

This form will report compliance with your permit as determined by an NRW officer

Site	PADESWOOD CEMENT WORKS				Permit Ref	BL1096IB		
Operator/ Permit holder	Castle Cement Limited							
Date	10/02/2015				Time in	15:15	Out	16:15
What parts of the permit were assessed	Various							
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge	
Recipient's name/position	David Quick							
Officer's name	Stuart Ross				Date issued		18/02/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

This Compliance Assessment Report follows an unannounced site inspection to assess basic housekeeping standards for fugitive dust control limited to external roads / yards and the use of existing doors. It also follows a noise complaint received on the same day.

The inspection was completed with the Shift Manager.

1. Dust Control

Site access roads / yard areas were generally well wetted by the bowser and minimal dust was observed coming from vehicle movements. The road sweeper was in operation and the amount of debris on site roads was generally acceptable given materials were well wetted (it is recognised that the site was in a state of flux following the recent annual maintenance shut down).

However, there is room to improve the cleanliness of yards areas etc, particularly in areas off the main access roads (e.g. in the vicinity of the clinker dome) and this will be inspected during the next visit.

Across the process areas, doors were shut and no dust emissions were observed arising from operations. The 3 doors at the front of the crane store building were closed when not in use and the PFA door was only observed to be open when a vehicle was entering / exiting the building. Vehicle deliveries were being supervised. The gypsum door to the east of the crane store building was shut and secured.

I note that work is underway to remove spilt filter dust from under the clinker cooler bag house - this issue was highlighted during the December inspection. I also note that some cladding on the clinker dome has been repaired / replaced.

N.B. The previous Compliance Assessment Report dated 22/12/14 requires that you submit, to Natural Resources Wales, the findings of your Environmental Management System review by 27/02/15 and your dust Management Plan by 27/03/15.

Part A & B Notification

Please provide your Part B notification following your Part A notification as received 21/01/15 reporting dust release from the kin / cooler area. Please do so by 27/02/15.

Further to our investigation into dust complaints in December 2014 we request that you confirm whether or not any CCTV footage of site operations is available to view for the month of December 2014 by 27/02/15.

Please submit your half hourly CEMS data for point source particulate emissions from emission points A8 and A9 for December 2014 along with the most recent QAL2 reports for the particulate CEMS calibration. Please do so by 27/02/15.

2. Noise

Prior to the inspection a visit was made to an isolated property off Padeswood Lake Road to investigate a noise complaint reporting an intermittent screeching noise originating from the works.

During the location visit I could hear a steady low level fan type noise and also a steady, slightly higher frequency tone. The tone was not particularly annoying in my opinion but was discernable above the general factory noise. It is not clear if this noise was what the complainant was reporting.

During the onsite inspection I noticed a screeching noise from the clinker cooler heat exchanger fans - however, to the south of the clinker cooler building this noise reduced significantly and appeared localised to the heat exchanger area. It was not clear if this noise was giving rise to any off site impact. No other screeching / high pitched noises were noted.


Thank you for e-mail received 11/02/15 reporting that your on site investigation had identified some potential noise sources including rollers on CV01 and the coal mill with remedial action taken to reduce noise. I also note that belt spray was applied to clinker cooler heat exchanger fan belts.

Raw Mill Reject Project

During the inspection it was reported that installation work for the new raw mill reject system has not yet started.

Castle Cement's action plan (as agreed with Natural Resources Wales) stated that installation work was due to commence January 2015, cold commissioning February 2015 and the system going into service March 2015.

NB. If the action plan is delayed then any existing suspended CCS scores may be applied and further non compliance scoring / enforcement considered.

	EPR Compliance Assessment Report	Report ID: BL1096IB/0232113	
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Site	PADESWOOD CEMENT WORKS	Permit	BL1096IB
Operator/ Permit	Castle Cement Limited	Date	10/02/2015

Section 3- Enforcement Response	Only one of the boxes below should be ticked
<p>You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.</p>	
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	<input type="checkbox"/>
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	<input type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

● We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

● Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.