

Inspector: Julia Frost

Visit Date: 11/12/15

Nature of visit: Review odour controls.

Issues raised requiring written response:

1. Alternative Resins – Impact on Permit Scope

I can confirm that there has been no change in the resin type used that would have an impact on the scope of the permit. The reference to discussions in 2010 relating to alternative resin was at a planning stage. This has yet to become live for the site and is currently on hold.

2. SA1 LEV discharge to air point

SA1 LEV was commissioned on the 28/11/2014 and is used to control exposure levels within the SA1 operating area and BP11 operating area within coatings. Refer to Photo 1 & Photo 2:

Photo 1 – SA1

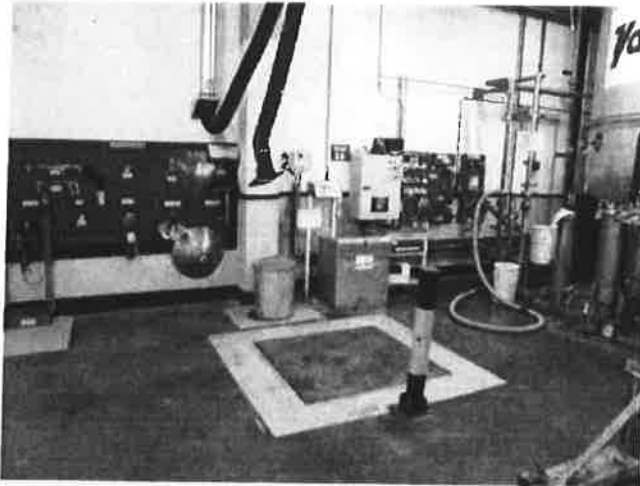


Photo 2 – BP11



The SA1 external discharge point is shown on Site Plan 1 and Photo 3 & 4:

Site Plan 1:

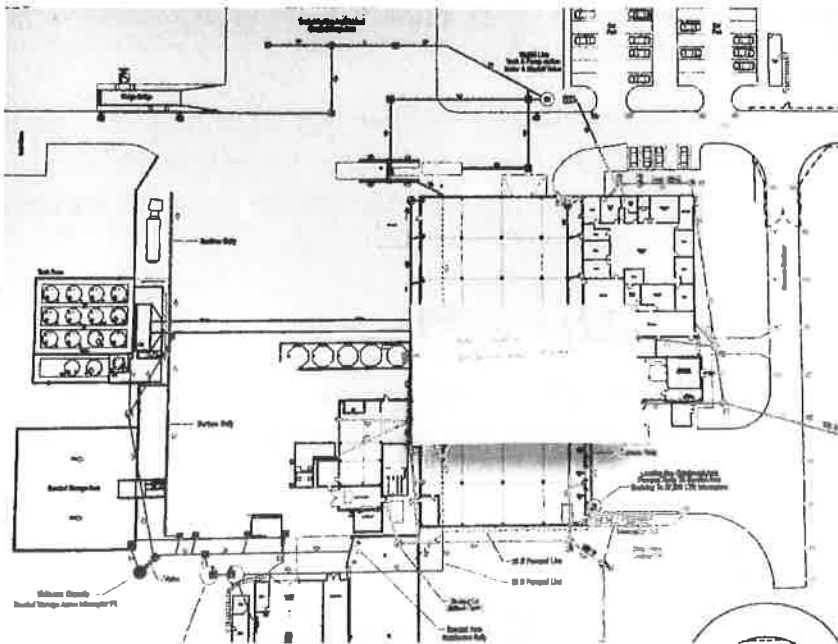


Photo 3:



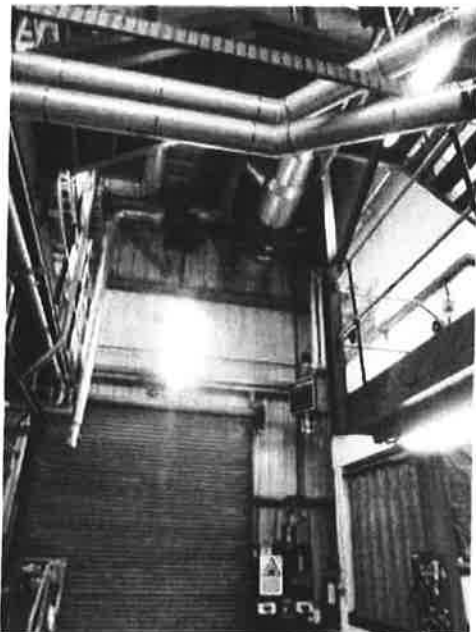
Photo 4:



