

Compliance Assessment Report

Report ID:
CAR_NRW0031871

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

Site	Aberthaw Works EPR/BL3986ID	Permit Ref	BL3986ID		
Operator/Permit holder	Lafarge Tarmac Cement and Lime Limited				
Regime	Installations				
Date of assessment	12/07/2017	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Alternative Raw Material - Bauxite Trial				
Lead officer's name	Griffiths, David				
Accompanied by					
Recipient's name/position	Kara Bennett/ Environment Coordinator	Date issued	13/07/2017		

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
A1 - Specified by permit	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H1 - Resource Efficiency - Efficient use of raw materials	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

On 6 July 2017 NRW received a request from Tarmac to use a new raw material called Bauxite, which they intend to trial as a replacement for a proportion of the slag in the raw mix.

The material is not a waste derived product, it is not covered by a waste code. However Tarmac have followed the same protocol as is identified in the permit and completed a risk assessment. Tarmac request authorisation to undertake two, one week trials using this material commencing 17th of July and 31st July. The trial will use 300 - 350 tonnes of Bauxite material per week.

On the 7th July 2017 NRW requested further information and justification for using Bauxite as this Mineral is imported from Africa / Australia etc. Furthermore, why are they replacing slag? As there is a lot of steel works slag available in abundance in the UK. NRW also understand the use of Bauxite is very Energy intensive (Carbon Footprint)

Tarmac responded on the 12th July 2017 justifying for the forthcoming two week trial with Bauxite. The plant would like to perform this trial in July 2017.

The trial is a major step in an overall project which is crucial for the future raw mix quality control of the plant. This project will enable the plant to implement a more modern approach in terms of quality control and stop the limited "bucket chemistry" which is our current mode of operation.

This project is crucial for the future optimization and sustainability of the plant. The plant has made progress in raw mix control, heat consumption, waste derived fuels and power consumption (for both Kiln and Cement mill workshop). Without this project, the plant will hit a status quo on these topics, and as a consequence a limited cost optimization hence a reduced lifespan for the plant i.e. plant will not be competitive.

This trial will help us size the equipment required for implementation of different kind of raw materials (Bauxite, Steel Slag...), available on the market to be future-proofed. This is necessary to remain sustainable.

The use of Bauxite is to produce cement at the required quality for our customers, the feed material to the kiln requires alumina in the mix. Bauxite is a conventional source of Alumina in the cement industry (e.g. CRH plants in Ireland, Platin and Limerick are using Bauxite). Due to its natural high concentration of this element, Bauxite will bring enough Alumina by only representing 2% of the total mix (~15 kt pa). The Bauxite will originate from Turkey or Greece.

The current source of Alumina today is from the Port Talbot Slag, which represents 11% of their total mix (~75 kt pa) to achieve the same level of Alumina. Unfortunately, Slag is not bringing only Alumina, but as well Silica which is degrading their mix. To compensate from this degradation, higher grade limestone is required from Cornelly to achieve the appropriate chemistry (~60kt pa).

Using Bauxite will also bring the following benefits:

- Less material movement on the road, and in the plant/quarry
- Less Storage on site (no more PT slag storage in the quarry ~ 1000 tons)
- Lower Cr6 input

- More usage of our own quarry

- Simplify our operations

- Reduction of our Raw Material bill which is today a source of concern (CRH has benchmarked Aberthaw, and it is bottom of the class today)

In order for the plant to be sustainable, maximum benefit is required from the quarry reserves, which currently is estimated to be 39 years. This will never be reached if the plant does not drastically review its recipes and costs.

In parallel, the Port Talbot slag, that we will not use, will find some other applications within the Tarmac business which is more appropriate to its chemistry (in Ready Mix or in Asphalt)

Based on the above information NRW approve this trail

EPR Compliance Assessment Report

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Operator/Permit holder	Lafarge Tarmac Cement and Lime Limited	Date	12/07/2017

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.

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.

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.