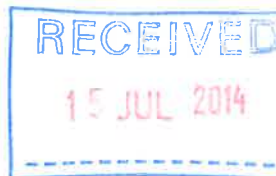


REC

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Anne Bell
Valspar Corporation (UK) Ltd
Parkway
Deeside Industrial Park
Deeside
Flintshire
CH5 2NN

Ref: 33977c1
Date: 14th July 2014

Dear Anne,

VALSPAR, DEESIDE INDUSTRIAL PARK - ODOUR MANAGEMENT PLAN AUDIT

Resource and Environmental Consultants (REC) Ltd were commissioned by Valspar Corporation (UK) Ltd ('Valspar') to undertake an audit of the Odour Management Plan (OMP) produced for the Parkway facility, Deeside. The outcomes of this process are detailed in the following letter.

BACKGROUND

It is understood that Valspar have received a number of odour complaints from nearby businesses and also the Environment Agency (EA) in relation to atmospheric emissions from their paint and lacquer production processes. In order to control releases as far as practicable an OMP has been produced for the facility. This summarises potential emission points, the complaints handling procedure and control measures. In order to identify any potential improvements to the OMP, REC was commissioned to undertake an audit of the document. This included consideration of the following:

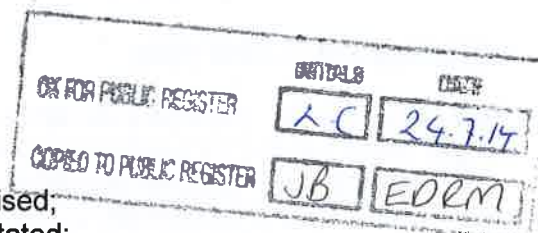
- The methodology utilised and associated suitability;
- The use of best practice guidance;
- Issues included;
- Level of detail; and,
- Identification of any relevant omitted sections.

The OMP has been reviewed and a site visit undertaken to inform the audit as detailed in the following Sections.

AUDIT

The OMP was reviewed and the following noted:

- The appropriate EA Guidance H4 has been utilised;
- The scope and purpose of the OMP is clearly stated;
- Responsibility for complaint response and operational management is clearly designated;
- The complaint handling procedure is clearly defined;
- Emission points are identified in text format;
- Controls to reduce loading of the scrubber are summarised;
- Measures to control fugitive emissions are identified; and,



- Record of amendments is included.

Although the existing OMP provides a brief overview of odour issues at the facility, a number of potential improvements have been identified during the review. These can be summarised as follows:

- Inclusion of complaint recording forms;
- Inclusion of monitoring protocol and associated reporting forms;
- Improved process description including existing control measures;
- Map of odour source emissions, both point and fugitive;
- Identification of potential receptor locations in both text and map format;
- Analysis of local meteorological conditions;
- Risk assessment of potential emissions and their associated impact; and,
- Record of actions being taken to investigate emissions and instigate remedial actions, as well as details of next assessment steps.

These points are expanded below.

Complaint Reporting Forms

Although the OMP currently identifies the complaint investigation procedure, an associated reporting form should be included within the document. This should be tailored to capture the relevant information to allow the complaint to be considered, as well as analysed with other records in order to identify any trends and allow remedial actions to be implemented.

Monitoring

It is considered that the implementation of daily boundary monitoring through sniff testing would allow the operator to develop their own record of odour levels and substantiate any complaints. This does not need to be a technical or time consuming exercise and would provide an appropriate evidence base of impacts as experienced by site operatives. A suitable reporting form should also be developed in order to capture all relevant information during the monitoring exercise.

Map of Odour Sources

Odour must be released from the facility in order for an impact to occur. Although the relevant odour sources are identified in text format, it is considered that the provision of a map would illustrate the relevant emission points and allow all readers to easily appreciate the potential issues at the site. This would also aid in the risk assessment.

Identification of Receptors

Any odour release must be experienced by a human receptor in order for an impact to occur. There are a number of locations in the vicinity of the facility where people are often present and these can be thought of in terms of different sensitivities, depending on the relevant land use. These should be identified and plotted on a map to aid in the risk assessment and subsequent mitigation options appraisal, if required.

Analysis of Meteorological Conditions

In order for an impact to occur any odour release must disperse towards the sensitive receptor. This relies on meteorological conditions, including wind direction and speed, and

analysis of historical data would help identify the locations where impacts are most likely to occur, as well as help inform any mitigation options appraisal, if required.

Risk Assessment

It is understood from discussions during the site visit that there are a large number of materials produced at the facility and the risk of odour emissions varies greatly between production cycles. Additionally, due to the location and duration of some releases, there is likely to be less risk of odour impacts occurring during certain operational conditions. As such, a risk assessment should be undertaken in order to fully understand when the most significant risks of effects occur and allow efforts to mitigate the associated release parameters to be concentrated on the most important issues. This will avoid expending unnecessary time and financial efforts on low risk emissions.

Record of Actions

During the site visit a number of initiatives currently being undertaken by Valspar to identify and reduce potential odour impacts were discussed. Although not perhaps suited to the main OMP text, it is considered important that these measures are fully documented in order to develop an evidence base for review by the EA, if required. This could be added as an appendix to the main OMP report and can be added to over time.

FURTHER ACTIONS

Following the review of the OMP it is recommended that Valspar implement the above improvements in order to develop the document further. REC would be happy to provide support and input on this as required. It is also recommended that an open dialogue is maintained with the EA in order to ensure they are aware of the actions being taken by Valspar and also allow regulatory input if required. Once the risk assessment has been completed additional works can be undertaken to identify mitigation options for the high risk issues. This could include consideration of relevant costs, as required by a Best Available Technique (BAT) Options Appraisal, and inform any decisions to implement additional control measures at the facility.

CLOSURE

I trust the above provides a suitable audit of the existing OMP and also identifies potential future actions to investigate and resolve the odour issue. Please feel free to contact me at your convenience should you have any questions or comments on this letter.

Yours sincerely,

FOR AND ON BEHALF OF REC



Jethro Redmore
BEng MSc CEnv AIEMA MIAQM MIEEnvSc

Associate Director

