

	EPR Compliance Assessment Report		Report ID: BL3986ID/0229923	
	This form will report compliance with your permit as determined by an NRW officer			
Site	Aberthaw Works NRW/EPR/BL3986ID/V010		Permit Ref	BL3986ID
Operator/ Permit holder	Lafarge Tarmac Cement and Lime Limited			
Date	19/01/2015	Time in	10:15	Out 12:30
What parts of the permit were assessed	Routine Site Inspection (Fugitive Dust Management)			
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op: Water Discharge:
Recipient's name/position	Mr Chris Bradbury - Plant Manager			
Officer's name	David Griffiths	Date issued	23/01/2015	

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	NA	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	A	
	2. Noise	N	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
 A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Lafarge Routine Site Inspection focusing on Fugitive Dust abatement improvements.
Routine Site Inspection with Chris Bradbury, Robert Fairless and Kara Bennett

Agenda

1. Recent dust complaints, comparison between the events on 12th and 15th January 2014.
2. Site Inspection to view improvements.
3. NOX Modelling.
4. Update on Lafarge's community engagement.
5. Dust Scan Results.
6. General

1. Recent dust complaints, comparison between the events on the 12th and 15th January 2015.

The dust that had affected two residents on the 12th January was from the Clinker handling system as the dust was very sticky and a sample could not be taken. The cause of this event was due to adverse weather conditions (high winds) that had also caused damage to the works.

However the dust complaints on the 15th January was much lighter and did not stick to the vehicles and could easily be washed off. NRW received 4 complaints during this time.

Lafarge's investigations did highlight a potential issues with a limestone stockpile close to the Burton Hill residents that had more dust in the stone than usual. However, two of the complaints were from a location that was opposite direction from the prevailing wind direction and some distance from the works. Therefore, these two complaints are unlikely to be from the Lafarge works.

As a result of the Burton Hill residents' complaints and potential limestone dust, Lafarge have actioned an investigation by the Quarry Manager to address this this issue with the supplier.

2. Site Inspection to view improvements.

The Kiln is currently on shutdown since Friday 16th January for a week. This was not a planned shutdown but was in response to bringing forward works to start the deep clean on the Clinker Handling System.

During the site inspection we inspected the limestone stockpile and it did contain more dust than other stockpiles and as previously discussed the Quarry Manager was at this time conducting an investigation with the supplier.

Clinker Transport Conveyor 1 – A sheeted porch was being constructed over the entrance which will be completed this week and will assist in preventing wind channelling through this area and causing fugitive dust releases..

Clinker Transport Conveyor 5 – A deep clean of this area has begun this week with contractors on site, this cleaning will be completed by works shutdown on the 15th Feb 2015. Improvements were also being made in metal sheeting in the underside of the walkway. This will prevent fugitive dust escaping through the gaps in the walkway.

Conical Store – Modifications to the feed to the store was being undertaken, these works brought forward to this week instead of February shutdown.

Clinker Store – A porch was being constructed of the entrance to the store to assist in fugitive dust releases from this area.

Kiln Cooler Tubes – General repairs being undertaken and two tubes will be replaced in February shutdown.

3. NOX Modelling.

NRW has undertaken modelling where results suggest that an exceedance due to the SNCR trial is unlikely at the human and habitats receptors, considering the overlapping with the power station and model uncertainty.

4. Update on Lafarge's community engagement.

Lafarge have improved their community engagement and have arranged for the local residents to visit the works on Wednesday 21st January 2015.

5. Dust Scan Results.

Lafarge have now been forwarding dust scan results to the residents and NRW.

6. General

- Ammonia substitute trial will now take place after the works shut down on the 15th February 2015.
- Improvements to the current road sweeping contract needs to be addressed.
- Cement Mill was also shutdown today for a few hours today and will then be shut down again for 5 days next week for routine maintenance.
- Improved complaint investigation reports that now include weather data (wind speed and direction) at time of complaint.
- NRW also met with the Burton Hill residents after this site inspection.
- Next planned Inspection is on the 6th February 2105 at 10am (Lagoons)

*****end of report*****

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Operator/ Permit	Lafarge Tarmac Cement and Lime Limited	Date	19/01/2015

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.

