



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: BL1096IB

Eich cyf/Your ref:

Chester Road, Buckley, Flintshire,
CH7 3AJ

Ebost/Email:

paul.wright@cyfoethnaturiolcymru.gov.uk

Ffôn/Phone: 03000 65 3890

FAO; The Company Secretary
Castle Cement Ltd
Hanson House
14 Castle Hill
Maidenhead
Berkshire
SL6 4JJ

14/05/15

Environmental Permitting (England & Wales) Regulations 2010, Regulation 60(1)

In December 2014, Castle Cement Ltd received complaints from members of the public reporting dust on their cars/property that had allegedly originated from Padeswood Cement works.

The Plant Manager reported these complaints to Natural Resources Wales on 20/01/15. This was followed by a Part A notification received 21/01/15 reporting a dust release from the kiln and cooler area and subsequent Part B notification received 04/03/15.

On 26/01/15 Officers from Natural Resources Wales visited Padeswood Cement Works to investigate the dust complaints and collected information under Section 108 of the Environment Act 1995 including the shift manager's logs (December 2014),

As part of our ongoing investigation, and for the purposes of assessing permit compliance, please find enclosed a Regulation 60(1) notice requiring the provision of information relating to permitted activities at Padeswood Cement Works, Padeswood, Mold, Flintshire, CH7 4HB (Environmental Permit number EPR/BL1096IB).

A copy of this notice has also be sent to the Plant Manager at Padeswood Works.

Yours faithfully,

Paul Wright
Industry Regulation – Team Leader

**Environmental Permitting (England and Wales) Regulations 2010
Regulation 60(1)**

NOTICE REQUIRING INFORMATION

To:
Castle Cement Ltd
Hanson House
14 Castle Hill
Maidenhead
Berkshire
SL6 4JJ

Natural Resources Wales requires you to provide the information specified in
Schedule 1 by 05/06/15

The information must be sent in writing to:

Stuart Ross
Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

Date: 14/5/15

Signed: 
Paul Wright
Team Leader – Industry Regulation

Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

Please see over for notes.

Environmental Permitting (England and Wales) Regulations 2010 Regulation 60(1)

Notes:

General

1. For the purposes of discharging its functions under the Environmental Permitting (England and Wales) Regulations 2010, Natural Resources Wales may (by virtue of Regulation 60(1) of those Regulations), require any person to provide information.
2. Failure to comply with this notice without reasonable excuse is an offence under Regulation 38(4)(a) of the Environmental Permitting (England and Wales) Regulations 2010, and may lead to legal action being taken against you.
3. Making any statement in response to this notice that you know to be false or misleading in a material particular, or recklessly making any statement which is false or misleading in a material particular is an offence under Regulation 38(4)(b) of the Environmental Permitting (England and Wales) Regulations 2010, and may lead to legal action being taken against you.
4. There is no right to appeal against this notice.
5. You may wish to seek independent legal advice.

Legislation note

In this document "Natural Resources Wales" means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012. On 01 April 2013 the Natural Resources Body for Wales (Functions) Order 2013 transferred the relevant functions of the Countryside Council for Wales, and functions of the Environment Agency and the Forestry Commission in Wales to the Natural Resources Body for Wales.

**Environmental Permitting (England and Wales) Regulations 2010
Regulation 60(1)**

SCHEDULE 1

DESCRIPTION OF INFORMATION REQUIRED	FORM THE INFORMATION MUST TAKE	DATE REQUIRED
<p>The information required by this notice relates to permitted activities at Castle Cement's Padeswood Cement Works, Padeswood, Mold, Flintshire, CH7 4HB (Environmental Permit number EPR/BL10961B).</p> <p><u>1.0 Kiln ID Fan Trips</u></p> <p>1.1 What is a kiln ID fan trip and what are the specific causes?</p> <p>1.2 Explain in detail what happens to the preheater/calcliner, kiln and cooler operations when the kiln ID fan trips.</p> <p>1.3 What are the potential environmental impacts arising from a kiln ID fan trip and how are these managed?</p> <p>1.4 What is the cause of the kiln ID fan vibration referred to in the shift manager's logs during December 2014?</p> <p>1.5. How many times did the kiln ID fan trip in December and what were the specific causes?</p> <p>1.6 Did the kiln trips during December cause a release of dust? If so what was the scale and severity of the release(s)?</p> <p>1.7 What maintenance regime is in place to ensure smooth and trouble free operation of the kiln ID fan?</p> <p><u>2.0 Holes in Calcliner/Cyclones</u></p> <p>2.1 The shift managers log of 18/12/15 states '<i>be aware of holes in top of calcliner level 6</i>' and '<i>Cyclone 5 cyclone level 6 hole plated over and back tomorrow to box in</i>'.</p> <p>2.2 Explain the nature and cause of the holes and the frequency of their occurrence.</p> <p>2.3 What was the cause of these holes, how were they detected and how long they had been present before repair?</p> <p>2.4 What is the normal corrective action to repair such holes?</p>	<p>Written Response (signed hardcopy)</p>	<p>05/06/15</p>

2.5 Did the holes in the calciner and cyclone 5 give rise to a dust release and what is the likelihood of an offsite impact?

3.0 Heat Exchanger (Part A & B Notification)

3.1 What heat exchanger / heat exchanger tubes were found to be damaged as referenced in your Part B notification received by Natural Resources Wales 04/03/15?

3.2 Describe the normal mode of operation of the heat exchanger and how you identify tube failure?

3.3 When was the damage to the heat exchanger tubes first identified?

3.4 What was the nature of the damage to the heat exchanger tubes?

3.5 What was the root cause of the damage and what were the findings of the internal inspection?

3.6 Prior to the inspection of the heat exchanger tubes referred to in the Part B notification, when was the heat the exchanger last inspected, what did the inspection consist of and what were the findings?

3.7 What is the maintenance regime for the heat exchanger to ensure smooth and trouble free operation?

3.8 The Part A notification received 21/01/15 refers to data analysis. What data analysis was completed and what were the associated findings?

3.9 On what date(s) was dust released from the damaged heat exchanger tubes? If the exact dates are not know what is the approximate period during dust releases may have occurred?

3.10 How was the dust release estimation completed to quantify the release as being less than 50Kg?

3.11 What repairs were made to the heat exchanger tubes following the identification of the damage?

3.12 What is the likelihood of the tubes becoming damaged before the intended replacement is installed in 2016.