

Industry & Waste Regulation Team
Natural Resources Wales
Rivers House
St Mellons Business Park
St Mellons
Cardiff
CF30EY

Date: 30th October 2020

Subject: Solutia UK Ltd – EPR Permit Number: BR9715IB
Supplementary information relating to Notification dated 09/06/2020 re: T66
Pumphouse 'pipe-through-wall' failure

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In relation to the above referenced Notification, this letter is to provide additional requested follow-up information related to the event i.e. to review if similar situations exist in other locations on site, with a view to eliminating, or otherwise reducing the associated risk

To summarize the review - the main manufacturing plant and ancillary site areas were assessed, with 82 locations identified via each of; i) engineering drawings review, ii) SAP (maintenance system) engineering information review, and iii) on-location visual inspections (excluding the multiple discounted examples for air / water etc.). This combined review in conjunction with the subsequent maintenance engineering inspections is therefore considered to constitute a comprehensive site assessment

The maintenance engineers' inspections specifically, looked at each of these locations to assess whether external corrosion in each instance might be an issue in a manner consistent with the original failure. Indeed, x2 locations were identified for additional action i.e. there was evidence of (minor) external visual surface corrosion 'blistering'. At both of these locations, the pipes are on HCl duty but not thought to be of any immediate failure risk and are also located on the internal side of the respective bund(s). These observations will nonetheless be further addressed to help avoid any future issues of this type. Encouragingly also, no examples of pipes passing through cavity walls (the cause of the original failure) were identified



Stephen Thomas

Environmental Specialist
Solutia UK Ltd *
Telephone: 01633 754403
Email: stthomas@eastman.com

* A subsidiary of Eastman