

Our Ref: BL1096IB/0249818/R

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13/11/15

Dear Stuart

Re CAR: BL1096IB/0249818

In response to the Actions raised in the noted CAR please see below and attached evidence/Appendices.

3.1.1 SRF

Action: Review your procedure for all sample analysis scheduling and data handling to ensure all determinants as required by the table S2.1 are analysed and reviewed regularly. Provide NRW with a copy of the procedure by 13/11/15.

Response: PEnv-01 has been reviewed and re-issued so that all staff are working to the same procedure and information. (Appendix 1: Procedures)

3.1.6 Hazardous Waste– Thermal Substitution Rate

Action: Please confirm how you ensure the thermal input of hazardous fuel (Cemfuel) does not exceed 40%. Please do so by 13/11/15.

Response: By calculation in order to reach 40% substitution of Cemfuel we would have to pump around 9.6 t/h to the main burner, the Cemfuel pump has a maximum design capacity of 10 t/h so there is a theoretical possibility of reaching this point (assuming the pump was still capable of running at this level).

However under operational conditions this amount of Cemfuel would not actually give us a high enough flame temperature to produce the clinker quality needed. Historical burn rates have rarely exceeded 50% of the pump capacity. At higher burn rates the supplier would not be able to maintain supply to cover this therefore we burn at a rate commensurate with kiln conditions and balancing the supply available.

3.3 Abnormal Operation (2.3.13-2.3.15)

Action: Clarify what action is taken in the event of CEM or abatement failure and review whether or not you are entering 'abnormal operation'. Please do so by 13/11/15.

Response: In the event of a CEMs failure we have a standby arrangement with NWL to provide monitors whilst our own systems are repaired/exchanged. The control system for the fuels has a 2 hr hold to give time to restart the CEMs if it's a minor fault. If the monitors are not back functioning in this time then the alternative fuels automatically ramp down over a 2hr period meaning at the end of four hours no alternative fuels are being burnt.

In this instance it would be recorded in the log sheet against that day as a 4hr "abnormal operation" this sheet also calculated cumulative hours in this event

Failure in the dust abatement systems: gas conditioning tower or filter would take the kiln out of operation, we would not be able to run with these failed.

3.4 Monitoring – Data Handling and Invalid Measurement (3.5.5)

Action: Ensure invalid half hours and days are clearly identified, recorded and tracked. Implement within 7 days of receipt of this report. Update procedures and staff training accordingly.

Action: As required by permit condition 4.2.3(c), report to NRW the number of invalid half hourly measurements as required by the emissions reporting template. This shall commence with the report for the period October – December 2015 due for submission Jan 2016.

Response: Discussions have been held with the staff responsible and a tracking spreadsheet set up to record the times at which the CEMS is locked for calibration. These can then be reviewed in the appropriate daily sheets and any amendments and the number of half hours affected will be recorded in the log sheet held by the Quality and Environment Manager which form the basis of the data sent in the monitoring reports. (See Example of Sheet on following page)

Yours Faithfully

A black rectangular box redacting the signature of Victoria Smith.

Victoria Smith
Quality and Environment Manager

Limit Date	Kiln							Cooler	Mill3	Mill 4		Abnormal Hours	Invalid 1/2 Hours
	10	200	500	50	10	1200		50.0	30.00	30.00	30.00		
	Dust	SOx	NOx	TOC	HCl	CO	NH3	Dust	Dust	Dust (filter)	Dust (DCE)		
01 Oct 15									0.67	0.00	17.75		
02 Oct 15									0.33	0.00	11.57		
03 Oct 15									0.40	0.00	3.88		
04 Oct 15									0.17	0.00	17.40		
05 Oct 15									0.00	0.00	19.59		
06 Oct 15									0.39	0.12	22.77		
07 Oct 15									0.57	0.10	18.40		
08 Oct 15									0.60	0.15	19.32		
09 Oct 15									0.58	0.11	10.08		
10 Oct 15									0.53	0.13	10.56		
11 Oct 15	5.76	51	393	11	8.46	370	26	5.8	0.54	0.14	21.45		
12 Oct 15	4.45	42	488	14	2.18	463	35	11.2	0.46	0.00	20.78		
13 Oct 15	4.62	54	473	11	5.94	410	31	12.3	0.46	0.15	20.93		
14 Oct 15	4.91	50	404	8	3.81	314	27	14.3	1.16	0.18	34.26		
15 Oct 15	6.23	54	372	9	8.89	328	27	16.7	0.83	0.12	18.86		
16 Oct 15	5.84	63	511	9	3.90	304	21	20.4	1.03	0.12	19.58		2
17 Oct 15	6.00	44	459	10	1.50	333	27	27.1	1.60	0.12	17.23		
18 Oct 15	6.39	44	475	10	2.83	355	30	23.5	0.98	0.15	11.52		
19 Oct 15									0.51	0.08	13.82		
20 Oct 15	5.62	52	439	10	3.57	304	23	22.5	0.75	0.21	13.12		
21 Oct 15	5.31	67	422	11	5.57	315	13	14.6	0.62	0.15	18.56		
22 Oct 15	6.89	57	365	10	9.54	333	28	16.7	0.73	0.26	22.48		
23 Oct 15	6.75	44	428	10	6.60	342	32	25.1	0.53	0.16	19.17		
24 Oct 15									0.87	0.21	5.95		
25 Oct 15	6.31	55	398	11	5.16	323	25	18.4	1.10	0.16	5.27		
26 Oct 15	6.52	74	368	10	5.27	317	22	22.3	0.96	0.17	13.74		
27 Oct 15	6.67	61	361	10	3.99	309	24	21.6	0.72	0.14	17.50		
28 Oct 15	7.52	50	365	10	6.66	296	24	21.4	0.74	0.24	19.87		
29 Oct 15	8.07	52	439	12	9.89	331	30	24.4	1.21	0.19	22.25		
30 Oct 15	6.93	65	390	14	4.26	366	22	25.7	0.95	0.24	20.70		
31 Oct 15	7.85	59	407	12	6.10	339	24	24.5	0.72	0.17	7.59		
01 Nov 15	8.33	52	408	12	8.18	320	28	24.3	0.46	0.31	14.78		
02 Nov 15	6.06	47	429	10	5.63	316	14	16.9		0.44	25.59		
03 Nov 15										0.23	24.25		
Average	5.87	32	435	12.63	1.71	368	28	18.5	9.77	1.75	11.53	0	2