

## Compliance Assessment Report CAR\_NRW0050869

**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:** Site Inspection,

**Reason:** Routine.

**On:** 12/02/2026 between 13:00 and 14:30.

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

**NRW Lead Officer:** Philip Harper, accompanied by Hannah Ibbotson.

**Report sent to:** Environment & Compliance Manager , Environment & Compliance Manager , on 02/03/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

### 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.

**At this time, we do not intend to take any further action.**

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**

At 13:00 am on the 12<sup>th</sup> February 2026 as site inspection was undertaken by NRW officers Phil Harper, Lead Specialist Industry & Waste Regulation and Hannah Ibbotson, Senior Industry & Waste Regulation. This was an announced familiarisation visit for officers to get an overview of the process and the sites permit. The site was operational at the time of the inspection.

**Upcoming Containment Audit**

The site will be subject to a planned containment audit during 2026. The operator is advised to review publicly available guidance documentation regarding the appropriate levels of site containment and the correct storage of IBCs in accordance with site permit and management system and to make any improvements it deems necessary.

**Noise Report WIR2600890**

On the 22<sup>nd</sup> January 2026, NRW received a report of noise from Knauf.

Following investigation the site provided the following information.

Please find below a summary of our investigation into the noise report reference WIRS 2600890.

*“The report was made at 23:55 on 27/1/2026 and indicated that the noise had started earlier but did not state the time it had started. There was no description of the noise. This was requested from NRW if possible on 28/1 but there has been no response to the request up to now.*

*At the time of the complaint site production had been stopped since 1930 27/1 due to process issues affecting the cupola. It was determined that it was necessary to drop the cupola and start the process again with a new batch of stone and coke.*

*Dropping the cupola involves stopping the melting process, draining off any molten material by tapping out and opening the bottom cupola doors to drop the contents of the cupola into the “hell-hole”. This contents consist of a mixture of molten, part molten and unmolten material and coke of varied levels of combustion completion, there may also be some solidified iron.*

*Having discussed events with personnel present at the time we estimate that we dug material out of the “hell-hole” from about 2330 to around midnight. Digging out the “hell-hole” is done using a shovel loader.*

*The material is scooped up and transferred to the hot waste shed where it cools before it is collected for*

*recycling (collection is during day hours).*

*Based on the timeline it is possible that the transfer activity created the noise referred to in the complaint.*

*I have discussed the events with several people who were present on that night including the shovel loader driver and can summarise as follows:*

- The drop of material proceeded normally without any unusual noises – this was before the time of the complaint*
- The transfer of material from the “hell-hole” to the hot waste shed proceeded normally, finishing with re-lining the “hell-hole” surface with sand ahead of restarting*
- The transfer and re-lining took about 30 minutes*
- The shovel loader used the normal route from “hell-hole” to hot waste shed*
- An experienced shovel loader from the Day Support team came in to carry out the transfer of material and re-lining*
- The reverse alarm on the shovel loader was switched off as is standard practice at night*

*We generally plan to drop the cupola/furnace on a planned basis where the material is transferred during day hours.*

*There are instances however where process performance or equipment breakdown can require us to drop the furnace at other times of day or night.*

*To minimize unplanned downtime it may then be necessary to transfer the waste as soon as possible to allow preparation for a restart of the cupola and associated hot end equipment.*

*While dropping and restarting and transferring hot waste out of normal planned day hours is infrequent, it does occur several times a year.*

*Up to now we haven't received any related noise complaints at any time of day or night.*

*Those on site at the time were surprised that we received a noise complaint based on what they heard at the time.*

*Noise tends to travel in straight lines and we would have expected site buildings between the shovel loader operation and the ChurchView/Gladstone Terrace postcode area to reduce noise travel.*

*As this is a possible 'new' source of noise affecting our neighbours it will be included in a review of the site noise management plan.*

*An action to carry out the review is recorded in the KIMS Action list with a completion date of 31/03/026.*

*KIMS = Knauf Insulation Management System an electronic reporting tool for incidents and actions."*

During the site inspection on the 12<sup>th</sup> February, officers visited the site boundary closest to the housing at Church View where it was determined that the site was only faintly audible. Sound levels during the time of the complaint or transfer of materials to the hot waste shed were not assessed.

No compliance issues have been identified.

#### **Report of Litter WIR 2601175**

On the 5<sup>th</sup> February 2026, NRW received a report regarding wind blow litter from the site. The complaint provided the following information.

*"Insulation debris from Knauf Insulation on Chemistry Lane, Sandycroft,*

*Deeside, Flintshire CH5 2DA, is polluting the area as far as the Queensferry roundabout. I understand this has been an ongoing problem for several years. Residents initially raised the issue two years ago and were promised that mesh fencing would be installed, but this has not been done.*

*Insulation debris is spread from the Knauf Insulation site on Chemistry Lane, Sandycroft, as far as the Queensferry roundabout.*

*No information on animals being killed, but local wildlife could potentially be affected by the debris. No odour has been reported.*

*No specific discolouration reported; pollution is mainly in the form of insulation material scattered across the area."*

On the 12<sup>th</sup> February officers walked the boundary of the site and found minor litter attributable to the operation at Knauf. The sites Environment & Compliance Manager discussed planned improvements to the site fencing.

**Action 1:** Inform NRW what improvements are to be made at the site to prevent wind blow litter by the **31<sup>st</sup> March 2026**.

Kind Regards

**Phil Harper**

**Lead Specialist - Industry & Waste Regulation NE**

**03000 65 3717/ 07890025506**

**philip.harper@cyfoethnaturiolcymru.gov.uk**

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

### **Disputing the Content of this Compliance Assessment Report Form**

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

### **Concerns Not Related to the Content of this Compliance Assessment Report Form**

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** [enquiries@naturalresourceswales.gov.uk](mailto:enquiries@naturalresourceswales.gov.uk)

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** [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.