

30/11/2017

Mr I Oakes
Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

Dear Mr Oakes

PART B REPORT (SCHEDULE 1) – PPC PERMIT NUMBER BU 2357

Please find enclosed the information provided as a Part B report for the following Part A notification:-

Part A ref. No. 08/11/2017 – A, 09/11/2017 - A

Yours sincerely
FOR WARWICK INTERNATIONAL GROUP LIMITED

MR PETER BRYANT
HEALTH SAFETY, ENVIRONMENT & SECURITY MANAGER

TITLE :	Part 'B' Report Form			ISSUE NO.	15.0
REF :	RCF20	AREA:	SITE	DATE OF ISSUE:	08.05.13
RELATED DOCUMENT:	WI 903 App C			PAGE:	2 of 2
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Part B Notification (schedule 1) in accordance with condition 5 (5.1.1 and 5.1.2) of PPC Permit BU 2357.

REFERENCES

Part A form, Ref. N°. 08/11/2017 – A, 09/11/2017 - A submitted to the Environment Agency on 31/11/2017.

Further, more accurate information on the matters for notification under Part A.

A scheduled discharge of waste water was due to take place on the 8th November but, despite a number of attempts to blow the discharge line clear, did not take place. Discussions with the NRA allowed a discharge to be carried out by running a pipeline above ground (following the line of the underground pipe) and directly into the River. The contents of the hold tank had been analysed before discharge and were within the consent limits.

Further work was carried out the following day to try to clear any blockage that there may be in the outfall pipe. Divers have identified that there is a significant amount of silt covering the outfall pipeline and were not able to access the discharge point during their operations on the 9th November. The 'overland' discharge was carried out again following the scheduled timing on the 9th November. The water usage for all site operations has been scaled back to ensure that there is suitable capacity in the hold tanks and that the frequency of the discharges can be reduced to a minimum. The divers were on site the following day to repeat operations but, again, were not able to access the outfall pipe discharge point. The diver had dug out a channel to access the pipeline and was now working in a trench about a meter deep.

Waste water discharges were now taking place at the scheduled times but were still overland and into the river.

Approval had been sought from NRW to cut into the outfall pipeline at a point above the low water line but below the high-water line. A point had been identified as low as possible but still allowing safe access for the people who would be cutting into the pipe. Divers were on site on the 10th and 11th November to continue to remove silt from the area. The work was stopped when the diver was working in an area that was shoulder deep as the potential risks were becoming more significant.

Work to cut into the pipe was completed on the 12th November when a 25mm by 40mm hole was made through the HDPE pipe. This then allowed the waste water discharge to be carried out within the scheduled time and well below the high-water level providing dispersion/dilution.

Scheduled discharges from the waste water tanks since this incident have been carried out as normal.

Measures taken (or intended to be taken) to prevent a recurrence of the incident.

Mostyn Dock has been approached to see if they can carry out dredging operations around the outfall pipe to remove any silt. They have not dredged in this area for the past three years. The boat crews using the pontoon adjacent to the outfall pipe have witnessed whirlpools up to seven meters wide moving downstream past the outfall pipe and other observations have been made relating to the movement of sand banks in the area.

Discussions have taken place to identify alternatives to the current situation. It is thought that the best sustainable solution (to ensure that the waste water can be discharged appropriately resulting in no or minimal environmental impact) is one where the pipeline outfall can be easily inspected. This could be a modification of the current 'hole in the pipe' or where an alternative position is identified which is further down the existing pipe and only just above the low water line. Alternative suggestions have been made which involve locating a pipeline above the current underground pipe and making a connection into the 'new' hole. This line could then be removed at suitable frequencies to ensure that it is clear. Further discussions with NRW have been planned.

Measures taken (or intended to be taken) to rectify, limit or prevent any pollution of the environment or harm which has been or may be caused by the emission.

It is thought that no measurable environmental damage has occurred as a result of this incident. The material discharged was within the emission consent limits.

Dates of unauthorised emissions from the installation in the previous 24 months.

02/03/2016, 12/03/2016, 23/04/2016, 19/07/2016, 11/08/2016, 18/04/2017, 26/04/2017, 04/05/2017, 20/08/2017, 21/08/2017, 09/11/2017.