

C/O The Company Secretary
Castle Cement Ltd
Hanson House
14 Castle Hill
Maidenhead
Berkshire
SL6 4JJ

26/06/15

Request for further information - Regulation 60(1) Notice

Permit Reference: EPR/BL1096IB
Operator: Castle Cement Limited
Facility: Padeswood Cement Works

Thank you for providing your response (received 30/01/15) to the Regulation 60(1) notice of the Environmental Permitting (England & Wales) Regulations 2010 (as amended) we sent to you 06/03/14.

Unfortunately your response did not contain sufficient information for Natural Resources Wales to complete the required review of your environmental permit and assess compliance with the requirements of the BAT Conclusions document for the production of cement, lime and magnesium oxide.

You are required to provide information as required by Schedule 1 of this letter by 30/07/15.

Please note that Natural Resources Wales is currently reviewing the implementation of the BAT-AEL range for dust emissions from fabric filters as detailed in BAT Conclusion (BATC) 18, as well as the associated monitoring requirements. We will inform you of the outcome of our review as soon as possible.

If you require further guidance please contact your local Regulatory Officer Stuart Ross on 03000 653915 or email stuart.ross@cyfoethnaturiolcymru.gov.uk.

Yours faithfully,



Amy Nethercott
Permitting Officer
Cc. Iain Walpole, Hanson Safety, Health and Environment Manager & David Quick, Plant Manager,
Padeswood Cement Works

Schedule 1

BATC 2 – Noise

(e) Use of soundproofed buildings to shelter any noisy operations involving material transformation equipment.

In your response you have queried the definition of transformation equipment. It is our interpretation that transformation equipment is *'any operation involving fracture, crushing, milling and screening of raw materials, fuels, clinker and cement'*.

I note that Appendix 2 of your response does review this criteria for various operations. If, in light of the above definition there are any additional items of transformation equipment not covered by your response, please review appendix 2 and resubmit accordingly.

(k) A written response was not received for sub criteria 'k' – please review your operations and provide a response accordingly.

BATC 5(g) & 16 – Channelled Dust Emissions / Monitoring

Please provide a list of channelled dust emissions from dusty operations and identify those with a volumetric flow rate $>10,000 \text{ Nm}^3/\text{hr}$.

For those $>10,000 \text{ Nm}^3/\text{hr}$, confirm the emissions monitoring provisions in place and that abatement is capable of meeting the BAT-AEL of $<10\text{mg}/\text{Nm}^3$ by 9 April 2017.

BATC 8 – Clinker Substitution

The response provided does not confirm how your installation complies with this BATC. Please explain how you have considered the reduction of the clinker content of cement products at the installation. If this BATC is not applicable (as defined in the BATC), please explain why.

BATC 9 - Cogeneration & CHP

The response supplied did not provide sufficient information on whether you have considered the utilisation of waste heat to produce electricity. Please provide details of how this has been considered fully for your works.

BATC 14 & 15 - Diffuse Dust Emissions

The site Dust Management Plan (as submitted to NRW 12/06/15) has identified a number of improvements to minimise/prevent dust emissions from dusty operations and bulk storage areas. Please confirm that improvement actions identified in this plan will be complete and you will secure compliance with these BAT conclusions by 9 April 2017.

NRW has recently witnessed fugitive dust emissions from the crane store building including via the 'gypsum door' (when open) to the east of the building.

Further control measures may be required to secure compliance with BATC 14 & 15 by 9 April 2017. Please review this aspect of your operation and provide additional information detailing how you will comply with BATC 14 and 15.

BATC 16 - Channelled Dust Emissions

For small sources (volumetric flow rate $<10,000 \text{ Nm}^3$), your response states that 'replacement filters' are specified and designed to emit $<10\text{mg/m}^3$. Please confirm all such emission points will meet the BAT-AEL of 10mg/Nm^3 by 9 April 2017.

BATC 18 – Dust Emissions from Cooling & Milling Processes

NRW is currently reviewing the application of the BAT-AEL ($<10 - 20\text{mg/m}^3$) for these sources.

BATC 19 – NO_x Emissions

Please confirm that the calciner is fitted with a low NO_x burner(s).

BATC 20 – Ammonia Slip

It is understood that the ammonia background monitoring exercise is likely to commence at your installation during August 2015. It is anticipated that the results will be available within 1 month of the trial having been completed.

In order for us to set an ELV for total ammonia emissions, please propose and justify an ELV based on the background ammonia emission level (no SNCR) and ammonia slip. You will also need to provide us with / or make reference to an appropriate environmental impact assessment or Air Dispersion Modelling on total ammonia emissions to support your proposal. Please do so within 1 month of the end of the trial unless otherwise agreed.

END