

Compliance Assessment Report

Report ID:
CAR_NRW0032665

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 | 04/01/2018 | Time in | N/A | Out | N/A |
| Assessment type | Report/Data Review | | | | |
| Parts of the permit assessed | Routine Emissions Monitoring Returns | | | | |
| Lead officer's name | Ross, Stuart | | | | |
| Accompanied by | | | | | |
| Recipient's name/position | Robert Keough/ Quality & Environment Manager | Date issued | 04/01/2018 | | |

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. 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 |
| E1 - Emissions - Air | C3 | 3.1.2 |
| E3 - Emissions - Surface water | A | |
| G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales | C4 | 4.3.2 |

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 | 3 | Total compliance score (see section 5 for scoring scheme) | 8.1 |
|-----------------------------|---|--|-----|

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

This Compliance Assessment Report covers a review of routine emissions monitoring data for the period 1st July – 30th September 2017 for all permitted emission points to air and water.

Monitoring reports received on time - thank you.

1. Emissions to Water (Emission Point W1)

Emissions compliant with the permit limits during the period.

2. Emissions to Air - Continuous Monitoring (Emission Points A1 - A9)

All parameters were within permitted limits with the following exceptions for which Part A and B notifications were received.

Emission Point A8 (Kiln)

a) NO_x (Emission limit 450mg/Nm³)

24/07/17 - 469 mg/Nm³

Castle Cement identified that an incorrect NO_x QAL2 calibration function was in use for the SNCR control system which in turn caused the system to inadequately abate emissions below the emission limit value (as determined using the correct QAL calibration function). Castle Cement have implemented a new procedure to ensure the correct QAL2 calibration function is used by the SNCR control system following a QAL2 exercise.

27/09/17 - 476 mg/Nm³

Castle Cement reported that;

'The kiln had been temporarily stopped for a blockage at 5:15 am. This was cleared and the kiln restarted at 10:30. When the kiln was restarted at 10:30 however the SNCR system was not. The SNCR system was restarted at 19:00 when the operator became aware of the over site.'

The root cause of inactivation of the SNCR system appears to stem from the following :

When the kiln is placed in a temporary stop the ammonia SNCR system will automatically shut off to prevent environmental issues. When the ammonia system is placed in a ready state an alarm message will be provided to the operator if the system is not effectively reducing the NO_x to the desired level.

However, there was no alarm in place to ensure that the SNCR system is in a ready state when the kiln is operational. It is down to the operators to place the SNCR system in a ready state when

the kiln is restarted.

A software alarm for the SNCR has been further modified so that it activates, when the Kiln is operational and it is not in a ready state. This further compliments the current alarm, to avoid operator error. Operators have received information into this breach and how to avoid future occurrences'.

The above incidents are in breach of permit condition 3.1.2 (emissions to air) and 1.1 (General Management) and attract a non compliance score of 3 (potential for minor impact).

b) Hydrogen Chloride (Emission Limit 10 mg/Nm³)

14/08/17 - 10.32 mg/Nm³

The marginal emission limit exceedance was recorded over 53 minutes into a 24hr averaging period before the kiln stopped. Castle Cement report that this was due to an issue with the raw mill (stoppage) preventing it scrubbing HCL from the kiln exhaust. A 5 day shutdown followed to carry out remedial work on the raw mill. Given the short operating period during this calendar day no non compliance score has been applied.

28/09/17 - 10.2 mg/Nm³

Castle Cement reported that 'There had been issues with operation of the raw mill before this date whereby consistent runs on it had been unachievable. The raw mill was stopped just after midnight on 28/09/17 and made ready for the planned maintenance day. During the time the mill was off HCl emissions increased, which is normal.

Following the maintenance day the mill was restarted at 16:40 and ran intermittently reducing the average HCl, however when the midnight report was run it became apparent that the HCl had been just over the permit level.

Due to the on-going issues with the raw mill at 07:40 on the morning of 29/09/17 the kiln was stopped for a two week maintenance period to allow further repair work to be carried out on the raw mill.

A variety of work was carried out to the raw mill internals during the two week shutdown which commenced on 29/09/17 in order for it to achieve longer runs and operate in a more stable fashion. A complete overhaul of the raw mill internal is planned for the January 2018 shutdown'.

This incident is in breach of permit condition 3.1.2, with potential for negligible environmental impact.(CCS score 4)

I am satisfied that Castle Cement has taken appropriate remedial measures with respect to the emission limit exceedances recorded in this compliance assessment report.

N.B, in accordance with NRW guidance, breaches of condition 3.1.2 have been consolidated into a single CCS score of 3 for this monitoring period.

3. Emissions to Air Periodic Monitoring (A8)

Due next quarter.

4. Reporting - Schedule 5 (Part A & B) Notifications

Emission Limit exceedances for 27/09/17 and 28/09/17 were received several days late on

02/10/17 which is a breach of permit condition 4.3.2 and attracts a CCS score of 4. Please ensure notifications are submitted to NRW in accordance with the timescales as specified in your permit.

Please use the permit template as issued with permit variation number V013.

EPR Compliance Assessment Report

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| | | | |
|------------------------|--|------------|------------|
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| Operator/Permit holder | Castle Cement Limited | Date | 04/01/2018 |

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.

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.

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 | | | |
| G4 | C4 | Refer details section | 05/01/2018 |
| C2 | C3 | Refer details section | 05/01/2018 |
| E1 | C3 | Refer details section | 05/01/2018 |

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 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 fifteen 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.