

## Compliance Assessment Report CAR\_NRW0049825

**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:** 31/10/2025 between 10:05 and 11:30.

**Parts of permit assessed:** various.

**NRW Lead Officer:** Rebecca Harwood.

**Report sent to:** Plant Manager, Plant Manager, on 07/11/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Action only (X)	
IR4A - Installations - Information - Records	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	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
IR2A	see text below	31/12/2025

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.

**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 an unannounced inspection of Padeswood Cement Works on the 31 October 2025.

Discussions were held with the Plant Manager relating to the wood chip and high sulphur petcoke trials. Live and historic emission data was reviewed as part of the visit.

**Wood chip trial**

The Operator provided an update in relation to the wood chip trial. The initial trial was between the 2 and 9 September 2025 with a follow up trial undertaken between the 14 and 21 October 2025. Wood chip is delivered to site via walking floor trailers and fed in via the SRF 121 feed system. A sample of the wood chip was seen during the visit. No adverse effects on stack emissions or kiln operations were noted during either trial.

The Operator has confirmed that they have undertaken a duty of care visit to Mick George's Cambridgeshire site where the wood chip material is being processed. They confirmed that hazardous waste is removed prior to the shredding of the wood chip. A sample of the wood chip was taken during this duty of care visit and sent away for analysis. Further analysis is being undertaken and the Operator is sourcing a laboratory with a lower limit of detection for mercury due to an apparent erroneous result within one batch of wood chip. The Operator has stated that further analysis was undertaken on the material sent to site during the initial trial and they are waiting sample results from the second round of trial material. **Action 1:** The outstanding analysis should be forwarded to NRW when received.

The Operator has stated that they are going to continue using wood chip as an alternative fuel as permissible by the permit. The Operator should ensure that there is a robust sampling system in place to evidence that the material is meeting the criteria for categorisation as EWC 19-12-07. NRW officers may review the sampling procedure and any results during future inspections.

**High sulphur petcoke trial**

A discussion was also held regarding the current and ongoing petcoke trial. The Operator stated that insufficient data has been obtained during the initial trial in regards the success or otherwise of the higher sulphur petcoke. Table S2.1 within the permit limits the sulphur content of petcoke to 5%. The sulphur content within the trial petcoke was expected to be above 6%, however, the petcoke delivered has had lower than anticipated sulphur content and the Operator requested an extension to the trial.

Initial findings indicate that the petcoke used during the initial trial has not impacted emissions. The continuous emissions monitoring data was reviewed whilst at site. NRW agree to an extension for a further 500t of petcoke to be trialled. As previously stated, the Operator must ensure that the kiln continues to operate in accordance with the permit and emissions are monitored. If the trial leads to a deterioration in emissions, then the trial shall

be stopped immediately and NRW notified accordingly. All permit conditions remain in force during the trial.

**Site Inspection**

An onsite inspection of the site was undertaken and no compliance issues were identified during the walkaround. The new SRF building is fully operational. The Operator is reminded that there are Improvement Conditions linked to the operation of the new SRF building - IC9a and IC9b.

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.