	<b>EPR Compliance Assessment Report</b>	Report ID: BL1096IB/0251893			
<b>This form will report compliance with your permit as determined by an NRW officer</b>					
Site	Padeswood Cement Works EPR/BL1096IB		Permit Ref	BL1096IB	
Operator/ Permit holder	Castle Cement Limited				
Date	13/11/2015	Time in	12:00	Out	14:20
What parts of the permit were assessed	Notifications				
Assessment	Report/data review	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	David Quick (Plant Manager)				
Officer's name	Stuart Ross		Date issued	19/11/2015	

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	N			
<b>b) Infrastructure</b>	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	C3		3.2.1	
<b>c) General management</b>	1. Staff competency/ training	C3		1.1.1	
	2. Management system & operating procedures	N			
	3. Materials acceptance	N			
	4. Storage handling, labelling, segregation	N			
<b>d) Incident management</b>	1. Site security	N			
	2. Accident, emergency & incident planning	N			
<b>e) Emissions</b>	1. Air	N			
	2. Land & Groundwater	N			
	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	C4		4.3.2	
<b>h) Resource efficiency</b>	1. Efficient use of raw materials	N			
	2. Energy	N			
<b>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>					

<b>Number of breaches recorded</b>	3	<b>Total compliance score</b> (see section 5 for scoring scheme)	8.1
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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 Compliance Assessment Report follows a review of Part A & B notifications between 06/07/15 and 10/09/15 and an additional Part A received 02/09/14 for which a part B notification was not received until 05/10/15. These reports were discussed during a site meeting 13/11/15.

### **1. 02/09/14 – Dust Release (Raw Mill Outlet Air Slide)**

A part A notification was received 02/09/14 reporting a dust release from the raw mill outlet air slide. This incident was discussed with the Plant Manager during a site inspection 27/11/15 and a Part B notification was requested as detailed in the site inspection report. The Part B was received 05/10/15.

The Part A states that a blockage occurred on the raw mill outlet air slide causing material to back up and push a lid off the duct causing raw meal to fall to ground and a release of dust to air. The Part B notification reports that the dust release was noted on the CCTV camera and the raw mill and kiln system were 'crash stopped' to stop the flow of materials and to allow an investigation into the cause.

On investigation Castle Cement reported that a hole was found in the cloth that was preventing it from conveying product effectively. This had led to a build up of material that lifted the lids and allowed material to escape. NRW is not aware of any complaints related to this incident regarding off site dust impact.

The cloth was repaired and the rest of the air slide cleaned out and checked and the lids secured. A 3 monthly maintenance check/task was added to the maintenance schedule.

Please ensure Part B notifications are supplied as soon as reasonably practicable as required by permit condition 4.3.2. It is deemed that the late reporting of this Part B notification was not in accordance with the permit and attracts a CCS4.

### **2. 06/07/15 - Dust Release (Kiln Inlet)**

Part A notification was received 17/07/15 reporting a release of gases and dust from the kiln inlet seal which was visible off site. This incident was reported to Natural Resources Wales by a member of the public 17/06/15 who also supplied photographs showing a cloud of dust & fumes rising from the pre-heater tower area of the plant. Following correspondence between NRW and Castle Cement it was agreed that a Part A notification would be submitted.

Castle Cement reported that the kiln had been stopped and the kiln hood suction set point was altered by the kiln controller from the default of -1mbar to -0.3mbar in order to quickly re-establish the flame. This resulted in a decrease in the negative pressure within the kiln system allowing gases to escape from the kiln inlet seal. Castle Cement report that in this particular case the kiln hood suction pressure was reduced too soon after the kiln had stopped (operator error) and in response the standing instruction for all kiln controllers has been altered to include a negative set point at the kiln hood of -0.5mbar opposed to -0.3mbar when trying to re-establish the flame.

