

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

Site	Pencoed Rockwool EPR/BS6149IQ	Permit Ref	BS6149IQ		
Operator/Permit holder	Rockwool Ltd				
Regime	Installations				
Date of assessment	05/06/2020	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Monitoring returns etc				
Lead officer's name	Griffiths, Toby				
Accompanied by					
Recipient's name/position	N Parnell/ Environmental Manager	Date issued	05/06/2020		

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
E1 - Emissions - Air	C3	3.1.2
E3 - Emissions - Surface water	A	
E4 - Emissions - Sewer	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H1 - Resource Efficiency - Efficient use of raw materials	A	
H2 - Resource Efficiency - Energy efficiency	A	

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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

Review of Annual, 6 monthly and quarterly returns

1. Quarter 1 2020 (Jan – March)

Air Emissions - Forms were received on 24th April 2020

January. Compliant with emission limit values (ELVs).

Form Air 5 (SO₂) has the ELV set at 2200 Mg/M³ as agreed via Improvement Condition IP18V in CAR form of 7th April 2016.

February. Particulates on A1 elevated, but within ELVs.

A19 – marginal exceedances on 11th, 12th, 14th of daily ELV for particulates. Schedule 5s were received on 12th and 13th February 2020, which explained the elevated emissions were due to failures in the bag filter house. Following replacement of the bags, emissions returned to compliance.

Non-compliance, Condition 3.1.2, CCS Category 3, Ref E1. The exceedances are marginal and in accordance with our guidance we have consolidated them into a single CCS record. NRW will follow up the issue during the routine site visits.

March. Compliant with ELVs.

Water Emissions - Form Water 1 received on 24th April 2020.

January 2020. Monthly suspended solids (TSS) = 49mg/l. ELV is 30. As explained in email of 29th May 2020, there was no discharge at this time, therefore the results are compliant. In addition, a monthly sample for TSS is not required by the permit but is taken for internal tracking purposes.

Feb and March are compliant with ELVs.

Permit Condition 4.2.5: Waste 1 form also received.

2. Quarter 4 – 2019

Air Emissions

Forms were received on 28th January 2020

October. Air 4 (A1) NO_x, SO₂, CO negative values reported. As explained in email of 29th May 2020, this was caused by a fault with the O₂ probe, but emissions stated to be within ELVs. There was an exceedance of NO_x on 9th October which was reported to NRW on 25th October. As this was within the commissioning trial phase of Line 1, NRW does not intend to take any further action for this brief exceedance.

Air 3 (A2) Particulates close to ELV on the 22nd.

Revised Air 2B form received on 4th June 2020 due to date error.

Remaining values were compliant with ELVs.

November

Air 3, (A2) close to ELV on 6th but all values were compliant with ELVs.

December

All values were compliant with ELVs

Water Emissions Form Water 1 received on 28th January 2020.

October: Query raised over monthly pH of 13 and November <5. This was a reporting error. Correct values from ALS report received on 29th May 2020 are compliant.

A revised Water 1 form for these values was received on 2nd June 2020.

December was compliant with ELVs.

Permit Condition 4.2.5: Waste 1 form also received.

3. Six monthly returns – (July to December 2019) - Forms were received on 28th January 2020 *

- Metals. A1, A2 and A19 – Compliant.
- Particulates (plus RSMs A12-A14). Compliant.
- Ammonia (plus RSMs A12-A14). A13A close to ELV but compliant.
- Formaldehyde (plus RSMs A12-A14). Compliant.
- Phenol (plus RSMs A12-A14). Compliant.
- VOCs (plus RSMs A12-A14). Compliant.
- Amines. Compliant.
- NOx. Compliant.

4. Annual returns for 2019 - Forms were received on 28th January 2020

Permit Condition 4.2.2. Review of the performance of the activities over the previous year was received. The improvements following the connection of water discharge to sewer are acknowledged. The investigations into the reuse or recovery options for the fly ash are noted.

*Note: Rockwool stated that A13c was not in use during 2019, therefore did not undergo periodic monitoring. A1 and A3 also not monitored due to being off line for a period during 2019. This applies to the 6 monthly and annual periodic monitoring.

Periodic Monitoring (Annual) Emission points: A1, A2, A19, A22, A23, A28

NOx. Compliant – but not required for A2 in permit. Email of 29th May 2020 confirms that these are additional checks for Rockwool internal process tracking.

SO2. Close to ELV, but compliant. but not required for A2 in permit. Email of 29th May 2020 confirms that these are additional checks for Rockwool internal process tracking.

HCL, HF, H2S. Compliant

Particulates. Compliant, but not required for A2 in permit. Email of 29th May 2020 confirms that these are additional checks for Rockwool internal process tracking.

5. Other reporting

- Water Usage 1
- Energy 1
- Performance 1

These requirements were compliant.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036656**

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Operator/Permit holder	Rockwool Ltd	Date	05/06/2020

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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

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			
E1	C3	NRW will review the arrangements at the next visit. (Action date is a holding date)	12/06/2020

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.