

The Environment Agency,
Permitting Support Group,
EPR Permitting Team Leader,
Quadrant 2 99,
Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

INVISTA Textiles (UK) Limited
Ermin Street, Brockworth,
Gloucester, GL3 4HP

Tel. [+44] 01452 633247

18 April 2011

██████████ PS Officer

REF : Permit Number: BM2063 (EP3431UA)
Operator: INVISTA Textiles (U.K.) Limited
Registered Office : 100 Barbirolli Square
Manchester
M2 3AB
Company Reg. Number: 04558109

Dear Sir/Madam,

Please find enclosed a Surrender Site Condition Report prepared in accordance with the Environment Agency's (EA) guidance "H5 – Site Condition Report – Guidance and Templates" by ARCADIS (UK) Limited on behalf of INVISTA Textiles (U.K.) Limited, operator of the INVISTA Nylon Site at (the Site).

INVISTA submitted written notification about the closure of the Site to the EA on 13th March 2009 and provided an updated and more detailed Site closure plan at that time. Since then all production at the Site has ceased and decontamination and decommissioning has been successfully completed in accordance with that plan.

INVISTA has completed a sale of the Site to One North East, the regional development agency.

Over the last year there have been some Minor Operational Changes associated with the permit conditions agreed with the EA, and INVISTA has complied with all the other conditions of its environmental permit throughout decommissioning and decontamination. INVISTA considers that pollution risk has now been removed, the Site remains in a satisfactory condition and therefore the permit can be surrendered.

A programme of demolition for the plant has now commenced and many of the storage tanks listed in Table 7a, 7b, 7c, 7d, 7e, 7f of the Surrender Site Condition report have now been removed. The attached Appendix 1 lists the remaining tanks.

Following a letter from ██████████, EA NPS Officer dated 30th September 2010 (copy attached for ease of reference) sought further clarification with respect to points a), b) and c) below.

a) BH1101: Different sampling technique giving different results for TPH-GRO?

- b) BH304: No reference to the distance from BH304 to the surrounding extra boreholes drilled (304-1, 304-2, 304-3 & 304-4). – provides validity with respect to the remedial measure undertaken to excavate and area 2m x 2m. (Section
- c) Documentation of procedures to ensure no release of residual materials to the environment

Additional comments are now included in the Site Surrender Condition report specifically in sections 9.1/9.2.1 and 8.2/8.2.1 to address these points

Please note also that Surrender Site Condition report was reviewed by [REDACTED] [REDACTED] (EA Groundwater and Contaminated Land Officer), who confirmed that the Site could be characterised for permit surrender.

Payment for surrender fees has been made by BACS transfer on 31st March and the reference number is EP34131UA. The EP OPRA charging calculation was obtained from the local EA office and represents the most recent information on file. Should you have any queries about the calculation please let me know.

If you have any questions about the surrender document, or wish to have more information about this application, please do not hesitate to contact me at [REDACTED] or by e-mail at [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]
EHS Manager

Enc: Site Surrender Report (3) copies
Copy letter dated 30/09/10 from EA

Cc: [REDACTED], ONE North East

Appendix 1

With reference to the Site Condition Report, **April 2011 960100303_02** the storage tanks listed in tables **7b, 7c, and 7d** have been removed from site. Storage tanks remaining and cleaned according to the procedure described in the Closure Plan submitted to the EA) are summarised as follows:

