

## Compliance Assessment Report CAR\_NRW0042748

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 02/11/2023.

**Parts of permit assessed:** Q3 2023 monitoring returns.

**NRW Lead Officer:** Rebecca Harwood.

**Report sent to:** David Quick, Plant Manager, on 04/12/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Information - Reporting	Assessed (A)	
IR4C - Information - Notification	Assessed (A)	
IR3B - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	1.1.1 / 3.2

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

Total non-compliances recorded	Total non-compliance score
1	4

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?

Criteria	Action needed	Complete by
IR3B	see text below	29/02/2024

Compliance criteria codes are listed in the 'Important information' section below.

### 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.

**You are non-compliant with your permit.**

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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

#### **Review of emissions monitoring Q3 2023 (July - September 2023)**

Emissions monitoring data covering the period 1 July to 30 September 2023 was received on the 24 October 2023 in accordance with permit condition 4.2.3.

#### **Emissions to Water**

No exceedances have been identified within the monitoring return for emission point W1.

#### **Emissions to Air**

*Continuous Monitoring (A5, A8, A9, A15)* - All continuous emissions monitoring was provided as required by the permit and shown to be within the permitted limits during this period.

#### **ARM and WDF Reporting**

Alternative raw material / waste derived fuel usage for July - September 2023 has been reported.

#### **Summary of Schedule 5 Notifications Received**

Three notifications were received from the Operator relating to dust releases from different areas of the site.

1. A Schedule 5 notification was submitted to NRW following a dust release from the pressure relief valves at the top of cement silos 1 to 4 on the 16 July 2023. It is estimated that approximately 20kg of dust was released as a cloud of dust. The root cause was as a result of a gate valve failure.

The initial Schedule Notification states:

*Immediate investigation found the release occurred due to the filter on top of the silo losing its pulse air and the bags becoming blinded leading to the filter losing its efficiency thus causing the PV valves to vent to atmosphere slightly.*

*Further investigation found that the pulse air was lost due to a 1" gate valve breaking internally and the gate part of the valve dropping into the closed position.*

*The gate valve was repaired and purge air re-instated onto the filter cleaning the bags.*

The investigation report states that:

*Failure of the gate valve was the primary cause of the incident. This has now been replaced with a new ball type valve which is a more modern and reliable valve.*

*The second action of installing a pressure sensor on the air receiver of the filter will ensure that any loss in air pressure is detected. The signal from the sensor will be used to trip any mills running to silos 1 – 4 and prevent the mills restarting to those silos until the alarm has been cleared.*

**Action 1:** Confirm to NRW that the pressure sensor has been installed on the air receiver.

**Action 2:** The Operator should review where gate valves are in use and undertake a proactive replacement programme for any that are found on environmentally critical equipment that may be at risk of similar failure. The Operator should provide an update to NRW by 29 February 2024 as to how they propose to initiate and undertake the replacement programme.

**2.** A Schedule 5 notification was submitted to NRW following a dust release from Cement Mill 3 on the 16 August 2023. It is estimated that approximately 30-50kg of cement dust particles were released. The root cause was as a result of a hole in the cyclone roof.

The investigation report states:

*Dust emission due to lumps found in the cyclone to mill air slide, ducting and mill outlet air slide. The lumps had blocked the airslide preventing cement from returning to the mill outlet. The blockage resulted in cement building up in the cyclone and being released from the top of the cyclone.*

*Add an annual PM to SAP to inspect the integrity of the cyclone roof. Use the information from this inspection to determine the correct preventative maintenance frequency for the cyclone.*

**Action 3:** Provide evidence that the cyclone roof inspection has been added to the PM on SAP.

**3.** A Schedule 5 notification was submitted to NRW following a dust release from Silo 6

penthouse on the 7 September 2023. It is estimated that approximately 20kg of dust was released as a cloud of dust.

The investigation report states:

*The tanker blow off line on silo 6 holed whilst a tanker was discharging into it creating a very visible dust emission. The driver was stopped from discharging and the valve locked off.*

*A temporary patch was also fitted backed up with a notification for a welded repair.*

*There are other cement silos on site that have tanker offloading lines. The learnings from this incident will be rolled out to the other relevant silos i.e. those with tanker blow lines*

*Add all tanker offloading lines, not just silo 6, to the NDT plan for cement transport lines by 31 December 2023.*

**Action 4:** Provide evidence that the off-loading lines have been added to the NDT plan.

**A category 3 score, under subheading IR3B Emissions of substances not controlled by emission limits, has been applied against permit condition 3.2 for the above releases.**

Corrective actions have been put in place for the above incidents. NRW may review these actions as part of future compliance visits.

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.

**If your assessment result in Section 1 is suspended, what does this mean?**

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 compliance criteria** (used in section 1 and 2):

**1. Management**

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

**2. Operations**

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

**3. Emission and Monitoring**

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

**4. Information**

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

**Enforcement response**

Any non-compliance with a permit condition 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 twenty 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 to 18:00), or email [enquiries@naturalresourceswales.gov.uk](mailto: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](mailto: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.