

GUIDANCE NOTE NO.52

ASSESSMENT OF CUSTOMER BULK RECEIVING FACILITIES

Delivering bulk volumes of solvents to a customer can present safety challenges due to the lack of familiarity with the receiving site, its layout, facilities and equipment. The safety management system and the culture that may also be different to those we already know.

Potential hazards that may be encountered when transferring solvents include the risk of fire / explosion and unintentional releases of substances classified as toxic to the aquatic environment, which may enter drains or foul sewer or other water courses.

It is therefore important that both supplier and customer are aligned and cooperate where possible in understanding and managing the risks. This Guidance Note covers transfers of solvents from road tanker or isotank to fixed bulk storage tanks. It is not intended for other types of transfer.

The purpose of this Notice is to provide some guidance criteria for the inspection of customer bulk receiving facilities for Oxygenated and Hydrocarbon solvents delivered by road tanker. This Guidance Note does not replace CEFIC's SULID (Site (Un)Loading Information Document) but is intended to be used in conjunction as an aide-memoire when carrying out an inspection of a customer's site. The aim is to reduce the risk of an incident during the delivery, and in particular to ensure the safety of the delivery driver whilst present at the customer's site. It is important to undertake this assessment with care, due to the variation in both customer facilities and bulk tanker design.

This document comprises an Assessment Form, examples of the different types of storage vessel and installations, an Interpretation Guide and additional References. The Assessment Form has been structured to follow the delivery process. It starts with questions about the customer contact details, follows discharge details and concludes with an Action List. Everyone using this document must make detailed judgements and an additional table has been provided with some broad guidance on interpretation of the responses, with the importance depending on the product delivered.

It is recommended that the preliminary assessment should take place before the first delivery, with regular follow up reassessments. Obtaining a completed SULID document from the customer prior to the inspection will provide a high level of detail regarding their operation. Reassessment is also required where there is a report of significant changes to the customer facility, to help to resolve a safety concern, or following an incident or near miss report.

It is the responsibility of the supplier to decide how and when to make the assessment. A planned visit may be made by the supplier or their approved haulier.

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Alternatively, the supplier may assist a customer to make a self-assessment and then decide whether to visit the site based upon the findings of the self-assessment. The Assessment Form has been based upon best practice from a range of industry sources. It is intended that solvents suppliers select from this content and add or amend in line with their requirements and other sources of guidance and regulation.

Additional guidance on safe loading and unloading of bulk solvent vehicles is available on The SIA safety film, Safe Loading and Transportation of Solvents by Road

Additional guidance on bulk storage of solvents in tanks can be found in the UK Health and Safety Executive publication HSG176.

General guidance on handling flammable liquids can be found in the NFPA 30 Flammable & Combustible Liquids Code

In order to facilitate the exchange of technical and safety data between (un)loading sites and carriers/drivers in a more structured and harmonised way a uniform site (un)loading document (SULID) has been developed by a joint Cefic-ECTA-FETSA-FECC Working Group. This document can be downloaded from the CEFIC website:

http://www.cefic.org/Industry-support/Transport--logistics/SULID/

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APPENDIX 1

ASSESSMENT OF CUSTOMER BULK RECEIVING FACILITIES

| CUSTOMER CONTACT DETAILS | | | |
|--|------|-----------|--|
| Customer name | | | |
| Site address | | | |
| Contact on site | Name | Position. | |
| Date of assessment | | | |
| Assessor | Name | Position. | |
| Vehicle type and configuration (where applicable) | | | |
| Products delivered (inc. grade and product code) | | | |
| Tanks & associated equipment assessed (specify tank ID and capacity) | | | |
| Special delivery instructions: e.g. Delivery book in, access requirements, etc. | | | |

| APPROACH TO DISCHARGE POINT | | COMMENTS (delete as appropriate) | | |
|--|--------|----------------------------------|--|--|
| Does the driver require any special instructions or directions to reach the discharge point? | YES/NO | Is a site Induction required? | | |
| Are there any special site rules / requirements that the driver needs to be aware of before approaching the discharge point? | YES/NO | | | |
| Is the access route on made ground in good condition and any incline in the approach is not excessive? | YES/NO | | | |
| Are there any vehicle access restrictions: Height/ width/ length/ weight? | YES/NO | State | | |
| Is the driver given a copy of site safety/delivery instructions? | YES/NO | Attach copy | | |
| Does the driver have to reverse into or away from point? | YES/NO | If yes, is a banksman provided? | | |

