From: Ross, Stuart
To: Bradford, Julie
Subject: FW: OMA respone
Date: 21 May 2013 10:35:20
Attachments: PLXX - Suspended Solids of Water Samples.doc
PEnv 18 F1 Compliance Report Sheet.doc
PEnv 18 - Lagoon Sampling and testing before discharge.doc
PLXX - pH Determination of Water Samples.doc

For public register

Thanks

Stu

	INITIALS	DATE
OK FOR PUBLIC REGISTER	SR	23.5.13
COPIED TO PUBLIC REGISTER	JB	EDRM

From: Young, Gary (Clitheroe) GBR [mailto:gary.young@hanson.biz]
Sent: 12 April 2013 13:05
To: Ross, Stuart
Cc: Sharpe, Nick (Clitheroe) GBR; Walpole, Iain (Loughborough) GBR; Quick, David J (Padeswood) GBR; Cowell, Paul (Clitheroe) GBR; Seal, Geoff (Padeswood) GBR; Smith, Victoria (Padeswood) GBR
Subject: OMA respone

Stuart,

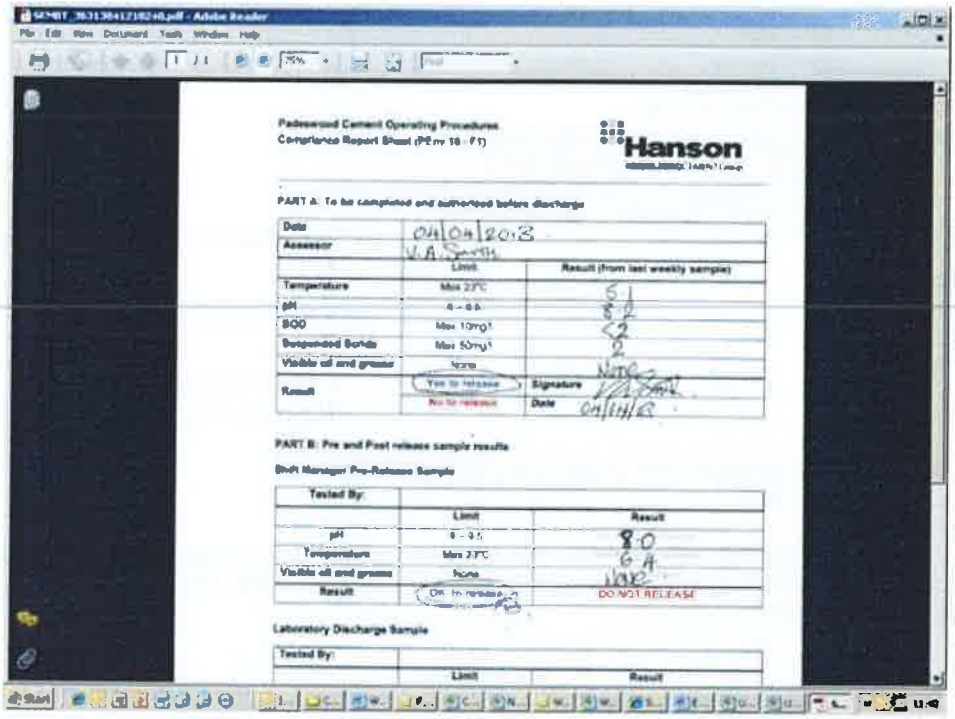
Please see below our updated response to your correspondence of the 5th April.
Our response is highlighted in blue.

Water OMA
The OMA water audit was completed 8th January 2013 and the final report sent to Castle
Cement on 22nd January 2013. The report included 12 actions some of which you have responded to in writing. I have listed the actions below and set out our position;
1. *On site sampling capability required to enable suitably trained site employees to collect a representative spot sample from any one weekly discharge for analysis at third party laboratory. A sampling procedure must be developed and staff suitably trained. Training records shall be maintained. This shall be implemented by 11/02/13.*

Your response indicates that procedures have not yet been implemented at Padeswood; rather that this is work in progress. Given the importance of effective sampling I expect a procedure to be in place as requested by the original condition. Please provide Natural Resources Wales (NRW) with a copy of the procedure and confirm staff have been trained by 13th April 2013.

The procedure is attached along with the associated lab procedures.
Training/information with regard to the discharge procedure has been carried out with the Shift Managers, who are responsible for decisions on discharging.
Analysis of certain parameters is currently being undertaken by Alcontrol Laboratories until such time as the necessary equipment is available on site for relevant analysis to be carried out in-house (this equipment is on order).

