

Compliance Assessment Report CAR_NRW0049053

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: 06/08/2025.

Parts of permit assessed: Q2 2025 monitoring.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Plant Manager, Plant Manager, on 20/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	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?

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

Review of emissions monitoring Q2 2025 (April - June 2025)

Emissions monitoring data covering the period 1 April to 30 June 2025 was received on the 30th July 2025 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, A17)

All continuous emissions monitoring was provided as required by the permit and shown to be within the permitted limits during this period except for dust, see below.

Dust spikes were recorded from emission point A15 - Cement Mill 5 on the 12th April and the 23rd May 2025 following start up. On both occasions the mill was in operation for around 30 mins before the Shift Manager stopped the mill to investigate the high readings.

The Operator has stated *"Dust disturbed following the bag change was deemed the cause of the high readings. We have identified an action to scope out the installation of a fixed line to the filter to allow for easy cleaning of the cell plate following a filter bag change in order to try and reduce the dust on during the mill start."*

NRW may review procedures linked to cement mill start up on future inspections.

The Operator has stated that QAL2 updates were applied to the main stack, cement mill 3 and cement mill 5 during Q2 2025.

Periodic monitoring (A15, A11, A8)

Particulate monitoring was undertaken at Cement Mill 5 (emission point A15) on

13/03/2025. The results were complaint with the ELV within the permit.

Particulate monitoring was undertaken at Clinker Transport Filter (emission point A11) on 18/03/2025. The results were complaint with the ELV within the permit.

Six monthly monitoring at the Kiln 4 main stack (emission point A8) was undertaken on 10/03/2024 & 11/03/2025. There were no exceedances of the ELVs stated within the permit.

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

3. Schedule 5 notifications

A Part A Schedule 5 notification was received in June following a failure of the ID fan resulting in a dust release from the base of the pre heater tower. The investigation and root cause analysis into the ID fan failure identified that the cause was a combination of design and wear. The Operator has instigated a 12-week inspection plan for the new impellor including 3D scanning to monitor wear rates and loss of material. This will enable early intervention should a problem be identified. The Operator is also undertaking a Failure Mode Effect Analyses (FMEA) exercise.

4. ARM and WDF Reporting

There were no updates to the alternative raw material for Q2 2025. A new SRF supplier was added in Q2 2025 and the waste derived fuel form updated.

5. Complaints

A noise complaint was received during April 2025, following an investigation by the Shift Manager and their liaison with the reporter it is not thought that the site was the course of the complaint.

Two dust complaints were received during May 2025, dust samples were taken by the operator and the analysis indicated that the *"dust appeared to be general dust in the form of a mixture of pollen and other organic material, plus fine mineral dust that was mainly siliceous."* The reports indicate that the dust was not from the site.

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.