Castle Cement report that due to the number of variables affecting kiln pressure and operation it is difficult to prescribe predetermined actions for the kiln controllers to follow in these circumstances and effective kiln control relies to a large extent on kiln controller experience and competence.

Additionally it was identified that the television screen in the kiln control room showing the live feed from the kiln inlet seal is positioned such that reflected glare from the internal lighting obscures the picture. This may prevent the kiln controller observing the fugitive release from the kiln inlet seal. This screen has since be re-positioned to improve the kiln controller's view.

This incident is deemed to be in breach of permit condition 1.1.1 in so far that the management system has not identified and minimised the risk of pollution arising from operations. This includes the kiln inlet seal television screen not being suitably positioned to optimise the kiln controller's view of operations and minimise the associated risk / duration of incidents of this nature. CCS 3.

## **ACTIONS**

- Castle Cement to complete kiln controller training commencing February 2016 to (amongst other operational matters prevent and where that is not possible minimise incidents of this nature).
- Castle cement to complete a review of CCTV cameras and associated control room equipment during the first 6 months of 2016 with the objective of improving the quality of the footage available to the kin controllers to enable the effective identification of abnormal plant operations.

### **3. 23/08/15 - Dust Release (Damaged Slide Damper).**

An estimated 25-50Kg of dust and fumes was released due to a damaged slide damper in ducting that carries hot gases from the kiln system through to the raw mill circuit. The kiln operator was trying to balance the negative pressures through the kiln system and there was a short period of positive pressure that caused the gas stream to exit through the damaged damper. Further investigations found that the damper casing had been holed. The hole in the damper was subsequently repaired and returned to normal operation.

Castle Cement report that this damper is inspected during shut down when access can be gained to this area and the system is cool (typically during a prolonged shut down). Additional maintenance work is scheduled for this damper during the annual shut down January 2016. Castle Cement report that kiln system dampers are visually inspected for wear and tear during the annual shut down.

### **4. 10/09/15 – Dust Release (Kiln System)**

Following a kiln stoppage the kiln feed was re-introduced at 00:30 10/09/15 and run for around 40 minutes at 140 tonnes per hour when the kiln became very unstable. Investigations by Castle Cement found that filter dust entering the top of the preheater tower (via the bucket elevator) was increasing the feed rate and overwhelming the kiln system. After 30 minutes the kiln controller reduced the raw meal feed to 120 tonnes per hour to reduce the material flow and the risk of further overwhelming the system.

A dust complaint was received from a member of the public on the 10/09/15 reporting dust on a vehicle. A sample was collected by Castle Cement and identified dust that is attributable to the kiln system. The sample analysis results and wind direction at the time of this complaint indicate that this incident was the cause of the complaint.

On 11/09/15 a further complaint was received from a member of the public who saw dust rising up from the kiln inlet area at 08:30. Castle Cement subsequently reported that this was a repeat of the same incident whereby the kiln system was stopped and on restart was overwhelmed with filter dust.

These incidents are primarily due to process design issues which if identified and corrected sooner would have avoided this incident. This incident is a breach of permit conditions 1.1.1 in so far that the management system has not identified and minimised the risk of pollution arising from operations.


It is also in breach of permit condition 3.2.1 in that appropriate measures have not been taken to prevent and minimise dust emissions. CCS3

## **ACTION**

As part of their Continuous Improvement Program Castle Cement report that a blowing line is to be installed January 2016 to transport dust from the main bag filter hoppers to a silo to allow filter dust to be transferred to the kiln system at a controlled rate to prevent the kiln system being overwhelmed on start-up and the associated risk of dust release.

Please confirm in writing when this work has been completed and the nature of the process changes.

N.B Subject to separate, ongoing correspondence, Castle Cement are due to complete a review of plant operations with the objective of further preventing and minimising dust emissions from the plant.

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Operator/ Permit	Castle Cement Limited	Date	13/11/2015

<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	Refer details section
C1	C3	Refer details section	Refer details section
G4	C4	Refer details section	Refer details section

## 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.