	<b>EPR Compliance Assessment Report</b>	Report ID: BL1096IB/0246694			
<b>This form will report compliance with your permit as determined by an NRW officer</b>					
Site	PADESWOOD CEMENT WORKS		Permit Ref	BL1096IB	
Operator/ Permit holder	Castle Cement Limited				
Date	06/08/2015		Time in	09:30	Out 16:30
What parts of the permit were assessed	Pollution Prevention and Control				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	David Quick (Plant Manager)				
Officer's name	Stuart Ross, Ian Oakes		Date issued	28/08/2015	

**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
<b>a) Permitted activities</b>	1. Specified by permit	A	
<b>b) Infrastructure</b>	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	C3	1.1
<b>c) General management</b>	1. Staff competency/ training	N	
	2. Management system & operating procedures	C3	1.1
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
<b>d) Incident management</b>	1. Site security	N	
	2. Accident, emergency & incident planning	C3	1.1
<b>e) Emissions</b>	1. Air	N	
	2. Land & Groundwater	C3	3.2.1
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
<b>f) Amenity</b>	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
<b>g) Monitoring and records, maintenance and reporting</b>	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
<b>h) Resource efficiency</b>	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

<b>Number of breaches recorded</b>	4	<b>Total compliance score</b> (see section 5 for scoring scheme)	16
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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 audit was completed on 06/08/15 (09:30 – 16:30) and 07/08/15 (10:00 – 13:45).*

### 1.0 Scope of Audit

Padeswood Cement works holds and uses an inventory of dangerous substances that have the potential, if not adequately controlled, to cause a significant environmental impact. This audit primarily assessed the pollution prevention measures in place to ensure stored liquids provide adequate protection and prevent and minimise the risk of contamination of land, groundwater and surface water.

These liquids include Cemfuel (a specified blend of waste streams including spent solvents, paint and ink residue and resins), ammonia and petroleum products. The coal store and solid recovered fuel (shredded combustible waste) handling system were also inspected.

Control measures assessed include primary containment (tanks), secondary containment (bunds) and tertiary containment (site drainage system, lagoons, interceptors and emergency response) and associated controls / procedures, including maintenance and inspection.

### 2.0 Permit Conditions

The following permit conditions were audited;

#### General Management

##### 1.1.1 *The operator shall manage and operate the activities;*

- a) *In accordance with a written management system that identifies and minimises risks if pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and*
- b) *Using sufficient competent persons and resources*

#### Emissions of Substances not Controlled by Emission Limits

*3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent and where that is not practicable to minimise those emissions.*

*3.2.3 All liquids in containers, whose emissions to water of land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.*

### **3.0 Audit Observations**

The audit observations have been summarised by subject /plant operations as follows;

#### **3.1 Cemfuel/Diesel/Ammonia Tank Farm**

Inventory; 2x Cemfuel 240m<sup>3</sup> stainless steel tanks, 1x Diesel 240m<sup>3</sup> stainless steel tank and 1x aqueous ammonia 100m<sup>3</sup> stainless steel tank.

##### **3.1.1 Tank Integrity**

Visually all tanks within the tank farm appeared to be in good condition, with no evidence of significant corrosion, leaks or spills.

Castle Cement have completed ultra-sonic (non-destructive) testing of Cemfuel tank wall thickness, this is scheduled in via SAP on a 5 yearly basis. The last round of testing was completed 17/04/09 and did not highlight any significant defects, but reported 0.7mm wear on some panels. Panel thickness (as built) is understood to vary from 8mm (lower tanks sections) to 6mm (upper tank sections).

Ultrasonic testing has not been completed on the ammonia or diesel tanks since their installation.

**ACTION** – Non-destructive testing of the Cemfuel tanks is one year overdue according to the sites own testing schedule. Testing of the Cemfuel, diesel and ammonia tanks shall be completed and the findings reported to NRW by **31/12/15**. The future testing frequency should be based on the test results and scheduled via SAP.

