

Compliance Assessment Report CAR_NRW0051610

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: 31/03/2026.

Parts of permit assessed: See Below.

NRW Lead Officer: Philip Harper.

Report sent to: Environment and Compliance Manager, Environment and Compliance Manager, on 27/04/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR2A - Installations - Operations - Permitted activities	C4 No impact (Suspended)	2.3.3
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	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
2	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
IR3A(2)	See actions in main text.	08/05/2026
IR2A	See actions in main text.	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 generated for the review of the Q1 2026 monitoring returns and Q1 waste returns which have been submitted to NRW to satisfy conditions for permit BR9383ID.

Q1 (January – March) Monitoring Returns

The Q1 monitoring returns were received on the 13th April 2026 in accordance with permit condition 4.2.3.

Emission point G

Particulate Matter

Monitoring for particulate matter at emission point G was undertaken in triplicate as required by the sites environmental permit on the 26th February 2026. A result of 5.5 mg/m³ was provided. This is a breach against the permitted limit of 5 mg/m³.

A category score has been applied against permit condition 3.1.2 (IR3A(2)) Emissions to water, air or land.

A schedule 5 part A notification was received from the 24th March 2026 as required by the sites

environmental permit. The notification provided the following information;

“We have had 12 quarterly TPM tests comprising 3 runs in each test since our last failure in Q1 2023. All 36 individual runs were below or ELV of 10 mg/Nm³. We will request Element carry out a retest before the Q2 test which is scheduled for w/c 18/5. Further investigation of process conditions at the time of testing and equipment condition will be carried out and reported in the part B”

Part B of the notification was received on 13th April 2026. Part B provided the following information;

“Checks of process trends and logs indicate normal operation in all but one aspect. A failure of the cooling zone drive belt was reported later in the day shift on 26/02/26. It is not known whether the belt failure occurred before the tests took place, but it was found after testing was finished. There are no definitive process trends that can identify the time of the failure. It is difficult to identify physically how this could increase the amount of particulate matter that could be entrained in the emissions but with everything else looking normal it must be considered as a possible cause. The belt was replaced later the same day.

Various system inspections have been carried out including the impact jets, feed pump and tank, and the amount of product build up in the cooling zone ducting.”

Action 1: Submit any sections of the sites environmental management system which relate to checks of the cooling zone drive belt to NRW for review by the 8th May 2026.

Q1 Waste Returns

The Q1 Waste Returns (January to March 2026) were received via email on the 16th April 2026 as required by permit condition 4.2.5.

The returns show that the installation is still receiving waste code 101103 – Waste glass-based fibrous materials which is not included in Table S2.2. The operator has now submitted a variation to add the waste code to the permit, a suspended category 4 score has been applied.

A suspended category 4 score has been applied under subheading IR2A, against permit condition 2.3.3.

Wind Blown Litter

Compliance assessment report CAR_NRW0050869 discussed a report made regarding wind blown litter from the site. A document was submitted to NRW for review on the 23rd March 2026 to evidence

that a fine plastic mesh fence had been installed at the fence line on Chemistry Lane.

NRW is satisfied that improvements have been made provided that procedures are put into place to ensure that litter is no longer being blown from the site and that further improvements are made in the event that litter is identified outside the site boundary.

Action 2: Ensure that the site boundary is routinely checked for windblown litter.

Kind Regards

Phil Harper

Lead Specialist - Industry & Waste Regulation NE

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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

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

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.