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| Is there a dedicated tanker bay or space around tanker isolated for at least 1.5 metres? | YES/NO | State |
|--|--------|---------------------------------------|
| Length of hose / pipe required to connect to the discharge point? Is this likely to vary? | | |
| Is the discharge to a fixed bulk storage tank? | YES/NO | |
| Is the bulk storage tank of a design standard described in HSG176 or similar? | YES/NO | |
| Is the discharge to other than a fixed tank? Note such discharges must not take place unless and until authorised by the supplier following a risk assessment and bund/pump inspection. The risk assessment should consider the ability to prevent overfill of a container, to be able to safely stop the transfer without risk to the driver and to prevent splash filling. | YES/NO | State mobile tank; IBCs; drums; other |
| Is the receiving facility and the discharge point located in an area defined by hazardous area classification (zoning)? | | |
| Are there any secondary hazards adjacent to the bulk storage tank e.g. incompatible substances, space restrictions, workplace transport considerations,? | | |
| Describe the discharge point and any suggestions for improvement? | | |
| Does the inlet pipe enter at the top of the storage vessel or the bottom? | YES/NO | |
| If the inlet pipe enters at the top of the vessel, is a dip tube present inside the tank to prevent splash filling? | YES/NO | |

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| AT THE DISCHARGE POINT | | | | |
|--|--------|--|--|--|
| Does a member of staff identify the precise discharge point and connection point? | YES/NO | | | |
| Is the driver accompanied at all times by a member of staff? If not, specify at what points during the delivery there will be direct supervision by the customer. | YES/NO | | | |
| Is access restricted to others during discharge? | YES/NO | Describe the controls in place | | |
| What are the tank's materials of construction? Note discharge into a tank constructed of other than carbon steel or austenitic steel is prohibited until authorised by the supplier following a risk assessment. | | | | |
| Does the tank or pipework show any signs of impact damage, wear, corrosion or evidence of previous overfill or under / over pressure events? | | | | |
| Is the tank in the open air? | YES/NO | State approximate distance (m) to nearest building or site boundary. | | |
| Is the tank above ground? | YES/NO | | | |
| Are other hazardous substances stored in other tanks or containers near the tank? If so, identify these. | YES/NO | | | |
| Does a Bund wall surround the tank? Comment upon apparent bund size and integrity | YES/NO | Suitable/Unsuitable | | |
| What is the distance between the discharge point and the tank? | | | | |
| Describe the transfer equipment e.g. fixed pipework, flexible hose and types of connection e.g. drybreak couple or bolted flange fitting. | | | | |
| Is the tank clearly identified / labelled such that it cannot be easily confused with a different tank? This should include the tank unique ID and information which clearly identifies the content in the tank. | YES/NO | | | |
| At the unloading point, is there good access for the driver around and on top of the vehicle? Where necessary is there a clearly marked turning circle? | YES/NO | | | |
| Does the site rely upon the vehicle handrails, or are other systems to prevent/arrest falls where work on top of the vehicle is necessary? | YES/NO | State the arrangements in place | | |

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| AT THE DISCHARGE POINT | | | | |
|--|--------|---|--|--|
| Are warning notices visible and in good condition? E.g. Ex zone sign, no smoking, use earth leads etc | YES/NO | State | | |
| At the point, are appropriate fire extinguishers provided? | YES/NO | State type/number. | | |
| Is there clear labelling on all pipe connections, lines and tank (including direction of flow)? | YES/NO | State Product/Inlet/Outlet/Tank number/ | | |
| Will a sample be taken prior to discharge? | YES/NO | If yes, state who takes it and from where | | |
| Is there adequate lighting? | YES/NO | Unsure/Suitable/Unsuitable | | |
| Is there an earth connection for tanker? If so, is this interlocked? | YES/NO | State type and visible condition | | |
| Is there an earth visibly connected to the bulk storage tank? | YES/NO | State if not visible. | | |
| Are storage tank inlets accessible from ground level? | YES/NO | | | |
| Is the inlet coupling inside a bunded or contained area? | YES/NO | | | |
| Is access into the bund required for either connection or sampling? If so, is this classed as a confined space? | YES/NO | | | |
| Are inlets capped and locked when not in used? | YES/NO | | | |
| Are connections easy to use? | YES/NO | | | |
| Does the inlet line also serve as an outlet line? | YES/NO | | | |
| Is there a facility for draining or blowing the transfer pipe / line? | YES/NO | | | |
| Is there a non-return valve or other anti-syphon device fitted? <i>Note: not applicable to joint inlet and outlet lines.</i> | YES/NO | State | | |
| Is there a procedure to confirm that the ullage in the receiving tank is sufficient to receive full content of delivery? Is this robust and include a crosscheck? Does this require signature from the driver? | YES/NO | State how this is achieved | | |
| Is pedestrian and vehicular (including FLTs) access restricted around the loading area and the driver? | YES/NO | State arrangements in place | | |

