



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	27/11/2014	Time in	13:00	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	11/12/2014		

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

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	*C3
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	N
h) Resource efficiency	
1. Efficient use of raw materials	N
2. Energy	N

3.4.1

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)	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

Handwritten initials: SR, 13.01.15

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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

1. Raw Mill Reject - Stone Drop Noise

Further to Compliance Assessment Report dated 8/9/14, Castle Cement have provided Natural Resources Wales with an action plan (e-mails from the Plant Manager dated 23/10/14 & 05/12/14) aimed at preventing and minimising noise from the raw mill reject system. In summary the project will bring the handling of rejected material within the raw mill building with reject material being conveyed to a hopper and returned back to the raw mill when conditions allow. Installation work is due to commence January 2015, cold commissioning February 2015 and the system going into service March 2015.

Natural Resources Wales has continued to receive noise complaints from a resident to the south of the cement works. Investigations by Castle Cement and Natural Resources Wales have linked a number of these complaints to noise from the raw mill reject system. At approximately 01:36 on 18/11/14 Natural Resources Wales was monitoring noise from the plant and recorded a distinct stone drop incident.

As previously detailed it is considered that appropriate measures are not currently in place to prevent and minimise noise from this activity (raw mill reject) which is in breach of permit condition 3.4.1. There is potential for minor environmental impact - this ongoing amenity breach attracts a non compliance score of 3.

As an action plan has been provided by Castle Cement and agreed by Natural Resources Wales, we agree to suspend the CCS score detailed above and any future scores for this issue provided the action plan is fully met by 31/03/15. If the action plan is not met then all CCS scores for this issue will be applied and will affect your compliance rating.

2. Raw Mill Air Slide

A part A notification for a dust release was received 02/09/14 - please provide your part B notification as soon as possible.

3. SRF Variation

Thank you for providing further information on the proposed changes to the SRF handling system. I have reviewed the scope of the original variation for the introduction of SRF at Padeswood along with the new proposals for additional intake stations, buildings and pneumatic handling system. It is our opinion that the proposed changes will require a permit variation. Please contact me to arrange further pre-application discussions.

4. Hot Gas Generating

This issue was briefly discussed during the inspection - please provide your final response to the original Compliance Assessment Report as agreed.

5. Site Walk

During the inspection a brief site tour was completed around the crane store building. Some recent dust complaints may be related to this building due to doors unintentionally opening in strong winds and doors not closing fully and quickly due to mechanical issues.

Castle Cement report that the crane store PFA door is due to be replaced (at the time of writing this has been completed), with the remaining adjacent doors to be replaced one at a time in Q1 and Q2 2015. The operating procedures and use of doors to prevent and minimise dust emissions from all operations on site will be subject to inspection by Natural Resources Wales Jan - March 2015.



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Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

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.

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			
F2	C3	Complete raw mill reject action plan to prevent and minimise noise emissions from this activity.	31/03/2015

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.

