



# **Hanson Cement, Padeswood Works**

**Annual Report as required by**

**Condition 4.2.2**

**Permit EPR/BL1096IB/V017**

**For Calendar year 2022**

## 1. Introduction

Condition 4.2.2 of EPR Permit BL1096IB/V017 requires an annual performance report.

*4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales each year. The report(s) shall include as a minimum:*

*(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;*

*(b) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.*

*(c) the functioning and monitoring of the plant involved with the burning of waste derived fuels, in a format agreed with Natural Resources Wales. The report shall, as a minimum requirement (as required by Chapter IV of the Industrial Emissions Directive (IED)) give an account of the running of the process and the emissions into air and water compared with the emission standards in the IED.*

## 2. Condition 4.2.2 (a)

### 2.1. Emissions to Air

The main emissions to air from the installation are from the kiln via the main stack, emission point A8, the filters and stacks on the cement mills, emission points A3-A7 and A15, the stack on the clinker cooler, emission point A9

#### 2.1.1. A3-A7, A9, A15

Table 2.1 provides a summary of performance of these emission points based on the monitoring data collected during 2022. It should be noted that continuous emissions monitors cannot be calibrated at low (below 10 mg/Nm<sup>3</sup>) emission levels as previously advised to NRW.

Permit Reference	Description	Daily Average Limit (mg/m <sup>3</sup> )	Annual Mean (mg/m <sup>3</sup> )	Standard deviation
A3	Cement Mill 1	10	-	-
A4	Cement Mill 2	10	-	-
A5	Cement Mill 3	20	3	2.7
A6	Cement Mill 4	10	-	-
A7	Cement Mill 4 classifier	20	-	-
A9	Clinker Cooler	20	2	2.1
A15	Cement Mill 5	10	1	1.6

Table 2.1 Summary of emissions for air monitoring points other than A8 for 2022.

In 2022, cement mills 1 and 2 were not operational.

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Date	End Date	Emission Point	Type
18/10/2022	18/10/2022	A15	Particulates

Table 2.2 Summary Schedule 5 notifications for 2022 for releases to air for emission points A3-A7, A9, A15

2.1.2. A8

Table 2.3 provides a summary of performance of this emission point based on the monitoring data collected during 2022.

Permit Reference	Description	Daily Average Limit (mg/m <sup>3</sup> )	Annual Mean (mg/m <sup>3</sup> )	Standard deviation
A8	Particulates	10	0	0.9
A8	SOx	200	30	39.1
A8	NOx	450	404	27.5
A8	TOC	50	26	7.0
A8	HCl	10	2	1.3
A8	CO	1200	454	121.9
A8	NH3	70	12	4.5

Table 2.3 Summary of emissions for air monitoring point A8 for 2022.

There were 4 events where emission point A8 did not comply with the environmental permit. Two of these were related to daily emission limit value breaches and two from the 6-monthly testing.

Each non-compliance is detailed in table 2.4 below.

Date	End Date	Emission Point	Type
23/02/2022	23/02/2022	A8	SO2
02/03/2022	02/03/2022	A8	SO2
23/03/2022	23/03/2022	A8	Mercury
23/03/2022	23/03/2022	A8	Hydrogen Fluoride

Table 2.4 Summary Schedule 5 notifications for 2022 for releases to air for emission point A8

2.1.3. A11 & 12

Two further emission points to air are the Arodo packer filter and the clinker dome filter. Indicative monitoring has been installed on each of these emission points to show deterioration in filter performance. During 2022 there were no incidences where these emission points indicated non-conformance with the permit.

2.1.4. Fugitive Emissions

There were eight schedule 5 notifications submitted from the site for fugitive emissions in 2022. This is shown in table 2.5 below.

Date	End Date	Emission Point	Type
07/01/2022	07/01/2022	Kiln	Fugitive dust
14/01/2022	14/01/2022	CM5	Fugitive dust
29/01/2022	29/01/2022	Kiln	Fugitive dust
27/06/2022	27/06/2022	Site	Fugitive dust
20/09/2022	20/09/2022	CM3	Fugitive dust
22/09/2022	22/09/2022	CM3	Fugitive dust
22/09/2022	22/09/2022	Dome	Fugitive dust
23/09/2022	23/09/2022	Kiln	Fugitive dust

Table 2.5 Summary of Schedule 5 notifications for 2022 for releases to air from fugitive emissions

## 2.2. Emissions to Water

The discharges to water from the installation are via emission point W1.

