



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

Site	QUEENSFERRY MINERAL FIBRE WORKS	Permit Ref	BR9383ID		
Operator/ Permit holder	Knauf Insulation Ltd				
Date	03/09/2014	Time in	10:00	Out	13:15
What parts of the permit were assessed	Site improvements				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Claire Hensley				
Officer's name	Alison Soper	Date issued	05/09/2014		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

Permit Conditions and Compliance Summary	Condition(s) breached
a) Permitted activities	
1. Specified by permit	A
b) Infrastructure	
1. Engineering for prevention & control of pollution	A
2. Closure & decommissioning	N
3. Site drainage engineering (clean & foul)	A
4. Containment of stored materials	A
5. Plant and equipment	A
c) General management	
1. Staff competency/ training	A
2. Management system & operating procedures	C4
3. Materials acceptance	A
4. Storage handling, labelling, segregation	A
d) Incident management	
1. Site security	A
2. Accident, emergency & incident planning	N
e) Emissions	
1. Air	N
2. Land & Groundwater	N
3. Surface water	N
4. Sewer	N
5. Waste	N
f) Amenity	
1. Odour	A
2. Noise	A
3. Dust/fibres/particulates	A
4. Pests, birds & scavengers	NA
5. Deposits on road	NA
g) Monitoring and records, maintenance and reporting	
1. Monitoring of emissions & environment	A
2. Records of activity, site diary, journal & events	N
3. Maintenance records	N
4. Reporting & notification	A
h) Resource efficiency	
1. Efficient use of raw materials	N
2. Energy	N

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	0.1
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

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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 inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Breach of permit condition

Condition 1.1.1 - Management system - The requirement to submit the Part B of the Schedule 6 Notification is not always met in a reasonable timescale; some have taken over twelve months to be submitted. The investigations are carried out and reported within Knauf and there is a computer system to track all non-conformances and action taken. The Part B submission should be added to this system to ensure that it is completed.

Observations

CO emissions

There have been ongoing problems with the Enetex emissions incinerator leading to breaches of the CO emission limit after the burner tripped out. Each event was investigated and a number of improvements have been made, or are planned. The burner manifold was replaced as hot gases were escaping and on one occasion damaged a cable. The thermocouple was moved to a position in the ducting further from the burner and away from the fluctuating flame temperature. The gas safety valve was also replaced as it was becoming worn from being re-set so frequently. A root cause analysis of the burner trips is to be carried out by the central Knauf engineering team in addition to the work that has been carried out on site. It is planned to replace the main gas / air control mechanism with an electronic one which will operate far more smoothly than the current pneumatic mechanism. This work will be carried out during the September shut down.

HCl emissions

The results of the routine extractive monitoring of HCl from point A in April were above the emission limit for all three of the samples taken. An investigation was carried out into possible causes due to process issues, or errors in sampling or analysis, but nothing has been found that it can be attributed to. Testing was done whilst running on different raw material inputs indicating that this might be the reason, but further work is needed to get to the root cause.

Cooling Zone stack emissions

Work has continued to reduce the particulate emissions from Point G, the Cooling Zone stack. A new pump is to be installed to increase the water flow to the impact jets and take more of the particulate out of the air stream.

Main stack

The change in the stack configuration to shorten the inner stack has resulted in the intended reduction in emissions of orange spots. Only one complaint has been received since the work was completed and this was attributed to residues carried over after cleaning the chimney. However, the interior surface coating of the outer stack is degrading and there is a risk of the structure of the stack itself being damaged by the emissions. Knauf are investigating options to resolve this problem, one of which may be installing a cyclone in the ducting between the Enetex and the stack to remove the residues. Further work is needed to determine whether the required flow can be maintained in the flue. A permit variation / agreed change in operation may be needed for this.

Oven oxidiser temperature reduction

The trial to reduce the oxidiser temperature from 800°C was carried out with on-line monitoring of emissions during worst case conditions. The initial trial ran at 760°C and then 740°C. In both cases the VOC emissions were within the ELV, but with less head room at the lower temperature. A second trial was carried out running at 750°C for over 7 hours and emissions were consistently comfortably within the 10mg/m³ ELV. A request will be made to change the operating temperature to 750°C and further trials will be carried out to determine whether a lower operating temperature would consistently meet the emission limits. The manufacturer's recommended temperature is 760°C.

Dust control

It has been agreed that the fortnightly dust monitoring can be stopped as the data is not providing any useful information. However, housekeeping standards must be maintained to minimise the dust generated from the activities. Whilst the main gate is not accessible all lorries have been entering site through the Rectors Lane gates increasing the potential for dust generation. At the time of the inspection all the water sprays were in use and the road surfaces were well damped down. Most of the potentially dusty raw materials and wastes are now stored under

cover, in line with the new BAT, but there is still a risk of generating dust if they are not handled carefully.

Drain survey


A full drainage survey has been carried out of the foul and surface systems, and drain covers are being painted up appropriately. The plans will be sent to NRW when they've been received. A problem was found at the side of the site where the level of water in the railway drain is high so the site water is not draining away and there is a large puddle. The drain is likely to be the responsibility of Network Rail so they should be contacted in the first instance to try to resolve the problem.

Fire water tank

There is a large fire water storage tank on site (~150m³) which needs to be drained down and cleaned before improvements are made to it to comply with legionella control requirements. A request has been made to NRW to discharge this water to the surface water drain to the west of the site.

IED Permit review

The site's permit is currently being varied in line with the revised BAT document published by the EU. A draft permit should be available for the operator by mid-September. There are some details that will need resolving before the variation is issued, one is to agree a definition for "normal operation" where emission limits will apply. Another is to determine how Chromium will be monitored, whether by an emissions monitoring technique or by a mass balance determination.

	EPR Compliance Assessment Report	Report ID: BR9383ID/0219264
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Operator/ Permit	Knauf Insulation Ltd	Date	03/09/2014

Section 3- Enforcement Response **Only one of the boxes below 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.	
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.	

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
C2	C4	Improve system for submitting Schedule 6 Part Bs once investigations are complete	N/A

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

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 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 which 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 fulfill 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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 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 the officer's line managers. 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.

