

## Compliance Assessment Report

Report ID:  
CAR\_NRW0017544

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	20/05/2016	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Routine Monitoring Returns				
Lead officer's name	Ross, Stuart				
Accompanied by					
Recipient's name/position	David Quick/ Plant Manager	Date issued	20/06/2016		

### 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
E1 - Emissions - Air	C4	3.1.2
E3 - Emissions - Surface water	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	

**KEY:** See Section 4 for breach categories, suspended scores will be indicated as such.

**A** = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
-----------------------------	---	--	-----

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

*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 covers a review of routine monitoring data for the period 1st January - 31st March 2016 for continuous monitoring of all permitted emission points to air and also emissions to water.

### 1. Emissions Monitoring - Monitoring data for emission points W1 (water) and A1 - A9 (Air)

a) Emissions to Water (W1) All parameters within permitted limits.

b) Emissions to Air - Continuous Monitoring (A1 - A9) - Fully Compliant with the exception of three marginal particulate emission limit breaches at emission point A8 (kiln). These occurred 02/01/16, 13/02/16 and 14/02/16 at 11.3, 12.8 & 11.8 mg/Nm<sup>3</sup> (emission limit value 10mg/Nm<sup>3</sup>). Part A & B notifications received as required.

The operator reporting the following;

03/01/16 - Kiln emissions were trending upwards over the previous 24hrs. Running checks were carried out with limited success so a decision was made the bring the kiln shutdown forward (annual maintenance shutdown).

13/02/16 & 14/02/16 - Following the annual shut down the kiln was restarted late 12/02/16 and dust emissions were elevated but not over the limit. This is usual operation as the filter system conditions following the major shutdown works where bags are changed and some cross contamination from the dirty to clean side can occur. Additional cleaning and movement of material through the kiln system through shutdown and remedial works can also mean there is an increased dust loading at start up but this usually settles quickly. However in this case the loading remained around the permit limit and a systematic investigation of the filter system was started when it became apparent that the levels were not dropping off as expected, with banks being shut and opened in sequence to identify the issues.

These investigations led to some suspect banks which were shut off. However a kiln stop was also taken as issues elsewhere meant feedstock was running low so the impact of the closures was uncertain until the kiln re-started. Although emissions were lower on re-start they were not sufficiently so to impact on the daily average on 13/02/16 - emission breach recorded at 12.8mg/Nm<sup>3</sup>.

Following onto 14/02/16, initially the results of the previous days work brought the dust below the limit. However it became more variable as the day went on and the filter system was checked again for obvious issues. Additional process adjustments were also made to reduce emissions. These impacted fully on emissions later in the day but not at sufficient levels to reduce the daily average below the limit - emission limit breach recorded at 11.8 mg/Nm<sup>3</sup>.

No further emission limit breaches reported, no complaints received regarding dust emissions.

The particulate emissions breaches are in breach of permit condition 3.1.2, with potential for negligible environmental impact, CCS4. One CCS score recorded - consolidated over the reporting period.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0017544**

**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	Date	20/05/2016

### 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			
E1	C4	Continue to monitor emissions monitoring trends and take action where necessary to ensure bag plant is operating effectively.	05/05/2016

## 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](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.

#### Welsh Language

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