##### **3.1.2 Pipeline Integrity**

Ultrasonic testing of the Cemfuel and diesel pipelines from the tank farm to the main kiln burner was completed June 2013. Testing is scheduled in via SAP on a 2 yearly basis - testing is due.

A copy of the most recent test report was obtained during the audit and testing was not completed on the Cemfuel and diesel pipelines as they pass through the underground service channel from the tank farm. These pipes are vulnerable and leaks may go undetected resulting in the contamination of land and groundwater. No testing of the ammonia pipelines (above or below ground level) has been completed to date.

#### **Permit Non-compliance**

**The existing Environmental Management System is not is not minimising risk of pollution (as per the deficiencies detailed in the paragraph above) and constitute a breach of permit condition 1.1. CCS 3.**

#### **ACTIONS**

– Non-destructive testing of pipelines from the Cemfuel, diesel and ammonia tanks from the respective tank to the point of use shall be completed (including within the underground service channel) to assess line integrity. This shall be completed by and the findings reported to NRW by **31/12/15**. The future testing frequency should be based on the test results and scheduled via SAP.

– Please clarify the trigger points for component (tank and pipeline) replacement due to loss of wall thickness by 30/10/15.

##### **3.1.3 Cemfuel / Diesel Pumps & Pipework Bund**

Pipework and pumps between the Cemfuel / diesel off-loading points and associated storage tanks are located within a fully bunded area. Spills from this areas are contained.

Cemfuel is a flammable liquid and its flammable properties can vary from batch to batch. For example, during the audit the Site Chemist reported that the methanol content can vary from anywhere between 25 and 60%.

The Cemfuel handling and storage system was, as far as is reasonably practicable, designed and built in accordance with the recommendations of the HSG176 guidelines 'The storage of Flammable Liquids in Tanks' 1998.

However, the audit identified a number of deficiencies that could pose a fire risk and an associated environmental impact;

- Multiple leaks from the Cemfuel / diesel handling and pumping system. Numerous buckets had been placed under pipework/pumps to collect drips and this appeared to be normal practice. An attempt had been made to contain spills below the Cemfuel pump using absorbent granules, which were saturated and could in turn constitute a hazard.
- The bund floor was covered in a film, and in places shallow puddles of liquid that appeared to be Cemfuel/diesel and rainwater. A general film of black residue was covering much of the equipment in this area (including pumps).
- The Cemfuel strainers were covered in a thick black residue, with liquid Cemfuel collected underneath in drip trays.
- Potentially unsuitable tools were evident in the area, apparently used for cleaning the strainers, such as a metal pallet knife and metal bar used for leverage.
- An open 45 gallon drum stored in the fuel unloading area was approximately 2/3 full of liquid (considered to be diesel).
- A cable behind the Cemfuel loading control panel was hanging loose with exposed connectors partially covered in insulating tape. It was not clear if this cable had been isolated.
- The diesel filling /back venting hose was in a poor condition.

### **Permit Non-compliance**

As Cemfuel can contain varying levels of flammable solvents (e.g. methanol) it is imperative that safe systems of work are in place with the highest standard of maintenance and housekeeping commensurate to the risk posed.

**The existing Environmental Management System is not minimising risk of pollution (as per the deficiencies detailed above) and constitutes a breach of permit condition 1.1. CCS 3.**

### **ACTIONS**

Accordingly Castle Cement shall complete the following actions by 30/10/15;

- Review all procedures for the tanker offloading, storage and handling of Cemfuel and diesel to ensure the risk of fire and spillage of materials is minimised as far as practicable. This shall include a review of the risk assessment used by contractor(s). Staff and contractors shall receive training as appropriate. Provide NRW with a summary of the review and actions taken.
- Repair equipment to prevent leaks and remove potentially flammable materials from high risk areas. Ensure ongoing maintenance to prevent and minimise the spillage of flammable liquids.
- Remove spilt liquids and accumulated residues from surfaces, plant and equipment. Ensure ongoing maintenance to achieve a high standard of housekeeping.
- Review signage and labelling and ensure that it meets all relevant standards (The Health and Safety (safety signs and signals) Regulations 1996 as amended by CLP Regulations 2015 – L64 3rd Edition Guidance, 1st June 2015. (Free download HSE website).

