

Compliance Assessment Report CAR_NRW0052367

Permit being assessed: BR9383ID.

For: Queensferry Mineral Fibre Works , **held by:** Knauf Insulation Limited

At: Chemistry Lane , Queensferry, Deeside, Flintshire, CH5 2DA.

Type of assessment: Audit,

Reason: Routine.

On: 09/07/2026 between 10:00 and 12:00.

Parts of permit assessed: See Text.

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

Report sent to: EHS Manager, EHS Manager, on 04/08/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.3
IR1A - Installations - Management - General Management	C2 Significant	1.1.1
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	C3 Minor	1.4
IR3C - Installations - Emissions and monitoring - Odour	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
3	39

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
IR3B	See Main Text - Action 1- 5	31/08/2026
IR1A	See Main Text - Action 6	31/08/2026
IR1E	See Main Text	31/08/2026

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This Compliance Assessment Report (CAR) has been raised following an announced visit to Knauf on 9 July. The intention of the site visit was to conduct a containment audit of the site and to review recent schedule 5 notifications that had been sent to NRW.

The site inspection was undertaken by NRW officers Phil Harper, Lead Specialist Industry & Waste Regulation, and Hannah Ibbotson.

Site Containment and infrastructure

Numerous containment and housekeeping issues were observed during the inspection. Significant accumulations of dust and silt were present across the site, particularly around the internal drainage channels leading to the effluent treatment plant (ETP). The extent of material build-up within the drainage system raised concerns regarding the effectiveness and frequency of drain cleaning and maintenance activities.

As a result of the accumulation of material within the drainage channels, standing water was observed in several areas of the site. This appeared to originate from the water spraying system used to suppress dust emissions and was unable to drain effectively due to blockages within the drainage network.

The accumulation of material across the site also obscured the condition of the underlying hardstanding, making it difficult to fully assess its integrity. However, large areas of hardstanding, particularly at the rear of the site, appeared to be in poor condition, with some sections incomplete or significantly degraded. Such defects could allow contaminated surface water or pollutants to bypass the site's containment and treatment systems, increasing the risk of undetected pollution leaving the permit boundary.

At the ETP, foam and process water were observed outside the designated containment

channels and on surrounding hardstanding areas. This indicated that liquids were not being fully contained within the engineered drainage system.

Mud deposits and scrubber discs were observed beyond the western containment area of the lagoon. The presence of this material outside the containment is consistent with previous overtopping or escape of material from the lagoon.

A pump associated with the area was also observed to be leaking. This was evidenced by the oil sheen visible on the surface of water surrounding the equipment.

The number and nature of containment deficiencies observed indicate a failure to adequately maintain infrastructure designed to prevent the escape of polluting substances.

A category 3 non-compliance score has been applied against permit condition 3.2.3 under subheading IR3B - Emissions of substances not controlled by emission limits.

Action 1: Undertake an inspection of the sites, drainage, containment and hard standing infrastructure and submit a written improvement plan to NRW. The plan must identify all defects, blockages and areas requiring repair, set out the corrective actions to be taken and provide timescales for completion. The improvement plan must be submitted to NRW by the **31st August 2026**.

Action 2: Investigate the source of mud and scrubber discs observed beyond the lagoon containment area remove any evidence of spillage from the lagoon area by the **31st August 2026**.

Chemical Storage and Secondary Containment

Throughout the inspection, multiple storage areas were observed where IBCs containing various chemicals were being stored without suitable secondary containment or within damaged and substandard tertiary containment systems. In addition, numerous cracks were identified in impermeable surfaces and bund walls across the site. These defects raise concerns regarding the potential for spills or leaks to migrate into the ground or drainage system without detection.

A designated chemical storage container was observed with numerous ammonia-containing IBCs stored externally and without any secondary containment measures. The container itself was labelled for the storage of empty oil drums; however, three metal oil drums were also being stored outside the container.

Upon inspection of the container interior, the integrated drip tray was observed to be close to full capacity, significantly reducing its ability to contain any future leaks or spillages.

On the opposite side of the container, an IBC containing urea was observed to be stored within a bunded area with the discharge taps projecting beyond the edge of the bund wall. Evidence of previous spillages was apparent in the form of staining on the bund walls. This

arrangement would reduce the effectiveness of the containment system in the event of a valve failure or accidental release.

The absence of suitable secondary containment and deficiencies in bunding arrangements demonstrate a failure to adequately prevent the escape of polluting emissions not controlled by emission limits.

A category 3 non-compliance score has been applied against permit condition 3.2.3 under subheading IR3B - Emissions of substances not controlled by emission limits. Note this score has been consolidated to with other scores to give a single score against permit condition 3.2.3.

Action 3: Provide copies of inspection and maintenance records for all chemical storage and containment infrastructure, including bunds, drip trays and associated secondary containment systems for the last year by 15/08/2026

Housekeeping and Pollution Prevention

Approximately 15 one-tonne bags containing fly ash were observed on site. The EHS manager confirmed that the material is routinely consigned off-site as hazardous waste. However, several of the bags had open tops with the closure flaps unsecured and were being stored outdoors. This presents a reasonably foreseeable risk that fly ash could be dispersed by wind, resulting in the release of particulate material to the surrounding environment.

Given the reasonably foreseeable risk of wind-blown emissions from the fly-ash a category 3 non-compliance score has been applied against permit condition 3.2.3 under subheading IR3B - Emissions of substances not controlled by emission limits. Note this score has been consolidated to with other scores to give a single score against permit condition 3.2.3.

Action 4. Review the storage arrangements for fly ash on site and implement appropriate measures to prevent wind-blown emissions, including securing all bags and ensuring hazardous waste is stored under suitable containment and protection from the weather. Provide NRW with photographs of the improved storage arrangements by the 31st August 2026.

Waste and Stock Management

Within a chemical storage building, several IBCs were identified bearing the markings "Old Stock", "Do Not Use", and "Not in Count". These containers had a significant build-up of dust, suggesting they had remained in place for an extended period. The EHS Manager was unable to identify the contents of these containers, confirm how long they had been stored on site, or identify an intended use for the materials. The EHS manager was reminded that materials stored without a defined use may be classified as waste under the Waste Framework Directive 2008 and that stock should be appropriately managed to prevent prolonged storage. This can be checked here : [Check if your material is waste -](#)

[GOV.UK](https://www.gov.uk)

NRW considers that these materials have been discarded and therefore are waste. A failure to identify potentially obsolete stock creates a foreseeable risk of waste being stored on site without adequate controls, therefore a category 3 non-compliance score has been applied against permit condition 1.4 under subheading IR1E - Avoidance, recovery and disposal of wastes produced by the activities.

Action 5. Arrange for removal of the the obsolete stock from site, retaining duty of care notes for review by NRW officers by the **31st August 2026**.

Management

The multiple breaches identified across several operational areas are indicative of poor site management and a lack of environmental control measures. The range and extent of these issues observed indicate that routine environmental inspections have not been undertaken with sufficient frequency, and have not been effective in identifying and rectifying issues.

Given the systemic nature of these issues and the increased risk of pollution arising from failures in inspection, maintenance and operational oversight, Category 2 non-compliance score has been applied against permit condition General Management under subheading IR1A.

Action 6. Carry out a root cause analysis of the management failings identified during the inspection, including deficiencies in housekeeping, containment infrastructure, chemical storage, waste management and routine environmental inspections. Submit a written improvement plan to NRW detailing the measures that will be implemented to improve environmental oversight, inspection frequency, defect reporting, maintenance and corrective action tracking by the **31st August 2026**.

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.