

## Compliance Assessment Report CAR\_NRW0045543

**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:** 31/10/2024.

**Parts of permit assessed:** See Below .

**NRW Lead Officer:** Carter Shone.

**Report sent to:** Environment & Compliance Manager , Environment & Compliance Manager, on 06/11/2024.

### 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	3.1.2, Schedule 3, Table S3.1
IR2A - Installations - Operations - Permitted activities	C4 No impact	2.3.3, Schedule 2, Table S2.2
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.3.1(a), Schedule 3, Table S3.1
IR2A - Installations - Operations - Permitted activities	C4 No impact	2.3.3, Schedule 2, Table S2.2

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

Total non-compliances recorded	Total non-compliance score
4	8.2

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	Provide an update to NRW on the progress of the variation to	14/11/2024

Criteria	Action needed	Complete by
	include the sulphuric acid scrubber system.	
IR2A	Ensure EWC 10 11 03 is applied for in the next permit variation.	Already completed
IR3E	Provide NRW with a maintenance plan to prevent the ingress of water into the oxygen probe.	13/12/2024
IR2A	Ensure EWC 10 11 03 is applied for in the next permit variation.	Already completed

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.

**At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.**

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 has been issued to review the Q2 and Q3 monitoring and waste returns as well as associated notifications submissions by the operator Knauf Insulation Limited.

#### Q2 Monitoring Returns

The Q2 Monitoring Returns (APR - JUN 2024) 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.

No breaches were reported at air monitoring Point A.

At Emission point G the Ammonia average result was 13.6 +/-2.5 mg/Nm<sup>3</sup>, over the emission limit values . This was reported in **Notification EP\_EX\_360**. This has resulted in the following score:

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

The operator has stated: *'The long-term solution to reduce ammonia levels is the installation of a sulphuric acid scrubber system after the impact jets and cyclones. At the time of this report the scrubber is on site for installation later this year. Preparation of a Permit variation is in progress.'*

**Action: Provide an update to NRW on the progress of the variation to include the sulphuric acid scrubber system.**

All other reported parameters were compliant with specified emission limits levels.

### **Q2 Waste Returns**

The Q2 waste Returns (APR - JUN 2024) were received within the required timeframe and all required information was reported.

The installation is still receiving waste coded EWC 101103 which is not included in the EWC's they can accept, resulting in the following score, the operator has stated this will be included in an upcoming variation. A waste acceptance procedure has now been received by NRW as discussed in CAR\_NRW0044475.

**Score: (IR2A) Permitted activities. Permit Condition 2.3.3, Schedule 2, Table S2.2. Compliance Score C4**

**Action: Ensure EWC 10 11 03 is applied for in the next permit variation.**

### **Q3 Monitoring returns**

The Q3 Monitoring Returns (JUL - SEP 2024) 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.

During this period, notifications EP\_EX\_362\_A and EP\_EX\_363\_A were received, they detailed that readings between 28th to 30th September were affected by water ingress into the oxygen probe, which provides calibration factors to the CEMS for emission point A. This resulted in fixed correction factors for Pressure and Oxygen having to be applied for this time period.

When the operator first became aware of the issues they replaced the probe with an onsite spare but this also failed shortly after being installed.

Despite this reading not being monitored by the operator and no abnormal emissions or permit ELV exceedances taking place, as fixed calibration factors were used, it renders the CEMS result from this period invalid resulting in the following score:

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

**Action: Provide NRW with a maintenance plan to prevent the ingress of water into the oxygen probe.**

All other reported parameters were compliant with specified emission limits levels.

### **Q3 Waste returns**

The Q3 waste Returns (JUL - SEP 2024) were received within the required timeframe and all required information was reported

Again, the installation is still receiving waste coded EWC 101103 which, is not included in the EWC's they can accept resulting in the following score, the operator has stated this will be included in a upcoming variation.

**Score: (IR2A) Permitted activities. Permit Condition 2.3.3, Schedule 2, Table S2.2. Compliance Score C4**

**Action: Ensure EWC 10 11 03 is applied for in the next permit variation.**

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](mailto: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](mailto: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.