### **3.1.4 Bund Integrity and Design**

The tanks are contained within a reinforced concrete, compartmentalised bund. The bund capacity is adequate and the bund walls appear to be in good condition.

Cemfuel and Diesel unloading takes place within a fully bunded, covered bay whereby any spillages are contained. The ammonia unloading area is adjacent to the ammonia tank. The rear of the delivery vehicle and connecting pipe work is over / within a shallow bund.

The bund floors were covered in a film of algae/sediment and some vegetation (the odd bullrush). It appears that a small volume of water has been present in the bund for some time allowing the vegetation/algae to flourish.

Trees / vegetation have encroached around the tank farm and pose a risk to the integrity of the bund (root damage / ground stability) and also the tanks due to tree fall. This risk is likely to increase as the trees mature. The roof line gutter was heavily clogged with vegetation which may be increasing the amount of rainwater entering the bunded area.

## **ACTIONS**

Accordingly Castle Cement shall complete the following actions by 30/10/15;

- Clean the tank bunds to remove vegetation and sediment and ensure measures are put in place to ensure the bund remain free of rain water (as practicable). This will allow for the visual inspection of bund floor integrity and maximise bund capacity. Review procedures/maintenance provisions accordingly.
- Clean roof gutters, remove vegetation that poses a risk to tanks and bund integrity. Ensure that this issue is reviewed regularly as part of the planned maintenance system.
- The original design was such that contaminated bund water from the Cemfuel bund would be collected in a separate waste water storage tank and regularly 'bled' at a low flow rate to the burner station. During the audit the Operations Manager stated that this system is no longer used. Provide NRW with the procedure for the disposal of Cemfuel contaminated bund water in order to prevent pollution.
- Provide NRW with the procedure for the testing arrangements in place for rainwater contained in the Cemfuel, diesel and ammonia bunds and the criteria for disposal to surface water/offsite.

### **3.1.5 Overfilling Filling Prevention**

Tanker offloading – all tanks within the tank farm are fitted with high and high-high level alarms. To prevent tank overfilling high level alarms are linked to the control room. The system is inspected and tested on a quarterly basis (Discussed with SHEQ operative / Electrician).

It was not established whether the tanks have remotely operated shut off valves in the event of high-high alarm activation, particularly for tanks that are loaded using the tanker off-loading pump.

### **3.1.6 Tanker Offloading Procedure**

The Operations Manager reported that tanker offloading (Cemfuel, diesel and ammonia) is not supervised by site personnel. NRW considers that unless you can justify (on a risk basis) that tanker offloading should be supervised.

ACTION - Provide a risk assessment for tanker offloading by 30/10/15.

### **3.1.7 Fire Suppression System**

The fire suppression system serving the Cemfuel tank farm is tested monthly, including (but not limited to) the water tank, foam additive tank and level, pump engine, pipework valves and spray nozzles. This includes the operation of the system without foam to test all aspects of the system are operational. The system was last checked 31/07/15 and an overview of these checks was discussed with the SHEQ Operative / Electrical Engineer.

It is understood that the fire suppression system can only be activated manually at the tank farm by means of a break glass switch.

## **ACTIONS**

- Confirm if the Cemfuel fire suppression system can be automatically or remotely operated in the event of a fire. If the system can only be manually activated by means of a break glass switch (local to the tank farm), complete an assessment of the options available to activate the system automatically / remotely.
- Confirm whether or not you hold an inventory of PFOS (perfluorooctanesulfonic acid) based firefighting foam. European Directive 2006/122/EC banned the use of this type of foam from 27/06/11.

Please complete the above actions by 30/10/15.

