

## Compliance Assessment Report

Report ID:  
CAR\_NRW0034387

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

Site	Padeswood Cement Works	Permit Ref	BL1096IB		
Operator/Permit holder	Castle Cement Limited				
Regime	Installations				
Date of assessment	21/12/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Routine Monitoring and Reporting				
Lead officer's name	Ross, Stuart				
Accompanied by					
Recipient's name/position	Elliot Wellbelove/ QE Manager	Date issued	21/12/2018		

### 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
E1 - Emissions - Air	C4	3.1.2
E3 - Emissions - Surface water	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	1	Total compliance score (see section 5 for scoring scheme)	0.1
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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 follows a review of routine monitoring returns and reports for the period 1st April - 30th June 2018 for all permitted emission points to air and water.

All reports received on time - thank you.

### **1. Emissions to Water (W1)**

Emissions compliant with the permit limits during the period.

### **2. Emissions to Air**

Continuous Monitoring (A1 - A9)

All parameters were within permitted limits with the following exceptions for which Part A and B notifications were received as required by the permit:

a) Emission Point A8 (Kiln) HCL (Daily Average Emission limit 10mg/Nm<sup>3</sup>)

04/05/18, 11 mg/Nm<sup>3</sup>

Castle Cement report that *'BC03 tripped at 01:10. An inspection found a large rock jammed up against the inside of the overband magnet frame. This overband magnet is used to remove tramp iron from the feed to the raw mill and prevent damage to the mill. The rock caused the belt to track over, which in turn led to material spilling on the tail drum of the belt. This material build up caused the belt to be pushed up by the tail drum and catch on the bottom left rear side of the vertical steel skirt.*

*This ripped the belt for approximately 40 meters with an additional 30 meters of belt badly damaged.*

*In order to repair the belt BC03 was off for the majority of the day which also meant the raw mill was not able to operate.*

*A contractor was called out to replace the belt. There is a paddle switch located on this belt which is used to detect large lumps on stone on the belt. However, this is located after the overband magnet. The site will review this location to determine if the paddle switch is better placed before the overband magnet*

*It is believed that this incident would have caused minimal environmental impact. The mass emissions from the stack if running at the ELV of 10mg/Nm<sup>3</sup> would equate to 67kg per day (based on a stack flow of 280,000 m<sup>3</sup>/hr). As the kiln ran for 22.5 hours, the mass emissions would have been approximately 2kg above the permitted level'.*

This is a marginal breach of the emission limit value (permit condition 3.1.2) and attracts a non compliance score of 4. :

b) Emission Point A5 (Cement Mill 3) Particulates

3/06/18, 21 mg/Nm<sup>3</sup>

Castle Cement report that *'The mill only ran from midnight to 0033hrs. The feed was on the mill from 00:00 – 00:25 with 00:25-00:33 being used to empty the transport system in preparation for a maintenance day. The daily average for the previous 3 days averages had been between 10-16mg/Nm<sup>3</sup>. The Mill was stopped from 0030hrs as a planned stop for routine maintenance on 4/6/18'.*

Marginal exceedance of emission limit value over a 33 minute period against a 24 hourly average. It is considered disproportionate to apply a non compliance score in this instance.

### **Periodic Monitoring**

1st January - 30th June 2018, all emissions compliant.



## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0034387**

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Site	Padeswood Cement Works	Permit Ref	BL10961B
Operator/Permit holder	Castle Cement Limited	Date	21/12/2018

### 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			
E1	C4	None	23/12/2018

## 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](mailto: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.