

Compliance Assessment Report CAR_NRW0044839

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: 30/07/2024.

Parts of permit assessed: Q2 Monitoring Returns.

NRW Lead Officer: Rebecca Harwood.

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
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
3	12

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	24/02/2025
IR3B	see text below	24/02/2025
IR1A	see text below	24/02/2025

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 Q2 2024 (April - June 2024)

Emissions monitoring data covering the period 1 April to 30 June 2024 was received on the 26th July 2024 in accordance with permit condition 4.2.3.

1. Emissions to Water

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

2. 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.

Periodic monitoring (A15, A11, A8)

Particulate monitoring was undertaken at Cement Mill 5 (emission point A15) during March 2024. The results were compliant with the ELVs within the permit.

Particulate monitoring was undertaken at the Clinker Transport to Storage Filter (emission

point A11) during May 2024. The results were compliant with the ELVs within the permit.

Six monthly monitoring at the Kiln 4 main stack (emission point A8) was undertaken during April 2024. There were no exceedances of the ELVs stated within the permit.

The Kiln by-pass dust 6 monthly analysis was also submitted.

3. ARM and WDF Reporting

There were no updates to the alternative raw material / waste derived fuel usage for Q2 2024.

4. Schedule Notifications

A Part A Schedule 5 notification relating to a dust release from the kiln inlet on the 21st May 2024 was received the same day. A cable fault on the cooler under grate fan tripped the kiln operating system. The Part B notification and investigation report were received on the 4th June 2024. The investigation report states that *"When the kiln controller stopped the kiln both the Main Exhaust Fan and the ID fan stopped running and so positive pressure built up in the kiln system and dust escaped from the kiln inlet."*

This has been scored a category 3 breach of condition 3.2.1 under subheading IR3B Emissions of substances not controlled by emission limits.

The main exhaust fan was restarted shortly after the trip to reduce the pressure in the kiln.

The investigation report goes on to say *"The dust release from the inlet was a result of the damage to the comms cables in the cooler duct meaning control of the cooler and clinker transport system in the CCR was lost... The power cable for 441FN05 had been jointed due to a previous failure and this joint was located within the cable duct... The fire within the cable duct was due to a failure of the joint - high temperatures within the cable caused the surrounding structure to melt. It was found that the duct contained a lot of dust and there was also some timber which would have aided the spread of the fire. As this cable has failed previously, the decision has been made to replace the 240mm² cable with two 185mm² cables to increase cable capacity. The plan is to reroute this cable so that it no longer sits in the duct. The cable will be run in an elevated position, helping keep the cable temperature down. The removal of a high-power cable from the cable duct will also help reduce the temperature in the duct. The long term goal is to remove other high power cables from this duct to reduce the risk of damage to the comms cables."*

Three immediate actions relating to the incident have been completed. A further two actions to review the removal of high power cables from the duct and to ensure that the cable duct is added to the thermography route are to be carried out, but the first is dependent on shutdowns.

Action 1: The Operator should advise NRW when these actions have been completed.

5. Complaints

A dust complaint was received from the Groves Estate on 26th June 2024. The Operator took a dust sample and the analysis confirmed that the dust on the vehicle was made up of both clinker dust and reacted/part-reacted raw meal.

The investigation report received on 30th July 2024 highlighted that a small hole had been found on the ducting from the cooler to the heat exchanger. This is believed to be the source of the clinker dust. A temporary repair has been made by the Operator and further work will be undertaken during the 2025 shutdown. The report suggests that the reacted / part reacted raw mill originated from the base of the gas conditioning tower and this was not collected in a timely manner, allowing time for the dust to dry and get picked up by the wind. Planned Preventative Maintenance is in place for the GCT and this has been reviewed. Additional resource to ensure dust is removed in a timely manner has been implemented.

This has been scored a category 3 breach of condition 3.2.1 under subheading IR3B Emissions of substances not controlled by emission limits.

A further category 3 breach of condition 1.1.1 has been applied under subheading IR1A General Management as resource was not available immediately to remove the dust when required.

Action 2: The Operator should continue to check the temporary repair for possible failure as part of their PPM and should subsequently advise NRW when the permanent repair has been completed.

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.