

Compliance Assessment Report CAR_NRW0041003

Permit being assessed: BL1096IB.

For: Padeswood Cement Works , held by Castle Cement Limited

At: PADESWOOD WORKS , PADESWOOD, MOLD, MOLD, CLWYD, CH7 4HB.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 23/01/2023 between 13:30 and 16:25.

Parts of permit assessed: See report

NRW Lead Officer: Lara Cubley.

Report sent to: David Quick, Plant Manager on 30/01/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

NRW conducted an announced inspection of the site (23/01/23) during the kiln annual shutdown to observe some of the areas more difficult to access during production, the heat exchanger replacement work and

progress with cleaning of conveyors and transfer points.

Prior to entering site, the new induction was completed. This included further instruction and responsibilities with regard to reporting and prevention of dust emissions.

During the inspection no work activity was being undertaken with respect to the ID fan bearing cooling system.

It was noted that the ESP from the old by-pass system has now been dismantled.

The old cooler heat exchanger had been lifted down and was observed at ground level. You could see tubes which had been capped off. The new heat exchange unit had arrived and was still on the lorry. This new unit looks practically identical to the old one. Only one of the three heat exchange fans (FN09 – 11) was still on site for observation, as they are reportedly being sent off site for overhaul. This fan was observed to have 12 straight impeller blades all very close to the fan casing. There were 4 main struts directly behind the impellers, with mesh supported on further smaller struts at the inlet to the casing. The Operator's contractor reportedly came to site the following day to inspect fan design and take measurements with a view to noise mitigation designs.

The ground floor of the cooler building was inspected. From the bottom of conveyor CV01, where clinker is deposited onto the conveyor following cooling and milling, you could see right up the conveyor. The walkway along this conveyor appeared to have been cleaned in comparison to knee deep clinker duct previously observed. Guarding had reportedly been replaced around the conveyor following cleaning. There were still relatively small residues noted on the floor in this area. The area housing associated hydraulics was very clean. The nose ring fan was inspected, and the operator reported that they are looking into replacing baffles.

Due to the shutdown, inspection inside the cooler was possible. Work was underway to install steel prongs, which in turn the refractory is attached to. Access into the kiln was possible via a bridge, where refractory replacement work had been undertaken. Work was also being conducted on the kiln burner. NRW also inspected the kiln position monitoring system at the kiln inlet end.

Conveyor transfer point BC03 to BC01 had cladding removed from the base and had been cleaned. This should be fully enclosed again prior to operation.

NRW inspected the old area of CM4 where material is transferred onto the Sicon conveyor to CM5. The changed ducting from filter BF10, which de-dusts the transfer of materials onto the belt, was pointed out. This area had lots of piles of dusty materials, which are reportedly due to work being conducted whilst CM5 is off. Within this building you could hear the noise of a vibration plate which was reportedly from CM3 feed. The Operator pointed out that a vibrator plate is usually also located in the Gypsum silo feed to CM5 but must have been removed as part of works in this area.

The Operator confirmed that work to replace BF41 filter cartridges had commenced this weekend and that CV02 had been cleaned. Plans are underway to replace this filter with a new one. The Operator indicated that this is more likely to be Q3 2023 than Q2. The Operator must provide design plans and data to NRW for this new abatement plant.

ADVICE & GUIDANCE: The operator should ensure all cleaning is completed during the annual shutdown and that spills and materials as a result of shutdown works are also cleaned up.

NRW briefly met with the Plant Manager prior to leaving site. Further information requested following the Regulation 61 information notice was discussed. The Operator has committed to providing this 3rd February

2023.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.