There were no emission breaches from emission point W1 during 2022

## 2.3. Other Releases

None

## 2.4. Compliance

In 2022 there were 13 notifications of non-compliance via Schedule 5 Notifications. Table 2.6 shows this in context with previous year's levels.

Year	Notifications
2006	134
2007	89
2008	40
2009	22
2010	11
2011	23
2012	17
2013	9
2014	3
2015	9
2016	7
2017	14
2018	15
2019	11
2020	8
2021	20
2022	13

Table 2.6 Summary of total notifications since 2006.

In depth descriptions of each of non-conformance have been provided to NRW through the Part A & Part B notifications which were sent for each incident.

**3. Condition 4.2.2 (b)**

The total substitute fuels burned in 2022 are displayed in the table below.

Parameter	Total Value	Units
Total Substitute Fuels Burned	Confidential	Tonnes
Total Hazardous Substitute Fuels Burned	Confidential	Tonnes

**4. Condition 4.2.2 (c)**

This report is produced using the standard NRW Annual WID Report template and is included in the following pages.

**Annual Performance Report for Hanson Cement Padeswood Works: 2022**

This report is required under the Waste Incineration Directive (WID) Article 12(2): - requirements on access to information and public participation. This requires the operator of an incineration or co-incineration plant to produce an annual report to the Regulator on the functioning and monitoring of the plant and to make this available to the public. To satisfy the requirements of the Directive the following information is provided:

**1 Introduction**

Name of company	Castle Cement Limited (trading as Hanson Cement)
Name of plant	Padeswood Works
Permit number	EPR/BL1096IB
Address	Padeswood, Mold, Flintshire, CH7 4HB.
Telephone	01244 550330
Contact name	Mr Stewart Mitchell
Position	Quality and Environment Manager
Further information	<p>There was one operational kiln at the Padeswood Works in 2022. This kiln is authorised to burn Cemfuel<sup>®</sup>, Profuel<sup>®</sup>, SRF, MBM and chipped tyres as kiln fuels in addition to more traditional fossil fuels such as coal, petcoke and kerosene. Coal and petcoke may originate anywhere in the world.</p> <p>Cemfuel<sup>®</sup> is manufactured from a range of waste streams including spent solvents, paint and ink residues, spent carbon absorbers and waste oils. The individual waste producers are located around the UK. Cemfuel<sup>®</sup> is produced specialist waste management companies via a number of processes including distillation, fractionation, grinding, melting, dissolving, filtering and blending.</p> <p>Profuel<sup>®</sup> is solid fuels produced to a tight specification. It is non-hazardous and produced from wastes such as paper, board, offcuts and scrap supplied by Manufacturers. Also includes mixed fibres/plastic from Waste Processors.</p> <p>SRF is non hazardous waste produced from sorted residual wastes by mechanical and biological treatment. The SRF is shredded to typically less than 50mm size by the suppliers.</p> <p>MBM (Meat and bone Meal) is supplied from several sources in mainland Britain and Ireland.</p> <p>Chipped tyres are derived from scrap tyres and supplied by a processing facility in Manchester. None were used in 2022.</p>

Copies of this report can be obtained via the Public Register.

## **2 Plant description**

The principal purpose of the activities at the installation is to manufacture cement.

Limestone, the main raw material, is extracted from a local quarry. This material is then crushed at the quarry in a dedicated crushing plant to a size of 95% no larger than 75 mm. The crushed stone is transported by road to the cement works where it is dried and crushed in a vertical roller mill with other minor components such as sand and pulverised fuel ash (PFA) to produce raw meal, a fine powder that is the feedstock for the cement kiln.

