



Date: 30th March 2023

William Wallace
Wales Permitting Centre (Cardiff)
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Dear William,

Reference: PAN-019896 (EPR/BS6149IQ/V011)

I am writing in response to your letter dated 16th March 2023 which requested further information with regard to our submission for a permit variation.

Please find the requested details below:

Extract from NRW letter, Ref 1: "Provide us with more information to question Form Part C2 question 2b. In your non-technical summary you have proposed amendments to the permit introductory note to include references to unabated emissions during abnormal operating conditions. Can you specify if this is a change in operating conditions and more details of when this is likely to occur."

ROCKWOOL response: This is not a change in operating conditions, but a clarification of operational practices that have existed for many years and are a safety control feature. Use of Cupola Relief Valve and Filter Bypass will automatically be activated by the control system when changes in temperature or pressure take place outside of fixed setpoints.

It should be noted that when the original permit application was made in 2002 (granted in 2004), Line 1 cupola and Line 2 cupola only had the functionality equivalent to Cupola Relief Valve. When Line 3 cupola was installed in 2008 (permit variation MP3436UC application made in 2007), it had the functionality of both Cupola Relief Valve and Filter Bypass. Filter Bypass functionality was introduced via the installation of new abatement systems (filter and combustion) to Line 2 in 2018 and to Line 1 in 2019.

Extract from NRW letter, Ref 2: "Under Section 4 Additional Updates in the application document "Application for a variation to EPR permit BS6149IQ to Install Flue Gas Desulphurisation Equipment on Line 3 Cupola (A19) Desulphurisation in Line 3' dated October 2022", the bulleted 'updates' have no supporting information provided, can you clarify if this is part of the operator initiated variation."

ROCKWOOL response: The two items listed (a. emissions to surface water, and b. return of waste stone wool from customers to site for recycling) were discussed during meetings with our Site Officer in 2022 who indicated it would be prudent to update the permit with additional detail.

Extract from NRW letter, Ref 2a: “Information to vary the permit in respect of a change to emissions to water or sewer would need to include but not limited to the following:”

ROCKWOOL Response:

Information Request	Response
Confirm which surface water discharge point in the permit (W1 or W2) is now going to sewer.	Neither. The settlement tank that releases to W1 has been extended and a connection made to sewer. However, it is still possible for surface water to flow to stream at W1 if the settlement tank overflows. W2 is unchanged and remains operational.
Specify if this surface water discharge point listed in the permit has now been fully replaced by the trade effluent consent (and thereby removed from the permit) or confirm if it is still in use.	It has NOT been fully replaced by the trade effluent consent. There is potential for W1 to be used should the settlement tank overflow. W2 is unchanged and remains operational.
Provide a national grid reference (NGR) for the discharge point to sewer so that this can be referenced in the permit.	SS 96256 83961
Provide an amended site plan show the location of the point where the effluent enters the sewer (list this a S1).	Attached file “V Notch Weir and Sewer Connection”
Provide a copy of the trade effluent consent.	Attached file “Welsh Water Trade Effluent Consent No SW657 of 2019”

Extract from NRW letter, Ref 2b: “There is no detail in the application regarding the change in details of the return of waste stone to the site. Please specify what details on the current waste authorised in the permit, have changed or what details need to be amended. Can you also confirm if this is referring to the wastes authorised under the waste codes listed in Table S2.2 of the permit:”

ROCKWOOL Response: As discussed with our Site Officer, nothing needs to be changed, but additional detail can be added for clarification. I confirm it refers to the waste returned under 17 06 04 listed in Table S2.2.

Yours sincerely



Victoria Hillman
SHE Manager
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