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Ian Oakes
Technical Specialist (PPC/RSR)
Natural Resources Wales
Chester Road
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EPR/NP3335GR Condition 3.1.3.

Dear Mr Oakes,

1.0 INTRODUCTION.

The Consolidated Permit with Variation EPR/NP3335GR V008 issued by NRW 23/06/2015 updated the permit to include modern Condition 3.1.3.

Permit Conditions prefixed 3.1 relate to emissions to water, air or land. Condition 3.1.3 states 'Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.'

The need for NRW to include the permit condition stems from the transposition of the Industrial Emissions Directive (2010/75/EU) on the 7th January 2014, whereby installations holding permits under the EPR Regulations (2010) need to meet the requirements of the directive. Article 16 of the Directive and Regulation 13(6)(b) of the 2013 amendment EPR Regulations require that monitoring of groundwater should take place at least every five years and monitoring of soil at least every ten years within the installation. The exception to this is where monitoring can be based on a systematic appraisal of the risk of contamination.

2.0 THIS REQUEST.

This request is to obtain agreement from NRW that the need for 5 yearly groundwater and 10 yearly soil monitoring is not applicable to this permit installation, on the basis that:-



Responsible Care



FM 01970 ,

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- The permit activities are limited to the abstraction and collection of groundwater to allow it to be passed through carbon filtration units for adsorption of trace organic compounds. Three carbon filter units are used for the treatment of groundwater pumped from two dewatering boreholes and two collection sumps. The permit area is the concrete pad (10m X 10m) where the carbon units are located. The process involves no chemicals other than the solid carbon held within the contained steel filter units. As required, spent carbon units are replaced by new units provided by the supplier. This method of operation eliminates the potential for on-site spillage of carbon.

The risk of contamination to groundwater and soil from the permit activity is considered to be negligible to non-existent. The area is a concrete base, the potential contaminant is solid carbon held in enclosed steel units and units are not replenished on the site. Based on this appraisal of the risk of contamination from current permit activity, the need for a 5 yearly groundwater and 10 yearly soil monitoring programme is not considered warranted.

- The permit directly associated activities are limited to the storage of treated groundwater and storm water and its subsequent discharge to the River Dee. As no additional chemicals are introduced during the storage activities there is no risk of potential contamination to soil or groundwater. Based on this appraisal of the risk of contamination from the current directly associated activities, the need for a 5 yearly groundwater and 10 yearly soil monitoring programme is not considered warranted.
- This request for NRW to agree that a soil and groundwater monitoring programme is not required relates only to permit condition 3.1.3 for current activities. Surface water and groundwater monitoring on a six monthly frequency as detailed in TableS4.3 of the permit will remain unchanged. Their purpose being to monitor site previous historical activities and not the limited current permit activities.

I look forward to receiving your response.

Yours sincerely,



Nicola Newton
HSE Manager
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