



Mackay, Mick

From: Kilby, Barry [barry.kilby@environment-agency.wales.gov.uk]
Sent: 11 November 2009 09:40
To: Mackay, Mick
Subject: FW: Solutia PPC Permit Surrender

Mick

Feedback from Holly.

Regards

Barry

Dr Barry J L Kilby
PPC Compliance
Environment Agency Wales

From: Noble, Holly
Sent: 10 November 2009 12:43
To: Kilby, Barry
Subject: RE: Solutia PPC Permit Surrender

Thanks Barry

WRT to 3 - having followed most of the permitting team's discussions, I would say yes they'll need a permit or discharge consent when they De Nano permit is surrendered, mainly to control the discharge. At this time, the permit will probably include the groundwater abstraction activity also.

WRT to 7 - happy to review any information on drainage as soon as it become available.

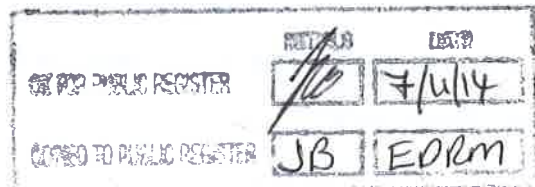
Regards
Holly

Holly Noble
Technical Specialist
Groundwater & Contaminated Land (Wales)
029 20466072
07909 701179
holly.noble@environment-agency.gov.uk

From: Kilby, Barry
Sent: 04 November 2009 15:40
To: Noble, Holly
Subject: FW: Solutia PPC Permit Surrender

Holly

Mainly for info



11/11/2009

Note queries 3 (ownership of the WWTP reverts to Solutia or another operator) and 7.

Regards

Barry

Dr Barry J L Kilby
PPC Compliance
Environment Agency Wales

From: Mackay, Mick [mailto:Mick.MACKAY@flexsys.com]
Sent: 04 November 2009 14:16
To: Kilby, Barry
Subject: RE: Solutia PPC Permit Surrender

Barry

Thanks for getting an early reply from Cardiff.

1. Repeat Groundwater.

Hopefully the information we provide for surrender will justify not needing to do further soil sampling. The large areas of concrete and tarmac within the manufacturing units, to my mind, seem to justify not requiring soil sampling.

3. Activated Carbon

Will a PPC Environmental or other type of permit be required when the DA Nano permit is surrendered?

6. Diesel Storage

Demolition contractor has decided it is easier to provide his own storage than sharing site storages with DA Nano. He has provided his own double skinned storages (2) for filling the demolition machines. They are located on made ground east of the DPG plant.

The site diesel storages will remain in use until DA Nano decide they are not required and provide their own storage. The diesel storages are each of 4.5 tonnes and provided with a bund.

7. Surface Water Runoff.

I am covering drainage system cleaning in the Decommissioning document required for the Permit Surrender. Is there any value in Holly reviewing this document prior to formally submitting the Surrender Application? Hopefully I will finish the document this week.

Other items OK in principle for continuing on a voluntary basis. Will this mean I should volunteer to continue as part of the surrender application?

Thanks again.

Best Regards.

Mick

From: Kilby, Barry [mailto:barry.kilby@environment-agency.wales.gov.uk]
Sent: 30 October 2009 14:32
To: Mackay, Mick

11/11/2009

Subject: RE: Solutia PPC Permit Surrender

Mick

Following various consultations with Cardiff, current thinking is:

1) Repeat Groundwater

OK with proposal - but as Holly has noted not in agreement with Enviros' reasoning for not undertaking soil sampling (that they cannot sample in exactly the same place and so cannot compare sample results), it is for this reason that composite sampling is undertaken and statistical tests applied to the data from each zone to identify outliers and hot spots. If the groundwater monitoring results, details of decommissioning and any of the life of permit indicate that land and/or groundwater may have been impacted, then further ground investigation will be required and we will not be accepting their argument for not taking soil samples.

2) Dewatering

The dewatering activity is currently exempt from a groundwater abstraction licence until October 2010 (earliest) when sections of the Water Act 2003 are implemented. At that time (suggest a reasonable period before e.g. 3 months), follow our website which has step by step instructions on how you should apply for a licence.

<http://www.environment-agency.gov.uk/business/topics/water/32032.aspx>

3) Activated Carbon etc

No permit required as long as water is discharged to the WWTP operated under the DANano permit

4) Env Monitoring

EA would prefer to see this continuing on a voluntary basis rather than through regulation. It does need formalising and importantly agreeing with the LA (Sarah Evans) since if this voluntary monitoring falls through then the LA would take enforcement action using powers under Part 2A and the EA have a remit to give them technical advice and support

5) W3 - OK

6) Diesel storage

Should be OK - please confirm quantities and containment measures(bunding etc)

7) Surface water runoff

Question has been raised has the underground drainage system been cleaned as part of the decommissioning (demolition?)? Concerns over residual contamination in the drainage systems - Cardiff would want to look at this as part of the closure report.

In the future it may be appropriate to manage surface water collection and discharge as part of a formalised voluntary approach (with subsequent agreed future review dates). May have to get our relevant EM team involved.

Regards

Barry

Dr Barry J L Kilby
PPC Compliance
Environment Agency Wales

11/11/2009

From: Mackay, Mick [mailto:Mick.MACKAY@flexsys.com]
Sent: 22 October 2009 14:26
To: Kilby, Barry
Subject: Solutia PPC Permit Surrender

[Click here to report this email as spam.](#)

Barry

I am currently working on the Solutia PPC permit surrender application with the assistance of Enviros. The following are items requiring addressing during the surrender process, early indication of the EA view on how they need to be handled will be appreciated.