The raw meal is conveyed to the top of the pre heater tower. The meal is heated by the exhaust gases from the kiln as it passes down the tower until it reaches the calciner. This is a combustion chamber located between the kiln inlet and the bottom stage cyclone in which approximately 60% of the thermal energy required for the kiln is input. In the calciner the material temperature reaches ca. 900°C which results in most of the carbon dioxide in the limestone being driven off, a process called calcination. Fuels permitted to be burned in the calciner are coal, petcoke, chipped tyres, SRF, MBM and Profuel®.

The calcined material enters the kiln, which is a slightly inclined tube rotating at approximately three revolutions per minute. As the kiln rotates the material moves down to the discharge end undergoing a series of complex reactions to produce cement clinker. To complete the required chemical reactions the material must reach a temperature in the region of 1450°C. The thermal energy required at this point is supplied via the kiln burner, a co-axial pipe that is permitted to use coal, petcoke, Cemfuel®, SRF, MBM and Profuel®. The heated material leaves the kiln and is cooled to control the chemical reactions; the heat recovered is used as combustion air in the kiln and calciner. The cooled clinker is then directed to a purpose built store for later grinding in the cement mills.

The clinker is transported from the storage facility by a series of conveyor belts and transferred to the cement mill feed hoppers. The clinker is dosed, along with gypsum, limestone and other minor additives which control the properties of the finished cement, to the cement mills. There are five cement mills, two of which are operational, which grind the material to a required fineness. Each mill is equipped with fabric filters which minimise releases of dust to air. Upon exiting the mills cement is transported pneumatically to storage silos before being despatched in bulk road tankers.

A packing facility is also operational at the works which allows the packing of the final cement into either 25kg paper or plastic bags.

### 3 Summary of plant operation

#### 3.1 Plant details.

One cement kiln with the capacity to burn waste materials operates on site: for historic reasons this is known as kiln 4.

#### 3.2 Annual waste throughputs.

The amount of waste burned in 2022 is summarised in the table 3.2 below.

Waste type	EWC code	Tonnes used
Cemfuel®	19 02 08	Confidential
SRF	19 12 10	Confidential
MBM	02 02 03	Confidential

Table 3.2: Amount of waste burned in 2022

#### 3.3 Operational hours

The total hours of operation of the kiln and the total tonnage of cement clinker produced in 2022 is summarised in the table below.

<b>Equipment</b> Kiln 4	<b>Annual production 2022</b> Confidential	<b>Operational hours 2022</b> Confidential
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The annual shutdown of the kiln took place from the 2<sup>nd</sup> January to 29<sup>th</sup> January during which time the major maintenance to the plant took place. There were also two minor planned shutdowns in the year as detailed in the table below:

Start	Stop	Comments
02/01/2022	29/01/2022	Planned shutdown
13/07/2022	23/07/2022	Planned shutdown
20/11/2022	29/11/2022	Planned shutdown

Table 3.3, Planned shutdown periods 2022

#### 3.4 Residues

The only residue which is produced by the kiln is bypass dust.

7,486 tonnes of bypass dust was sent off-site in 2022 for use as either a land conditioning product or for further treatment.

### 4 Summary of plant monitoring.

#### 4.1 Pollutants measured.

Emissions from kiln 4 main stack (point A8) are monitored continuously for particulate matter, carbon monoxide, sulphur dioxide, hydrogen chloride, oxides of nitrogen, total organic carbon and ammonia. In addition to the continuous monitoring, periodic monitoring is carried out for hydrogen fluoride, a range of metals, persistent organic pollutants, and other more volatile organic species. The following summarises the emissions measured and the frequency.

<b>Pollutants Measured</b>	<b>Continuously</b>	<b>Periodically</b>
Particulate matter	✓	
Total Organic Carbon (TOC)	✓	
Hydrogen chloride	✓	
Carbon monoxide	✓	
Sulphur dioxide	✓	
Oxides of nitrogen (NO & NO <sub>2</sub> expressed as NO <sub>2</sub> )	✓	
Ammonia	✓	
Hydrogen fluoride		✓
Cadmium & thallium and their compounds (total)		✓
Mercury and its compounds		✓
Sb, As, Pb, Cr, Co,Cu, Mn, Ni and V and their compounds (total)		✓
Dioxins / furans (I-TEQ)		✓
Dioxins / furans (WHO-TEQ) Humans / Mammals / fish / birds.		✓

Table 4.1, Emissions measured from A8 and the frequency

#### 4.2 Availability of continuous emissions monitors.

The percentage of time during the year when the kiln was in operation that the continuous emission monitors were operating normally is summarised in the table below.