### **3.2 Other Tanks (Petroleum Products & Adblue)**

There are numerous tanks located around the site serving heating boilers and vehicle refuelling stations. All tanks observed were bunded and labelled (Tank ID, contents and capacity). Not all tanks were inspected during the audit, for those that were the details / findings are as follows;

- Fuel Oil – (2 steel tanks 17,200 + 6,800 litres) serving a boiler (site ref. Tank 7 & 8). Tanks located opposite main site office within a block wall bund (not rendered). A spill response kit containing booms and absorbents located next to bund wall. Refer recommendation below.
- Fuel Oil – (1 tank 6,900 litres) serving a boiler (site ref Tank 1) located to rear of the ablutions block. Tank within a single skinned rendered block wall bund. This tank appears to be >20 years old. The bund contained a small amount of water and appeared to be weeping through the base of the bund wall.

**ACTION** – Assess the integrity of the bund serving Tank 1 and take steps (where necessary) to ensure the bund is structurally sound and impermeable. Refer recommendation below.

- Derv (90,000 litres), Gas oil 27,500 litres, Lube oil (5000 litres) stored within triple compartment tank (single outer steel bund wall) located by the vehicle refuelling station (site ref. Tank 21A, B, C). The tank was well secured. There was a film of oil / oily residue around the outside of the tank and on the concrete hardstanding where the pipelines exit the tank / under the filling points. This may be due to a recent spill or ongoing leak.

**ACTION** – Investigate the cause of the oil leak on tank 21A, B, C and take remedial action as necessary to prevent further leaks. Complete by **30/10/15** and report findings to NRW.

- Adblue (aqueous urea) is stored next to the vehicle refuelling pumps. The tank capacity and construction is unknown. The tank is located very close to a surface water drain which is not marked on the site drainage plan.

**ACTION** – Confirm the tank design and pollution prevention measures in place to prevent spillage to surface water. Please do so by 30/10/15.

**ACTION** – Confirm tanks T23 and T24 (located adjacent to vehicle wash) are no longer in use. Please do so by 30/10/15.

**Recommendation** – Review the suitability of existing secondary containment for tanks listed above (and where appropriate those not subject to this audit), against CIRIA guidance note C736 'Containment Systems for the Prevention of Pollution – Secondary, Tertiary and other measures for industrial and commercial premises' 2014. This is particularly important for old tanks or where the bunds are of block wall construction. Where secondary containment is deemed inadequate take appropriate remedial measures to minimise the risk of pollution.

**Recommendation** – Tanker off-loading of petroleum products and Adblue should be supervised by site personnel.

### **3.3 Coal Storage**

Coal is stored on a concrete pad and largely covered by the coal store roof. There is potential for diffuse pollution from rainwater washing fine material off yard areas / stockpiles into an adjacent watercourse although the risk appears to be low. Castle Cement have created a settlement area and 'limestone dam' to minimise the release of suspended solids from around the coal store area. This area has been used to store coal for a significant period of time and the system appears proportionate to the pollution risk.

### **3.4 Solid Recovered Fuel (SRF) Unloading/Handling**

The original and new SRF waste reception bays were inspected. No surface water drains were observed within these buildings. It was confirmed that the existing surface water drains in the new SRF handling building have been backfilled/capped with concrete as detailed in the permit variation application.

A spill kit is located within the original building. Small hydraulic oil stains were noted on the concrete around the walking floor trailers – please ensure spills are minimised by effective maintenance of hydraulic systems. The new hydraulic pump is located on a integral drip tray

**Recommendation** – Place an additional spill kit in the new SRF building to allow potential oil spills to be quickly contained.

### **3.5 Waste Oil Storage**

Waste oil is stored in a dedicated tank (2400 litres), plastic double skinned tank (integral bund). The tank was protected from plant/machinery by barriers.

No other waste oil storage / oil contaminated waste storage was assessed as part of the audit.

### **3.6 Kiln Bed 2**

Following an inspection of the SRF reception building it was observed that waste oil has been spilt from the oil drain down pipe below kiln bed 2 due to poor design and practice. This, has caused localised ground contamination and splattered on the concrete kiln support. It was reported that the spillage occurs when waste oil is decanted into drums.

