

## Compliance Assessment Report

Report ID:  
CAR\_NRW0026534

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	26/10/2016	Time in	N/A	Out	N/A
Assessment type	Site Inspection				
Parts of the permit assessed	General Management, Emissions				
Lead officer's name	Ross, Stuart				
Accompanied by					
Recipient's name/position	David Quick/ Plant Manager	Date issued	30/12/2016		

### 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
C2 - General Management - Management system and operating procedures	C3	1.1

**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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

This Compliance Assessment Report follows a review of information provided in your letter of 01/09/16 and previous correspondence.

### **Process Control – Operating Procedures**

#### **Kiln Jetting**

1. On 03/02/16 at 13:35, SR witnessed dust leaving the general vicinity of the kiln inlet seal and rising up the pre-heater tower before dissipating on the wind towards Penyffordd.
2. On 06/04/16 at 13:28 SR again witnessed dust leaving the general vicinity of the kiln inlet seal and rising up the pre-heater tower before dissipating on the wind towards Penyffordd, the quantity of dust appeared more significant than during the incident detailed above. This was observed for approximately 10 minutes and ongoing.

Other than the fugitive release of dust and fumes from the kiln system to air, there was no known offsite impact or complaints received from local residents.

Both incidents were sent to site for investigation. Following ongoing correspondence and investigation into the root cause, a letter was received from Castle Cement 01/09/16 stating the following;

#### **Water jetting bypass offtake**

*The routine task of water jetting the bypass offtake has been identified as the cause of these two complaints. The purpose of jetting is to remove small amounts of localised build up with the aim of preventing a significant blockage and/or kiln stop. Process conditions will occasionally increase the risk of fugitive emissions. Water jetting is an activity that we use to manage this and the environmental risk is lower than that for a kiln stop.*

*The Water Jetting Risk Assessment has been reviewed and amended to include environmental risks. The risk assessment is attached and now includes communication with the kiln controller and formally requests the use of the Tertiary Air Damper to control pressures*

NRW recognises that kiln/bypass jetting is an important maintenance task to prevent significant blockages occurring and avoiding kiln flushes in more extreme cases. However, and owing to the new control measures implemented relating to the use of the tertiary damper and procedure/risk assessment, we do not consider that all appropriate measures were in place at the time of these incidents to minimise the risk of pollution arising from plant operations as required by permit condition 1.1. Incidents such as those detailed above have the potential to cause minor environmental impact and attract a single non-compliance score of 3.

I note that the kiln inlet camera is also being upgraded with the ability to record data for 7 days. This will aid kiln control and more effective complaint investigation / root cause analysis.

It is understood that the tertiary damper is due to be upgraded during the annual shutdown, January 2017.

Since the improvements detailed above have been implemented, no further occurrences have been observed by NRW, reported via the complaint hotline or formally notified by Castle Cement Ltd.

No further actions are required by this report.

#### **Kiln Shut-down**

Finally I acknowledge your comments (below) regarding the dust emission from the kiln inlet seal area as observed by SR 18/04/16;

*This was a planned stop due to low fine coal stock. The shutdown sequence is automated and has been tuned to protect assets and minimise environmental impact. The visible impact observed was in the transition from normal running conditions to standby mode. During the transition the kiln feed stops, the ID fan stops and the filter fans change speed to maintain negative pressure at both ends of the system. The inlet seal is approximately the midpoint between the filter fans. It is designed to control gasses not dust and is the weak point during the shutdown. All Pre-calciner kilns have a similar inlet design.*

Please ensure that all appropriate measures continue to be taken, and improved where feasible to minimise the potential for

release of fugitive dust emissions from the kiln system. I will discuss this issue further during my next routine site inspection.

## EPR Compliance Assessment Report

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Operator/Permit holder	Castle Cement Limited	Date	26/10/2016

### 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			
C2	C3	Refer details	31/10/2016

## 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. 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.