

Compliance Assessment Report CAR_NRW0036900

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 carried out: Site Inspection, Reason: Routine.

On 28/08/2020 between 14:25 and 17:40.

Parts of permit assessed: see report text

NRW Lead Officer: Lara Cubley.

Report sent to: David Quick, Plant Manager on 29/10/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F2 - Amenity - Noise	Action only (X)	

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

Total number of 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
F2	See report text	31/10/2020

Action 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

A site visit was organised to discuss the noise BAT review at the site and inspect some of the items of plant identified as likely to have the greatest impact at sensitive receptors.

A site walkover of the plant was conducted mostly externally and the following items of

interest with respect to noise were looked at:

- Raw Mill Reject: The internal silo for storage of raw mill reject has not been in use due to issues with blockage on exit from the silo. Discharge of via reject chute to clad building is thus occurring with increased noise impacts. The Operator is currently designing an engineering fix to the blockage issue. **ACTION 1: The Operator is to provide details of the project with timescales to NRW by 23rd October.**
- Mill 5: Improvements to Mill 5 elevator filter fan BF03 have been completed and verified to eliminate 1183Hz tone. The exhaust was just visible from the ground at a distance and wasn't discernible. There have been a few issues picked up with Mill5 relating to building completeness and sealing, as well as metal plates vibrating because they are only secured at edges. This is poor given that the Mill has only recently been developed. **ACTION 2: The Operator must investigate and understand the issues which have led to recent construction/development projects failing to adequately address environmental issues. A programme of actions/remedial measures to address these issues so as to prevent recurrence must then be put in place. The Operator must provide a report outlining the main issues with proposed solutions with timescales by 31/12/20.**
- Coal Mill Ex vent: This has been re-sealed and the contractor has taken a noise reading. **ACTION 3: Noise reading to be provided to demonstrate the sealing has worked.**
- Shell Fans: These were inspected from the ground. There are 4 larger fans and 2 of a smaller type. One of the larger fans is not used as it is not serviceable. Compressed air for cooling was not in use at the time of the visit. Compressed air is available as secondary control measure after the shell fans.
- Air Cannons: Some work has already been completed to use water lancing along with air cannons. The improvement is to install a fixed line for the water lancing to make the task more efficient. Cannons will always be in use on the preheater tower. Further review work is ongoing as part of the BAT review.
- Filter Fan (nose ring) 431 FN02: This is located on a gantry at height and has been identified as tonal with vibration issues. The Operator plans to overhaul this and we await the contractors proposals regarding improvements.
- Pre-heater Tower Kiln Feed Elevator BE02: There have reportedly been problems with this motor previously. It is elevated and the proposal to enclose further should be looked at by an expert, to ensure enclosure if acoustically designed with predicted benefits
- Kiln 4 compressor house is fully enclosed.
- Cooler Building: Within the cooler house there are 4 fans and there are also cannons located on the gantries above. Readings have been completed by contracted acoustic engineers on the day of NRWs visit and we are keen to see results of this due to concerns that these fans and cooler stack fan could be causing an impact off-site especially when ramped up.
- Limestone Transfer Point BC03-BC030: This was noted to be noisy during the site inspection. Cladding was in poor repair with gaps. **ACTION 4: The BAT assessment should be cover this transfer point.**

Permit Condition 3.4 - F2 Noise as per CAR_NRW0035354 **ACTION 5: The Operator must submit the Noise BAT review currently being conducted by acoustic**

engineering contractor by 31/10/20.

During the site inspection a compressor was operational outside the packing bay. This has reportedly been brought in due to a failure of the packing bay drier. **ACTION 6: The Operator must feed back to NRW the nature of the fault and likely date for the drier returning to usual service.**

The Operator is reminded that there are 3 outstanding Part Bs as follows:

- 10/07/20 Packing bay silo 1 - penthouse above silo 1 gasket failure on blow line.
- 23/08/20 Dust release kiln inlet.
- 30/08/20 Silo 6 finished cement silo penthouse PRV malfunction.

ACTION 7: The Operator must provide Part B investigations as soon as practicable.

Following the site inspection a short visit was made of the Bannel Lane area for noise observation purposes. Although the site was audible at the time of this inspection it was not considered to be of a level or nature likely to cause pollution.

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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):

A: Permitted activities

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 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 – 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.