<b>Continuous emission monitor</b>	<b>% Time operating normally</b>
Particulates	100
Carbon monoxide	100
Sulphur dioxide	100
Oxides of nitrogen	100
Ammonia	100
Hydrogen chloride	100
Total organic carbon	100

Table 4.2, Emission monitors operating percentage

#### 4.3 Summary of Continuous Emissions Monitor data.

Continuous emission data is submitted monthly to the Natural Resources Wales. This information is required by permit EPR/BL1096 and provides the daily average emission concentration for the month, the maximum daily mean concentration, the number of days in the month the relevant limit was exceeded for each pollutant and the number of invalid hours.

A summary of emission data is shown graphically and in tabulated form in Appendix 1

#### 4.4 Results of periodic monitoring.

Results of periodic monitoring of emissions are shown in the table below

Substance / Parameter	Emission Limit Level	Result /Nm <sup>3</sup>		Test Method <sup>(2)</sup>
		First 6 Months	Second 6 Months	
Hydrogen Fluoride	1mg/Nm <sup>3</sup> over minimum 1 hour period	<0.022 mg/Nm <sup>3</sup>	0.033 mg/Nm <sup>3</sup>	ISO 15713
Cadmium & thallium and their compounds (total)	0.05mg/Nm <sup>3</sup> over minimum 30 min, max 8 hr period	<0.00047 mg/Nm <sup>3</sup>	0.00023 mg/Nm <sup>3</sup>	EN 14385
Mercury and its compounds	0.05mg/Nm <sup>3</sup> over minimum 30 min, max 8 hr period	0.050 mg/Nm <sup>3</sup>	0.013 mg/Nm <sup>3</sup>	EN 13211
Sb, As, Pb, Cr, Co, Cu, Mn, Ni, and V and their compounds (total)	0.5mg/Nm <sup>3</sup> over minimum 30 min, max 8 hr period	0.0069 mg/Nm <sup>3</sup>	0.0084 mg/Nm <sup>3</sup>	EN 14385
Dioxins / Furans (I-TEQ) <sup>6</sup>	0.1ng/Nm <sup>3</sup> over minimum 6hr, max 8 hr period	0.011 ng/Nm <sup>3</sup>	0.098 ng/Nm <sup>3</sup>	EN 1948
Dioxins / Furans (WHO – TEQ Humans/ Mammals) <sup>6</sup>	No Limit	0.010 ng/Nm <sup>3</sup>	0.090 ng/Nm <sup>3</sup>	EN 1948
Dioxins / Furans (WHO – TEQ Fish) <sup>6</sup>	No Limit	0.0097 ng/Nm <sup>3</sup>	0.079 ng/Nm <sup>3</sup>	EN 1948
Dioxins / Furans (WHO – TEQ Birds) <sup>6</sup>	No Limit	0.051 ng/Nm <sup>3</sup>	0.53 ng/Nm <sup>3</sup>	EN 1948

Table 4.4, Results of periodic monitoring of emissions 2022

#### 5 Summary of plant compliance.

For continuously monitored emissions from the kiln 4 stack (Point A8) the plant met its total organic carbon, carbon monoxide, NO<sub>x</sub>, hydrogen chloride, ammonia, and particulate matter emission limit values (ELV's) 100% of the time. Two breaches were reported for sulphur dioxide achieving a 99% compliance against the sulphur dioxide ELV.

The result of the first 6 months' testing for mercury and its compounds and Hydrogen Fluoride were above the ELV on emission point A8. These breaches were reported using schedule 5 notifications.

#### 6 Summary of plant improvements.

There were no improvement conditions relating to the burning of waste materials due in 2022.

**Summary of information made available.**

Monthly emission data reported to the Natural Resources Wales is published in the public register. The register is held at the following address:

Natural Resources Wales  
Chester Road  
Buckley  
Mold  
CH7 3AJ

Hanson Cement Liaison Committee meetings are held quarterly. This meeting provides a forum for local residents, local groups and elected representatives of local parish and District councils to discuss matters of concern with the company. Representatives of Natural Resources Wales also attend this meeting.