**The above matter constitutes a breach of permit condition 3.2.1. CCS3. Emissions of substances not controlled by emissions limits shall not cause pollution (including contamination of land). Appropriate measures are not in place to prevent and minimise emissions.**

**ACTION** – Remove oil contaminated ground and dispose of at a suitably permitted site. Review the options available to prevent future spills and contamination and implement accordingly. Maintain records of the remediation work. Inform NRW of the action taken by 30/10/15.

### **3.7 General Pollution Prevention**

#### **3.7.1 Site Drainage**

Water courses run from north to south along the eastern and western boundaries of the site, both draining to Blackbrook which is in turn a tributary of the river Alyn which discharges to the River Dee.

The main discharge from the site is from the surface water lagoon (emission point W1) which receives surface water from a large proportion of the site yard areas. It has two manually operated shut off 'penstocks' at the inlet and outlet. Under normal circumstances the lagoon outlet penstock is shut and only opened to drain surface water as and when required.

Having reviewed the site drainage plan (ref. drawing number 000-01 August 2012) there appear to be additional discharges from the site that do not pass through the lagoon and are not listed in the permit;

- Outfall SJ292623 - Cement silo/loading area (and possibly additional areas extending to the packing plant and main site road) draining from manhole S150/S151 to a ditch to the north of the clinker dome. During the audit this outfall was possibly located (Engineering Manager Present). A plastic pipe was found on the bank of the ditch but there was no evidence of any recent discharge (no silt or evidence of flow over vegetation below the pipe). Having reviewed the permit application it is possible, although not confirmed that this drainage leg was blocked during the construction of kiln 4.
- Discharge from manhole S140 & S141, to the culverted watercourse that runs around the east and south of the clinker dome.
- Outfall SJ292619 – draining surface water from the clinker dome area and possibly beyond (complicated drainage layout in this area) to the watercourse that runs to the west of the surface water lagoon.
- Outfall SJ288622 – this drainage network runs along the western side of the works, it begins at the A5118, continuing through the works behind the canteen, works storage warehouse & garage areas. The drainage plan does not include any detail on drainage from the lorry refuelling area (drains were observed during the audit in the immediate vicinity of the fuel pumps, fuel tank and Ad blue tank).
- There appear to have been changes to site drainage system that are not reflected on the plan e.g. lorry refuelling area.

### **3.7.2 Emergency Plan**

The 'Padeswood Emergency Response Plan' was reviewed during the audit. The plan is kept at the security lodge which is a suitable location in the event of a major incident and for briefing the Emergency Services. The plan covers the actions to be taken in the event of a fire / or spillage and was last reviewed by Castle Cement in June 2015.

The Emergency Plan includes the following pollution prevention elements;

- Definition of an Emergency (emergency plan triggers)
- Incident Co-ordination Roles and Responsibilities
- Contacts (including sewerage undertaker, NRW & spill cleanup contractors)
- The site drainage plan
- Site maps/plans (including the location of spill kits although it was difficult to read).
- An inventory of fuels and chemicals stored on site (those with significant volume) along with the location map of those tanks. The location and type of gas cylinders stored / used within the pre-heater tower is also detailed.
- Drawings of the Cemfuel tanks / tank farm
- List and location of fire hydrants
- The approach to addressing spills (pollution control hierarchy) - the isolation of spills at source, containing the spill, containment within the drainage system (closing the lagoon penstock).
- Material Safety Data Sheets (for significant inventories, including Cemfuel, & ammonia)

It was confirmed that the shift manager was conversant with the incident response principles detailed in the Emergency Plan and was familiar with the lagoon penstock shut off arrangements. The Emergency Plan was last tested February 2014.

### **Permit Non-compliance**

The Emergency Plan requires that the lagoon penstock is closed to prevent potentially polluting materials from entering the watercourse via emission point W1 and is an important control measure. However the plan has a significant shortcoming as it does not refer to any other discharge points that are shown on the site drainage plan.

Following a discussion of the site drainage arrangements and emergency plan with site personnel it is clear that W1 is considered to be the only discharge point from the site with a high degree of uncertainty shown regarding the other discharge points.

It is conceivable that a spill or fire in areas of the site that do not discharge to the lagoon could be inadvertently released to a watercourse. This is particularly true of outfall SJ288622 as this network drains an area where a significant volume of petroleum products are stored and used.

