

## Compliance Assessment Report CAR\_NRW0049876

**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:** 29/10/2025.

**Parts of permit assessed:** Q3 2025 monitoring returns.

**NRW Lead Officer:** Rebecca Harwood.

**Report sent to:** Plant Manager, Plant Manager, on 10/02/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - Information - Notification	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR4A - Installations - Information - Records	Action only (X)	

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
IR3A(2)	see text below	Already

Criteria	Action needed	Complete by
		completed
IR4A	see text below	Already completed

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 2025 (July - September 2025)

Emissions monitoring data covering the period 1 July to 30 September 2025 was received on the 29 October 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, A11, A15)

All continuous emissions monitoring was provided as required by the permit and shown to be within the permitted limits during this period with the exception of NO<sub>x</sub> from A8 (Kiln 4) and dust from A5 (Cement Mill 3), see below.

##### A8 NO<sub>x</sub> exceedance

A schedule 5 notification relating to a NO<sub>x</sub> emission from the Kiln was received on 17 August 2025. A NO<sub>x</sub> reading of 510 mg/m<sup>3</sup>, above the ELV of 450 mg/m<sup>3</sup>, was recorded on the 16 August 2025. The investigation summary stated:

*"The use of alternative fuels means that during normal operation there is minimal coal used to fuel the kiln. The timing of the bypass system and SRF granulate system stop occurring at 23:30 meant that the high NO<sub>x</sub> levels caused by an increase in coal feed to the main burner was enough to trigger the fuels off strategy at midnight. Once triggered the kiln*

*operator is unable to re-introduce alternative fuels. In this case being able to keep Cemfuel running to the main burner would have helped to reduce the NOx due to its lower CV and higher water content, it can act to cool the flame and reduce thermal NOx. The incident has prompted a review into the fuels off strategy.*

*The investigation also reviewed the operation of the SNCR system during the high NOx incident. The system was able to deliver its maximum capacity of 900 litres/hour when placed in manual with the valves fully open. We are confident the SNCR system is operating correctly, and no further action is required.*

*The coal-kiln Pfister feeder is serviced and calibrated annually during the January shutdown by a third party. The Pfister feeder will be re-calibrated during the next stop – anticipated to be the end of September. There are no plans to amend the frequency of calibrations at this time."*

**This has been scored a category 3 breach of condition 3.1.2 IR3A(2) Emissions to air.**

The Operator has confirmed to NRW that the actions identified within the investigation report have been completed.

#### *A5 Dust exceedance*

A schedule 5 notification was received on 10 August 2025 relating to a dust emission from Cement Mill 3, however the mill only ran for 73 minutes whilst the Operator carried out repairs.

*The Operator stated "It has been identified that the daily average value displayed in the control room is less than that reported by ABB. It should be noted that the daily averages reported under schedule 4 of the permit uses the ABB report. This investigation has highlighted that the calculation methodology is potentially over-reporting dust emissions from Cement Mill 3. The discrepancy has only been highlighted because of the short mill running times and the elevated dust values. The decision to continue with the fault-finding exercise was influenced by the daily average displayed in the control room screen. Operators and Shift Managers are aware that the value in the control screen is not accurate, and that ABB is to be used until a review of the programming can be undertaken. In the week following the Part A, work carried out on the filter has included:*

*Further visoliting to identify any holed bags.*

*Additional dust monitor maintenance to confirm correct operation.*

*Replacement of 13 bags in one of the chambers following observations by the maintenance team.*

*Inspection of the filter by a third-party – which identified a restricted air supply.*

*The new bags and resolution of the air supply issue have reduced the dust readings at the stack."*

The daily exceedance reported has not been scored on this occasion due to the short run time and the requirement to run to resolve the issue.

The Operator has confirmed to NRW that the actions identified within the investigation report have been completed.

**3. Schedule 5 notifications**

Schedule notifications were received from the Operator in relation to the emissions exceedances above in accordance with the permit.

**4. ARM and WDF Reporting**

There were no updates to the alternative raw material for Q3 2025. A new SRF supplier was added in Q3 2025 along with use of Shredded Wood Chip, these have been added to the waste derived fuel form. Further information relating to the wood chip can be found within CAR NRW0049825.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### **Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

### **Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [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.