Hanson Cement operates an 'open door' policy enabling members of the public to contact the company to arrange a visit to the site or obtain information. The company can be contacted by the following methods:

By post: Hanson Cement, Padeswood Works, Padeswood, Mold, Flintshire, CH7 4HB.

By e-mail: [enquiries@hanson.com](mailto:enquiries@hanson.com)

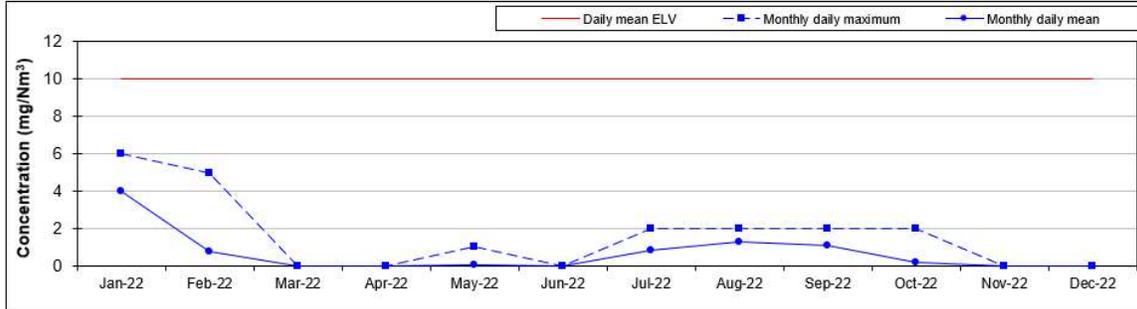
By telephone: 01244 550330

**Appendix 1**

The graphs show the annual emission to air of the continuously monitored pollutants:

Particulate matter.

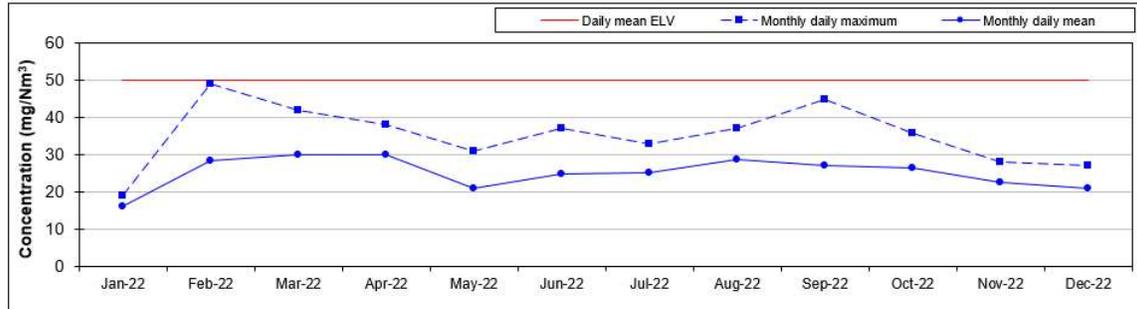
Pollutant: Particulate Matter



Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily mean	Daily mean ELV		10	10	10	10	10	10	10	10	10	10	10	10
	Annual daily maximum	6	6	5	0	0	1	0	2	2	2	2	0	0
	Annual daily mean	0	4	1	0	0	0	0	1	1	1	0	0	0
<b>Exceedences</b>														
Daily Limit			0	0	0	0	0	0	0	0	0	0	0	0

TOC as total organic carbon.