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| AT THE DISCHARGE POINT | | | | | | |
|--|---|---|--|--|--|--|
| The operator should sign an authority to discharge before discharge commences to confirm that the tanker is connected to the correct tank and there is sufficient ullage space for the load to be transferred. | YES/NO | State arrangements in place. | | | | |
| Are there level gauges and overfill protection devices fitted to the tank? | YES/NO | State | | | | |
| Are visual or audible high-level alarms at the discharge point to provide early warning of a potential overfill event? | YES/NO | State | | | | |
| Is the tank overflow/vent visible from the loading point? | YES/NO | | | | | |
| Does the tank overflow/vent into the bund? Does it vent at high or low level? | YES/NO | If NO state how secondary containment is achieved | | | | |
| What prevents vehicle moving whilst still connected? Whose responsibility is it to implement measures to prevent the risk of inadvertent drive away during transfer? | State | | | | | |
| | | | | | | |
| Is any type of tanker preferred? | e.g. hose cor nearside | nections - Rear (single pot)/ Centre offside/Centre | | | | |
| What is the type of discharge? Note: compressed air discharges <u>must not</u> take place unless and until authorised by the supplier. | Customer's Pump/Vehicle Pump/Gravity/ Compressed Nitrogen/Compressed Air | | | | | |
| If customer's pump is used, is it Ex /ATEX certified and fitted with an emergency stop? What type of pump is it e.g. centrifugal, positive displacement. | YES/NO | | | | | |
| If the customer's pump is utilized, how are pressure and flowrate monitored and controlled? | State | | | | | |
| What is the inlet connection type/size? E,g, 3" BSP or drybreak. | State | | | | | |
| Does the customer require the driver to utilise discharge flexible hoses? | YES/NO | State connection size/type: Length(m): | | | | |
| Does the customer require a vapour return hose back to the road tanker or another tank? | YES/NO | State connection size/type (if installed): Length (m): | | | | |
| Where vapour return is required, is the receiving tank under pressure? | YES/NO | State | | | | |
| Are there any restrictions on flow rate or pressure during transfer? | State | | | | | |

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| TANKER DISCHARGE REQUIREMENTS | | | | |
|--|-----------------|---|--|--|
| Who makes the connection of flexible hose to the tank inlet point? | State | | | |
| Is the driver given a specific direction by the customer on when to start the transfer? | YES/NO | | | |
| | | | | |
| POSTI | DISCHARGE | ACTIVITIES | | |
| Can hoses be safely depressurised and drained before disconnection? | YES/NO | | | |
| How is residual solvent in the flexible hose disposed of? | | State | | |
| | | | | |
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| Is there a procedure for quickly dealing with leaks or spillages? | YES/NO | State | | |
| How is an alarm raised in the event of an emergency? If the driver is unaccompanied at any time, how would he do this? | | State | | |
| Is there any unmade ground; public sewer; open water; river or other watercourse within 10m of the tank or delivery point? | YES/NO | If yes, state | | |
| Are there open drains near the discharge point? | YES/NO | If yes, how are these isolated in an emergency? | | |
| Is the exit for the delivery vehicle kept clear in case of an emergency? | YES/NO | | | |
| | | | | |
| SAFETY | EQUIPMEN | IT PROVIDED | | |
| Is there an emergency shower readily available? | YES/NO | If yes, state whether hot/cold/trace heated | | |
| Are there clear directions to shower? | YES/NO | State distance to shower. | | |
| Is First Aid available? How would a first aider be contacted? | YES/NO | | | |
| Are there clear directions to first aid point? | YES/NO | | | |
| Is an eyewash station available near discharge point? | YES/NO | | | |
| Is a Spill Kit available near to the loading/unloading point? | YES/NO | | | |
| What PPE standards are utilised by any person supervising the transfer? | State | | | |
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|--|---|
| Is there a safety instrumented system (SIS) | |
| installed which will automatically trip to protect | |
| against overfill? If so describe. | |
| How would the driver be aware of a trip in an | |
| SIS? What action would the driver then need to | |
| take? | |

