



## EPR Compliance Assessment Report

Report ID: BL1096IB/0198436

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	15/01/2014	Time in	13:00	Out	16:00
What parts of the permit were assessed	Various				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Gary Young (Plant Manager)				
Officer's name	Stuart Ross, Paul Wright		Date issued	23/01/2014	

### 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	C3	3.2
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	A	
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	N	
	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	A	
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

1

Total compliance score  
(see section 5 for scoring scheme)

4

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.*

### Comments

This inspection was completed during a major kiln shut down / maintenance period. Work included coal mill and raw mill overhaul and partial kiln refractory relining. Thank you for taking time to show us the work in progress.

### 1. Dust Complaints

On 12, 16, 17 & 18th December 2013 Natural Resources Wales received dust complaints from local residents in the Spon Green / Megs Lane area of Buckley reporting dust on their cars. During this period S/SW winds prevailed potentially linking the complaints to the Cement Works. Castle Cement also received a number of dust complaints and dust samples were collected from a number of vehicles in the potentially affected area.

Castle Cement sent dust samples for third party laboratory analysis and the results show the presence of clinker dust and fly ash. Clinker dust is highly likely to originate from the cement works and fly ash is also used as a raw material in the cement making process. Both of these materials are stored in the crane store, although may originate from other areas of the site.

Shortly after the complaints were received / sample analysis results were available, Castle Cement reported that the source of the dust is likely to be the crane store. The automatic door closing mechanism for the PFA reception bay at the front of the crane store had failed causing the door to remain open when it should have been closed between deliveries. Whilst Castle Cement reported that dust emissions were not particularly evident during this time it appears that strong winds during this period caused dust to be released from the building. Clinker is typically conveyed into the crane store over night so this may account for the emissions being less obvious. The door was forcibly closed following plant shut down and is scheduled for repair before the plant starts up early February 2014. This must be completed before materials are received into the crane store unless otherwise agreed.

During this inspection the adjacent door for shale/coal deliveries was noted to open on arrival on site at approx 13:00 and no vehicles were observed using the bay. During the site walk over approximately 1.5hrs later the door was open and dust was observed blowing out of the building. Again no vehicles were observed using the bay at that point. It was later reported that the door had been opened by a contractor using the area, and upon trying to close the door it was found to have malfunctioned. The fault was not reported to the shift manager to allow remedial measures to be taken.

As discussed, the crane store doors must remain closed inbetween deliveries to prevent and minimise dust emissions, and doors must be maintained in good operating condition. Where break down occurs provision must be made to ensure doors are quickly repaired. Contractors must be managed to ensure they understand the importance of environmental control measures

by reporting issues to site management. The dust release in December and the issues noted during this inspection do not constitute appropriate measures for the prevention and control of dust emissions and are in breach of permit condition 3.2. This attracts a consolidated CCS score of 3.

Please confirm when the defective PFA door has been repaired.

Please confirm the measures you are taking to ensure doors remain in good operating condition and that contractors are aware of the site's permitted responsibilities. Please do so in writing by 31/01/14.


## **2. Kiln Flush**

Thank you for submitting a Part A and Part B notification for the kiln system overpressurisation incident on 16/11/13. A blockage occurred in cyclone 1 and whilst clearing it a sudden surge of material dropped through the kiln system and overpressurised the clinker cooler / clinker transport system. Hot material was spilt onto the floor of the cooler building with some dust/hotgases becoming airborne. The quantity becoming airborne is estimated (by Castle Cement) to be 15 kg. There is no known off site impact from this incident, although it is possible that some dust / fumes may have left the installation boundary.

The cause of the blockage is unknown and is unusual at this location. During the January 2014 shut down a pressure ring is to be fitted to cyclone 1 to give an early indication of blockage and thus minimise material build up and the subsequent amount to be cleared through the system. All other cyclones currently have the pressure ring system fitted. During this inspection it was noted the scaffolding has been erected at the base of cyclone in readiness for this improvement work.

## **3. Noise Abatement Works**

During the inspection it was noted that substantial progress has been made to install the kiln shell fan noise enclosure. Work is also due to start on the conditioning tower water pump and cooler stack and scheduled for completion prior to kiln start up.

 <b>Cyfoeth Naturiol Cymru Natural Resources Wales</b>	<b>EPR Compliance Assessment Report</b>		Report ID: BL1096IB/0198436	
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Operator/ Permit	Castle Cement Limited	Date	15/01/2014	

<b>Section 3- Enforcement Response</b>		<b>Only one of the boxes below should be ticked</b>	
<p>You must take immediate action to rectify any non-compliance and prevent repetition.</p> <p>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.			
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.			X
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

<b>Section 4- Action(s)</b>			
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			
B1	C3	Refer to details section	31/01/14

## 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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](mailto: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.