**Therefore the discrepancy between the Emergency Plan and the site drainage plan does not minimise the risk of pollution which is a breach of permit condition 1.1. CCS3**

### **ACTIONS**

- Confirm the site surface water discharges (other than W1) and complete a pollution risk assessment to establish the pollution risk from these sources and whether adequate pollution prevention control measures are in place (e.g. oil/water interceptors, emergency shut off valve etc.). Report your findings to NRW.
- Review the accuracy of the site drainage plan and redraw to include the surface water lagoon and any pollution prevention equipment (the permit application refers to proposed installation of 1x Class 1 Bypass Oil/Petrol Separator or similar and 2 x particle interceptors (1 for new kiln 4 drainage and 1 for existing works)).
- Inform NRW of the as built design and purpose of the 'klargesters' as installed at the lagoon inlet.



- Add discharges to site emergency plan along with the required emergency response measures and train staff accordingly.
- The drainage plan indicates (in writing) areas of 'cross contamination' suggesting the materials other than surface water are entering the drainage system. Inform NRW of the nature of this cross contamination and whether action has been taken to address it.

Please complete the above actions by 30/10/15.

### **Recommendations**

- The emergency plan would benefit from additional detail on the type and location of pollution prevention equipment held on site e.g. booms, drain mats, drain blockers etc.
- Whilst the lagoon penstock(s) may contain pollution on site under most circumstances, consideration should be given as to how the lagoon contents are managed in the event of the lagoon exceeding its capacity e.g. during/following a period of prolonged heavy rainfall.
- In the unlikely event of oil polluted water escaping the surface water lagoon, pre-determined locations for the deployment of oil absorbent booms help minimise the impact of any pollution.
- Spills on site could be isolated more locally within the drainage system opposed to running to the lagoon penstock. This would prevent the contamination of long runs of pipework and potentially save on cleanup costs. Options include the use of inflatable drain blockers that can be inserted into drains, normally at pre-determined manholes where safe access is possible.
- During the audit it was noted that some drains are colour coded to identify them as either foul or surface water. This is good practice and it is recommended that this is carried out across the site. In the event of a spillage or fire this will allow the receiving drainage system to be identified quickly.

### **3.7.3 Drainage Maintenance**

The 'Klargesters' upstream of the lagoon are cleaned out 6 monthly – according to SAP this was last completed 08/05/15 and due 17/11/15. During the audit maintenance was being carried out.

### **3.7.4 Sewage / Trade Discharges**

Waste water from the lorry wash and wheel wash is discharged to sewer. Sewage is collected in a dedicated sump and pumped to DCWW WWTW at Ty Gwyn. The onsite pumping station has recently been upgraded to include a duty and standby pump.

## **4.0 Actions / Recommendations**


Please ensure the actions detailed above are completed as per the proposed timescale. Should you require more time to complete the action please contact NRW to discuss.

The recommendations are not mandatory but constitute best practice and advice that may avoid potential future pollution / non-compliance.

## **5.0 Further Advice & Guidance**

The following guidance notes are available at [www.gov.uk](http://www.gov.uk);

1. Pollution & Prevention Guideline (PPG) 21 – Incident Response Planning
2. PPG 22 – Dealing with Spills
3. PPG 3 – Use & design of oil interceptors in surface water drainage systems

	<b>EPR Compliance Assessment Report</b>	Report ID: BL1096IB/0246694	
<b>This form will report compliance with your permit as determined by an NRW officer</b>			
Site	PADESWOOD CEMENT WORKS	Permit	BL1096IB
Operator/ Permit	Castle Cement Limited	Date	06/08/2015

<b>Section 3- Enforcement Response</b>		<b>Only one of the boxes below should be ticked</b>	
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.			
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 checked="" type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.			<input type="checkbox"/>

<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			
B5	C3	Refer details section	31/12/15
C2	C3	Refer details section	30/10/15
D2	C3	Refer details section	30/10/15
E2	C3	Refer details section	30/10/15

## 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.