

Compliance Assessment Report CAR_NRW0040750

Permit being assessed: BR8212IK.

For: Pont-y-Felin EPR/BR8212IK, held by Knauf Insulation Ltd

At: Pont-y-Felin , Cwmbran, Torfaen, NP44 2YQ.

Type of assessment carried out: Audit, Reason: Routine.

On 16/11/2022 between 09:00 and 16:00.

Parts of permit assessed: All

NRW Lead Officer: Luke Burton, accompanied by Rebecca Green.

Report sent to: Warren Christy, HSE & Systems Manager Cwmbran on 12/01/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

This CAR has been produced following the Operator Monitoring Assessment audit conducted at Knauf Insulation Limited on and leading up to the 16 November 2022.

The objective of an OMA audit is to ensure the monitoring data provided to NRW as part of the permit conditions is accurate and reliable. It is specific to emissions monitoring and covers in-house and contractor measurements. It is prescriptive, following OMA guidance

and using current technical guidance for reference. The audit is mainly desk-based, with some aspects of monitoring inspected in-situ.

The audit covered the following areas:

Desk based – OMA 1 – Management of monitoring

- A. Documentation of management-system procedures for monitoring
- B. Organisational structure for monitoring
- C. Schedules and planning of monitoring, including contingencies
- D. Monitoring records and use of monitoring data
- E. Understanding the requirements of the permit and monitoring methods

Site based – OMA 1 – Management of monitoring and OMA 2 – Periodic monitoring and test laboratories

Hot end control room

- A. Documentation of management-system procedures for monitoring
- D. Monitoring records and use of monitoring data

OMA 2 – Stack emission monitoring

- A. Sampling provisions
- B. Certification of equipment
- C. Measurement methods and standards
- D. Calibration methods
- E. Frequency of maintenance and calibration
- F. Reliability of equipment (data availability)
- G. Breakdown response
- H. Traceability

Site based – OMA 3 – Continuous monitoring

- A. Provision for monitoring and locations of continuous monitors
- B. Certification of continuous monitors
- C. N/A (water only)
- D. Calibration Methods
- E. Frequency of maintenance and calibration
- F. Reliability of equipment (data availability)
- G. Breakdown response
- H. Traceability

Desk based – OMA 4 - Quality assurance of monitoring

- A. External quality control schemes
- B. Internal Data QC
- C. Competence of monitoring personnel
- D. Auditing of monitoring
- E. Audit Compliance
- F. Reporting

Members of staff present: HSE and Systems Manager, Sustainability & Environmental

Manager, Sustainability Engineer, hot end control team, periodic monitoring contractors and continuous monitoring contractor.

Overall Natural Resources Wales (NRW) can be satisfied with the quality and reliability of the operators and contractors monitoring required by the permit. Limited monitoring shortfalls have been identified and on the whole those shortfalls can be addressed through developing improved procedures / instructions and record keeping,

Knauf Insulation Limited demonstrated an appropriate commitment to providing adequate resources for monitoring, but there is scope for improvement in the areas of documentation, structures, contingencies, use of data and staff understanding of monitoring. Score 76%.

Knauf Insulation Limited's contractor demonstrated they obtain good quality monitoring data through outstanding sampling provisions, measurement methods, equipment, and techniques. A maximum score was achieved for this section. Score 100%

Knauf Insulation Limited's contractor demonstrated very good sampling provisions for equipment certification, and calibration but there is scope for improvements to maintenance and breakdown response. Score 89%.

Knauf Insulation Limited demonstrated an excellent level of quality assurance of monitoring but there is potential for improvements to written management procedures and work instructions. Score 90%.

Knauf Insulation Limited, Cwmbran are undertaking self-monitoring an objective and consistent manner and this is reflected in an overall excellent OMA score of 89%.

Full findings of the audit are contained in the separate, full OMA report issued to Knauf Insulation Limited, Cwmbran.

Knauf Insulation Limited, Cwmbran have already made a commitment to complete the 3 'requires improvement' actions in the report through their 22-11 OMA Audit Action Plan. A separate CAR, specifying deadlines for completion of these actions will be produced in due course, following further discussions on timescales and improvements with Knauf Insulation Limited, Cwmbran.

NRW would like to thank Knauf Insulation Limited, Cwmbran for the time and resources committed to this OMA, both in preparation and on the day.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.