3. Resin TK Filters LEV discharge to air point

The Resin LEV unit was commissioned on the 28/11/2014 and is used to control exposure levels within the Resin TK Filters operating area. Refer to Photo 5:

Photo 5:



Resin external discharge point is shown on Site Plan 2 and Photo 6:

Site Plan 2:

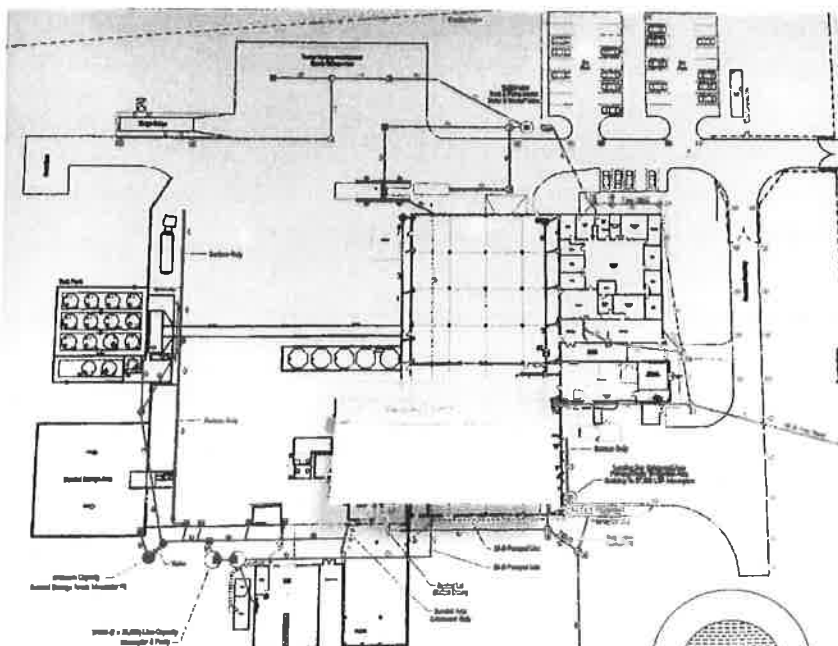


Photo 6:



4. Odour within boundary

- During the site walk odour was witnessed externally within the boundary. This was at points:
 1. Car park (approx. 10h00) – wind direction SW
 2. Adjacent to bulk tank farm (approx. 11h00) – wind direction NE
 3. Adjacent to bulk tank farm (approx. 11h45) – wind direction NE
- Operations within the plant between 10h00 and 12h00 were confirmed as:
 1. Resin plant was not at any stage where odour would have been emitted;
 2. Coating plant was carrying out normal operations.
- Therefore, it is probable that the odour was being emitted from the **coatings area**.

- Possible odour points within Coatings:
 - SA1 tank IBC fill – LEV :
 - no odour abatement in place.

Photo 7:



- Coatings emissions through stack A5:
 - 1. no odour abatement in place.

Photo 8:



5. Further Action

Following on from the Odour Investigations that included dispersion modelling, carried out by REC in 2014, the following actions will be taken by Valspar to control the potential odour issues:

- Review height of stacks 1 – 3 to ensure that any potential odour release is dissipated without any nuisance odours beyond the boundary.
- Review the controls in place on the scrubbers controlling the resin odours from the Resin plant, A1 and A3, to ensure that the system is not overloaded during the operating cycle.
- Undertake VOC (specific composition) monitoring for discharge points A7 to A36.
- Undertake VOC boundary monitoring. *→ required by OMP.*
- Review requirements for abatement controls for SA1 LEV; A5 and the Lab area. *Imports → risk + modelling?*

Valspar will be contracting the services of REC to assist with the completion of the actions stated above.

*dispersion modelling 2013 results → AS Methyl Acrylate 1385.63g/hr
→ Efflux velocities.*



Philip Silver

Dated: 15/1/16

SHE Manager

Valspar Deeside

Tel: 01244 837317

VoIP: 6027317

Mobile: 07900 748 619