are available during transfer, emergency equipment in place such as drain covers, absorbent pads, sand bags, spill kits, hosepipes and emergency shower.

Pumping gear and pipework for transfer from bulk storage to process tanks

During normal operations loss of containment from pumping gear and pipework could lead to ground contamination.
Pipework is all double lined with detector sight tubes to identify loss of containment within inner pipe.
All areas are subject to daily and weekly checks and safe working practices and procedures are in place.
The system is only active during short periods of topping up the chemicals within the process tanks.
If an IBC fails during delivery or changeover there is an emergency unit, empty IBC with pump and hoses fitted, which can be connected and used to pump out from damaged IBC.

Review

The safe systems and procedures are reviewed regularly on an annual basis or if equipment/processes are changed. If a procedure is changed, process or equipment updated then training is given to appropriate personnel.

Attached documents

Policy	
Overview Bulk Storage	HS-86
COMAH Plan	
Risk Assessment	RISK-0033
Gas layout	
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HF Chemical Delivery	HS-82
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Chemical Spill Emergency Plan	EP-003
Bund and Spill Alarm Procedure	EP-001
Bund Alarm	EP-002
Chemical Burns Procedure	EP-004
Incident Controllers Check List	EP-005
Cellbond Emergency Contacts List	EP-006
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MSDS Novox 5100 Phosphoric Acid	
MSDS Novox 5101 Hydrofluoric Acid	
MSDS Novox 302 Sulphuric/Nitric Acid	
SPILL inspection check list	EP-010
SPILL inspection check sheet	EP-010a