

Compliance Assessment Report CAR_NRW0050620

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: 31/12/2025.

Parts of permit assessed: Q4 & Annual 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)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	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
IR1A - Installations - Management - General Management	C3 Minor	1.1.1(a)
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
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
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	Already completed
IR1A	see text below	Already completed
IR3B	see text below	31/03/2026

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 Q4 2025 (October - December 2025) and annual reporting

Emissions monitoring data covering the period 1 October to 31 December 2025 was received on the 30 January 2026 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. CEMS has been installed on emission point

A12 - Arodo Packer Filter.

Periodic monitoring (A8, A11, A12, A15)

Six monthly monitoring at the Kiln 4 main stack (emission point A8) was undertaken on 27/10/2025 & 28/10/2025. There were no exceedances of the ELVs stated within the permit.

Particulate monitoring was undertaken at Clinker Transport Filter (emission point A11) on 28/10/2025. The results were compliant with the ELV within the permit.

Particulate monitoring was undertaken at the Arodo Packer Filter (emission point A12) on 16/12/2025. The results were compliant with the ELV within the permit. This was the first extractive monitoring at this emission point.

Particulate monitoring was undertaken at Cement Mill 5 (emission point A15) on 29/10/2025. The results were compliant with the ELV within the permit.

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

3. Schedule 5 notifications

A schedule 5 notification relating to a dust emission from the pre heater tower cyclone 3 was received on 4 December 2025. The Operator has stated in their investigation report, received on 23 December 2026, that:

"Whilst using a high pressure water jetting to remove a material blockage from cyclone 3, a large amount of material fell down. This caused fugitive dust emissions from the pre heater tower as dust material exited through the jetting port. The rest of the material flushed through the kiln and cooler into the rear of the cooler building covering CV01. Dust was observed to be escaping from the kiln outlet area and cooler stack for around 15 minutes."

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 investigation summary states:

"A new interlock has been put in place following the incident. This will ensure that if the pressure ring is reading zero during start-up (when ID fan has started) it will not allow the kiln feed to start.

It also ensures that if the cyclone pressure ring reaches zero during operation the ID fan will trip after a 5-minute delay if the issue hasn't been resolved (delay to allow for natural variations in vessel pressure and to allow for any instrument fault to be cleared / resolved).

Cyclone blockage can occur on startup whilst conditions within the pre-heater tower are optimised. It is standard procedure to clear cyclone blockages with high pressure water jetting or by cardoxing the affected area. Smaller blockages can easily be cleared. In this case the volume of material that built up inside the cyclone was not typical and the

interlocks that have been put in place should prevent a recurrence."

The root cause indicates that there were inadequate controls in place. **This has been scored a category 3 breach of condition 1.1.1(a) under subheading IR1A General Management.**

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

A further schedule 5 notification relating to a dust emission from the Kiln outlet seal / kiln hood was received on 9 December 2025, because of an issue with the damper not opening fully.

The Operator has stated that *"The Kiln was stopped when operating trends indicated an issue so as to reduce the risk of dust escaping to atmosphere, once the cooler filter temperature dropped to a temperature allowing the cooler filter fan 441.FN08 to restart it was started and negative pressure was increased to the kiln outlet."*

The Operator stated in their investigation report, received on 23 December 2025, that:

"During operation a flush of material occurred down the preheater tower through the kiln and into the cooler. The volume of material overwhelmed the cooler and the heat from the material triggered an interlock on the cooler filter inlet temperature which stopped the cooler filter fan. This loss of suction meant there was positive pressure at the kiln outlet/hood area. Dust release was observed for around 7 minutes."

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 root cause was identified as an issue with the damper operation. The Operator also stated that:

"We have identified that there is an issue with the operation of the damper. The damper will be cleaned and inspected during the annual shutdown. A summary of the findings will be forwarded to NRW prior to start up following the annual shutdown."

Action: Report to be submitted to NRW upon completion.

Further non compliances may be applied on review of this report.

Nb: No dust complaints were received by NRW in relation to either incident.

4. ARM and WDF Reporting

No amendments were made to the alternative raw material / waste derived fuel usage forms for October - December 2025.

5. Annual Report

Annual performance parameters were reported to Natural Resources Wales in accordance with permit condition 4.2.2. No issues were identified.

A report on the performance of the activities as required by permit condition 4.2.2. was received by Natural resources Wales on the 30 January 2026. No issues have been identified.

6. Complaints

Two noise complaints were received during December 2025.

The initial complaint was attributed to the use of the disab. NRW had been notified of its use. The operation was stopped when the complaint was received.

The second complaint was not investigated at the time as it was not rung through to the Shift Manager when received by NRW. The retrospective investigation did not identify any specific issues that may have caused the complaint.

7. Permit Variation

The permit variation relating to the carbon capture and storage facility was issued by NRW on 17 October 2025.

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

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

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.