

This form will report compliance with your permit as determined by an NRW officer

Site	Queensferry Mineral Fibre Works	Permit Ref	BR9383ID		
Operator/Permit holder	Knauf Insulation Ltd				
Regime	Installations				
Date of assessment	31/12/2019	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Routine Monitoring Returns and Reporting				
Lead officer's name	Ross, Stuart				
Accompanied by					
Recipient's name/position	Claire Keouski/ Environmental Manager	Date issued	10/02/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	3.3.1
C2 - General Management - Management system and operating procedures	C3	1.1
E1 - Emissions - Air	C3	3.1.2
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	3.3.1

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	4	Total compliance score (see section 5 for scoring scheme)	16
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This Compliance Assessment Report follows a review of quarterly emissions monitoring returns and associated notifications for the period 01/10/19 - 31/12/19 and the annual report as required by permit condition 4.2.2.

1. Emissions Monitoring

Emissions to air and surface water were monitored in accordance with the permit, all emissions compliant with the following exceptions;

Emission Point A (Cupola Stack) - Oxides of Sulphur

02/10/19 (Part A reference EP_EX_242), daily average of 1506.77 mg/Nm³ recorded in exceedance of the emission limit value of 1350 mg/Nm³.

Knauf reported that a diverter plate jammed resulting in the cross contamination of the two slag streams. Upon identification the diverter was freed and limit switch changed and SO₂ emissions returned to within normal permitted levels.

In order to prevent a recurrence, a monthly preventative maintenance task has been set up to inspect the diverter and limit switches.

This incident and emission limit exceedance is a breach of permit condition 1.1 and 3.1.2 with potential for minor environmental impact (CCS3).

03/10/19 & 28/10/19

Apparent emission limit exceedances were reported to NRW that were subsequently identified as being due to erroneous Oxygen values. Following several call outs of a CEMS engineer and repairs and replacement of the oxygen probe the cause was subsequently found to be a faulty cable.

Knauf maintain that the ELV was not exceeded given that the raw CEMS data for oxides of sulphur remained stable, the corrected results prior to the issue were below the ELV and plant process trends were normal.

The inability to accurately correct raw data to standard reference conditions is a breach of permit condition 3.3.1 and attracts a CCS score of 3.

Action - With the objective of ensuring a high level of CEMS reliability, review the planned preventative maintenance checks in place (inspection and testing) for electrical and fibreoptic cabling serving CEMS and auxiliary equipment and provide NRW with a summary of your findings along with any necessary improvements by 31/03/20.

Emission Point A (Cupola Stack) - Hydrogen Chloride

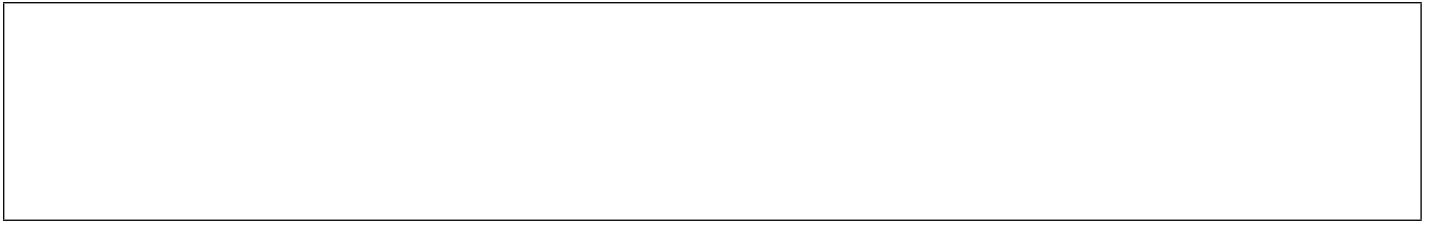
31/10/19 (Part A reference EP_EX_244), indicative exceedance of the HCL emission limit value (estimated 40 mg/Nm³ versus 10 mg/Nm³ based on historical unabated data).

Knauf reported that a blockage occurred in the lime dosing system leading to a unabated HCL emission. In the subsequent part B notification it was reported that on 06/11/19, during a planned shutdown, the lime injection pipework was unblocked and an engineering modification made to reduce the likelihood of a recurrence. Should any future blockages occur, this modification will allow the blockage to be cleared during a routine tap out opposed to plant shut down.

Failure to abate HCL emissions is a breach of permit condition 2.3.1 failure to operate in accordance with as specified in schedule 1, table S1.2) with potential for minor environmental impact (CCS3).

2. Annual Report and Performance Parameters

Thank you for submitting reports as required by permit condition 4.2.2 - we have reviewed the reports and have no further comments.



EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036309**

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Operator/Permit holder	Knauf Insulation Ltd	Date	31/12/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C2	C3	None - Action already taken. PMs in place for diverter gate and limit switches.	11/02/2020
E1	C3	None - Action already taken	11/02/2020
B1	C3	None - Action already taken	11/02/2020
G1	C3	Refer Details Section	31/03/2020

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.