An example of a recent use of the procedure is shown below:



Hanson

Date 04/04/2013

Assessor V.A. Smith

	Limit	Result (from last weekly sample)
Temperature	Max 27°C	6.1
pH	6 – 9.5	8.2
BOD	Max 10mg/l	22
Suspended Solids	Max 50mg/l	2
Visible oil and grease	None	None
Result	Yes to release / No to release	Signature / Date

PART B: Pre and Post release sample results

Shift Manager Pre-Release Sample

Tested By:	Limit	Result
pH	6 – 9.5	8.0
Temperature	Max 27°C	6.4
Visible oil and grease	None	None
Result	OK to release /	DO NOT RELEASE

Laboratory Discharge Sample

Tested By:	Limit	Result

2. *You must now have your flow monitoring arrangements inspected by an inspector under the MCERTs Self Monitoring of Effluent Flow Scheme and then apply to Sira Certification Service for a MCERTs site conformity inspection certificate. Please provide the Environment Agency with anticipated timescales for the completion of this action by 15/02/13.*

Permit condition 3.5.3 requires that monitoring equipment shall have MCERTs certification unless otherwise agreed in writing with NRW. Following our discussion of this issue at our meeting on 28/02/13 and your subsequent response we agree to temporarily waive the requirement to have flow monitoring arrangements MCERTs certified with a view to assessing the surface water monitoring requirements as part of your forthcoming permit variation. This position may be subject to review if circumstances change.

3. *The existing Endress & Hauser pH and temperature probe is not MCERTs certified as required by the permit. It is possible that Endress & Hauser are in the process of applying for product certification through the MCERTs scheme. If certification is subsequently gained then the probe will not require replacement with certified equipment. Accordingly I recommend that in the first instance you contact Endress & Hauser to establish their position. Please do so and report your findings to the Agency by 15/02/13.*

I can confirm that the Endress & Hauser Orbisint CPS11D probe is currently subject to MCERTs testing the outcome of which will be determined within the next 4 – 8 weeks. If at the end of this process the instrument does not achieve certification an MCERTS replacement will be required. In the interim and in accordance with permit condition 3.5.3, I agree to allow you to continue to use the instrument named above. This agreement expires 31st May 2013 or sooner if it becomes known that the instrument failed the MCERTs testing process.

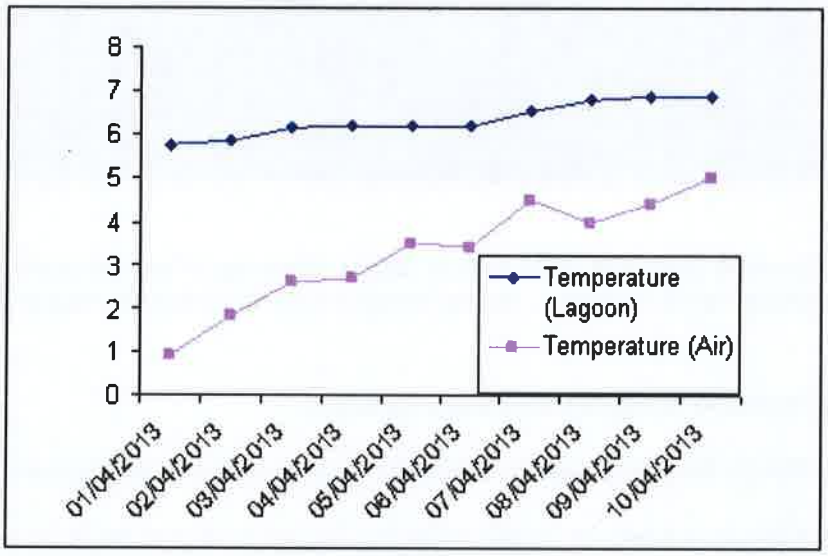
An enquiry has been placed with our purchasing department with a view to obtaining a suitable MCERTS probe should the Endress Hauser system fail. We have as yet been

unable to obtain details of any alternative MCERTS ph probes from our current list of equipment suppliers.

***4.** Continuous temperature monitoring data must be logged to meet permit requirements. Data transmitter and data logger have been ordered. Continuous temperature measurement and logging shall be implemented by 15/02/13.*

Thank you for confirming that this action has been completed.