| ADDITIONAL GENERAL COMMENTS FROM VISITING CUSTOMER FACILITY | | | |
|---|---|--|--|
| Describe the housekeeping and the access routes around bunds? | | | |
| Describe site security? | | | |
| What is the visual appearance of the tank & pipework? | | | |
| Are there any nearby ignition sources? | | | |
| Do the customer representatives clearly understand the risk from flammable solvents (where applicable)? | | | |
| Does the customer representatives understand the risk from static? | | | |
| Other | | | |
| | | | |
| Driver/assessor's signature | | | |
| | | | |
| Office Use Only | | | |
| Management approval of receiving site: All actions should have a completion date assigned. | | Approved (no actions); Approved with actions; Approval pending completion of actions; Not approved. (cross out all apart from the appropriate line) | |
| Action required | | Action completed | |
| | 1 | | |
| | 2 | | |
| | 3 | | |
| | 4 | | |

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This Guidance Note has been developed to assist companies in carrying out inspections at customer bulk facilities and can be used in conjunction with SULID.

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APPENDIX 2 - EXAMPLES OF TYPES OF TANKS AND INSTALLATIONS

1. VERTICAL CYLINDRICAL TANK ON LEGS*



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2. VERTICAL CYLINDRICAL TANK ON FLAT BASE*



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3. 'TWIN SKIN' RECTANGULAR TANK*



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4. ABOVE GROUND HORIZONTAL STORAGE TANK*



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PUMP DISCHARGE TO OVERGROUND TANK

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(Typical layout)



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APPENDIX 3 - INTERPRETATION GUIDE FOR THE SUPPLIER

| QUESTION | Suggest according | Suggested Importance, subject to | | |
|---|----------------------|--|----------------------|--|
| | if yes | if no | product delivered | |
| APPROACH TO DISCHARGE POINT these questions need amending as above: | | | | |
| Access route is made ground in good condition and any incline is not excessive? | none | investigate | Medium | |
| Vehicle access height/width/length/weight restrictions? | investigate | none | High | |
| Given copy of site safety/delivery instructions? | none | investigate | Medium | |
| Reverse into or away from point? | investigate | none | Medium | |
| Dedicated tanker bay or space around tanker isolated for at least 1.5 metres? | none | investigate | High | |
| Discharge is to fixed bulk storage tank? | none | investigate | High | |
| Discharge is to other than a fixed tank? Note such discharges must not take place unless and until authorised by the supplier. | investigate | none | High | |
| Description of point and any suggestions for improvement? | | check details | 5 | |

| DISCHARGE POINT | | | | |
|--|---------------------|-------------------------|--------|--|
| Member of staff indicates the point? | none | investigate | High | |
| Accompanied at all times by member of staff? | none | investigate | High | |
| Is access restricted to others during discharge? | none | investigate | High | |
| Is tank in the open air? | none | investigate | High | |
| Is tank above ground? | none | investigate | Medium | |
| Bund wall surrounds tank? Comment upon apparent bund size and integrity | none | investigate | High | |
| At the unloading point, is there good access for the driver around and on top of the vehicle? | none | investigate | High | |
| Does the site rely upon the vehicle handrails, or are other systems to prevent or arrest falls provided where work on top of the vehicle is necessary? | none | Check details | Medium | |
| Are warning notices visible? E.g. Ex zone sign, no smoking, use earth leads etc | none | investigate | Medium | |
| At the point, are fire extinguishers provided? | Check details | investigate | High | |
| Clear labelling on all pipe connections, lines and tank? | Check details | investigate | High | |
| Is the discharge point close to the bund? | none | investigate | Medium | |
| Will a sample be taken prior to discharge? | investigate | none | Medium | |
| Adequate lighting? | none | investigate | High | |
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| QUESTION | Suggested action according to response | | Suggested Importance, subject to |
|---|---|-------------|--|
| | if yes | if no | product delivered |
| Earthing strap for tanker? | Check details | investigate | High |
| Is there an earth visibly attached to the bulk storage tank? | none | investigate | High |
| Inlets are accessible from ground level? | none | investigate | High |
| Inlet coupling inside a bunded or contained area? | none | investigate | Medium |
| Are inlets locked off when not in used? | none | investigate | Medium |
| Connections are easy to use? | none | investigate | Medium |
| Does the inlet line also serve as an outlet line? | Check details | none | Low |
| Is there a non-return valve or other antisyphon device fitted? <i>Note: not</i> applicable to joint inlet and outlet lines. | none | investigate | Medium |
| Is there a procedure to confirm that the ullage in the receiving tank is adequate before discharge? | none | investigate | High |
| Are visual or audible high-level alarms or overfill protection devices fitted? | none | investigate | Medium |
| Is tank overflow/vent visible from the point? | none | investigate | High |
| Does the tank overflow/vent into the bund? | none | investigate | High |
| What prevents vehicle moving whilst still connected? | check details | | |

