

Bradford, Julie

From: Oakes, Ian
Sent: 05 November 2014 16:22
To: Bradford, Julie
Cc: ian.oakes@environment-agency.gov.uk
Subject: FW: [I] RE: EASTMAN SITE, CEFN MAWR EPR PERMIT NP3335GR

PR

From: Oakes, Ian
Sent: 04 November 2014 11:37
To: 'Chandler, Rich'
Cc: Armitage, Peter Stuart; House, Michael Lynn; Mackay, Mick - Contractor; Wright, Paul; Lee, David; Wort, Elaine; Macdonald, Eirian; Powell, David; Voice, Elizabeth
Subject: RE: [I] RE: EASTMAN SITE, CEFN MAWR EPR PERMIT NP3335GR

ch, Peter,

Having reviewed the following requests:

17 October 2014 – Solutia

'Request to terminate weekly sampling & analysis of the activated carbon filter outlets detailed in permit EPR/NP3335GR', and the request to cease 'Environmental monitoring programme as detailed in permit EPR/NP3335GR', and

20 October 2014 - Air Products

Request to remove iron concentration limit from permit EPR/BV2689IE

I have the following comments to make:

- Welsh Water (WW) were originally quoted as being prepared to take the contaminated groundwater and it was a matter of arranging suitable sewer access. I was informed by WW 17 October that they were not prepared to accept it on the grounds of unquantifiable risks to the water supply in the Dee valley, and that they intend to employ an expert to assess the risks (to include proposed leachate discharges in the Wrexham area). Also from the 'Remove Fe ELV limit request' that the 'engineering design to provide the necessary facilities (to sewer) on-site is currently suspended'. With this in mind how is Solutia now planning to address the issue of on-going contaminated groundwater? Has Solutia discussed sending the groundwater to sewer after the carbon filters (removal of organics) so that Fe is the only issue? Has Solutia explored alternative Fe removal options (to sending to Air Products run ETP)?
- I believe the 'request to terminate weekly sampling & analysis of the activated carbon filter outlets detailed in permit EPR/NP3335GR' to be premature as there is no proposed alternative treatment (sewer) or Fe removal strategies, bearing in mind Solutia's stated intention to take the carbon filters off line as part of the surrender. Sampling and analysis to remain in place.
- The 5 mg/l Fe discharge limit on Air Products permit is set to be environmentally protective and as stated the closure of the ETP will result in the loss of the Fe co-precipitation with silica and potential discharge breaches to the River Dee. Previous changes to discharge species has resulted in extensive assessments of the various impacts on the River Dee. Potential future Fe discharges need to be compared with the current actual discharge and not the ELV and the impact on the River Dee assessed accordingly. This is considered to be a permit surrender determination issue and the ELV maintained until permit surrender has been concluded.

FOR PUBLIC REGISTER	INITIALS	DATE
	<i>[Signature]</i>	7/11/14
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- Cessation of the 'Environmental monitoring programme as detailed in permit EPR/NP3335GR' is all inclusive and effectively strips the permit of all current / future monitoring requirements. This has to be subject to a permit variation or surrender determination as has previously been the case.

As it stands at the moment it is conceivable that Air Products surrender their permit and the ETP returns to Solutia with the current Fe limit. The Solutia permit is varied to include the ETP and a Fe limit and remains in place in some form next year depending on resolution of the above issues. All this is subject to permit surrender determination.

I will discuss with permitting as to the best way forward. Available to meet up next week to discuss.

Rgds Ian

Ian Oakes MSc(Dist) CChem MRSC AIEMA

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

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffon/Tel: 01244 894589

E-bost/E-mail

ian.oakes@cyfoethnaturiolcymru.gov.uk

ian.oakes@naturalresourceswales.gov.uk

Gwefan / Website

www.cyfoethnaturiolcymru.gov.uk

www.naturalresourceswales.gov.uk

Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.

Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

From: Chandler, Rich [<mailto:rechan@eastman.com>]

Sent: 17 October 2014 16:06

To: Oakes, Ian

Cc: Armitage, Peter Stuart; House, Michael Lynn; Mackay, Mick - Contractor; Wright, Paul; Lee, David; Wort, Elaine

Subject: RE: [I] RE: EASTMAN SITE, CEFN MAWR EPR PERMIT NP3335GR

Good Afternoon Ian,

Thank you for your quick response. Attached is scan of letter in post to you with the 2 attached requests.

Best Regards

Rich

From: Oakes, Ian [<mailto:Ian.Oakes@cyfoethnaturiolcymru.gov.uk>]

Sent: Friday, October 17, 2014 2:25 PM

To: Chandler, Rich

Cc: Armitage, Peter Stuart; House, Michael Lynn; Mackay, Mick - Contractor; Wright, Paul; Lee, David; Wort, Elaine

Subject: [I] RE: EASTMAN SITE, CEFN MAWR EPR PERMIT NP3335GR

Hello Rich,

Could you please provide me with a signed covering letter referencing permit conditions you want NRW to consider altering prior to permit surrender and I will review upon my return from annual leave week commencing 27 October.

You will need written confirmation from NRW to discontinue or otherwise modify any permitted activity.

Thanks Ian

I have just had a discussion with Welsh Water and made aware of their current thinking with regards to your the request to send borehole water to sewer.

Ian Oakes MSc(Dist) CChem MRSC AIEMA

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

Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffon/Tel: 01244 894589

E-bost/E-mail

ian.oakes@cyfoethnaturiolcymru.gov.uk

ian.oakes@naturalresourceswales.gov.uk

Gwefan / Website

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Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

From: Chandler, Rich [<mailto:rechan@eastman.com>]

Sent: 17 October 2014 09:03

To: Oakes, Ian

Cc: Armitage, Peter Stuart; House, Michael Lynn; Mackay, Mick - Contractor

Subject: RE: EASTMAN SITE, CEFN MAWR EPR PERMIT NP3335GR

Good Morning Ian,

I hope you are well. Following our meeting last month, and our Pre-submission proposal subsequently sent to you below:

Please see attached requests to cease monitoring of the output from the carbon filters, and to cease environmental monitoring. These requests are consistent with our previous discussion but if you have any comments or questions please tell me. In the unlikely event you are unable to respond we will change to sampling as described on the attached after next month.

Regards

Rich

From: Chandler, Rich

Sent: Friday, September 26, 2014 3:04 PM

To: Oakes, Ian (Ian.Oakes@cyfoethnaturiolcymru.gov.uk)

Cc: Armitage, Peter Stuart; House, Michael Lynn; Mackay, Mick - Contractor; Westhead, Steve

Subject: EASTMAN SITE, CEFN MAWR

Good Afternoon Ian,

Following our meeting of the 4th, as requested we are providing Pre-submission proposals to you. One relates to the residual Environmental Permit NP3335GR held by Solutia UK Ltd covering the carbon treatment of pumped groundwater. The other relates to the water discharge to the Dee that will become the responsibility of Eastman once surrender of the Air Products Environmental Permit BV2689IE is accepted.

At the meeting with your colleagues David Lee, Beth Davies and Elaine Wort on Tuesday nothing was raised which contradicts anything in the attached.

If you have any immediate queries I will return from holiday on Wednesday 1st October. If you want to meet with us please tell me. I believe we have a teleconference call next Friday organised by Air Products.

Regards

Rich Chandler
Environment & Land Manager

☎: 01633 754367

rechan@eastman.com

Solutia UK Ltd, Corporation Road, Newport, Gwent. NP19 4XF.

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