

## Compliance Assessment Report CAR\_NRW0037573

**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 31/12/2020.

Parts of permit assessed: Annual returns Q4 reports Schedule 5 reports

**NRW Lead Officer:** Richard Taylor.

**Report sent to:** Huw Edwards, H&S Manager on 11/02/2021.

### 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          | 3.1.1            |

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       | Manage Cupola inputs to ensure compliance to limits. | 31/03/2021  |

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.

**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

Rockwool Ltd BS6149IQ

Review of Annual Reports 2020. (also, Q4 returns)

Quarter 4 (Oct – Dec 2020)

On 1<sup>st</sup> Dec 2020, site sent a notification Schedule 5 report for 30<sup>th</sup> Nov SO<sub>2</sub> A19 2232mg/m<sup>3</sup> against a permit limit 2200mg/m<sup>3</sup>. Reported 1<sup>st</sup> Dec.

The exceedance was thought to be due to the variation in Sulphur content of the feedstock. Despite being aware of the approach to limit, the site was unable to manage the process sufficiently for this to be avoided.

The limit breach earns a Cat 3 breach of permit condition and if for an incident which could have a minor environmental effect.

**1 x Cat 3 breach of permit condition 3.1.2 where limits given in schedule 3 shall not be exceeded. Site returned a figure of 2232mg/m<sup>3</sup> against a permit limit of 2200mg/m<sup>3</sup> for A19 stack on 30<sup>th</sup> Nov 2020.**

Forms received – Assessed with comments;

Q4 Air – Oct, Nov, Dec 2020.

The above SO<sub>2</sub> exceedance on 30<sup>th</sup> Nov from Line 3 was reported. Also reported was the 25<sup>th</sup> Oct Line 3 daily limit exceedance of 2208mg/m<sup>3</sup>. However, this was not accepted as a permit breach due to there being only 4 valid samples for the day.

Permit condition 3.5.5(d) states; ‘daily average values shall be determined as the average of all the valid half-hourly average values within a calendar day. The daily average value shall be considered valid if no more than five half-hourly average values in any day have been determined not to be valid’; As there were 4 valid half-hourly readings, the quantity is not enough to constitute a valid daily average which must include at least 43/48 valid half hourly readings. This information was provided to site via an email dated 5th Nov 2020.

Q4 Water

No flows to water were reported in the quarter, however site fulfilled the permit requirement to take monthly samples. The results of these were all within permit limits.

Q4 Waste

Waste fly-ash is now sent to landfill as lining material under a D9 disposal code. 48 tonnes was disposed of this way during Q4. Very little was seen to go to landfill for disposal as 3.24 tonnes of conveyor belt rubber. The site took in 230 tonnes of recycled Rockwool products from external sources during the quarter.

## Annual Reports 2020

Annual H<sub>2</sub>S Air

H<sub>2</sub>S has a permit limit of 2mg/m<sup>3</sup> from A2 and A19 (line 3). Results from annual spot samples taken in June showed figures between 0.15 and 0.26 mg/m<sup>3</sup>.

Annual HCl Air

Hydrogen Chloride limits are 30mg/m<sup>3</sup>. Results were maximum of 2.8 from A2 and 0.43 from line 3.

Annual HF Air

Hydrogen Fluoride limits are 5 mg/m<sup>3</sup>. Site reported a max of 0.32 from A2 and 0.17 from Line 3.

#### Annual Particulates Air

Annual spot samples of particulate matter were taken from A2, A18, A19 and A24 over June and July. Permit limits are 10mg/m<sup>3</sup>. Maximum results were from A19(line3) at 5.09mg/m<sup>3</sup>.

#### Annual Energy use

Form E1. Site has a separate Greenhouse gas permit not included with this review. Returns showed the site used 321,501.71 MWh during 2020 comprised mainly of Coke at 168,527 MWh with natural gas at 58,155. MWh, and electricity at 94,819 MWh.

Site used the conversion factor of 2.4 when accounting for losses in transmission of electricity, meaning that the site was billed for 39,508 MWh delivered electricity to site.

#### Annual Performance

Performance 1 – Site produced 133,827 tonnes of mineral wool during 2020. Internal recycling of rockwool plus the waste return scheme accounted for 73,000 tonnes coming from recycle.

Water Usage 1 - Rockwool reportedly used 105,182.8 M<sup>3</sup> of water during 2020 with nearly 2% of this coming from recycled rainwater.

#### Annual Waste

Waste decreased compared to 2019 largely due to fly ash disposal routes. Some is now recycled into briquettes on site. 1,322 tonnes of returned wool was accepted and recycled through the process during 2020.

#### Biannual reports summary

##### 2<sup>nd</sup> Biannual results Amines

Amine limits at A4, A7, A8, A21, and A23 are 3mg/m<sup>3</sup>. Of these the maximum reading was 1.63mg/m<sup>3</sup> in Sept on A21.

