

Compliance Assessment Report CAR_NRW0048074

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: Audit,

Reason: Routine.

On: 03/04/2025 between 11:07 and 12:10.

Parts of permit assessed: See below .

NRW Lead Officer: Carter Shone, accompanied by Kathryn Bradshaw.

Report sent to: Environment & Compliance Manager , Environment & Compliance Manager , on 14/04/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3C - Installations - Emissions and monitoring - Odour	C3 Minor	3.4.1
IR3C - Installations - Emissions and monitoring - Odour	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3C	1. Submit a report to NRW with reference to the best available techniques on preventing offsite odour via fugitive emissions in relation to the 'tapping out' procedure. 2. Submit to NRW an analysis of how the main stack buoyancy could be improved.	14/05/2025
IR3C	Submit to NRW a route cause analysis on what led to the	05/05/2025

Criteria	Action needed	Complete by
	offsite odour detected by the Environment & Compliance Manager at the site of the reported incident.	

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

Natural Resources Wales senior industry and waste regulation officers, Carter Shone and Phil Harper, attended the Knauf site in Sandycroft on an unannounced inspection after, the officers detected strong offsite odours on 03/04/2025.

The officers were met by the site's Environment & Compliance Manager before having a discussion on the possible cause of the offsite odour.

The wind was blowing in an eastly direction pre, during and post visit.

(IR3C) Odour

While on a drive around of the Sandycroft and Queensferry area on an odour round, in order to detect any possible 'wet mop' odours, officers were exiting the A494 Queensferry roundabout onto the B5129 Chester road east at 1050 and, detected the distinct metallic odour that the Knauf prosses produce, this then continued along the B5129 until the Junction with Chemistry Lane.

At the time the Knauf main stack emission was visible blowing east over the top of the officers.

The officers then passed the front gate of the site on chemistry lane where no odour was detected.

After going under the railway bridge at 1152 onto factory road, a strong metallic odour was picked up again and continued along factory road until the entrance to the Conrad energy compound.

Around this second area of odour, officers were not under the visible main stack emission, which continued to blow east.

The officers then proceeded onto site.

During the discussion with the site's Environment & Compliance Manager, he stated that there had

been no changes on site that would provoke an offsite odour.

Officers then asked questions around the ‘tapping out’ procedure and, were told that the frequency of the procedure had increased to every 6 hours instead of every 12 hours. This was happening due to an increase in the length of the production run between clearing out of the cupola.

Officers then asked if there was anything that could be done to increase the buoyancy of the main stack and the operator stated there may be something they could do.

The detection of offsite odours by NRW officers has resulted in the following score:

Score: IR3C – Odour. Permit Condition 3.4.1. Compliance Score C3.

Action:

1. **Submit a report to NRW with reference to the best available techniques on preventing offsite odour via fugitive emissions in relation to the ‘tapping out’ procedure.**
2. **Submit to NRW an analysis of how the main stack buoyancy could be improved.**

WIRS

Later that day an odour incident was reported to NRW at 1434. The reported described that the smoke from the Knauf main stack was creating an acrid smell.

The sites Environment & Compliance Manager visited the incident site at 1520 and stated *‘I could smell some odour that may have been from the stack intermittently for short periods’*.

Action: Submit to NRW a route cause analysis on what led to the offsite odour detected by the Environment & Compliance Manager at the site of the reported incident.

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.