

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	18/10/2017	Time in	10:45	Out	13:00
Assessment type	Audit				
Parts of the permit assessed	As Indicated Below				
Lead officer's name	Griffiths, David				
Accompanied by					
Recipient's name/position	Kara Bennett/ Environmental Coordinator	Date issued	30/10/2017		

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	
D1 - Incident Management - Site security	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
F3 - Amenity - Dust/fibres/particulates and litter	O - Suspended	3.1.1
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	0	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	----------	---	----------

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

Dust Management and Complaints

- Tarmac gave an update on community stakeholder engagements.
- Discussed recent improvements on site, these included replacement of 6 new planetary cooler tubes. These cooler tubes have been redesigned limiting the number of fixing belts and reducing the potential for fugitive dust emissions. Further replacement of the remaining planetary coolers is planned for January 2018.
- Improvements have been completed on the clinker transport conveyor system, all conveyors are now enclosed preventing fugitive dust emissions.
- Repairs are required to the cement silo, some damaged during recent weather but apart from this issue the silo is now all enclosed.
- The Clinker shed roof and building – A new porch has been constructed at the entrance of the building with fast opening and closing roller automatic doors.
- Main dust issue now on site causing fugitive emissions is from unplanned kiln stoppages, NRW require a report from you detailing the root causes behind these unplanned stoppages. Furthermore, what are you as Tarmac doing to prevent the frequency of these from occurring.
You also need to undertake an option appraisal for abating this emission, cost benefit analysis and possibly how this issue compares to other works with similar technology.

Im the meantime I will also contact our sector lead and hopefully we can get a way forward with this. I will also temporary suspend these emissions in this CAR form whilst you compile your report and we meet in a few weeks.

We do acknowledge that there has been significant improvement t in the unplanned stoppages (25 – 2017 to date, 44 in 2016 and 65 in 2015)

- To improve efficiency in you investigating complaints, NRW will set up an automatic email notification to site upon receipt of any complaint.
- Discussed recent quarry blasting complaint and details forwa5rded to Tarmac to investigate.

IC5

- In your report you state that the concentration of all relevant hazardous substances in your discharge are less than their associated EQS (freshwater) which is correct.

Test 1

- 3.1.2 The concentrations of all relevant priority hazardous are less than their associated EQS. Pollutant discharges from the feeder aqueduct does not therefore present a risk to the environment.

However, to our understanding NRW need to know more than this and you should have a least completed 'test 1' of H1 to confirm the concentration present in the discharge is <10% of the EQS and if any substances failed that complete 'test 2' to consider the dilution factor of the receiving water course.

If this results in the discharge <4% of the AA EQS / MAC then no further work is required. NRW looked at the H1 files as provided and hoped test 1 and 2 results would be present but there are no numbers – it just says 'NONE'. However, you appear to have entered all the input data (e.g. flow and sample data) to run the test so we don't understand this. Please clarify

Finally, in your report you have calculated annual significant loads for cadmium and mercury at 50% of the LOD but you detected cadmium >LOD so we would have thought that you should use the maximum concentration found for purposes of the calculation? All PAH were < LOD but you have not calculated the significant load for this at all. You could do this at 50% of the LOD as per mercury – probably academic but your approach seems inconsistent. Please can you clarify

This is the list of annual significant load limits.

Pollutant	Annual significant load limit in kg
Anthracene	1
Brominated diphenyl ether	1
Cadmium	5
C10-13 Chloroalkanes	1
Endosulphan	1
Hexachlorobenzene	1
Hexachlorobutadiene	1
Hexachloro-cyclohexane	1
Mercury and its compounds	1
Nonylphenol (4-Nonylphenol)	1
Pentachlorobenzene	1
Polycyclic aromatic Hydrocarbons (PAHs)	5
Tributyltin compounds (Tributyltin-cation)	1

General

- Use of Inert Waste – We discussed backfilling some old bunkers at the old crusher building. NRW approve that this may be done with Inert waste generated on site and within the permitted installation boundary. The waste to be used MUST be inert and must not cause any pollution of the environment.
- During this inspection, I met and discussed dust complaints with one of the residents.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032358**

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	Date	18/10/2017

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			
F3	O	Action plan to be submitted to NRW	01/12/2017

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.