Compliance Assessment Report CAR_NRW0053205

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: Site Inspection,

Reason: Other.

On: 30/09/2026 between 10:10 and 11:15.

Parts of permit assessed: See Below.

NRW Lead Officer: Hannah Ibbotson, accompanied by Ricky Hartleb.

Report sent to: Environmental & Compliance Manager, Environmental & Compliance Manager, on 13/10/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	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

This Compliance Assessment Report (CAR) has been raised following an inspection of the installation of the trial ammonia abatement rig at Knauf Queensferry, undertaken to verify that the installation has been completed in accordance with information previously submitted to NRW. NRW officers were accompanied by the Environmental & Compliance Manager, the Projects Manager, and an engineer representing Wessel.

The purpose of the trial is to inform design decisions for the potential development of a new site at Shotton, where lower ammonia emission limits are anticipated.

The trial scrubber has been installed alongside the existing water scrubber currently operating on site. Approximately 0.5% of the site's total exhaust flow will be diverted through the trial scrubber before being returned to the existing scrubber. As a result, no new emission points have been created. Airflow for the trial rig is taken from the main process downstream of the existing water scrubbing stage, reducing dust loading before entering the trial unit. The treated airflow is then returned to the process upstream of the existing scrubber's water recirculation and final discharge stages, meaning the trial airflow will undergo treatment twice before final emission.

The trial scrubber reduces ammonia emissions through the addition of sulphuric acid, generating ammonium sulphate as a waste product. Waste scrubber liquor is expected to be generated at a rate of approximately 20 litres per day during the 8-10 week trial period and will be recirculated into the main scrubbing process. The trial scrubber rig is fitted with independent fans which maintain the system under negative pressure. Consequently, in the event of a leak or pipework failure, clean air would be drawn into the system rather than untreated emissions escaping prior to scrubbing.

Site representatives confirmed that, upon completion of the trial, the trial scrubber ducting and associated pipework can be disconnected from the main scrubber and isolated using blanking plates, allowing the existing scrubber to return to normal operation. The trial ducting has been connected through existing access panels within the scrubber pipework that are routinely used for maintenance and cleaning activities.

An engineer from Wessel, the manufacturer of the trial rig, will be present during the first week of operation to oversee commissioning and ensure the system is functioning correctly. Prior to the commencement of the trial, site-specific operating and monitoring guidance will be produced for site staff following the departure of the Wessel representative. NRW requested a copy of this guidance once it has been completed.

The Wessel representative is expected to return on one or two occasions during the trial period to verify continued performance and effectiveness. In the event of a fault occurring

within the trial scrubber, an emergency stop can be activated either locally at the rig or remotely. Activation will automatically close the valves supplying airflow from the main scrubber to the trial unit. These valves can also be operated manually at the ducting. Should the valves fail to close, all exhaust airflow would continue to be treated by the site's existing scrubbing system and remain subject to the site's current permitted emission controls.

At the time of the inspection, installation of the pipework required to divert airflow from the main scrubber had been completed and connection to the scrubber itself was scheduled for later that afternoon. The return ducting from the trial scrubber to the existing scrubber was observed on site. No separate or unpermitted emission points were identified during the inspection.

Based on observations made during the inspection, NRW is satisfied that the trial scrubber rig has been installed and connected in a manner consistent with the information previously provided. NRW has requested that it be informed of any issues arising during the trial that could affect the site's compliance with its environmental permit.

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.