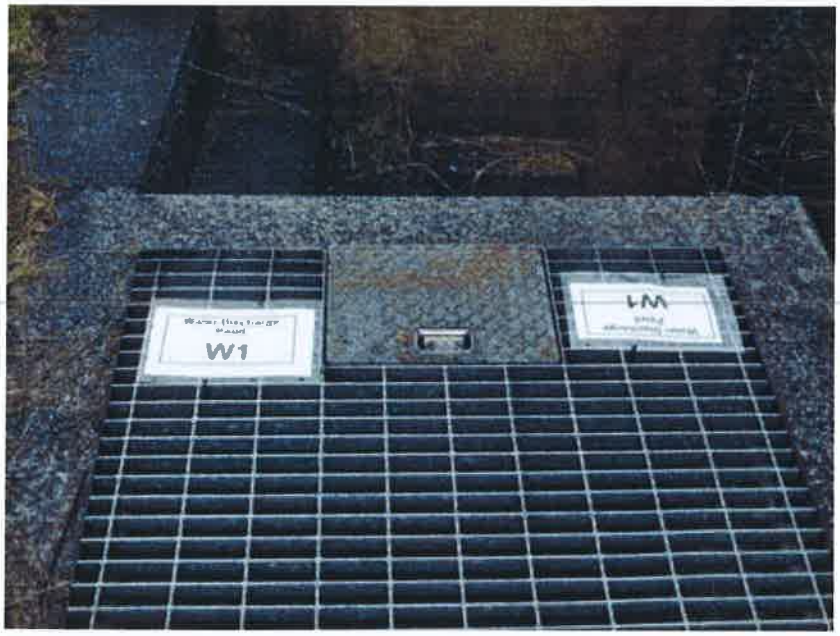
Lagoon and air temperature are shown below for the month of April; this shows the relationship that exists. This will continue to be monitored and recorded.



***5.** Clearly label the discharge from the surface water lagoon as sample point W1. Please do so by 15/02/13.*

This will be inspected during the next site inspection.

Complete



6. *The maintenance schedule must include regular cleaning of sample point / flow race to ensure representative samples / measurements can be obtained. Please do so by 15/02/13.*

This will be inspected during the next site inspection.

This is included on the worksheet for calibration/maintenance of the equipment.

7. *The permit requires a weekly visual check for oil and grease in the discharge. Samples are collected and analysed for hydrocarbon content opposed to a visual check. Whilst sample analysis has value, a visual oil and grease check at the time of discharge will enable immediate action to be taken to stop / remediate a discharge should it be present. We recognise that it may be difficult to assess a film of oil and grease at the designated sample point and recommend that a weekly visual oil and grease check is made of the lagoon surface. In any case, a visual weekly check (discharge dependant) should be undertaken commencing 11/02/13.*

This will be inspected during the next site inspection.

This is included in the new sampling and discharge procedure and is recorded.

8. *Devise a means of formally recording CWME uptime and downtime. Please do so by 15/02/13*

This will be inspected during the next site inspection.

This is difficult due to the intermittent nature of the discharge, as we would need to differentiate between a true zero when no water is discharged and a faulty reading. Our software engineer is developing a way to arrive at an equipment availability factor; in the meantime we are assessing the data from the instrumentation manually. I can confirm that all CWME has been working for 100% of the time from the date of the installation of the data logger for the lagoon temperature probe.

9. *Develop a formal procedure for the calibration of the pH / temperature probe incorporating the manufacturer's guidelines / and site specific requirements. Ensure staff are suitably trained and training records maintained. Please do so by 15/02/13.*

This will be inspected during the next site inspection.
See response to point 10.

10. *Maintain more thorough calibration records for the pH / temperature probe. The records should include the time and date of calibration, calibration results and any actions taken to rectify any problems encountered. Please do so by 15/02/13.*

This will be inspected during the next site inspection.
Calibration of this equipment is and has been part of the duties of one of our engineering staff, along with other emissions monitoring equipment such as those on the kiln and cement mill stacks. Records as maintained by that individual are being brought up-to-date for inclusion on the IMS site page.

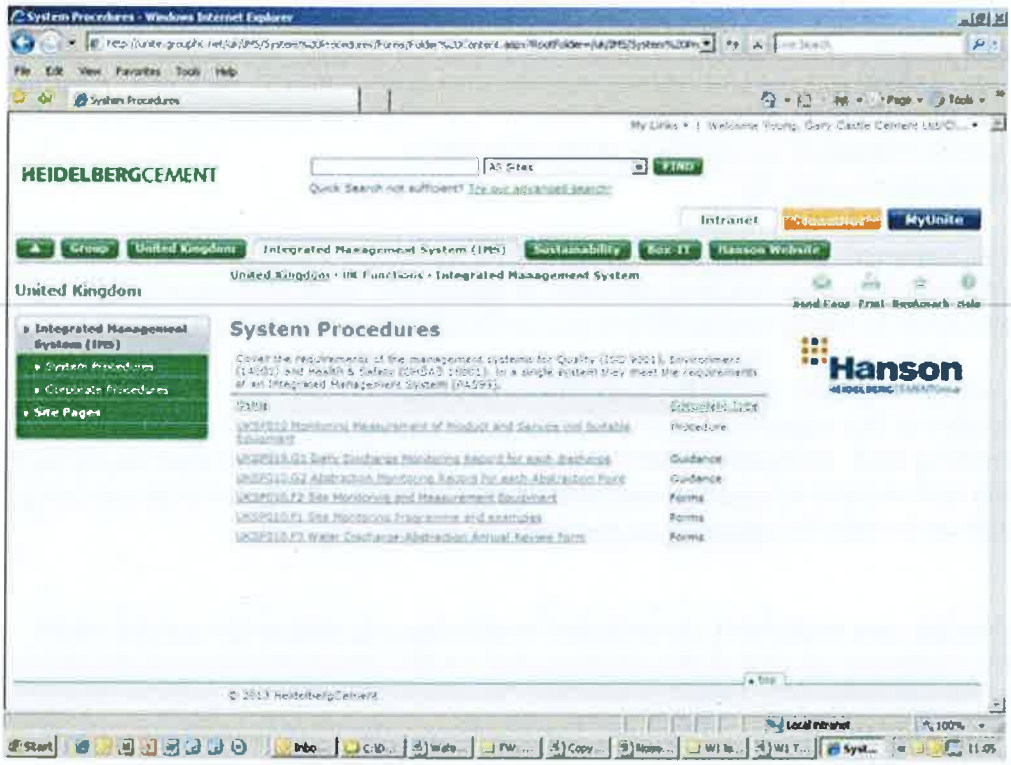
11. *Develop and implement documented monitoring procedures for surface water quality monitoring as part of the company IMS / EMS. Monitoring procedures should cover the operation of continuous monitors, periodic sampling and sample storage etc and be issued to relevant personnel. The procedure should require the use of MCERTs certified equipment as per permit requirements. Please do so by 15/02/13.*