For sources A5, A6, and A22 the limit is 2mg/m<sup>3</sup>. The highest reading was found at A21 in July at 0.41mg/m<sup>3</sup>. All results were well within permitted limits.

##### Biannual results Ammonia – Air2A

Results are measured at 5 locations, A12, A13a, A13b, A13c, and A14. Of these, A13c was not measured during this period. Of the others, the permit limit is 40mg.m<sup>3</sup>.

After removal of the uncertainty figure, all results complied to the permit limits. The site is permitted to produce their results in triplicate with the average figure used for reporting. The uncertainty figure is in mg/m<sup>3</sup> not percentages. The lowest average figure minus the uncertainty is used by NRW for compliance purposes. After querying the results with site, all permit limits were seen to be compliant after the uncertainty figures were taken off.

2 recommendations have come to light regarding reporting.

**1. Site to submit their measured results as well as the uncertainty figures, with the**

**uncertainty figures taken from each result in future reporting to enable easier cross-checking.**

**2. Site to build more tolerance into the system. Site should adopt the permit limit as the target figure for compliance and not rely on the removal of the uncertainty to be compliant.**

All other readings were within permit limits.

#### 2<sup>nd</sup> Biannual Ammonia Air 2B

The report sheet was queried with site as above with the same recommendations applying. After removal of the uncertainty figure, all results complied to the permit limits.

#### 2<sup>nd</sup> Biannual results Formaldehyde Air 2A

Results were provided for 4 emission points. All readings were within the permit limit of 5mg/m<sup>3</sup> with the highest at A13b on 16<sup>th</sup> Sept at 2.06mg/m<sup>3</sup>.

#### 2<sup>nd</sup> Biannual results Formaldehyde Air 2B

Results were provided for 9 locations all with a permit limit of 5mg/m<sup>3</sup>. No limits were breached. The highest reading came from A8 on 12<sup>th</sup> Dec with a reading of 1.09mg/m<sup>3</sup>.

#### 2<sup>nd</sup> Biannual report Metals Air2A

Results were from 2 locations. Group 1 metals carries a combined limit of 1mg/m<sup>3</sup>. No results exceeded this. The highest reading came from A19 with 0.22mg/m<sup>3</sup>.

Group 2 metals carry limit of 2mg/m<sup>3</sup>. The highest reported figure was also A19 with 0.25mg/m<sup>3</sup>.

#### 2<sup>nd</sup> Biannual NO2 Air2A

NO2 limits for site release points A5, A6 and A22 are 200mg/m<sup>3</sup>. The site did not exceed permit parameters in this period. The highest measurement was at A5 on 24<sup>th</sup> Nov at 91.8mg/m<sup>3</sup>.

#### 2<sup>nd</sup> Biannual results PM Air2A (July – Dec)

Particulate matter (PM) has emission limits of 30mg/m<sup>3</sup> for A4, A5, A6, A21, and A22.

A7, A8, and A23 have a higher limit of 50mg/m<sup>3</sup>.

A9, A10, A11, and A25 have a limit of 10mg/m<sup>3</sup>.

Site results from triplicate testing were all well within limits, with only A22 approaching half of its limit.

#### 2<sup>nd</sup> Biannual results Particulates Air2B (Jul-Dec).

Emission points A12, A13a, A13b, A13c, and A14 have emission limit values of 10mg/m<sup>3</sup>. Results showed the limits were not breached, and that only A12 came close to an average of half its limit.

#### 2<sup>nd</sup> Biannual report Phenols Air 2B

4-point emissions were measured in triplicate. Point A13c was not operating. All results were well within permit limits.

2<sup>nd</sup> Biannual report Phenols Air 2A

8 points were measured in triplicate. The permit limit is set at 5mg/m<sup>3</sup> for all points. The highest readings were a fraction of 1mg/m<sup>3</sup>. No limit was breached.

2<sup>nd</sup> Biannual report TOC Air 2A

8 points were monitored with different permit limits. No limit was breached. 4 points were approximately half of their permitted maximums.

2<sup>nd</sup> Biannual report Phenols Air 2B

4 points were measured. A13c was not operating. Permit limits are 10mg/m<sup>3</sup> for all points. No limits were breached. The maximum readings came from A14 which were approximately a quarter of the limit.

**Rockwool Annual Report 2020 (permit condition 4.2.2).**

Notable improvement in water quality emission during 2020 with no limit exceedances and 100% compliance. There has been no release to external stream since Feb 2020.

Line 1 Air – 1 exceedance for particulate matter

Line 2 Air – No exceedances reported during 2020.

Line 3 - 3 exceedances for particulate matter

1 exceedance of Nitrogen Oxides

16 exceedances of Sulphur Dioxide

1 exceedance of Carbon monoxide

All exceedances were reported to NRW. Several SO<sub>2</sub> exceedances were dealt with in the last CAR form CAR\_NRW0031190 issued 2<sup>nd</sup> Dec 2020. A further number of breaches were reported to us from Q1 and Q2 2020 which are subject to an ongoing examination.

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](mailto: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](mailto: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.