



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

N. Newton HSE Manager
(Solutia UK Limited at Cefn Mawr)
Eastman Chemical Company,
Corporation Road,
Newport Road,
NP19 4XF

Ein cyf / Our ref:
Eich cyf / Your ref:

Dyddiad/Date: 11 January 2016

Dear Nicola,

**Environmental Permitting Regulations (England and Wales) 2010, as amended
Solutia UK Limited permit EPR/NP3335GR request to decommission the Effluent
Culvert Sump letter dated 24 November 2015 (and site visit 17 December 2015).**

The three transfer lines (live, standby and isolated) currently carry storm water and activated carbon treated groundwater to the Ground and Storm Water Storage Facility (GSSF) for balancing and controlled discharge to the River Dee. They are contained within concrete culverts (with free access for maintenance) and traverse the Tref-y-Nant Brook in a covered waterproof trough. The trough feeds the Effluent Culvert Sump at the systems low point within the 'south' bank of Tref-y-Nant Brook. The Effluent Culvert Sump is designed to collect rainwater ingress and safeguard against any seepage / line failures.

The sump has a level activated pump (to transfer to the GSSF), High and High High alarms providing local and mobile phone notification and valve actuating level switches to isolate the lines. The proposal is to remove these safeguards and hole the sump for rainwater soakaway as the lines no longer carry process effluents (COMAH relevant before cessation of operations) and replace with a monthly inspection by the Site Caretaker.

Your environmental permit allows a flow controlled and monitored discharge via emission points W1 & W2. Natural Resources Wales considers that removing the safeguards and holing the sump would provide an alternative route to the Tref-y-Nant Brook (and River Dee). In which case losses could go undetected and result in uncontrolled discharges and as such the proposal is not considered to be acceptable.

Yours sincerely

Ian Oakes

Technical Specialist (PPC / RSR) / Arbenigwr Technegol (RhDP / RhSY)

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English