Cyfoeth Naturiol Cymru Natural Resources Wales

Compliance Assessment Report

Report ID: CAR_NRW0000045

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	9th March 2016		
Assessment type	Audit		
Parts of the permit assessed	See report		
Lead officer's name	Neil Herbert	Accompanied by	N/A
Recipient's name/position	Victoria Hillman (Environment & Energy Manager)	Date issued	7th April 2016

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	A	
B2 - Infrastructure - Closure and decommissioning	N	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
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	A	
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	N	
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	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/cournal/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	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 (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 including:
  - details of advice given;
  - any other areas of concern;
  - any actions requested;
  - any examples of good practice;
  - a reference to photos taken.

Ammonia Surface Water Releases (SW 1)

- A recent spate of surface water exceedances for the Ammoniacal Nitrogen limit has occurred at the facility. In response the operator regularly shuts the discharge (diverting flows back into the process) has undertaken an investigation and is currently believed that the source could be the storage of a large number of redundant briquette boards. These are being processed currently and this work should be completed by mid-May 2016. In the meantime the operator will continue road sweeping to reduce road runoff and will continue to monitor and report. The compliance assessment for these failures will be assessed as part of the Q1 monitoring report review (due 31st April).

- As part of this visit we undertook a limited visual inspection of the yard area (used to store the boards). During the visit I noted some evidence of contaminated liquids ponding near the surface water drainage system. Whilst this was not entering the surface water system the liquids must not be allowed to pond and must be cleaned. **Action: Ongoing**

- We inspected the watercourse at the discharge point and no visual evidence of contamination was noted, during this visit.

Update on last year's CEMS failure

- The systems are now operating normally.
- The operator are now starting the process of choosing a new system to replace the GM31 monitor in 2017.

Improvement Condition 18 – SO_2 limits

- The IC 18 submission has been approved and the new SO_2 limit of 2200 will now apply for the three cupola emission points.

- As part of the initial review of the IC18 submission I have noted that ammonia releases from the facility is impacting upon some of the local habitats. During our discussion I explained that further work to mitigate this would be likely. It is understood that this issue has been raised previously and Rockwool commissioned a report in 2012 and a report was produced. Unfortunately I have been unable to locate a copy in NRW records and the operator are now attempting to retrieve a copy from their records. **Action**

Update on recent PM failures

- The burners in Line 3 will be cleaned in Line 3 as part of the Easter shutdown which should help resolve this issue.

New IED Permit

- A revised permit was issued in March 2016 to correct and amend the permit issued in 2015 (which contained a number of errors).
- We discussed a number of issues relating to the permit including the improvement programme and the implementation of EN BS 14181. Separate correspondence on this matter has now been sent.

Annual Review – Condition 4.2.2(a)

- We discussed the requirement to ensure that next year's annual review (due Jan 2017) includes the data and discussion of all environmental monitoring including groundwater monitoring (as part of SPMP), habitat monitoring (e.g. river studies) etc, **Action**
- We also asked that the mass release of specified parameters are also included in the annual report (they are no longer routinely reported as part of the revised permit issued in 2016). **Action**

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

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			
n/a	**n/a**	**See section 2 of the report**	

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.