

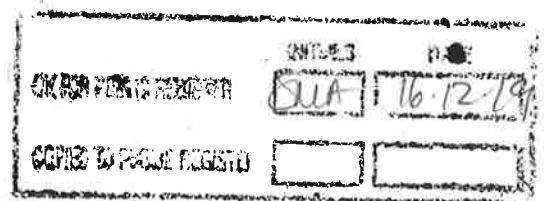
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SHERWIN-WILLIAMS®

The Valspar (UK) Corporation, Limited
Packaging Coatings Group
Parkway, Deeside Industrial Park
Deeside, Flintshire CH5 2NN, UK
Phone: +44 (0)1244 288901
Fax: +44 (0)1244 280875

11 December 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 CAR_NRW0035808 received 14 October 2019. Our response to your questions are listed below.

Action:

Element 2A – Review monitoring locations against M1 requirements as highlighted in the monitoring contractors reports and identify feasible improvements in a report.

Response:

The 'suitability of sampling location' feedback from Element were reviewed for the 2019 quarter sampling reports. There were few improvements suggested in this section by Element. The Company has taken the comments on board and fitted suitable sampling ports to the M1 specification. Sample point A6 had one remaining area of concern which is being addressed at site (Maintenance Request placed 1197561). ✓

Action:

Element 2C – Identify the reasons for and remedial action required to address the issue of monitoring points A1 and A5 not meeting the EN15259 requirements (differential pressure <5pa) during the last monitoring round.

Response:

Query was sent to ELEMENT to verify the concerns of A1 and A5 points not meeting the differential pressure <5pa. ELEMENT responded that they have checked and that 'All the reports from Q1 – Q3 2019 have identified the deviation of the differential pressure being less than 5Pa for both A1 & A5'. ✓

Action:

Element 2D - Confirm why the June 2019 VOC results were reported as not MCerts analysis?

Response:

The sampling pumps used by ELEMENT are calibrated to UKAS standards, using MCERTS accredited techniques and staff, so the sampling is accredited. The analysis however is unaccredited. This is because the analysis laboratory would have to be accredited for all the compounds which are detected on each sampling tube. This would be prohibitively expensive. ELEMENT sometimes detect trace amounts of a compounds in the different sampling tubes, the analysis laboratory would have to calibrate their GC-FID for every potential compound that may be detected in order to issue accredited results. If a compound was

detected that hadn't been foreseen or calibrated for, the total result would still be unaccredited. ELEMENT believes that the current method of analysis using a 'screen' is the most practical approach.

Based on your recommendations, the EHS and Maintenance Managers have been enrolled in MCERTS awareness training to enhance the critical review of SSPs, monitoring reports and contractor monitoring activities.

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

A handwritten signature in cursive script that reads "Candice Aliasgar-Sankoomar".

Candice Aliasgar-Sankoomar

EHS Manager
Sherwin Williams
(The Valspar (UK) Corporation Ltd)