

Compliance Assessment Report CAR_NRW0044861

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: Site Inspection,

Reason: Routine.

On: 31/07/2024 between 09:30 and 12:05.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood, accompanied by Paul Challender.

Report sent to: Plant Manager, Plant Manager, on 21/08/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Action only (X)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	

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

Total 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?

Criteria	Action needed	Complete by
IR1A	see text below	31/10/2024

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.

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

This Compliance Assessment Report (CAR) follows a site inspection undertaken on the 31st July 2024. Officers met with the Sustainability Analyst, Plant Manager and Production Manager.

Discussions were held in the Operators offices prior to the site inspection.

NRW officers discussed the Operators submission of start-up and explained that more information and justification was required to establish when steady state within the kiln had been achieved. NRW have subsequently provided further guidance linked to the Incineration BREF, which is not currently applicable to the cement industry but may assist in helping define start-up and shutdown.

Action 1: A more detailed proposal relating to the start-up and shutdown of the kiln should be submitted to NRW by 31st October 2024.

Following a previous Enforcement Notice and subsequent Audit the Operator raised a query in relation to the retention period for paper copy work orders linked to maintenance activities. NRW confirmed that if the paper copies were transposed to the Operators SAP system, and that if the Operator was confident that all details had been added then there was no requirement to keep the paper copies. This should however be reflected in the Operators EMS and any other relevant documents.

NRW were notified of a trial the Operator was undertaking whereby dust from the main filter bag is fed into the bypass system. This should decrease the chloride content of the bypass dust and reduce blockages in the bypass system. When this happens the main bag filter dust is diverted away from being reused in the process. NRW are of the opinion, based on the information provided and subsequent discussions that this trial does not have any adverse environmental impacts.

Action 2: The Operator should provide an update to NRW relating to the trial and their proposal going forward.

Improvement Conditions

IC9a/b applies to the installation of the new SRF feed. The construction of the SRF feed has been delayed and therefore as yet the IC relating to noise is not yet due. The Operator is reminded that a noise assessment is due within 9 months of the SRF feed having been commissioned.

IC10a/b applies to the new filter that has been installed on the clinker transport to storage conveyor. The noise assessment is scheduled to be undertaken at the beginning of September.

Noise

NRW attended Bannel Lane, Chester Road and Fedwen Arian between 22:15 and 23:55 on the 29th July 2024 to assess noise emissions. The Shift Manager confirmed that the Kiln had been started up that evening following a shut down the previous week. The Operator has subsequently sent through details of what plant was operating when during this period. No obvious intrusive off site noise was detected by Officers at any of the locations.

The Operator stated that the Noise Action Plan is updated as actions are completed. A number of other queries that NRW's Officers raised in relation to the Noise Action Plan were in hand and it was agreed that the updated Noise Action Plan should be sent to NRW quarterly.

In relation to Action 2 from CAR NRW0043245 the quiet fan insert for the jet pulse filter fan in Cement Mill 3 is to be installed by the end of October 2024. Additional work to the main stack fan on Cement Mill 3 has also been undertaken and the success of this will be assessed as part of the quarterly noise monitoring assessments.

In response to Action 3 from CAR NRW0043748 (squeal from the cooler drag chains), the Operator confirmed that the squealing noise is generated by the cooler filter drag chains running when empty of material, linked to when the kiln is stopped. The Process Team have reviewed the run time of the cooler filter system following a kiln stop and are reducing the amount of time that the drag chains need to run during the cool down and subsequent start-up. This operational change will be monitored by the Operator to establish whether further work is required.

Site Inspection

Officers undertook a general inspection of the site. During the inspection no excessive or unusual noise was noted and no non-compliances were raised.

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 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.