	EPR Compliance Assessment Report	Report ID: BL1096IB/0237170	
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	09/04/2015	Time in	10:00 Out 14:00
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 (Plant Manager)		
Officer's name	Stuart Ross	Date issued	20/04/2015

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	A	
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 a site meeting with the Plant Manager, Production Manager, Site Chemist and Hanson SHE Manager to discuss various issues and an inspection of general external yard / process areas and clinker conveyers CV01 & CV02 with the Production Manager. The kiln was not operational at this time (planned shutdown).

1. EMS Review

In December 2014 Natural Resources Wales requested that Hanson completes an EMS review covering operational procedures, staff training, supervision and auditing in the context of preventing and minimising dust emissions from site operations. Hanson provided a response 27/02/15 providing a brief summary of their review with a proposal that procedural changes would be made in conjunction with the development of the dust management plan (see discussion below).

a) Training - Hanson operate a group level environmental training matrix with procedural training at a site level being cascaded to operational staff via shift managers using measures such as 'tool box talks'. Hanson shall develop a formal site level environmental training matrix for roles with key environmental responsibilities by **31/07/15**.

'Permit Awareness and Environmental Responsibilities Training' has recently been delivered to new supervisors, the site Planning Engineer, the site Chemist and others by the Company SHE Manager. This training covered the history of the plant including environmental incidents, the requirements of the permit, BAT requirements and more.

b) Auditing - the Plant Manager reported that the site is subject to a number of internal and external audits. The site manager completes a monthly audit covering a different topic, this reportedly includes dust control (annually). Shift managers complete a walk / route during each shift to check there are no issues arising from plant/operations. It is recommended (if not already in place) that housekeeping / dust control standards are clearly defined and communicated to staff with relevant responsibilities.

Where issues are identified during site walks / audits they are logged on the site's incident tracking system 'entropy' and tracked / discussed during management meetings.

The Plant Manager reported that that is an ongoing drive to improve the site presentation and management ethos.

Operating procedures and training will be audited by Natural Resources Wales upon completion of the dust management plan (refer section 2 below).

2. Dust Management Plan

I acknowledge receipt of your draft dust management plan. We agree with your approach in identifying dust sources, control measures, risk, inspection requirements and additional improvements.

The plan needs to be expanded and finalised to include additional detail on the control measures in place, inspection (PM frequency / daily routes etc), and confirmation of the proposed improvements and timescales for completion. The dust management plan should also make reference to relevant operational procedures. The management plan shall form part of your EMS and be a tool for securing ongoing permit compliance.

Following the site inspection please review the control measures for CV02 - including doors and additional cladding in the general vicinity of the bag plant and dust collection skip. It was also noted that at two locations on CVO1 and at the bottom of CV02, rough holes have been cut in the cladding to allow access for vacuum lines (cleaning). It appears that the cladding could be better fitted around the hoses to reduce the potential for dust being carried out of the conveyor housing - please review this as part of your plan.

The dust management plan and relevant EMS procedures for dust control shall be finalised by 12/06/15 and a copy submitted to Natural Resources Wales. If during the interim period you wish to discuss any issues regarding the plan, please do not hesitate to contact me.

The Plant Manager has committed to continue making progress to implement improvement measures as identified in the plan, particularly regarding the installation of industrial self closers on doors and the ongoing plan to replace the crane store sand door (w/c 13th April) and the adjacent shale door in Quarter 3 2015.

3. Raw Mill Reject Improvement Works

It was reported that plant installation has been completed with hot commissioning to commence when the kiln next starts up. Please keep me up to date with progress. It was reported that raw mill trips have reduced in number due to ongoing improvement works to improve raw mill reliability. Natural Resources Wales has not received any recent noise complaints that may relate to the raw mill reject system.

4. Emissions Monitoring - Normal Operating Conditions

As discussed the definitions as required by permit condition 2.3.12 (a) & (b) require review. Please submit a written proposal for each condition to Natural Resources Wales for agreement.

5. Site Inspection

Site access roads / yard areas where inspected were generally well wetted by the bowser and minimal dust was observed coming from vehicle movements.

Doors fitted to buildings were shut and no dust emissions were observed arising from operations. All 3 doors at the front of the crane store building were closed and not in use.

Since the last inspection work has been completed to remove spilt filter dust from under the clinker cooler bag house - this is a significant improvement to prevent and minimise dust emissions and has improved site presentation. Please ensure that this area is not allowed to deteriorate.


6. Background Ammonia Monitoring Trial (BAT Conclusion 20)

Thank you for providing a revised version of Appendix 3 (received 16/04/15) as part of your Regulation 60 response.

Natural Resources Wales agrees to Hanson completing the trial at Padeswood as detailed in your report subject to the following conditions;

- a) The cumulative SNCR downtime or 'off period' shall not exceed 6 weeks in total, operating on a 2 week off, 2 week on pattern. If during the 2 week off period the kiln is not operational for unforeseen reasons this time may be added to the end of each off period as required. Natural Resources Wales shall be pre notified of the start of each 2 week transition.
- b) For the purposes of the trial, and during SNCR down time, NO_x emissions (A8) shall not exceed 1500mg/m³ as a daily average and 1500mg/m³ as an hourly average. The normal daily average NO_x limit will apply at all other times.
- c) The above emission limits are based on advice from our Air Quality Modelling Risk Assessment Team and review of pre SNCR NO_x data for Kiln 4 (2006) which suggests that these limits are unlikely to be exceeded. This is a conservative approach to prevent and reduce potential air quality impacts.
- d) If during SNCR down time the NO_x emission limits are exceeded, Hanson shall notify Natural Resources Wales without delay and take corrective action to reduce NO_x emissions to within the trial limits including the restart of SNCR as necessary. The cause of the exceedance shall be investigated and findings discussed with Natural Resources Wales.
- e) Accurate records shall be kept of SNCR down time and included in the final report. Emissions monitoring data shall be collected and reported as per normal permit requirements.
- f) Relevant staff shall be fully conversant with the limitations and requirements of the trial.

Subject to Hanson confirming agreement to the above conditions the trial may commence.

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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.