

Solutia UK Ltd
(a subsidiary of Eastman Chemical Company)
Corporation Road
Newport
South Wales
NP19 4XF

Ian Oakes
Technical Specialist (PPC/RSR)
Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

24th November 2015

EPR/NP3335GR NOTIFICATION of a 4.3.5 PROPOSED CHANGE

Dear Mr Oakes,

1.0 INTRODUCTION

The December 2014 Permit Variation Request included a document entitled DOC 7 Operating Techniques Form C3 Question 3a. This document recognised that the basis for operation of the Effluent Treatment Plant (ETP)/Ground and Storm Water Storage Facility (GSSF) stemmed from the original 2003 PPC Application. The document described the major changes to the ETP which had occurred since 2003 and described the basis for operation of the current GSSF.

Included within the 2003 PPC Application is a description of secondary containment provided for the three transfer lines connecting the main site area to the then biological ETP.

- The strong effluent line.
- The weak effluent line.
- The standby/auxiliary weak effluent line.

Secondary containment for the transfer lines is provided by enclosing their pipe rack within a u-shaped waterproof trough. The low point of the trough flows to the Effluent Culvert Sump which was designed to collect any spills or leaks from the transfer lines. The 18 m3 sump is provided with a pump which discharges to storage tanks within the current GSSF. The pump is controlled by local level switches within the sump to allow removal of any liquor collected. Routinely this is for removal of rainwater which bypasses the cover provided over the collection trough.



Responsible Care



FM 01970

Tel: 01633 278221 - International: +44 1633 278221

Registered Number 3295486 in England and Wales
Registered Office, Corporation Road, Newport, South Wales NP19 4XF

As part of COMAH Major Accident Assessment the sump was additionally provided with two independent level switches which were interlocked to close valves in the transfer lines, thereby isolating effluent leaving the manufacturing main site. The design was assessed as being required to safeguard potential contamination of the adjacent Tref-y-Nant Brook in the event of a line failure when manufacturing operations were present.

2.0 PROPOSED CHANGE

This proposal is to remove the pump from the collection sump with all associated level switches, interlocks/alarms and electrical supplies. In order to allow drainage of rainwater collecting in the sump the base will be punctured to allow natural soak -a-way to ground.

The change is considered to be acceptable as the design intention of the sump to collect/contain/alarm released manufacturing effluent is no longer required. The transfer line previously used for strong effluent has been cleaned and is currently isolated. The other two transfer lines are used solely for the flow of site storm water and collected ground water following carbon treatment. Any release from the lines on their current duty will have insignificant environmental impact. The probability for a release is also significantly less as the duration the lines are in use is less, volume flows are lower and activities with potential for mechanical damage of the lines are limited.

A monthly visual inspection of the sump will be completed by the Site Caretaker. An inspection port will allow visual identification of any liquid accumulation and audible identification of any liquor entering the sump.

The proposed change is considered as requiring notification to NRW as per clause 4.3.5 of the EPR permit. NRW agreement to the change is requested.

I look forward to receiving your response.

Yours sincerely,



Nicola Newton
HSE Manager
Solutia UK Ltd, Newport

Tel: 01633 754549
e-mail: nnnewt@eastman.com