

Compliance Assessment Report CAR_NRW0041164

Permit being assessed: BR9383ID.

For: Queensferry Mineral Fibre Works , held by Knauf Insulation Ltd

At: Chemistry Lane , Queensferry, Deeside, Flintshire, CH5 2DA.

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

On 30/01/2023 between 09:30 and 16:00.

Parts of permit assessed: OMA - Air

NRW Lead Officer: Paul Challender.

Report sent to: Graham Jones, Environment Energy & Compliance Manager on 16/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
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C1 - General Management - Staff competency/training	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?

Criteria	Action needed	Complete by
G1	Action 1: Emissions monitoring data for the Main Line Curing Oven to be normalised to a temperature of 273K, at a pressure of 101.3 kPa and an oxygen content of 3% dry.	31/12/2023
C2	Action 2: Create an organogram for the control of emissions monitoring for the Knauf Queensferry site and submit to NRW.	31/05/2023
G1	Action 3: Provide a written update to NRW regarding proposed timescales for installation and commissioning of an MCERTS DAHS.	28/04/2023
C2	Action 4: Update procedure QF_WI_057 to include QAL 2 calibration function implementation requirements.	04/08/2023
G1	Action 5: Submit evidence to NRW showing that the recent calibration functions have been applied to CEMS software.	31/03/2023
G1	Action 6: Create a QAL3 procedures and submit to NRW.	04/08/2023
G1	Action 7: Create a monitoring audit procedure and submit to NRW.	04/08/2023

Action criteria codes are listed in the 'Important information' section below.

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 Compliance Assessment Report (CAR) has been raised due to the completion of an Operator Monitoring Assessment (OMA) to Air. The OMA to Air report is attached to the accompanying email. The final OMA to air score was 73% and compliance actions have been raised below.

Monitoring of Main Line Curing Oven

Element have normalised the emissions monitoring data for the Main Line Curing Oven to reference conditions 273k, 101.3kPa. The permit, however, requires that emissions from combustion processes are also normalised to the concentration in dry air with an oxygen content of 3% for gaseous fuels.

Schedule 6 – Interpretation of the permit states:

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means: (a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 8% dry for the cupola3%, dry for liquid and gaseous fuels, 6% dry for solid

fuels;

There is a badly placed comma highlighted in the paragraph above. The above should read as below:

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means: (a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 8% dry for the cupola, 3% dry for liquid and gaseous fuels, 6% dry for solid fuels;

These permit requirements must be implemented in the next monitoring round for this emission point.

Action 1: Emissions monitoring data for the Main Line Curing Oven to be normalised to a temperature of 273K, at a pressure of 101.3 kPa and an oxygen content of 3% dry.

Organogram

An organogram outlining monitoring responsibilities and scheme of delegation needs to be created and procedures implemented.

Action 2: Create an organogram for the control of emissions monitoring for the Knauf Queensferry site and submit to NRW.

MCERTS Data Acquisition & Handling System

The operator is currently investigating the installation, accreditation and utilisation of an MCERTS a certified DAHS.

Action 3: Provide a written update to NRW regarding proposed timescales for installation and commissioning of an MCERTS DAHS.

QAL 2

The procedure QF_WI_057 should be amended to include the requirement to implement QAL2 calibration functions into the DAHS within 6 weeks of receipt of the QAL2 report. The operator reports that calibration functions from the most recent QAL2 have been applied but this was not verified – operator to evidence.

Action 4: Update procedure QF_WI_057 to include QAL 2 calibration function implementation requirements.

Action 5: Submit evidence to NRW showing that the recent calibration functions have been applied to CEMS software.

QAL3

The operator is in the process of implementing QAL3 procedures for the OPSIS CEM. These are required to be formalised into a written procedure. The operator is currently working on these procedures.

Action 6: Create QAL3 procedures and submit to NRW.

Auditing

Review of site specific protocols, monitoring reports and monitoring data including the raising of queries post-campaign is occurring. On-site monitoring is formally audited and this audit recorded in hard copy. The monitoring regime could be enhanced by creating a formal procedure to control and track the audit of the monitoring required by the permit.

Action 7: Create a monitoring audit procedure and submit to NRW.

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.