

Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	EPR/BL1096IB/V013
Name of operator	Castle Cement Limited
Location of Facility	Padeswood Works, Padeswood, Mold.
Time and date of the detection	13/12/2017 10:05 AM

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment	
To be notified Immediately	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a permit condition	
To be notified immediately	
Emission point reference/ source	13/12/2017 03:30 – 10:05 AM
Parameter(s)	Non compliance with section 2.3.12 of permit
Limit	Unavailability of the FID for a period of 7 hours
Measured value and uncertainty	N/A
Date and time of monitoring	13/12/2017 03:30 – 10:05 AM
Measures taken, or intended to be taken, to stop the emission	<p>At 03:30 on the morning of 13-12-17 the flame ionisation detector (FID), which measures TOC in main stack gases, went in to error at 3.30 AM. The TOC reading was lost from that time until 10.05 when the analyser maintenance electrician was able to restart the equipment.</p> <p>Since the restart of the FID there have been no further problems and the maintenance electrician will further monitor over the coming days</p> <p>The kiln continued to burn alternative fuels during the time the FID was unavailable.</p>

	<p>The reason this fault was not picked up by and rectified by the shift team is currently being investigated, and also an investigation of the alarms associated with this system is also being looked into.</p> <p>Although TOC was not available, due to the use of a temporary FTIR analyser data is available for presence of the below analytes.</p> <p>CH4 C2H4 C2H6 C3H8 C6H14 CHOH</p> <p>These are expected to account for most organic carbon found in stack gases, whereby CH4 usually represents 80% of TOC. These could potentially be used as a proxy for TOC analysis during this period.</p>
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Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:	
To be notified immediately	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

<p>Any more accurate information on the matters for notification under Part A.</p>	<p>There is a fuels off strategy in place at the site which acts as part of the kiln control system.</p> <p>The fuels off strategy is a program which automatically reduces the waste fuel input to the kiln when any of the emissions exceed the daily average ELV.</p> <p>This program was also designed to initiate if there was a problem with the stack gas analysers. This was originally programmed so that if the TOC on emissions stayed at zero for in excess of 20 mins, then a fault on the FID would be indicated.</p> <p>In the instance on the 13/12/17 although the analysers TOC value went to zero, the application of the QAL2 factor made the displayed value equal 0.1. This meant that the fuels off strategy was not triggered.</p>
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Measures taken, or intended to be taken, to prevent a recurrence of the incident	<p>In order to rectify this. We have adjusted the minimum TOC alarm to initiate the fuels off if the values reads less than 2mg to allow for the QAL 2 adjusted value to be taken into account.</p> <p>In addition to this a new larger visual alarm has been built into the emissions page to inform operators when the stack analysers are in error.</p> <p>The fuels off strategy alarms have also been modified to give more visual feedback to the operators.</p>
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	<p>When this failure took place a backup FTIR analyser was on loan from the Exova group. This provided analysis of individual TOC analytes for the duration of the FID downtime.</p> <p>During the time period from 03:30 -10:15 to total emissions from CH₄,C₂H₄ & C₂H₆ was 9mg/NM₃. This would strongly indicate that the TOC emissions were not high during the period where the FID was unavailable, and that there would be little impact on the environment.</p>
The dates of any unauthorised emissions from the facility in the preceding 24 months.	<p>02/01/2016 13/02/2016 26/08/2016 24/11/2016 03/02/2017 30/03/2017 21/04/2017 08/05/2017 24/07/2017 14/08/2017 27/09/2017 28/09/2017 19/10/2017 23/10/2017 03/11/2017 04/11/2017</p>

Name*	Robert Keough
Post	Q&E Manager
Signature	Robert Keough
Date	16-01-2018

* authorised to sign on behalf of the operator