

Solutia UK Ltd
(a subsidiary of Eastman Chemical Company)
Corporation Road
Newport
South Wales
NP19 4XF

E. A. Parr
PPC Compliance Assistant
Natural Resources Wales
Plas yr Afon
St.Mellons business park
CARDIFF
CF3 0EY

29th June 2015

Dear Mrs Parr,

ENVIRONMENTAL PERMIT BR9715IB: IMPROVEMENT CONDITION 33

The Operator shall submit to Natural Resources Wales in writing a report upon completion of a review of the costs and benefits of further measures to reduce emissions to water of Pentachlorophenol, including details of any beneficial improvements identified and the date by which these improvements will be implemented.

Please find the status of this item below.

Consultants Conestoga-Rovers & Associates (Europe) Ltd (CRA) were engaged earlier in 2015 by Solutia UK Ltd to complete a study of the potential methods for the reduction of pentachlorophenol (PCP) to enable us to address this Improvement Condition.

The study included a review of previous investigation reports, volumes and quantities of discharged PCP and results of previous drainage manholes and channels. An assessment of the perched water in the former Santobrite Area (where the PCP was produced) was also completed. This involved installation of shallow monitoring wells and measurement of groundwater levels.

CRA identified several possible technologies for either

- i) Interrupting the pathway, or
- ii) Addressing the contamination directly through treatment or removal

The second approach above would be preferable to the company as it would permanently reduce the risk posed by PCP beneath the site, although it is likely to incur higher initial costs.



Responsible Care



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A key issue would be that a lot of the contaminated area is occupied by operational process plant and storage tanks. Several methods have been identified for directly treating the PCP and reductive dechlorination using molasses or other proprietary substance is identified as one solution which may be suitable. CRA have recommended further laboratory and field tests to confirm the feasibility of this option.

CRA also reviewed the effectiveness of the capping of contaminated areas implemented since 2008. It was concluded that as a standalone technology further capping will not provide an effective solution.

At this stage we do not have sufficient information to be able to commit to a particular technology and we need to obtain further information from CRA about the likely costs, practicality of treating areas which are not easily accessible and effectiveness of the reductive chlorination option and the other discounted solutions. This will enable us to determine which would be the appropriate solution and whether the benefits would actually justify further expense.

I therefore need to request an extension to the timing of this item to allow us to determine the next steps and ask that the Improvement Condition be extended to the end of the year.

If you require any further information please do not hesitate to contact me.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'N Newton', written in dark ink.

Nicola Newton
HSE Manager

cc S Hampson
 D Graham