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Ref:
KB/IO/03

Telephone Number:
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Subject: COMAH Site intervention / inspection update and review of ongoing projects

Dear Ian

As requested please find below an update following your visit on the 9th September 2014

Bund Inspection Remedial Work

As a result of a civils survey of our stock tank bunds carried out by Bilfinger we have agreed to carryout a number of improvements / repairs. Most of the improvements are minor works involving repairs to bund walls, pipework penetrations, sealant shrinkage, blockwork and concrete cracks. We have agreed that these will be complete by the end of December 2014.

One major piece of work will be the redesign of the Formalin tank bund in Middle Road we must ensure a chemical resistant and sealed bund area with the capability of taking 110% of the tank contents.

The Bilfinger report raised concerns about inadequate bunding for gas oil stored in 2 stock tanks on Middle Road, this fuel is kept as an alternative to gas in the event of an interruption in supply but has to our knowledge never been used. We are currently negotiating sale of the stocks in both tanks. I will write to you when this is complete.

2. Biomass Co incinerator

Since our last review the following has taken place:

As HAZOP and DSEAR assessment has been completed led by Chilworth, no major issues were identified. Responsibilities and timescales for completion for all actions identified during the assessments have been agreed.

K8 Biomass Boiler Pre-commissioning Stage 2

1. Drying of the refractory by means of clean wood – **Complete**



2. Plant stop to install dust unit filter bags – **Complete**
3. Installation of monitoring equipment – **Complete**
4. Further refractory drying by means of clean wood – **Complete**

Commissioning Plan Stage 3

1. Commissioning plan issued and agreed with Wrexham CBC – **Complete**
2. Draft permit issued for consultation 11/09/2014 - **Complete**
3. Awaiting issue of final permit after all comments have been considered

6 Implementation of V005 surface water Lagoon 3

There is an outstanding action to commission the solids screen beside No.3 lagoon. We have ensured that power and water supply are connected there remains some outstanding level indicator hardware to be ordered. We have been in contact with the company that manufactured the screen and they will be coming to site to carryout commissioning

7. Lagoon continuous discharge, effluent treatment and wetlands project.

The continuous discharge of surface waters from the site via lagoons 1 & 2 is very much dependant on our ability to sample and test continuously for a number of parameters. We set up the equipment to sample for ammonia and formaldehyde. After commissioning the equipment gave results that were comparable to spot tests taken prior to lagoon discharge.

Unfortunately at that point we had blockage issues with the sampling pump and solids material passing through the pump filter. This resulted in blockages in the very narrow analyser sample lines. Since then we have refurbished the pump / filter, cleared the sample lines and installed a second pump arrangement to help remove further solids by settling in a second overflow chamber. This has helped and after running for a week we have found that the effluent overflowing has less solids and should not block the analysers.

Based on current sampling performance we will set the analyser running again within the next 2 weeks to prove the long term viability of on-line measurement.

Lagoon aeration, bacterial treatment and wetlands project

We have been working with Living Water Ecosystems on this project. We have recently agreed with them that due to the fact we are still commissioning the continuous monitoring equipment as discussed above, we will split the project into 2 phases:

1. The first phase will cover aeration, pumice baskets and bacterial gel in all three lagoons.
2. The second phase will be floating wetland plant rafts as a final polishing stage before discharge to the Afon Bradley.

As part of this project we discussed the possibility of carrying out some cleaning work in and around the Afon Bradley.

Temporary Consents

At the beginning of this project we stated in discussion with the then Environment Agency (NRW) that under the current Lagoon surface water management systems we could not achieve the emission limits set in our Permit. As a result temporary elevated limits were agreed for Formaldehyde and ammonia. This was documented in a letter from Julia Frost dated 11/08/2014. It was agreed at our recent meeting with Ian Oakes on the 9th September that we should formally request for an extension of the temporary emission limits by the end of December 2014

I hope this meets with your approval

Yours sincerely

Keith Baker
EH&S Manager

