

Compliance Assessment Report

Report ID:
CAR_NRW0022675

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

Site	Padeswood Cement Works EPR/BL1096IB	Permit Ref	BL1096IB			
Operator/Permit holder	Castle Cement Limited					
Regime	Installations					
Date of assessment	13/06/2016	Time in	14:00	Out	17:00	
Assessment type	Audit					
Parts of the permit assessed	Various					
Lead officer's name	Ross, Stuart					
Accompanied by	Wright, Paul					
Recipient's name/position	David Quick/ Plant Manager	Date issued	14/11/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

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 Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Bund Water Disposal - Procedure PG-019

Thank you for providing a copy of the amended bund water disposal procedure. We have the following recommendations;

Paragraph 1.2 - for accuracy diesel and ammonia bunds should be referenced in this paragraph.

Paragraph 1.3 - the pumping arrangements for the diesel and ammonia bunds is included in this paragraph

Paragraph 3.6.1 - that Cemfuel odour is included as a check for bund water in addition to a visual check.

Paragraph 3.6.2 - should the reference to the 'Cemfuel tank' in fact read 'waste water handling tank'?

I am pleased to note the new requirements set out in paragraphs 3.1 and 3.8. It is recommended that an additional paragraph is added as 3.7.3 to include the requirement to investigate the source of ammonia if bund water exceeds 1mg/l. This reflects the similar requirement for the diesel bund.

Pollution Prevention

During the inspection it was reported that a revised site surface water drainage plan has now been completed following site drainage survey work. It is recommended that the surface water outfalls are referenced on the plan as W1 (lagoon) and W2 (Western outfall) which has been added to the draft permit. This will aid communication in the event of a spill, particularly with NRW.

It is acknowledged that there may be some future amendments to the drainage plan following the installation of an isolation valve the oil interceptor (prior to W2) and following the completion of investigations into possible misconnections (foul /surface water) adjacent to mill 3.

It was agreed during the inspection that the site emergency plan will be updated to reflect the revised drainage plan and awareness training provided to responsible staff by the end of June 2016. Please inform NRW when this has been completed.

Now that the kiln shell has been removed, the possible misconnections adjacent to mill 3 must be investigated to confirm whether or not remedial drainage work is required to ensure only clean surface water is discharged to the surface water lagoon. Please complete the investigation by 8th July 2016 and report your findings to NRW within one week.

Kiln 4 main bag filter blowing line

Work is progressing to install the main bag filter dust handling system as detailed in previous reports. It is anticipated that this work will be completed by the end of June 2016. It was agreed with the Operations Manager that NRW will be notified when this is complete.

Fugitive Dust Emissions

Thank you for your letter of 16/06/16 providing further information on the dust incidents on 18/02/16, 03/03/16 & 06/04/16. I still have some outstanding questions / areas for clarification that would be best addressed by a short site meeting. I also seek clarification with regards to the incident reported to site 18/04/16 following the last CAR form. Following receipt of this report please provide a suitable date for a meeting.

Site Inspection

New signage installed at Cemfiel tank farm, site housekeeping was to a good standard, no dust emissions observed from any site operations.

EPR Compliance Assessment Report

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Section 3 – Enforcement Response

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

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 verbally or 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 that 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 fulfil 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 (eg. 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
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental 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 reports 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.