

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

Site	Queensferry Mineral Fibre Works EPR/BR9383ID	Permit Ref	BR9383ID		
Operator/ Permit holder	Knauf Insulation Ltd				
Date	15/09/2015	Time in	10:00	Out	12:40
What parts of the permit were assessed	General compliance				
Assessment	Site Inspection	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	C Hensley				
Officer's name	Alison Soper	Date issued	21/09/2015		

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	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	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	C3	3.1.2
	2. Land & Groundwater	N	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	A	
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)	4
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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 normally completed within 14 days of an assessment.

Complaints about the plume

Three local residents complained to NRW on the 3rd of September about the plume from Knauf's main stack. They weren't relating to a single event, but were similar in that they were all generally concerned about the look of the plume and the smell of the smoke. Two were from the Garden City area and the other from Mancot. Site had been contacted by NRW to ensure that all was operating normally, and the residents were given feedback.

Problems on start up

High CO levels in the combustion chamber caused temperature fluctuations which resulted in the burner tripping out and the emergency stack opening on three occasions during start-up in June, July and August. Each event was investigated and measures put in place to try to prevent a recurrence. Actions taken in June and July did improve things, but not enough to stop this happening. A high temperature in the burner chamber occurred again following start up on 10/09, it didn't result in the burner tripping but the daily average CO limit was breached on 11/09. Further work will be done to assess the best rate to add quench air in this situation. Part A notifications were submitted for all four events (Ex_149 - Ex_152), The CO breaches have been combined to one non-compliance for the quarter

High HCl

For the last 12 months or so the HCl concentrations have been above the emission limit. A range of investigations have taken place including trialling different raw materials, washing stone before charging and reverting to historical operating temperature conditions. None has so far explained the high results. Testing has been carried out looking for possible sources of Chloride in the raw materials, and the monitoring methods and reporting have been checked for errors. There is pressure to resolve this problem as the concentrations have been above the BAT AEL which must be complied with by March next year.

Cooling zone emissions from Stack G

Work is continuing to try to reduce the emissions from point G, as required by an Improvement Condition in the recently issued permit variation. A day of trials is planned in October when the monitoring contractors will be on site to be able to assess the effects.

Main stack replacement

This is planned for next year and work is ongoing to improve the design on the current stack. If possible, the height will be increased to improve dispersion. The internal surface of the chimney was cleaned and given a new coating during the summer shutdown.

Permit variation

NRW will be re-issuing the recent permit variation to correct a number of errors.


Observations from walking around site

The plant was shut down for maintenance at the time of the inspection with work being carried out on the oven. Raw materials were still being moved around and there was a noticeable squeak on one of the conveyors. This had been identified during the daily walk-around and was

on the list for action. The scrubber had a problem with excessive foam overflowing from the tank onto the yard. This was due to difficulties in getting the dosing of anti-foam correct, but did not affect the efficiency of the scrubber. The yard area is all bunded so the foam would return to the waste water system.

Waste is being separated in all areas of the plant with further improvements to storage containers planned.

Bag filter waste is currently classified as hazardous, but this has been questioned in the past by Knauf. A suitable assessment will need to be carried out to determine whether it does have hazardous properties, in line with guidance document WM3 which can be accessed from the NRW website.

	EPR Compliance Assessment Report	Report ID: BR9383ID/0248414
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Operator/ Permit	Knauf Insulation Ltd	Date	15/09/2015

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.	X
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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.	
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We will now consider what enforcement action is appropriate and notify you, referencing this form.	
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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			
E1	C3	No action specified	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.