Your response to this action consists of historical and revised surface water sampling schedules. Whilst I agree that the 'current schedule' appears fit for purpose, this does not meet the requirements of the action as detailed above. A robust surface water quality monitoring procedure is essential.
NRW / Environment Agency Technical Guidance Note M18 'Monitoring of discharges to water and sewer' provides detailed guidance of surface water quality monitoring and the relevant aspects of this guidance should be reflected in your procedures. You may also wish to review the OMA 'Discharges to Water' v4 scoring criteria to clarify what is expected by NRW. Both documents can be found at www.mcerts.net. I have also enclosed them with this letter.
Please revise your procedure considering the guidance referenced above and submit a copy to the Environment Agency by 20th April 2013. If a suitable a procedure is not received we will have to consider our position.
See response to point 12 below:

12. *A procedure for the auditing of onsite surface water quality monitoring should be developed and implemented to ensure personnel carrying out monitoring do so in accordance with the agreed documented procedures. This should include contractors used for analysis and sampling. Audit records should be kept and corrective actions tracked. Please do so by 15/02/13.*

This will be inspected during the next site inspection.

The procedures for water monitoring, and subsequent procedures for auditing the same procedures, are partially incorporated into the overall IMS that is now in place for Hanson. The IMS, under which the site must operate, contains requirements for identifying, calibrating and auditing all monitoring equipment (not just environmental ones) as indicated below:



In this case however there is agreement that a more specific set of local procedures are required to cover the requests from NRW and the EA and thereby demonstrate compliance with the permit. These are outside the instructions we have been asked to follow therefore local procedures will be created on the Padeswood site page to support those shown above and these will be available for review at the next inspector visit.

Noise Management Plan

Thank you for providing an updated noise management plan.
As discussed during our meeting on 28/02/13, I am concerned that timescales for various proposed monitoring activities (including the acoustic camera survey) have been extended since the submission of your original plan in December 2013.

It has been extremely difficult to co-ordinate the availability of the acoustic camera with our own run plan on the kiln, when combined with weather and wind issues that we have had. The current plan is for a full survey in the 2nd week of May. Other monitoring data has been collected as planned and is being reviewed.

I now request that the noise management plan is finalised by including a proposed programme of improvement works as referred to in your plan by the end of the next operating campaign.

As referred to in my last correspondence the following improvement works have been completed:

- Replacement of kiln refractory – 48 metres – reduces need for use of shell fans
- Raw Mill fan building cladding
- Cladding on the raw mill discharge chute
- Raw Mill SC04 screw noise – Replaced journals and re-aligned screw

BF32 & BF33 Filter fans clean & balance
- Crane store cladding
- Clean and re- balance quench fan

The following tasks are planned for completion during April:
- Shell fan insulation and cladding
- Shell fan steel cladding to be replaced with acoustic screen

If you cannot meet this requirement please contact me to discuss further. Please note that if timescales continue to slip we may consider requiring BAT review for noise control via an improvement condition.

Some, but not all, of the factors affecting time-scales are out of our direct control; it continues to be the case however that a significant amount of time and effort is dedicated to improving both the actual overall environmental performance and the understanding of environmental issues both on site and amongst our neighbours. Recent operational runs have given rise to just one noise complaint to the site. It remains our intention to continue to operate within our permit, but also to improve performance wherever we can; recent results indicate that this is the case.

Please contact me if you wish to discuss these matters further prior to our next site visit.

Regards

Gary

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