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27th February 2015

Dear Stuart,

re: CAR BL1096IB/0229448

I am writing in response to the compliance assessment report CAR BL1096IB/0229448 of 22/12/14.

With regard to section B. Permit Compliance and Remedial Actions, I note that you require a Dust Management Plan to be submitted by 27/3/15 and this will be submitted in due course.

You further require that, in conjunction with the development of an emissions management plan, we review the site's Environmental Management System to identify areas for improvement to ensure the issues highlighted in this report are not repeated during normal plant operation. This shall cover operational procedures, staff training, supervision and auditing.

The findings of this review and remedial action taken shall be submitted to Natural Resources Wales by 27/02/15.

In response to the requirement of our permit for an emissions management plan we have completed a review of the site's environmental management plan as detailed below

A) Operational Procedures

The site's overarching environmental management plan falls under the Hanson Integrated Management system. The relevant procedure is UKCP05 Environmental Aspects Register. The aspects register has been reviewed and some minor amendments have been made as shown in Table 1.

In addition local procedures 'PG10 Control of dust not controlled by emission limits', 'PEnv 09 Environmental incident reporting' and 'PEnv 12 Complaints procedure' have been reviewed. Minor amendments have been made to the latter procedures and PG 10 has been identified as requiring more significant changes. These changes will be made as requested, in conjunction with the development of the dust management plan and will not therefore be complete until the dust management plan is finalised at the end of March 2015.

B) Staff Training and Supervision

As detailed in my email of 23rd Dec 2014 to yourself, additional staff training was completed immediately that a number of issues were identified on site following your visit of the 22nd December. Having further reviewed our training, whilst key individuals who have previously been trained on the environmental aspects of the operation remain the same, a number of supervisory positions are now filled with new incumbents or individuals who are new to Padeswood. We have therefore organised a training session entitled 'Permit Awareness and Environmental Responsibilities' for those individuals, such that they understand the regulatory requirements and how they may differ to those at any other cement factory that they may have worked at. This training will take place during March 2015.

C) Auditing

Padeswood site is subject to a number of audits both internal and external. The audit schedule is one visit annually by the internal team and the external assessors. These are supplemented by Heidelberg Group Audits and site proud assessments. In addition we have on site monitoring with issues being raised and logged during the entropy system.

All of our environmental performance is 'audited' by the on-site management team via the sustainability meeting, a bi-weekly management meeting.

I hope this answers the queries that you raised but should you require any further information please do not hesitate to contact me,

Yours sincerely,



David Quick
Plant Manager

Table 1

		Reviewed	Amended
	General (inc. Offices)		
EA1	Asbestos Management	Yes	No
EA2	Batteries use and disposal	Yes	No
EA3	Compressor use	Yes	No
EA4	Discharge from bulk powder tankers road	Yes	No
EA5	Engineering - Plant and equipment maintenance	Yes	No
EA6	Fuel and chemical Storage and use - bulk	Yes	No
EA7	Fuel and Chemical Storage and use - Intermediate (IBC)	yes	yes
EA8	Fuel and chemicals storage and use - drums (<205 litre)	yes	yes
EA9	Gas cylinder storage and use	Yes	No
EA10	Habitat, wildlife and archaeological disturbance	Yes	No
EA11	Use of Heating, Lighting and air conditioning	Yes	No
EA12	Invasive vegetation species (Ragwort, Japanese Knotweed etc)	Yes	No
EA13	Litter, trespass/theft/vandalism/fly tipping	Yes	No
EA14	Storage and use of Materials in stockpiles	Yes	yes
EA15	Storage and us of bulk powders	Yes	No
EA16	Mobile plant operations	Yes	No
EA18	Transformers - presence on site and maintenance	Yes	No
EA19	Transport - Rail operations (under control of rail companies)		
EA21	Waste - Disposal of hazardous waste	Yes	No
EA22	Waste - Disposal of non hazardous waste	Yes	No
EA24	Water - Abstracted water usage	Yes	No
EA25	Water - Discharge sewer	Yes	No
EA26	Water - Discharge surface water	Yes	No
EA27	Water - Mains water usage	Yes	No
EA28	Water - softening/treatment plant		
EA30	Water - Surface run off fire water	Yes	yes
EA31	Water - Vehicle washing and cleaning	Yes	yes
	Cement		
EA10 1			
EA10 2	Cement and GGBS Milling	Yes	yes
EA10 3	Cement and GGBS storage	Yes	No
EA10 4	Cement conveying	Yes	No

EA10 5	Engineering - Construction and shutdown work	Yes	yes
EA10 6	Engineering - Demolition and disposal of redundant plant and equipment		
EA10 9	Engineering - Use materials (eg steel, plastics)		
EA11 0	Fuel storage and use - Cemfuel	Yes	No
EA11 1	Fuel storage and use - Fine Coal	Yes	No
EA11 2	Fuel storage and use - Kerosene	Yes	No
EA11 3	Fuel storage and use –MBM	Yes	
EA11 4	Fuel storage and use –Profuel	Yes	
EA11 9	Kiln Operation	Yes	No
EA12 0	Kiln operation - Bypass operation	Yes	yes
EA12 1	Kiln operation - Clearing preheater tower blockages	Yes	No
EA12 2	Kiln operation - coal milling	Yes	No
EA12 4	Kiln Operation - SNCR plant	Yes	No
EA12 5	Kiln operation - Storage, loading then transport of bypass dust	Yes	No
EA12 6	Kiln operations - grate cooler	Yes	yes
EA12 8	Landfill cell restoration	Yes	yes
EA13 1	Landfill Levelling and grading		
EA13 2	Landfill surface run off		
EA13 4	Material Storage and use - Gypsum	Yes	yes
EA13 5	Material storage and use - Raw meal	Yes	No
EA13 6	Material storage and use - reducing agents	Yes	No
EA13 7	Materials storage and use - Alternative Raw Materials	Yes	No