

## Compliance Assessment Report

**Report ID:**  
**CAR\_NRW0000134**

**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	30/03/2016	Time in	13:00	Out	17:00	
Assessment type	Site Inspection					
Parts of the permit assessed	Various					
Lead officer's name	Ross, Stuart					
Accompanied by						
Recipient's name/position	David Quick/ Plant Manager	Date issued	11/04/2016			

### 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
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**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

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
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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

### **1. Pollution Prevention Audit - Actions Review**

Following the submission of information required by the Pollution Prevention Audit of 06/08/15 a review of actions was completed.

#### **1.1 Bund Water Disposal**

Procedure PG019 'Bund Monitoring and Disposal of Collected Water in Cemfuel tanks area' was provided to NRW and covers Cemfuel bunds and drip trays. A procedure for the monitoring and disposal of water from the diesel and ammonia tank bunds located at the Cemfuel tank farm was not provided as requested.

PG019 allows the discharge of Cemfuel bund water with a COD <500mg/l to the site surface water lagoon with the apparent reliance on dilution within the lagoon prior to discharge via W1 which is not considered Best Available Technique. The lagoon is for surface water attenuation and solids settlement and it is considered that a COD threshold of 500mg/l is excessive.

COD may form part of the test suite, but in general bund water should consist of rainwater with little discolouration or odour. Cemfuel contaminated bund water should be directed to the waste water return system as detailed in your permit application and burnt in the kiln system as authorised by the permit.

The testing of ammonia tank bund water should be targeted at ammonia contamination rather than COD. Inexpensive field test kits are available for such testing. Typically contamination levels exceeding 1mg/l should not be returned to surface water.

Similarly water within the diesel tank bund should be free from oil and grease, this can be based on a visual inspection. Where contamination is found the source should be identified and remedied and bund water not discharged to the surface water lagoon but to a suitable disposal point.

A procedure review is required in respect of the above points - please amend the relevant procedures and submit to NRW by 29/04/16. Please confirm that the waste bund water return system is operational as there was some uncertainty during the inspection.

#### **1.2 Site Drainage Plan / Emergency Response Plan**

During the inspection it became apparent that despite recent drainage surveys not all drains in the lorry refuelling area have been properly mapped/identified. Cross contamination has been identified in the area outside the mill house repair shop but further investigation has been delayed due to redundant mill shell being placed above site drains. The mill shell is due to be moved and drainage survey will be completed. The site drainage plan should be finalised April 2016 and cross contamination issues investigated by 31/05/16.

The Pollution Prevention risk assessment has not yet been completed nor an update to the Emergency Response Plan. This must be completed by 29/04/16 along with staff training for those who have emergency plan responsibilities. A copy of the risk assessment, response plan and staff training records shall be made available for inspection during the next site visit.

Cemfuel Signage - it was reported that revised signage has been ordered and will be installed imminently.

#### **1.3 Pipeline Integrity Testing**

Additional information was provided by Castle Cement to confirm that Cemfuel pipe lines under the site road had been subject to thickness testing by Ultrascan. In the reports measurements have been highlighted to draw attention to a reduction in wall thickness. Castle Cement report that pipelines are replaced when they reach 40% of their original thickness.

#### **1.4 Vegetation**

Vegetation (small trees/scrub) has been cleared from around the Cemfuel tank farm. Consideration should be given to pruning or removing some of the larger trees if they pose a risk to the tank farm from tree fall etc.

### **2. Fugitive Dust Emissions**

**2.1** Fugitive dust incidents on 03/02/16 (13:35), 18/02/16 (12:40) and 06/04/16 (13:28) as witnessed and reported to Castle Cement by NRW require investigation and findings reported to NRW by 29/04/16. The investigation shall identify the root cause of the incidents and an assessment as to whether or not appropriate measures are in place to prevent and minimise emissions with

corrective actions where necessary. As discussed these releases are not in our opinion 'normal operation'.

**2.2** The plant manager reported that a new CCTV camera has been procured for replacing the camera that views the kiln inlet seal. It is strongly recommended that footage from this camera is recorded to enable the effective investigation of dust complaints that may originate from the kiln system. CCTV coverage / control room screens are subject to review by Castle Cement 2016 as agreed with NRW (letter from Hanson 26/11/15).

**2.3** Kiln 4 main bag filter blowing line was not installed during the January shutdown as planned, it shall now be installed by June 2016. Interim control measures are to be formalised for kiln controllers to prevent the overloading of the kiln system during start up. This will be inspected during the next site visit.

### **3. Emissions Monitoring**

Record abnormal operation for temporary CEMS downtime (related to power cut) and provide NRW with confirmation of fuel mix during bag filter issues 14 - 15 February 2016. Please do so by 29/04/16.

Review all emissions data collected during the use of temporary CEMS against all relevant auxiliary measurements and confirm any non-compliance by 15/04/16.

Emission limit breaches as reported in recent Part A & B notifications will be assessed in the Compliance Assessment Report covering routine monitoring returns for the period 1 January - 31 March 2016.

## EPR Compliance Assessment Report

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Operator/Permit holder	Castle Cement Limited	Date	30/03/2016

### 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			

## 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.