

**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	02/08/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	3.1, 3.3, 3.4, 4.2				
Lead officer's name	Voice, Elizabeth				
Accompanied by	McGregor-Andrew, Sian				
Recipient's name/position	Claire Keouski/ EHS Manager	Date issued	22/08/2018		

### 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
E1 - Emissions - Air	C3	3.1.2
F1 - Amenity - Odour	C2	3.4.1
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C4	3.3.1

**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>3</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	35.1
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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

**Permit Condition 3.1.2** The limits given in Schedule 3 shall not be exceeded.

16/05/18 EP EX 202 Chloride breach from emission point A 76.5mg/m<sup>3</sup> and 33.2mg/m<sup>3</sup> against emission limit value of 10mg/m<sup>3</sup>. Not scored as new air abatement planned for Q4 2018.

05/02/18, 06/02/18, 17/05/18 -EP EX 203 breach of ammonia and particulate from emission point G.

### Emission Point G 2016 to date

PM	Result 1	Result 2	Result 3	ELV
2013	11.6	10.7	13.3	10
2014	4.8	15.4	13.5	10
06/10/2015	12	17	17	10
19/10/2016	6.1	5.3	8.8	10
26/09/2017	11.2	10	11.9	10
02/11/2017	4.5	7.1	8.6	10
05/02/2018	11.1	10.7	5.8	10
17/05/2018	30.6	17.6	9.4	10

Ammonia	Result 1	Result 2	Result 3	ELV
2013	11.9	12.8	11.9	10
2014	30.2	33.8	22.8	10
06/10/2015	8.3	15	22	10
19/10/2016	0.73	0.51	0.75	10
26/09/2017	19.8	20.6	22.3	10
02/11/2017	9.9	7.3	9.3	10
05/02/2018	14.5	12.9	6.9	10
17/05/2018	15	17.3	18.8	10

2018 results were submitted as a Part A and Part B on 20/07/18. Results were received from the monitoring contractor on 19/07/18. Please provide an explanation about why there was such a delay in obtaining the results, and actions in place to ensure that results are received in a timely fashion from now onwards. Submit by 31/08/18.

## Part B response

Knauf have stated that no permanent harm will result from the incident. Please provide more detail to justify this statement; the emission limit values are set to be protective to the environment and Knauf have not met these over a significant period.

NRW have serious concerns that Knauf is not preventing breaches from emission point G as there have been ongoing issues since 2013. This was the reason for increased monitoring frequency from annually to quarterly. The site needs to be proactive in investigating what is causing these long term breaches. An enforcement notice is to be served on Knauf to bring emission point G into compliance.

Breach of emission limit values Q2

**E1** – emission to air CCS3

**Action** – Enforcement Notice

**Permit Condition 3.3.1** Operator shall undertake monitoring specified in Schedule 3. Emissions to water are to be analysed every 6 months. Samples taken 13/07/18. Operator has stated that 'due to dry weather conditions storm water monitoring was undertaken at the earliest opportunity for the first 6 months of 2018'. NRW accept that while there has been a recent dry period it has not been the case for all of 2018 therefore this is a breach of monitoring requirement.

**G1** -CCS4

**Action** - review EMS to ensure scheduling of monitoring is sufficient to ensure compliance.

## Odour Complaints

17/05/18 –complaint from Sandycroft School regarding strong odour and blue/grey smoke on yard for 16<sup>th</sup> and 17<sup>th</sup> May 2018.

06/06/18 - complaint from Sandycroft School regarding strong odour and smoke on yard and previous afternoon.

28/06/18 – complaint from Sandycroft School regarding dust (smoke). Response on 29/06/18 that Knauf are using dust suppression system and are going to review this.

02/07/18 - complaint from Sandycroft School regarding odour and smoke.

03/07/18 - complaint from Sandycroft School regarding odour and smoke. Knauf had meeting with the school head on 06/07/18.

04/07/18 – complaint from business on Queensferry Industrial Estate regarding the plume grounding from the main stack on their yard and noise.

10/07/18 – complaint from Sandycroft School regarding smoke described as white with blue haze.

12/07/18 - complaint from Sandycroft School regarding smoke for 11/07/18 and 12/07/18.

20/07/18 - complaint from Factory Road of smoke.

26/07/18 – complaint from Factory Road of haze and smoke from louvres – substantiated by NRW.

27/07/18 – complaint from Factory Road of massive burst of smoke in louvre area.

30/07/18 – two complaints from Factory road of odour and smoke.

31/07/18 – odour complaint from Factory Road.

The complaints from the school were not substantiated by a NRW officer. On the dates that an officer did attend, the plume was directly above the school therefore there was potential for it to ground on the school.

The fugitive emission on 26/07/18 was substantiated by NRW. In accordance with the methodology for

assessing compliance, ongoing amenity issues are scored a CCS2. The fugitive emissions from the furnace have been modelled to demonstrate that they are not a breach of air quality objectives, however they are classed as a nuisance and are unacceptable.

Please ensure that you follow your OMP, in particular 'if the odour complaint is received during the working day and the odour event is on-going, the EM or authorised person will visit the location of the perceived off-site odour to subjectively determine the odour presence/absence, odour characteristics and intensity'.

It is Knauf's responsibility to resolve ongoing complaints. There has been an improvement for response from Knauf regarding contacting complainants, however we need evidence that the site is proactively assessing off site impact eg. standing offsite during a tap out to observe impact of fugitives, investigating why the plume from the main stack is grounding with such frequency and observing the impact, rather than only responding to a complaint.

**Action:** The site is to meet with NRW 04/10/18 to discuss the replacement of the main stack. Please provide the proposal to NRW by 20/08/18 to allow time to consider this before the meeting.

### **Noise Complaint**

09/07/18 – low vibrating noise, site spoke to complainant.

Loud banging noise due to the acoustic suppression material in the transfer from the conveyor to the silo having worn out. It was planned that the material would be renewed after 3pm on 09/07/18. Please confirm whether this was done.

Vibrator running longer than required and creating louder sound than normal by vibrating empty equipment. Propose to fit timers on the vibrators to switch them off automatically. Please provide timescale for this action.

In the case of the vibration it is possible that doors were left open resulting in louder sound than normal. Knauf will look to fit automatic closing doors and instruct their operators to ensure they close the doors. Signs will be fitted to the doors as a reminder of noise issues with open doors. Please provide a timescale for these actions.

Actions from previous CAR

1. Knauf to resubmit Odour Management Plan by 30/06/18. Not received. No evidence that training on OMP has been carried out? Please submit evidence by 31/08/18.
2. Root cause analysis has not been submitted for breaches Q1 and Q2 (EX 194, 195, 196, 197, 198, 199, 200). Date to be submitted 30/06/18, date submitted 31/07/18.
3. Dust emission limit value reading in control room - actions were highlighted by Knauf and timescales requested, but not provided. Submit 31/08/18.
4. The modelling reports have been reviewed by AQMRAT and NRW will feed back in due course.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0033728**

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Operator/Permit holder	Knauf Insulation Ltd	Date	02/08/2018

### 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.

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

### 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			
G1	C4	See details	31/08/2018
E1	C3	See details	31/08/2018
F1	C2	See details	20/09/2018

## 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. 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.