

Schedule 6 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	BU7545IM
Name of operator	The Valspar (UK) Corporation Limited
Location of Installation	Parkway, Deeside industrial park
Time and date of the detection	13/12/2016 @ 11:30hrs

((a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident or fugitive emission which has caused, is causing or may cause pollution	
To be notified within 24 hours of detection	
Date and time of the event	13/12/2016 @ 11:30hrs
Reference or description of the location of the event	Odour detected on site and on the boundary by Iceland
Description of where any release into the environment took place	Unclear where the release has emitted from, this is still being investigated from a previous occurrence
Substances(s) potentially released	Unknown substances as the investigation is still ongoing to identify the source of the release, which once located, will determine what substances were involved
Best estimate of the quantity or rate of release of substances	The quantity and rates are unknown due to not knowing how long the issues was going on
Measures taken, or intended to be taken, to stop any emission	Outside contractor employed to review the set up. Review of our current abatement on all emission points ongoing
Description of the failure or accident.	The initial investigation identified the following points and will be rectified by the site maintenance team: The scrubber fluid was low The pipework had low points that could cause pooling The pumps were too big for the task Still awaiting the full report on other points by the specialist contractor

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	Not yet confirmed the exact location of the release point
Parameter(s)	Not yet known
Limit	Unknown
Measured value and uncertainty	Unknown
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	Full investigation currently underway to identify that the system is functioning correctly. An independent contractor that specializes in these scrubber systems attended site and made some

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	recommendations for the scrubber
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Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	Odour was detected on the site boundary opposite Iceland
Substances(s) detected	Unknown
Concentrations of substances detected	Unknown
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	Following this report we carried out a series of checks on the main emission points with our specialist emissions monitoring contractor. As a result we have identified that the gas flow rates for emission points A1 and A5 are an order of magnitude lower than historically reported due to an error in the measurement methodology used by the independent emissions monitoring company. We now understand that whilst this means that the overall mass of emissions is lower than historically reported it also can result in short duration higher concentration emissions at low flow rate. The low flow rate implies that there is poor dispersion by the exhausts. In turn this means that odour is much more likely to be detected outside the boundary than our dispersion modelling had predicted. We are also now confident from carrying out odour comparisons with many materials used on site that the odour most frequently detected off site is Ethyl Acrylate in very low concentrations, which has a very different odour characteristic when compared to the higher concentrations that would normally be present in close proximity to the material at point of use. This helps to explain why we have found it very difficult to identify the source of the odour. We have also been able to combine this new understanding with a thorough investigation of all activities that are in progress at the times when
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	odour has been detected. We now believe we have been able to identify some operating conditions which could lead to the reactor scrubber not performing efficiently which would also explain intermittent higher odour emissions.
Measures taken, or intended to be taken, to prevent a recurrence of the incident	We have implemented the recommendation from the specialist contractor to stop recirculation of scrubber liquor to the residence chamber on the TK scrubber linked to emission point A3. Whilst we don't believe this has been a source of the odour it removes the low probability that an event may occur due to insufficient residence time. In relation to the findings above, our specialist consultant is in the process of re modelling the emissions dispersions. From this they will determine whether it is possible, by adjusting the flow rates at the relevant emission points, to ensure that the permit conditions for odour can be met in accordance with BAT and if this is not possible to help identify alternative abatement technology. This report will be available at latest by the end of February 2017 to allow us to initiate whatever remedial work is most appropriate with minimum delay thereafter. We will provide further feedback on receipt of the dispersion modelling report.
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	Given that the odour is intermittent and at low level it is not considered likely that there is any ongoing pollution of the environment as a result of the emissions.
The dates of any unauthorised emissions from the facility in the preceding 24 months.	25/10/2016

Name* Dudley Pritchard	
Post – Site Manager	
Signature 	
Date –10/2/2017	

* authorised to sign on behalf of The Valspar (UK) Corporation Limited