

This form will report compliance with your permit as determined by an NRW officer

Site	Padeswood Cement Works	Permit Ref	BL10961B		
Operator/Permit holder	Castle Cement Limited				
Regime	Installations				
Date of assessment	07/08/2018	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Noise Control				
Lead officer's name	Ross, Stuart				
Accompanied by	Oakes, Ian				
Recipient's name/position	Robert Keough/ Quality & Environment Manager	Date issued	09/08/2018		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
F2 - Amenity - Noise	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This Compliance Assessment Report summarises the findings of a subjective night time noise monitoring exercise around the cement works on the evening of 07/08/18. This is a precursor to establish what, if any, detailed monitoring is required in response to noise complaints relating to the works as received by NRW.

Monitoring locations were chosen that reflect the location of complaints and to allow an assessment at different locations around the works. Each location was visited for approximately 5 minutes and subjective observations noted. The cement works was not visited as part of this assessment.

Weather Conditions; Dry, approximately 18 degrees Celsius, calm, with intermittent light breeze (westerly < 5mph). Cloud cover - overcast with some breaks in cover.

Findings/Observations

1. 22:10 Dingle Road, Pontblyddyn (Residential area with properties facing cement works)

Road traffic noise (near and distant) was the dominant sound at this location, during lulls in the road traffic noise the cement works was barely audible – very low level (very quiet) and distant broadband type sound. Unlikely to be noticeable unless a concerted effort is made to detect / observe the sound. Not of concern / likely to result in complaints.

2. 22:20 Penyffordd Railway Station Carpark

The Cement works was audible during lulls in the road traffic noise. The sound can be described as low level (quiet) broadband type sound, no notable features of tonal or impulsive nature. The sound of the works was easily 'drowned out' by road traffic noise. The character and level of sound emission from the plant at this location was not of concern / likely to result in complaints.

3. 22:36 Aspen Way, Penyffordd

Road traffic noise was very dominant at this location. During lulls in the road traffic noise the cement works was audible (low level broadband type sound) but slightly louder. Occasional impulsive noise but not particularly prominent (air cannon?). The character and level of sound emission from the plant at this location was not of concern / likely to result in complaints.

4. 22:46 Padeswood Lake Road (field entrance opposite animal sanctuary)

Some distant road traffic noise but less so compared to above locations. The Cement works was audible (although quiet) and can be described as broadband type sound. However, a tone (not particularly prominent but noticeable) was present that increased and decreased in volume in a regular fashion/cycle. Possibly linked to fan/motor or gearbox. No features of impulsive nature. The character and level of sound emission from the plant at this location was not of concern / likely to result in complaints.

5. 22:54 Padeswood Lake Road (Entrance to Well House Farm Access Road)

Observations are generally as per location 4. The tonal aspect was more prominent and whilst not considered significant at this location it may possibly result in complaints at residential properties closer to the works relative to the monitoring location. Other properties between Padeswood Lake Road and the south of the works may be similarly affected.

6. 23:05 Padeswood Lake Road (Opposite 'The Old Barn')

The Cement works was audible (although quiet) and can be described as broadband type sound. The tone described at locations 4 and 5 was present but quieter / less prominent. No features of impulsive nature. The character of sound emission from the plant at this location was not of concern / likely to result in complaints.

7. 23:15 Spon Green (Entrance to Spon Green Farm Access Road)

The Cement works was just audible during lulls in the road traffic noise. The sound can be described as low level (quiet) broadband type sound, no notable features of tonal or impulsive nature. The sound of the works was easily 'drowned out' by road traffic noise. The character and level of sound emission from the plant at this location was not of concern / likely to result in complaints.

8. 23:22 Cwrt Brenig / Jubilee Road

The cement works not audible. Whine and rattle of what may be an extractor fan was noticeable from the direction of Chester Road (Take Away Restaurant?). House or vehicle alarm sounding in the distance. Road traffic noise.

9. 23:28 Bannel Lane (Entrance to 'Sunny Bank')

The Cement works was audible (low level / quiet broadband factory sound) and the tone noticed at locations 4, 5 and 6 was possibly present / barely audible). The character and level of sound emission from the plant at this location was not of concern / likely to result in complaints.

Plant Operations 22:10 – 23:28 (as confirmed by Castle Cement)

Limestone Intake: Yes
Kiln Feed Rate (tph): 170
Kiln ID (fan speed): 89%
Clinker Cooler Heat Exchanger (fan speed): 69-73%
Cooler Grate Fans (fan speed): 90%
Raw Mill Fan: 92% power
Raw Mill (tph): 215/220
No. kiln shell fans running: x 1 (431fn11)
Coal Mill (On/Off): On (22:12 – 23:10)
Cement Mill 1 (On/Off): On
Cement Mill 2 (On/Off): On
Cement Mill 3 (On/Off): Off
Cement Mill 4 (On/Off): Off
Clinker Dispatch: No
Cement Dispatch: No

Conclusions

At the time of these observations, and in the opinion of NRW officers, the character and level (loudness) of sound emissions from the works at locations 1-- 7-& 9 was not of concern and unlikely to give rise to complaints. The cement works was not audible at location 8.

These findings are subject to uncertainty due to the short duration of the observations and given that background sound levels and sound emissions from the works will vary over time and with changes in production levels. Weather conditions, particularly wind direction is believed to be a factor in increasing the sound level and potential for complaints at residential properties in this area. The background sound level will likely reduce in the early hours of the morning possibly causing sound emissions from the works to become more prominent, particularly due to a reduction in road traffic noise.

The tonal noise observed at locations 4 -6 may be more prominent and possibly have the potential to give rise to complaints at isolated residential properties closer to the works. Location visits to such properties were not made during this exercise so an opinion cannot be reached at this time.

Recommendation - Castle Cement identifies the source of the tone and assesses whether steps can be taken to prevent and minimise the potential for complaints from this source.

NRW is considering further monitoring exercises to build confidence in our understanding of sound emissions from the plant as part of our compliance assessment.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033777**

This form will report compliance with your permit as determined by an NRW officer

Site	Padeswood Cement Works	Permit Ref	BL10961B
Operator/Permit holder	Castle Cement Limited	Date	07/08/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.