

Compliance Assessment Report CAR_NRW0036656

Permit being assessed: BS6149IQ.

For: Pencoed Rockwool EPR/BS6149IQ, held by Rockwool Ltd

At: Rockwool Ltd , Bridgend , Mid Glamorgan , CF35 6NY.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 05/06/2020.

Parts of permit assessed: Monitoring returns etc

NRW Lead Officer: Toby Griffiths.

Report sent to: N Parnell, Environmental Manager on 13/08/2020.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E1 - Emissions - Air	C3 Minor	3.1.2
H2 - Resource Efficiency - Energy efficiency	Assessed (A)	
H1 - Resource Efficiency - Efficient use of raw materials	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
E4 - Emissions - Sewer	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	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
E1	NRW will review the arrangements at the next visit. (Action date is a holding date)	12/06/2020

Action 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

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.
- NO_x. 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

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 only relating to the activity assessment
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.

What are suspended scores?

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 and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance 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 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at 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.