

Compliance Assessment Report CAR_NRW0048988

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: 29/07/2025.

Parts of permit assessed: See Below .

NRW Lead Officer: Carter Shone.

Report sent to: Environment & Compliance Manager, Environment & Compliance Manager, on 12/08/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.3.1(a)
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	
IR2A - Installations - Operations - Permitted activities	C4 No impact (Suspended)	2.3.3

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

Total non-compliances recorded	Total non-compliance score
3	8

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
IR3E	See Action 1&2	31/08/2025
IR3A(2)	See action 3	31/08/2025

Criteria	Action needed	Complete by
IR3A(2)	See action 4&5	31/08/2025
IR2A	See action 6 (completed)	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

Compliance Assessment Report (CAR) for the review of the Quarterly monitoring and waste returns submitted to Natural Resources Wales (NRW) for permit BR9383ID.

Q2 monitoring returns

The Q2 Monitoring Returns (APR - JUN 2025) 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.

Loss of CEMS

During this period Schedule 5 notification EP_EX_375 was received on the 01/05/2025, relating to a loss of the CEMS for emission point A.

An AC unit was plugged into the spare socket on the UPS protected supply to the various CEMS components, overloading the supply. The USP then tripped to protect the CEMS, causing a loss of power to the CEMS that resulted in a loss of readings for 100 minutes.

The operator has proposed to move the UPS protected CEMS supply sockets to within the CEMS cabinet and modify it to have locks on the doors preventing access to the UPS and the 240V sockets.

Schedule 5 notification EP_EX_379 was received on the 01/07/2025, relating to a loss of CO measurement for CEMS for emission point A on 30/06/2025. NRW was initially notified of this by a self-reported WIRS at 20:00 on the 30/06/2025. (WIRS2506076)

The operator believes that the AR650 CO analyser shut down at around 17:30, due to the temperature in the CEMS panel room increasing when, the AC unit to the room shut off. The analysers began operating again at 01:30 the next morning after the AC was turned back on.

The operator is currently in the process of installing a new, permanent, air conditioning system to deal with high temperatures with a temporary A/C unit in use until it is functional. They have also proposed to install an alarm to indicate to operators if either of the analysers stops reporting.

During both of these incidents the operator does not believe a ELV exceedances occurred but the loss of CEMS data for these time periods has resulted in the following score:

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

Action 1: Inform NRW if the proposed work to move the UPS protected CEMS supply sockets to within the CEMS cabinet has been completed.

Action 2: Inform NRW when the system alarm to indicate analyser failure has been put into place.

ELV exceedances

At emission point G the Ammonia average result was 19.3 +/-3.5 mg/Nm³, over the emission limit values . This was reported in Notification EP_EX_377. This has resulted in the following score:

Score: (IR3A(2)) Emissions to air. Permit Condition 3.1.2, Schedule 3, Table S3.1. Compliance Score C3.

The operator is currently installing an acid scrubber to neutralise and remove ammonia from the cooling zone stack emissions. Submission of the Permit Variation in support of that was submitted to NRW in June 2025.

Action 3: Notify NRW when the acid scrubber has been installed.

At emission point C, schedule EP_EX_378 was received in relation to the Particulate Matter average result being 67.0 +/-3.3 mg/Nm³, over the reportable ELV .

Investigations into the process conditions during the testing on 16/05/2025, found that in 2 of the 3 monitoring runs there were periods where there was no mat on the drum which the operator states provides some self filtering.

The operator states that the reason the mat was not on the drum was a malfunction (edge trim problem) and a product change over, and that these incidents did not represent normal running. NRW accepts that on this occasion this did not represent normal running, but this may be revisited in the future should there be a recurrence.

A retest was arranged for w/c 7th July and the average result was under the ELVs (42.56 +/- 2.30 mg/Nm³).

The third run, of the original test on the 16/05/2025, was still elevated at 54.5 +/- 2.6, the Operator stated that there was a mat on the drum.

The Industrial Emissions Directive (IED) also states that an operator should minimise emissions when not in normal running conditions. NRW would expect a well maintained and appropriate particulate filter system to be able to achieve the ELV when the mat is not on the drum.

Action 4: Investigate the current Particulate Matter abatement system and how it can be improved to reduce emissions during abnormal operation, report findings to NRW.

Action 5: Conduct root cause analysis on what caused the third run to be over ELV's despite the mat being on the drum.

Q2 Waste returns

The Q2 waste Returns (APR - JUN 2025) 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 Table S2.2 which states the EWC's that can be accepted, however the site has now submitted a variation to NRW to add the waste code to the permit. This has resulted in the following suspended score, which will be removed on determination of the permit variation.

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

Action 6 (completed): 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 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.