

13-9-19

SHERWIN-WILLIAMS®

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12 September 2019.

Natural Resources Wales
 Regulatory and Community Division
 Chester Road
 Buckley, Flintshire
 CH7 3AJ.

For the attention of Sian McGregor-Andrew

Dear Sian,

This is a follow up letter to the OMA inspection and the site's Odour Improvement Plan conducted by yourself on Thursday 15th August. Please see the summary of the events of the improvements made to the stack emissions and disperse modelling.

Table 1 - The number of odour complaints received over the last 5 years.

Year	No of Complaints	Comments
Jan, Apr (x2), Jul 2014	4	Complaints from NRW and Public
Dec 2015	1	Complaints from NRW
Oct 2016	1	Complaints from NRW
2017	0	No Complaints Modelling exercises completed
2018	0	No Complaints Odour Improvement plan, Stack Extension, Secondary Fan
2019	0	No Complaints

Table 1 shows the complaints received from the public from year 2014 to current. During 2018, the extension of A1 stack was completed, and a secondary fan was introduced to assist with the odour distribution. The cost of the stack extension works amounted to £38,000. The cost for a series of odour sampling and testing, air dispersion exercises, updates of the solvent management plan and odour management plan amounted to £16,910. Hence a total of **£54,910** was spent on the abatement of odour at the site since August 2016.

Table 2 compares the odour values offsite and odour concentrations limits from stack emissions monitoring and dispersion modelling before and after the stack extension.

DATE	16/09/19
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Table 2 - Odour values offsite and concentrations limits before and after stack changes

Before stack changes - 2016	Air Modelling Reports	Max Odour offsite values (ouE/m ³)	Benchmark Odour Conc (ouE/m ³)	Comments
	May 2017 - Exova Report No. CAT 3349 ver 2	15.3	3	High odour offsite values.
After stack changes – 2018	May 2017 - Exova Report No. CAT 3349 ver 1	4.31	3	Stack ext – 15m Sec fan vel – 15m/s Substantial decrease in the odour offsite values.

The maximum odour offsite has **significantly decreased from 15.3 ouE/m³ to 4.31 ouE/m³** as a result of the stack extension and introduction of the secondary fan.

Currently the site uses condensation and wet scrubbing as abatement technologies. Consideration of another form of VOC abatement eg a thermal oxidiser would incur an estimated cost to be in the region of £800K GBP to £1.2MM GBP (BREF CWW 2016) for a reduction in offsite odour values to reach the below 3 ouE/m³ benchmark from 4.31 ouE/m³. Note that the 4.31 ouE/m³ figure was modelled using the worst-case scenario parameters.

We have not had an odour complaint from the community in approximately 2 year and we have completed the agreed works to the stack changes with NRW. As such, we would like for you to confirm your satisfaction with the odour reduction measure taken from our site and close off the Odour Improvement Plan.

If you have any questions regarding the information above, please contact either:

EHS Manager -Mrs Candice Aliasgar-Sankoomar (CANDICE.SANKOOMAR@SHERWIN.com)

Site Manager –Mr Neil Booth (NEIL.BOOTH@SHERWIN.COM)

Yours sincerely

Candice Aliasgar-Sankoomar

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EHS Manager
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