Table 7a - Adipic Acid Storage Tanks

Tank number	Description	Capacity(m3)	Substance originally stored prior to cleaning
5031-160	Spill containment tank	80	high copper/ high conductivity sump material from Crude building/ NACS/ Purge building, normally disposed of to Bio.
5031-200	Salt-refined crystalliser feed tank	180	Salt
5031-220	Recycled Acid Tank (RAT)	368	Nitric & organic acids
5031-233	Blended Acid Tank (BAT)	368	Nitric & organic acids
5031-246	Spillage dissolver		OOS
5031-303	Semi-refined sol collection	30	typically 45 - 49% Adipic <100ppm Nitric Acid
5031-340	No 1 Semi-refined solution tank	30	used as buffer space, typically 45 - 49% Adipic <100ppm Nitric Acid
5031-341	No 2 Semi-refined solution tank	30	used as buffer space, typically 45 - 49% Adipic <100ppm Nitric Acid
5031-346	Dryer crystalliser feed tank	30	35 - 40% adipic acid dissolved in water, plus impurities mainly NA at < 150ppm.
5031-371	Half-salt dissolver		half - salt solution (DI water/ HMD / Salt ref c/fuges export)
5031-422	Re-work solution tank		out of spec material from Semi - ref/ Salt refined that require recycling & re-added to the process, in solution.
5031-466	Waste liquor tank		Semi - Ref distillate. Process effluent (sent via AA sump)
5031-630	Crude solution tank		Crude solution - exit Crude dissolvers 40 - 42% Adipic, <0.2% Nitric
5031-2250	Salt solution tanks	145 (te)	Salt solution
5031-2251	Salt solution tanks	145 (te)	Salt solution
5031-2252	Salt solution tanks	145 (te)	Salt solution
5031-2257	Blended salt solution tank	3,398	Blended salt solution
5031-4700	NACS tails tank	40	Typical comp: 35% nitric, 33% water, 22% Adipic, 8% Glutaric, 3% Succinic, pp, levels vanadium & copper.
5031-4900	Sulphuric acid tank	23	Sulphuric acid
5031-5900	Recovered catalyst storage tank		Regen acid containing copper & vanadium catalyst exit ISEP unit

Table 7f -Nalco Storage Tanks

Location	Number	Comment
POLYMER CASTING (93033)	181869	
NYLON 1A CT (72211)	CT003211	HDPE tank with steel IBC on frame above
NYLON 1A (HYPO)	TS06 - 039B	HDPE double skinned tank (5,000 l)
NYLON 1B (HYPO)	IBC - TEMPORARY	Hays IBC (No 2516)
NYLON 2 CT (H ₂ SO ₄)	PV 250	Steel tank in concrete bund

Table 7e - Polymer Storage Tanks

Tank number	Description	Capacity(m3)	Substance originally stored prior to cleaning
5130-1862	Copper acetate tank		Copper Acetate
5130-1864	Copper acetate tank		Copper Acetate
5151-203	TiO ₂ mill feed tank		TiO2 Slurry
5151-204	TiO ₂ mill feed tank		TiO2 Slurry
5151-212	TiO ₂ settling tank	2.8	TiO2 Slurry
5151-213	TiO ₂ settling tank	2.8	TiO2 Slurry
5151-214	TiO ₂ settling tank	2.8	TiO2 Slurry
5151-215	TiO ₂ settling tank	2.8	TiO2 Slurry
5151-224	TiO ₂ bulk storage	10	TiO2 Slurry
5151-225	TiO ₂ bulk storage	10	TiO2 Slurry
5151-227	No 1 TiO ₂ conc adjustment tank	2.5	TiO2 Slurry
5151-229	No 2 TiO ₂ conc adjustment tank		TiO2 Slurry
5151-245	TiO ₂ tanker offloading tank	135	TiO2 Slurry
5151-7810	TiO ₂ drainage collection tank	56	TiO2 Slurry
5151-949	Effluent tank	56	Process Effluent
5151-925	Dycal storage tank	50	Dycal
5130-2526	Dowtherm storage tanks	105	Dowtherm
5130-2527	Dowtherm storage tanks	105	Dowtherm
5130-2537	Dowtherm storage tanks	14	Dowtherm
	80% acetic acid tank		Acetic Acid
	Casting water storage tank	22	Water
	No 1 & 2 vent drains tanks	0.5	
	Thermex E, W & containment tanks		Dowtherm
	Calgon solution & storage tanks		
	Caprolactam storage tank		Caprolactam
	TiO ₂ weak storage		TiO2 Slurry