



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	02/07/2013	Time in	14:00	Out	16:45
What parts of the permit were assessed	general operations				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	K Pratley, C Hensley				
Officer's name	Alison Soper	Date issued	16/07/2013		

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
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	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	N	
	3. Materials acceptance	NA	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	NA	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	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	N	
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

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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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

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 completed within 14 days of an assessment.

Site inspection to meet the new Environmental Manager, Claire Hensley, who will be taking over from Keith Pratley in August. Also to review progress on site works.

A number of non-conformances had been reported in April and May for high CO from the Enertex stack. After protracted investigations the problem was found to be a faulty actuator in the pneumatic system controlling the gas and air ratios. This resulted in erratic operation of the linkage and very high CO as the burner cut out. A new actuator was installed and there have been no more problems. The sudden cut out also led to the emergency stack opening to safely vent emissions which led to a few complaints about fall-out from nearby residents.

Other complaints have been received about a gritty fall-out. This is thought to be ammonium sulphate which is forming from the ammonia and SO_x emissions. Droplets collect on the rim of the inner stack and crystallise out on shut down; the crystals are expelled on start up. Plans are in place to alter the shape of the rim to prevent droplets collecting. Another contribution to the fall-out may be emissions during tapping out which are difficult to prevent. Tapping out also affects the colour of the plume which has been noticed by complainants.

The high velocities in the stack contribute to the problems experienced by the neighbours as droplets and flakes of rust from within the ducting are carried out. The remaining section of ducting with corrosion problems is to be cleaned and inspected during the July shut down. Improvements will then be designed to implement later in the year.

The dust problems from raw materials handling have also not been entirely eliminated and there are plans to increase the dust suppression to try to prevent it from blowing onto neighbouring properties.

The breach of emission limit from point G, the Cooling Zone abatement is thought to result from the increased production. The current equipment is not capable of taking out all the dust, so it is planned to install additional water sprays and associated pipework, pumps and filters to handle the additional flow. Once detailed proposals have been agreed with NRW any future non-compliance from this emission point will not incur a score until after the implementation date. The work will not require a permit variation.

No progress has been made with the project to utilise the cooling zone cellar for additional water storage. The source of the water infiltration has not been found and there is also a pump and pipework to be moved.

A breach of the VOC limit on point C, the scrubber occurred in April. The only likely reason for this was thought to be due to inaccuracy in binder delivery. A project has been done to look at delivery and how it can be improved, both for product quality and emissions control purposes.

Walked around site to see main operational areas. The weather was wet so any dust problems would not be evident. The large amount of product stored on the yard means that vehicles have to go to the bottom of the yard to turn around with the potential of creating dust. There was also a large pile of fibre waste on the yard awaiting collection. Internally there had been a problem in the cooling area resulting in a thick covering of dust.

The emissions breaches mentioned above will be included in the compliance report for Quarter 2's monitoring returns when these are reported at the end of July. No breaches have been recorded on this CAR.



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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			

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.