

Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

22nd January 2014

Dear Aled Zachary.

The Environmental Permitting (England and Wales) Regulations 2010
Permit Reference: BM4848/DP3338MY
Condition 4.1.5

1.0 Introduction

Condition 4.1.5 of permit BM4848/DP3338MY requires an annual review of fugitive emissions covering the releases and measures taken to reduce them.

2.0 Measurements

2.1 Total Inhalable Dust and Lead Concentrations

Tests were conducted using SKC 'Sidekick' air sampling pumps and pre-set at a constant flow rate of 2.0 l/min. The filters were analysed by ESP Environmental Limited, Swansea, for fugitive Lead emissions.

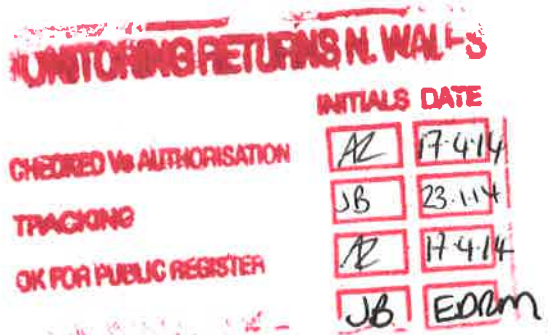
The reported results show that the total inhalable dust personal exposure was 7.9% of the WEL and the background was 5.0% of the WEL. The Lead concentration personal exposure was 5.3% of the WEL and the background exposure was 2.67% of the WEL.

These results indicate the effectiveness of the LEV system which was monitored and maintained as follows:

Monthly First Line Maintenance checks by our production department, quarterly H&S inspections and an annual check by external contractors. Any actions found necessary were under the control of our maintenance department.

To reduce exposure, breathing apparatus is provided for use by the operators when the dressing off operation is performed.

To ensure the control measures continue to provide adequate personal protection for the operators, surveillance testing of the blood Lead levels of a sample of operators is determined periodically, at a frequency governed by the actual results obtained. As the latest results of blood Lead levels obtained in 2012 and indeed, the maximum of all results obtained since 2007 is 9 ug per 100 ml. and therefore well within the accepted occupational health maximum of 50 ug per 100 ml., the frequency of testing has been reduced.



2.2 Hydrocarbons

The Hydrocarbon containing materials used in the installation are Bituminous Black paint (PF4) being a mixture of Bitumen and white spirit. The bitumen and white spirit mix is used to provide a thin coating to the extruded Lead cable sheath.

The results of tests performed are

Date	Material / Location	Ambient Temperature	Reading (ppm)
11 th June 2013	Bituminous black paint (PF4) - Lead press extrusion point during standby – within 0.5m of PF4 applicator	20.0	None detected
11 th June 2013	Bituminous black paint (PF4) - Lead press extrusion point (operational) – within 0.5m of PF4 applicator	20.0	None detected
11 th June 2013	Bituminous black paint (PF4) - Lead press cable take-up point (operational) – within 0.5m	20.0	None detected

For the above tests, a Drager pump fitted with 10 – 300 ppm tubes for the detection of petroleum hydrocarbons was used.

3.0 Conclusions

As the exposure to Lead remained a small percentage of the WEL Time Weighted Average and the exposure to hydrocarbons was not detectable at a lower limit of 10 ppm, no further improvements to the materials we use, the methods of extraction of the LEV system or the maintenance system are necessary.

Yours faithfully

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