

Compliance Assessment Report CAR_NRW0044475

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: 31/03/2024.

Parts of permit assessed: Q1 Monitoring returns & Waste Returns.

NRW Lead Officer: Paul Challender.

Report sent to: Environment & Compliance Manager, Environment & Compliance Manager, on 12/06/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	C3 Minor	Permit Condition 3.1.2, Schedule 3, Table S3.1
IR2A - Installations - Operations - Permitted activities	C4 No impact	Permit Condition 2.3.3, Schedule 2, Table S2.2.
IR1A - Installations - Management - General Management	C3 Minor	Permit Condition 2.3.1, Schedule 1, Table S1.1.

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

Total non-compliances recorded	Total non-compliance score
3	8.1

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	Action 1: Ensure that bags filters are exchanged before failure. Submit relevant bag filter maintenance schedule to	05/07/2024

Criteria	Action needed	Complete by
	NRW for review.	
IR2A	Action 2: Raise procedures to ensure only single stream offcuts of Knauf insulation material produced at Queensferry Mineral Works generated by third party customers are returned to the Queensferry site. Implement waste acceptance procedures to inspect and ensure waste received under waste code EWC 10 11 03 are uncontaminated with other materials. Acceptance under these procedures is considered an interim measure, EWC 10 11 03 must be applied for in the next permit variation. Submit these procedures to NRW.	26/07/2024
IR1A	As per Action 2.	26/07/2024

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

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 monitoring and waste returns and associated notification submissions by the operator Knauf Insulation Limited.

Q1 Monitoring Returns

The Q1 Monitoring Returns (Jan - Mar 2023) were received via email on 12/04/24 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.

The 20 mg/m³ emission limit value for particulate matter was breached in February 2024. The operator reported upon the issue and instigated investigations to identify the cause of the elevation with a resolution implemented on 28th February. The breach of this parameter attracts a compliance score.

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

Action 1: Ensure that bags filters are exchanged before failure. Submit relevant bag filter maintenance schedule to NRW for review by 30/06/24.

Q1 Waste Returns

The Q1 Waste Returns (Jan - Mar 2023) were received via email on 23/04/24 within the required timeframe and all required information was reported.

The operator is still in receipt of waste with the EWC code 10 11 03. This is a non-permitted waste type as per the conditions of the permit.

This unpermitted waste type was discussed in CAR_NRW0040574 & CAR_NRW0041244. NRW awaits your response to the applied actions. The operator started to investigate this issue and has stated in writing that this waste code has been applied for in the proposed variation. A waste acceptance procedure as required by the action's compliance date, however, has not been received by NRW. **The operator must now cease acceptance of this waste stream or create and submit a waste acceptance procedure as outlined below to NRW by 16/07/24.** Scores have been applied for the acceptance of not permitted waste types and the root cause is ascribed to lack of control of waste acceptance in the management system.

Score: IR2A - Permitted Activities. Permit Condition 2.3.3, Schedule 2, Table S2.2. Score C4.

IR1A - General Management. Permit Condition 2.3.1, Schedule 1, Table S1.1. Score C3.

Action 2: Raise procedures to ensure only single stream offcuts of Knauf insulation material produced at Queensferry Mineral Works generated by third party customers are returned to the Queensferry site. Implement waste acceptance procedures to inspect and ensure waste received under waste code EWC 10 11 03 are uncontaminated with other materials. Acceptance under these procedures is considered an interim measure, EWC 10 11 03 must be applied for in the next permit variation. Submit these procedures to NRW by 16/07/24.

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.