

Compliance Assessment Report CAR_NRW0038997

Permit being assessed: BL1096IB.

For: Padeswood Cement Works , held by Castle Cement Limited

At: PADESWOOD WORKS , PADESWOOD, MOLD, MOLD, CLWYD, CH7 4HB.

Type of assessment carried out: Site Inspection, Reason: Other.

On 25/11/2021 between 19:30 and 20:30.

Parts of permit assessed: SEE NOTES

NRW Lead Officer: Emma Pierce, accompanied by Stuart Ross.

Report sent to: Plant Manager, Plant Manager on 07/01/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	Action only (X)	
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
E1	See Notes	28/01/2022
B1	see notes	28/01/2022

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

NRW carried out an unannounced OOH site inspection at Castle Cement on the evening of the 25th November 2021. We met with the shift manager and carried out a site inspection.

An inspection was undertaken of the Kiln Inlet on floor 2 and in particular the clean-up of the area following the issues with the seal. It was noted that the majority of the dust in this area has been cleared, however Officers considered that more can be done to reduce risk of fugitive dust releases from this area. Shift manager was advised of this accordingly.

ACTION 1: Can you confirm what steps have been taken to improve housekeeping in this area following this incident by the 14th January 2022.

An inspection was also undertaken of the dust room doors where on our previous inspection (18/11) there had been a large amount of fine dust, a clean-up has taken place. Damage to the door was more evident now the material had been cleared away. An action is already in place to address the issue.

Work was been carried out within the Clinker store building during our visit and the main doors were open, there was some dust being released from this point. The Shift Manager explained that an operative in the vehicle observing the work been carried out for H&S reasons, hence why the doors were open. Whilst NRW appreciate the need for supervision for H&S, the vehicle was able to enter the building and close the doors behind it once we raised our concerns, and this alleviated the dust.

ACTION 2: Review potential dust control measures when carrying out activities in this area and provide your findings and proposed improvement measures by 28th January 2022.

The Bag filter 41 was not running at the time of our inspection, the Shift Manager turned this on once we had pointed out that it was not running.

ACTION 3: Provide an explanation as to why the bag filter was not running at the time of our inspection and how long was it off before our inspection. What part of the process does bag filter 41 serve and were these processes operational during the time period the filter was off. Provide this information by the 28th January 2022.

G1 Conveyor belt – there is a section of the corrugated cladding which is missing and has been temporarily covered with plastic sheeting. During our visit we witnessed dust escaping from this point.

ACTION 4: Investigate and confirm this is planned in for replacement/repair and when it will be completed by 14th January 2022

Dust was observed escaping from the crane store building where the side walls meet the roof (also witnessed by shift manager) When we looked back at this point from afar, it was also noticeably 'hazy' in this floodlit area, and in contrast to other areas on the site. The crane store and clinker transport in particular needs more investigation into its integrity and potential for dust releases.

ACTION 5: Review and investigate dust control measures on the crane store building and provide feedback by the 28th February 2022.

Three sets of crane store side doors were all ajar, whilst at the time there was no visible evidence of dust release, these doors need to be closed as there is a potential for dust to be released. The Shift Manager believed that the volume of material within the crane store had caused it to push against the doors and therefore pushing them open. The Shift Manager advised that he would rectify this immediately.

ACTION 6: Please carry out a review into this event to establish the root cause analysis and what needs to be actioned to prevent a re-occurrence. Please provide a summary of actions once review completed by the 28th February 2022.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.