

Compliance Assessment Report CAR_NRW0049680

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: 15/10/2025.

Parts of permit assessed: See Below.

NRW Lead Officer: Carter Shone.

Report sent to: Environment & Compliance Manager, Environment & Compliance Manager, on 19/11/2025.

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
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR2A - Installations - Operations - Permitted activities	C4 No impact (Suspended)	2.3.3
IR4B - Installations - Information - Reporting	Assessed (A)	
IR4C - Installations - 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	12

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 actions 1 & 2	31/10/2025
IR3B	See action 3 & 4	31/10/2025
IR1A	See action 3 & 4	01/05/2026
IR2A	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.

Q3 monitoring returns

The Q3 Monitoring Returns (JUL - SEP 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 quarter there was 2 periods of CEMS loss, in July (12/07/25 to 15/07/25) reported in Schedule 5 notifications EP_EX_380, 381, 382 and 383 and in August (7/08/25 – 10/08/25) reported in Schedule 5 notifications EP_EX_385, 386, 387 and 388, relating to a loss of the CEMS for emission point A.

During the July CEMS loss period the AR650 Analyzer measuring CO failed. After an investigation by the sites CEMS contractor, Enviro Technology, it was found to be a faulty interferometer, this was replaced and CEMS fully returned to service. This part change has generated the requirement to

carry out a new QAL2 that is scheduled in the first 2 weeks of October.

Upon inspection of the Operator's preventative maintenance schedule, it was found that they are conducting maintenance as recommended by the supplier.

The second CEMS loss period in August. During a loss of power to the site a control card for the AR650 Analyzer was damaged and failed meaning no CO measurement was taken. USP protection was not in place as it was out for repair after being damaged in a previous incident reported in CAR_NRW0048988. The card was replaced and CEMS restored to full operation as well as the UPS being repaired and is now in operation.

It is recommended to the operator, in any future loss of USP protection it be replaced immediately to prevent damage to CEMS systems and periods of unsuccessful monitoring.

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 of the findings in Enviro Technologys workshop inspection of the interferometer and actions by Knauf to prevent a future failure of the interferometer.

Action 2: Include USP protection, and actions in the event of its failure, in any procedures or work instructions for CEMS.

All other results were compliant.

WIRS report

On the 25/07/2025 NRW received WIRS 2506849. The caller reported a discharge they believed to be coming from the stacks at the Knauf site, described as a black oily tar-like fallout, noticeable on cars and in the trees. Upon investigation the site found that there was a blocked drain on the main stack, resulting in the extraction flow carrying entrained droplets of aqueous liquid from the stack that then deposited on the local area downwind of the stack.

During downtime on Monday 28/07/2025 the main stack drain was then removed and all liquid drained from the stack and the build-up of solids removed.

The drain is normally cleaned out annually but the site has now proposed to develop a way of clearing out the drain on "*every OCO (16 hour shut approx. every month)*".

They will also try to establish a measured normal range for overflow rate at the drain seal pot to

provide a means of assessing whether it is starting to build up material in the drain.

On further investigation it was discovered that the annual maintenance for 2025 (scheduled for April) had not taken place. The last time the drain was cleaned before the 28/07/2025, was the 17/04/24.

This shows that if maintenance schedules are followed an annual clean on the drain is sufficient.

This off-site pollution and failure to complete scheduled maintenance has resulted in the following scores:

Score: (IR3B) Emissions of substances not controlled by emission limits . Permit Condition 3.2.1. Score C3.

Score: (IR1) General management. Permit Condition 1.1.1. Score C3.

Action 3: Set an ‘alarm’ in the EMS to ensure the 2026 cleaning of the drain on the main stack is completed.

Action 4: Inform NRW when 2026 cleaning of the drain on the main stack has taken place.

Q3 Waste returns

The Q3 waste Returns (JUL - SEP2025) 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. Score C4.

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.