1. Repeat Groundwater and Soil Sampling.

Groundwater sampling of the PPC reference boreholes was completed in September, prior to the demolition activities starting in October. Sampling prior to completing demolition is considered acceptable as decontamination of chemicals is already complete. There is one exception of the Phthalic Anhydride storage where the solidified product will be removed during the demolition phase. A specific risk assessment to ensure no ground contamination will be used.

Enviros advice is that sampling of soil is not proposed at this stage of site investigation as no spillages or leaks to ground of any particular contaminative materials are known to have occurred. In addition, soil sampling is very specific to the exact sample location and, given the long industrial history of the site, obtaining a soil sample from a point, even 0.5m from the original soil sampling point may not produce comparable samples.

Our understanding is that the EA will accept soil sampling is not required provided the PPC Surrender Report demonstrates that :-

a) Details of the decommissioning need to be provided to demonstrate that the works has not led to ground contamination.

b) For the life of the permit - control measures have worked

- information on spills and remediation are provided to demonstrate that there has been no deterioration in ground quality since the start of the permit

- an assessment of the drains and potential for their leakage is included in the closure report.

2. Site Dewatering Borehole Abstraction.

Operation of the two dewatering boreholes, as described in the PPC permit, will need to continue after permit surrender to collect contaminated shallow groundwater.

There is the need for EA direction as to how this abstraction needs to be licensed.

3. Activated Carbon Treatment of Collected Groundwater.

The treatment of groundwater collected from the two dewatering boreholes and Brook / Road Culvert sumps, as described in the PPC permit, will need to continue after permit surrender. Treatment of the contaminated groundwater is required prior to it being discharged to the WWTP operated under the DA Nano PPC permit.

There is the need for EA direction as to how / if the carbon treatment facilities need permitting.

4. Environmental Monitoring Requirements.

The monitoring requirements remaining on the Solutia permit after the recent transfer to the DA Nano permit are :-

11/11/2009

Pontcysllte Adit.
Tref y-Nant Brook.
Factory Dewatering Boreholes.
Brook Culvert sump.
Road Culvert sump.
Rhosymedre Quarry Leachate.
Rhosymedre Quarry Borehole.
River Dee upstream.
River Dee downstream.
Groundwater Carbon Filter outlets.

Sampling of the Carbon Filter outlets is weekly with analysis for micro-pollutants, iron and phenol.

Sampling of the River Dee is monthly with analysis for micro-pollutants.

Other sampling is monthly with analysis for TOC, phenol and micro-pollutants.

There is the need for EA direction as to how the monitoring programme needs permitting. There is also potential that a review of current results may allow a proposal for reduced frequency of monitoring.

5. W3 Emission point to water.

W3 outlet allows non-routine discharge of process/cooling water to the Tref-y-Nant Brook. This discharge point will not be required after permit surrender.

6. Site diesel storages.

The diesel storages are scheduled to remain in-use until the end of the demolition phase April 2010. Their use by the demolition contractor is considered preferable to providing temporary storage facilities. On completion of the site demolition phase, the storages will be emptied and removed. In the event that DA Nano require ongoing diesel storage, a separate application for storage will be made under their permit.

EA confirmation is needed that the scheduled date for removal of the diesel storages will not impact permit surrender.

7. Site area surface rainwater run-off.

The site underground drainage system and lagoons for the collection of rainwater will remain in place after the plant / building demolition phase. Water will continue to be collected for discharge to the DA Nano operated WWTP, where it will be stored prior to controlled release to the River Dee. Retaining the current arrangements for collection of the on-site rainwater for further processing at the WWTP allows progressing of the surrender application..

Operational improvements for the handling / processing of the rainwater within the WWTP are currently being evaluated. These changes do not impact the Solutia PPC permit surrender process. The proposals will be separately reviewed with the EA as changes to the DA Nano permit.

Longer term development of the main site area will require changes to the underground drainage collection system and review of surface water discharge points. Any such future plans will be reviewed with the EA at the design stage and do not impact the current permit surrender process.

Gall yr wybodaeth yn y neges hon fod yn gyfrinachol, ac yn gyfreithiol freiniol. Os ydych wedi derbyn y neges hon trwy gamgymeriad, rhoddwch wybod ar unwaith i'r sawl a'i gyrodd, os gwelwch yn dda. Yna dilêwch hi, a pheidiwch â gyrru copi at neb arall.
Bu inni fwrw golwg ar yr e-bost hwn a'i atodiadau, rhag bod feirysau ynddo. Serch hynny, dylech chwilio unrhyw atodiad cyn ei agor.
Efallai bydd rhaid inni ryddhau'r neges hon, ac unrhyw ateb iddi, i sylw'r cyhoedd pe gofynnid inni tan y Ddeddf Rhyddid Gwybodaeth, y Ddeddf Gwarchod Data neu at ddibenion ymglyfreithio. Y mae'n bosib hefyd y darllenir negesau ac atodiadau e-bost a yrrir at unrhyw gyfeiriad Asiantaeth yr Amgylchedd, neu a dderbynnir oddi yno, gan rywun arall na'r gyrrwr a'r derbynnydd. Hynny at ddibenion busnes.
Os ydym wedi gyrru gwybodaeth atoch, a chithau'n dymuno'i defnyddio, yna ddarllenwch ein telerau a'n

hamodau, os gwelwch yn dda. Gellir eu cael trwy ein galw ar 08708 506 506. Am ragor o wybodaeth ynghylch Asiantaeth yr Amgylchedd Cymru, ewch at www.asiantaeth-amgylchedd.cymru.gov.uk.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

If we have sent you information and you wish to use it please read our terms and conditions which you can get by calling us on 08708 506 506. Find out more about Environment Agency Wales at www.environment-agency.wales.gov.uk