

Compliance Assessment Report CAR_NRW0042288

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: Report/Data Review,

Reason: Routine.

On: 15/08/2023.

Parts of permit assessed: Q1 & Q2 Monitoring Returns.

NRW Lead Officer: Paul Challender.

Report sent to: Graham Jones, Environment Energy & Compliance Manager, on 03/10/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A - Emissions and monitoring - Emissions to water, air or land	C3 Minor	Permit Condition 3.1.2, Schedule 3, Table S3.1
IR3E - Emissions and monitoring - Monitoring	C3 Minor	Permit Condition 3.3.1(a), Schedule 3, Table S3.1.
IR3E - Emissions and monitoring - Monitoring	C3 Minor	Permit Condition 3.3.1(a), Schedule 3, Table S3.1
IR3E - Emissions and monitoring - Monitoring	C3 Minor	Permit Condition 3.3.1(a), Schedule 3, Table S3.1
IR4B - Information - Reporting	Assessed (A)	
IR4C - Information - Notification	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
4	16

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
IR3A	No action applied. Investigation completed.	Already completed
IR3E	Action 1: Assess results of the QAL2 campaign and investigate suitable, stable CEMS monitoring equipment to maintain compliant continuous monitoring. Submit finding to NRW in writing.	31/12/2023
IR3E	Action 2: Assess results of the QAL2 campaign and investigate suitable, stable CEMS monitoring equipment to maintain compliant continuous monitoring. Submit finding to NRW in writing.	31/12/2023
IR3E	Action 3: Assess results of the QAL2 campaign and investigate suitable, stable CEMS monitoring equipment to maintain compliant continuous monitoring. Submit finding to NRW in writing.	31/12/2023

Compliance 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 by the Natural Resources Wales (NRW) regulating officer, Paul Challender to report on the Quarter 1 and Quarter 2 monitoring reports and associated notification submissions by the operator Knauf Insulation Limited.

Q1 Monitoring Returns

The Q1 Monitoring Returns (Jan - Mar 2023) were received within the required timeframe and all required information was reported. In addition, notifications for this time period were raised via a Part A submission and closed out with the outcomes of relevant investigations.

Again, it was reported via notification that discrete areas of the CEMS system had failed and required repair and replacement. The operator utilised it's appointed contractor to perform swift remote and on-site fault identification and resolution.

No breaches were reported at air monitoring Point A however, temperature and pressure that are utilised for correction factors were unable to be utilised due to the failure of a ribbon cable that took many days of fault finding to identify.

Schedule 6 - Interpretation 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 cupola 3%, dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or

(b) in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

This interpretation is applicable to the details contained in Schedule 3, Table 3.1. Although the raw data for monitored gases was available throughout this period of down time, they could not be continuously monitored with the required corrections for temperature and pressure via a fully functioning CEMS. A breach is applied below.

Score: (IR3E) Monitoring. Permit Condition 3.3.1(a), Schedule 3, Table S3.1. Score C3.

Action 1: Assess results of the QAL2 campaign and investigate suitable, stable CEMS monitoring equipment to maintain compliant continuous monitoring. Submit finding to NRW in writing.

Point G was subject to testing which, identified a breach of particulate matter on the 08/02/23. This breach was subject to an investigation and notifications were received. Upon retesting this parameter was found to be compliant. Although no ongoing issue was detected, the reported average result of 15.3 mg/m³ breaches the applied 10 mg/m³ emission limit value (elv) and has raised a compliance score.

Score: (IR3A) Emissions to water, air or land. Permit Condition 3.1.2, Schedule 3, Table S3.1. Score C3

Action: No action applied. Investigation completed.

Q2 Monitoring Returns

The Q2 Monitoring Returns (Apr - Jun 2023) were received within the required timeframe and all required information was reported. In addition, notifications for this time period were raised via a Part A submission and closed out with the outcomes of relevant investigations.

6 monthly reporting for emissions to water were reported as required with no issues identified.

6 monthly reporting for emissions to air from Point C were reported as required with no reported breaches.

Quarterly reporting for emissions to air from Point A & G were reported as required with no reported breaches.

Again during this quarter, it was reported via notification that discrete areas of the CEMS system had failed and required repair and replacement. The operator utilised it's appointed

contractor to perform swift remote and on-site fault identification and resolution.

These failures resulted in a period of 3 days with NO_x and SO₂ measurement due to the sweeper wheel in the AR600 analyser sticking. In addition outside of the previous timeframe, CO suffered a 40 hour period with no monitoring which, was resolved by renewing mirrors and checks of the optical system. Failure to monitor via the CEMS system represents a breach of permit conditions. The scores for failure to monitor NO_x and SO₂ measurement have been consolidated as the root cause was due to the failure of a shared analyser. A QAL 2 campaign is scheduled for early October and the operator is investigating replacements as appropriate.

Failure of the AR600 analyser sweeper wheel:

Score: (IR3E) Monitoring. Permit Condition 3.3.1(a), Schedule 3, Table S3.1. Score C3.

Action 2: Assess results of the QAL2 campaign and investigate suitable, stable CEMS monitoring equipment to maintain compliant continuous monitoring. Submit finding to NRW in writing.

Failure of the AR600 analyser mirrors:

Score: (IR3E) Monitoring. Permit Condition 3.3.1(a), Schedule 3, Table S3.1. Score C3.

Action 3: Assess results of the QAL2 campaign and investigate suitable, stable CEMS monitoring equipment to maintain compliant continuous monitoring. Submit finding to NRW in writing.

Further consideration will be given to the performance and suitability of the whole CEMS system upon receipt of the outcomes of the QAL 2 campaign.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.