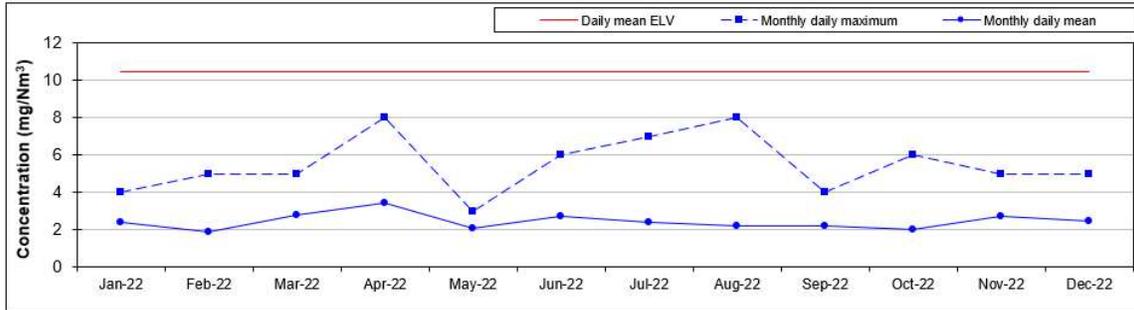
Pollutant: TOC



Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily mean	Daily mean ELV		50	50	50	50	50	50	50	50	50	50	50	
	Annual daily maximum	49	19	49	42	38	31	37	33	37	45	36	28	
	Annual daily mean	26	16	28	30	30	21	25	25	29	27	26	23	
<b>Exceedences</b>														
Daily Limit			0	0	0	0	0	0	0	0	0	0	0	

Hydrogen chloride.

Pollutant: HCL

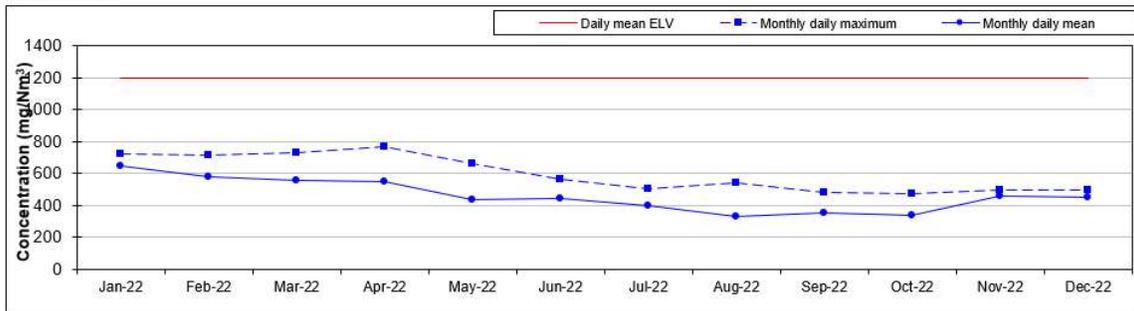


Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily mean	Daily mean ELV		10	10	10	10	10	10	10	10	10	10	10	10
	Annual daily maximum	8	4	5	5	8	3	6	7	8	4	6	5	5
	Annual daily mean	2	2	2	3	3	2	3	2	2	2	2	3	2

Exceedences		Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily Limit		0	0	0	0	0	0	0	0	0	0	0	0

Carbon monoxide.

Pollutant: CO

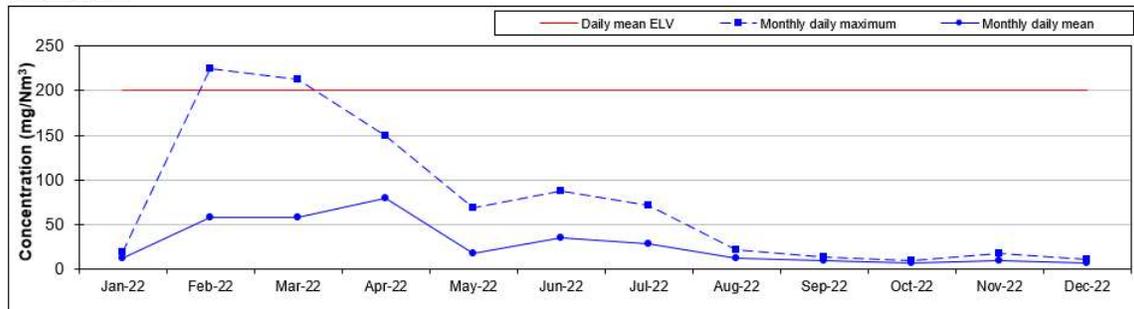


Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily mean	Daily mean ELV		1200	1200	1200	1200	1200	1200	1200	1200	1200	1200	1200	1200
	Annual daily maximum	767	725	719	731	767	663	563	502	541	481	475	497	498
	Annual daily mean	454	645	584	555	547	438	446	399	334	354	342	456	455

Exceedences		Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily Limit		0	0	0	0	0	0	0	0	0	0	0	0

Sulphur dioxide.

