

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

28.05.2015

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

Dear Mr Oakes,

MCERTS REQUIREMENTS EPR/NP3335GR/V008 Solutia UK Ltd.

The following is to recap discussions between yourself and Richard Chandler as to how MCERTS requirements in Condition 3.5.3 of the permit apply to the on-going operation of the site GSSF. This letter is to document the outcome of the discussions and to request NRW agreement by an exchange of letter.

1. Quarterly and Twice Yearly Monitoring.

Sampling required for the Quarterly and Twice Yearly Monitoring Programme will be taken by trained/validated site caretakers using documented operating instructions.

Samples will be despatched to a third party MCERTS accredited laboratory for subsequent analysis and reporting of results. Sample bottles and insulated container for their despatch will be provided by the third party laboratory. Received results will be entered into Solutia Electronic Share Point system to allow internal review and later reporting to NRW as required by the permit.

2. Weekly Total Iron Monitoring.

A sample of final water discharge from the GSSF will be taken from the designated sample point in the outlet line from the Treated Water Tank by trained/validated site caretakers. The sample will be analysed by the site caretaker in the in-house laboratory at the GSSF for Total Iron content. Analysis will be by the colour metric Hach Lange Ferrover test method. This is a recognised, widely used, commercial method which has been used at the site for the past six years for analysing iron concentration of treated groundwater exiting the carbon filter units. The test meter will be calibrated annually by the manufacturer.



Responsible Care



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Analysis by this in-house method is considered preferable to using a third party laboratory even though it is not MCERTS accredited. The result will be immediately available to the site caretaker and provide required confirmation that correct mixing of groundwater and rainwater is being controlled.

On a quarterly basis, in-house testing of Total Iron concentration will be compared with results from a third party MCERTS accredited laboratory. Once a quarter, duplicate samples of the final water discharge will be taken by the site caretaker. One sample will be analysed by the in-house test method and the other despatched for analysis by the third party laboratory. Results will be compared and differences investigated as required.

3. **Final Discharge Flow Measurement.**

Annual calibration of the Final Discharge Flow Meter will be by an accredited third party as required under MCERTS. Scheduling and recording of the annual calibration will be done within the Newport SAP system used as part of their Quality Management System.

As flow measurement is for a facility handling only treated groundwater/rainwater the need for a full QMS audit, as is applicable to effluent treatment facilities, is not considered appropriate.

Yours sincerely,

Nicola Newton
HSE Manager
Solutia UK Ltd, Newport

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