| TANKER DISCHARGE REQUIREMENT | | | |
|---|---------------|---------------|--------|
| Type of tanker preferred? | | check details | 3 |
| Type of discharge? <i>Note: compressed air discharges</i> must not take place unless and until authorised by the supplier. | check details | | |
| If customer's pump is used, is it is it Ex /ATEX certified and fitted with an emergency stop? | none | investigate | High |
| Inlet connection type/size? | check details | | |
| Does customer require discharge hoses? | check details | none | Medium |
| Does customer require vapour return hose? | check details | none | Medium |
| Where vapour return is required, is the receiving tank under pressure? | investigate | none | High |

| POST DISCHARGE | | | |
|---|------|---------------|------|
| Can hoses be safely depressurised and drained before disconnection? | none | investigate | High |
| How are drainings disposed of? | | check details | 3 |

| EMERGENCY PLANNING | | | |
|--|---------------------|--|-----------------------------|
| Is there a procedure for quickly dealing with leaks or spillages? | none | investigate | High |
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| | | COMMON RESPONSIBI | LITY |
|---|--|-------------------|--|
| QUESTION | Suggested action according to response | | Suggested Importance, subject to |
| | if yes | if no | product delivered |
| How is an alarm raised in the event of an emergency? | | check details | 6 |
| Is there any public sewer; open water; river or other watercourse within 10m of the tank or delivery point? | investigate | none | High |
| Are there open drains near the discharge point? | investigate | none | High |
| Is the exit for the delivery vehicle kept clear in case of an emergency? | none | investigate | High |

| SAFETY EQUIPMENT | | | |
|---|---------------|-------------|--------|
| Shower readily available? | check details | investigate | High |
| Clear directions to shower? | none | investigate | Medium |
| First aid available? | none | investigate | High |
| Clear directions to first aid point? | none | investigate | Medium |
| Eyewash available near discharge point? | none | investigate | High |
| Spill kit available on site? | none | investigate | High |
| Comment on site PPE requirements, including eye protection (eg goggles, gloves, arms/ legs covered, safety boots) | check details | | |

| GENERAL COMMENTS | | |
|---------------------------------------|---------------|--|
| Housekeeping and access around bunds? | check details | |
| Site security? | check details | |
| Visual appearance of tank & pipework? | check details | |
| Nearby ignitions sources? | check details | |
| Other | check details | |

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REFERENCES

Whilst some additional sources of information are included below, this list is not intended to be comprehensive and is not maintained to cover amendments:

Solvents Industry Association and European Solvents Industry Group:-Short Safety Film – Safe Loading and Transportation of Solvents by Road

SIA Guidance Notice No.51: Use of IBCs for Oxygenated and Hydrocarbon Solvents

ADR: European Agreement Concerning the International Carriage of Dangerous Goods by Road

API Recommended Practice 2003, 'Protection against ignitions arising out of static, lightning and stray currents'

PD CLC/TR 60079-32-1:2018 Explosive atmospheres. Electrostatic hazards, guidance

BS EN 14015: 2004 Specification for the design and manufacture of site built, vertical, cylindrical, flat-bottomed, above ground, welded, steel tanks for the storage of liquids at ambient temperature

CDG: Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 – SI 2009/1348

CEFIC Paper: "The Hazards Associated with Static"

COMAH: Control of Major Accident Hazards Regulations 2015 (Sevesso III)

Control of Pollution (Oil Storage) (England) Regulations 2001

Dangerous Substances and Explosive Atmospheres Regulations 2002

EEMUA 159:03 Users' Guide to the Inspection, Maintenance and Repair of Above ground Vertical Cylindrical Steel Storage Tanks

Health and Safety at Work etc Act 1974

HSE Guidance Note HS (G) 176 The storage of flammable liquids in tanks

Management of Health and Safety at Work Regulations

PPG2: Above Ground Oil Storage Tanks.

PUWER: The Provision and Use of Work Equipment Regulations

Regulatory Reform (Fire Safety) Order

SULID a joint Cefic-ECTA-FETSA-FECC Working Group harmonised loading & unloading document

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