Pollutant: SOX



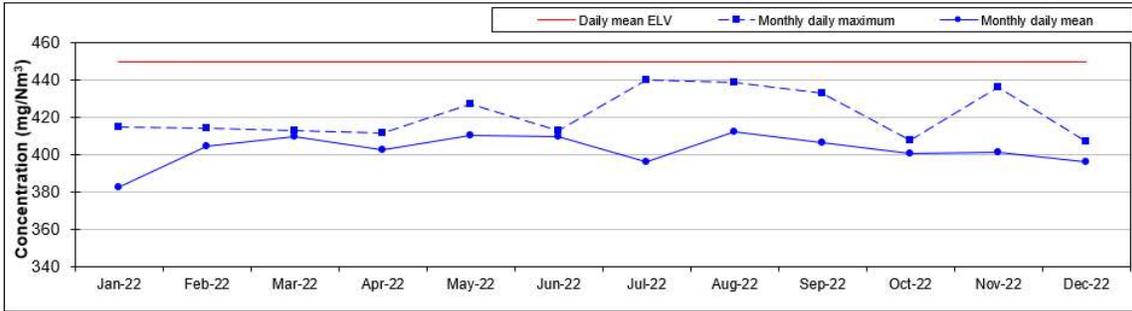
Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily mean	Daily mean ELV		200	200	200	200	200	200	200	200	200	200	200	200
	Annual daily maximum	225	19	225	213	149	69	87	71	22	13	9	17	11
	Annual daily mean	30	12	58	57	79	17	34	28	12	9	7	9	7

Exceedences		Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily Limit		0	1	1	0	0	0	0	0	0	0	0	0

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Oxides of nitrogen.

Pollutant: NOx

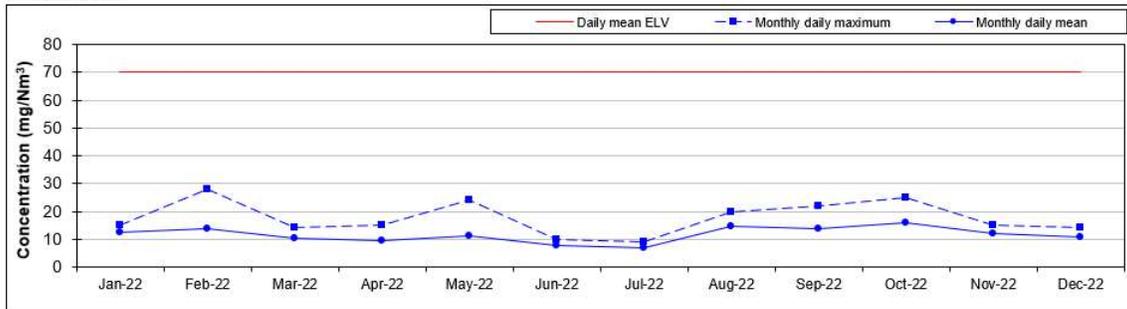


Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	
Daily mean	Daily mean ELV		450	450	450	450	450	450	450	450	450	450	450	450	
	Annual daily maximum	440	Monthly daily maximum	415	414	413	412	427	413	440	439	433	408	436	407
	Annual daily mean	404	Monthly daily mean	383	405	410	403	410	410	396	413	407	401	401	396

Exceedences		Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily Limit		0	0	0	0	0	0	0	0	0	0	0	0

Ammonia, NH3

Pollutant: NH3



Annual Summary		Month	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	
Daily mean	Daily mean ELV		70	70	70	70	70	70	70	70	70	70	70		
	Annual daily maximum	28	Monthly daily maximum	15	28	14	15	24	10	9	20	22	25	15	14
	Annual daily mean	12	Monthly daily mean	13	14	10	10	11	8	7	15	14	16	12	11

Exceedences		Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
Daily Limit		0	0	0	0	0	0	0	0	0	0	0	0