

**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				
Regime	Installations				
Date of assessment	31/12/2016	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	2.3.1, 2.4.1, 3.1.1, 3.1.2, 3.2.1, 3.3.1, 3.3.2, 3.5.1, 4.3.2				
Lead officer's name	Voice, Elizabeth				
Accompanied by					
Recipient's name/position	Claire Keouski/ EHS Manager	Date issued	01/03/2017		

### Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. 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	C4	2.4.1
C2 - General Management - Management system and operating procedures	C3	2.4.1

**KEY:** See Section 5 for breach categories, suspended scores will be indicated as such.  
**A** = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,  
**O** = Ongoing non-compliance, not scored.

<b>Number of breaches recorded</b>	<b>2</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>4.1</b>
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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:

- The part(s) of the permit that were assessed (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This compliance assessment report (CAR) is for the year end reports, actions from the CAR dated 15/11/16, and permit improvement conditions.

### Compliance Assessment Reports

#### **Requirement - Permit Section 3.1.2 (Emissions and Monitoring) and 4.3.2 (Notifications)**

##### **Emission Point A Q1 2016**

Breach of Emission Point A on 23/02/16. Reference EX 157 Part A, Part B 02/08/16

The SCADA system will help with future analysis but cannot retrospectively be used for root cause analysis of this breach.

##### **Emission Point A Q2 2016**

Breach of Emission Point A on 27/06/16. Reference EX 162. Part B submitted 22/12/16. No explanation as to why HCl has increased. Site have submitted a permit variation to increase the emission limit values to 30mg/m<sub>3</sub>.

##### **Emission Point A Q3 2016**

Breach of Emission Point A on 15-16/08/16. Reference EX 163, EX 164, EX 165 and EX 166. Part B submitted 22/12/16.

An explanation as to why the breach of emission limit values was not acted on on 15/08/16 has not been provided. Knauf need to implement a system to review the data and trends to see the projected concentration and predict whether they will breach the emission limit value (daily average). Set an alarm if getting close to the elv.

The maintenance department have amended the planned maintenance procedures to include a physical check of the thermocouple to check the wiring is correct followed by a functional check once installed.

**ACTION:** implement a system to review the data and trends to see the projected concentration and predict whether they will breach the emission limit value (daily average). Set an alarm if getting close to the elv. Date of completion 31/03/17.

##### **Breaches EX 158 and EX 161**

Received 31/01/17. In response to the request from Knauf for clarification as to the need for the monitoring increase.

Results for April 2015 to June 2016 have demonstrated breaches in particulate and ammonia results. The results for August and October 2016 have been in compliance but at high levels for ammonia, and NRW want to be confident that the site is able to meet the emission limit values with the increase in loading/operating hours.

#### **Requirement – Permit Section 3.3.1 (Monitoring)**

Reference EX 159. Part B submitted 22/12/16.

Since the incident, the CEMs data and control PC has been relocated to the Technical Department to enable regular monitoring. The main SCADA screen used by the Hot End Operators to monitor the flue gas abatement system has been modified. The actual emissions for the CEMS parameters are now displayed in the control room.

#### **Requirement – Permit Section 2.3.1 (Operating Techniques) and 3.1.1 (Emissions and Monitoring)**

EP EX 167. Part B submitted 30/12/16. The operator stated that the release point has been in place for 9 years. They were unable to calculate emissions due to there being no duct velocity. The % PF operation was not provided. NRW need to have information of the potential composition of this release to be able to pass on to Public Health Wales.

**ACTION:** Provide an estimate of the concentration of gaseous components present in the oven and the % PF operation by 31/03/17.

### **Requirement – Permit Section 3.2 (Fugitive Emissions) and 3.5.1 (Noise and Vibration)**

New spinners were installed in November and the ceildote extraction flow improved. The resulting shot waste is a dense weight which has reduced the volume of waste and therefore reduced the vehicle movement.

The reversing alarm on the mechanical loading shovel has been replaced with a lower sound level alarm. No complaints to site since the CAR. If site receives complaints it will review the night reduction options.

Roadway sweepers in place. No dust complaints since the CAR form.

### **Improvement Conditions**

Permit Section 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table.

Late submissions of improvement conditions have been consolidated into one CCS4 under criteria A1 (permitted activities) and CCS3 under criteria C2 (management systems).

IC32 was due 31/12/15 and IC33 due 07/03/16. The date of submission was extended to 06/06/16. The reports were submitted 31/01/17.

IC34 was received 26/02/16 and requested a 3 month trial date of March to May to verify the process conditions. The report for the trial has not been submitted.

ACTION: Submit trial report by 31/03/17.

IC35 was due 31/07/16 and the final version submitted as part of the permit variation dated 01/12/16.

IC38 was due 24/12/16 and was submitted 23/12/16. However this submission stated that as the H1 Annex D1 'Assessment of hazardous pollutants within surface water discharges' had been withdrawn that Knauf required advise as to the priority list of substances and the appropriate screening method to use. This guidance document has been replaced by the 'surface water pollution risk assessment for your environmental permit'. <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit> which details the priority hazardous substances, priority substances and other pollutants and the screening methods to use. The operator should ask for clarification about an improvement condition before the deadline to ensure it is met.

ACTION: Submit IC38 by 31/03/17.

ACTION: Review environmental management systems to ensure that permit deadlines are met by 31/03/17.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0031302**

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Site	Queensferry Mineral Fibre Works	Permit Ref	BR9383ID
Operator/Permit holder	Knauf Insulation Ltd	Date	31/12/2016

### Section 3 – Enforcement Response

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.

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.

### 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			
A1	C4	See comments section	31/03/2017
C2	C3	See comments section	31/03/2017

## 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 (eg. 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 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 fifteen 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](mailto: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.