

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

Site	Rockwool, Pencoed	Permit Ref	BS6149IQ
Operator/Permit holder	Rockwool Ltd		
Regime	Installation		
Date of assessment	9 th October 2018		
Assessment type	Inspection		
Parts of the permit assessed	See section 2		
Lead officer's name	Neil Herbert	Accompanied by	N/A
Recipient's name/position	Joshua Caulton	Date issued	10 th October 2018

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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	N	
B1 - Infrastructure - Engineering for prevention and control of emissions	N	
B2 - Infrastructure - Closure and decommissioning	N	
B3 - Infrastructure - Site drainage engineering (clean and foul)	N	
B4 - Infrastructure - Containment of stored materials	N	
B4 - Infrastructure – Plant and equipment	N	
C1 - General Management - Staff competency/training	N	
C2 - General Management - Management system and operating procedures	N	
C3 - General Management - Materials acceptance	N	
C4 - General Management - Storage, handling labelling, labelling and Segregation	N	
D1 - Incident Management - Site security	N	
D2 - Incident Management - accidents, emergency and incident planning	N	
E1 - Emissions - Air	N	
E2 - Emissions - Land and groundwater	N	
E3 - Emissions - Surface water	*	see section 2 for comment
E4 - Emissions - Sewer	N	
E5 - Emissions - Waste	N	
F1 - Amenity - Odour	N	
F2 - Amenity - Noise	N	
F3 - Amenity - Dust/ fibres/ particulates/ litter	N	
F4 - Amenity - Pests/birds/scavengers	N	
F5 - Amenity - Deposits on road	N	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	N	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	N	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	N	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H1 - Resource Efficiency - Efficient use of raw materials	N	
H2 - Resource Efficiency - Energy efficiency	N	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), N = Not Assessed, X= Action only

Number of breaches recorded		Total compliance score (see section 5 for scoring scheme)	
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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:

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| <ul style="list-style-type: none">➤ 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 | <ul style="list-style-type: none">➤ Information on the compliance score accrued including:<ul style="list-style-type: none">○ details of advice given;○ any other areas of concern;○ any actions requested;○ any examples of good practice;○ a reference to photos taken. |
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Short, unplanned visit in response to elevated levels of surface water determinands, detected over preceding weekend (5th to 8th October). I was escorted around the facility by Joshua Caulton (JC) and later joined by Chris King (CK) both of Rockwool.

Surface Water W1 emission point

Overview

- Email submitted by operator to NRW on Saturday morning 6th October 2018. Email stated that there were issues with the composite sampling system. The report further stated that they believed that some of the determinands in the W1 emission point were elevated.
- Schedule 5 notifications emailed on Monday the 8th of October 2018 to NRW. It included the results of monitoring which indicated elevated levels of two determinands at the W1 emission point on the 6th, 7th and 8th of October.
- The report indicates that the tank exit was closed on the 5th of August following an onsite containment failure at the Line 1 filter bowl. Water was also diverted back into the process to reduce levels and furthermore the report specified that five tankers had also been brought on-site to collect and remove water (in an effort to reduce levels further).
- Report also stated that the above samples were based on spot samples and not composite due to a breakdown in the sampling unit.

Visit comments

- Weather was dry and no forecast of rain for next two days.
- Whilst on-site the settlement tanks were at capacity and further tankers were being arranged by JC to drop levels in the tank.
- I was informed that the sample taken at the water discharge point was now compliant with the emission limits, based on the sample taken that morning.
- Both the tank and bypass were in operation.
- I was then taken and shown the Line 1 Bowl and the remaining contaminated water (now contained) and being removed.
- JC & CK stated that the investigation into the cause was still ongoing and that they had some of the shift operatives to still interview once they return to work.

Immediate Actions

- Operator to empty process tank as matter of urgency to provide capacity. Operator attempting to arrange additional tankers and maximising recirculation of the water back into the process.
- Provide preliminary Part B (Schedule 5) response to NRW – to include:
 - detailed investigation findings into the cause of the failure;
 - measures taken (or being taken) to mitigate the emission (including date/time undertaken);
 - proposals (with proposed timescales) for additional measures to mitigate current exceedance;
 - proposals (with proposed timescales) to prevent or further surface water emission failures at the site.by Friday 12th October 2018.
- Once received NRW will consider the submission and respond accordingly.

NOTE: On return to the office the operator later confirmed, by email, that they had secured another contractor to provide:

- two additional tankers for Wed the 10th of October (with the possibility of more depending on availability);
- three tanker removals for Thursday 11th of October; and,
- a further three have been scheduled for Friday the 12th of October.

It was stated that this should manage levels on site in readiness for the inclement weather forecast for Friday.

*Compliance

The compliance assessment (ccs) of these exceedances will be considered separately as part of the next quarterly submission assessment.

Enforcement and protective responses

These will be considered on conclusion of the investigation.

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Other Matters

We were also provided with updates on some ongoing issues, specifically:

- Line 1 re-commissioning trial now completed (line will be offline now for rest of the year whilst various refurbishment works continue);
- Line 2 afterburner re-configuration now completed and extractive sampling scheduled in the next two weeks;
- Improvements to waste (wool) storage across the site underway with construction contractors now on-site;
- groundwater boreholes being sampled today (9th October);
- Line 3 curing oven – phased door seal replacement to start shortly;
- Problem with CEMS data logger software on Line 2 being investigated. The CEMS data is visible to operatives in the control room however the data is not being captured presently.

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NOPR issued: Ref: 10333

End of section 2

Compliance Assessment Report

Report ID:
CAR_NRW0034034

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Site	Rockwool, Pencoed	Permit Ref	BS6149IQ
Operator/Permit holder	Rockwool Ltd	Date	9 th October 2018

Section 3 – Enforcement Response

Only one box 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

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.

x

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			
TBA	TBA	See section 2	12 th October 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 (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 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 reports 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 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.