

Compliance Assessment Report CAR_NRW0037800

Permit being assessed: BR8212IK.

For: Pont-y-Felin EPR/BR8212IK, held by Knauf Insulation Ltd

At: Pont-y-Felin , Cwmbran, Torfaen, NP44 2YQ.

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

On 01/02/2021 - 29/04/2021.

Parts of permit assessed: 3.1 Emissions; 3.3 Monitoring; 4.2.2 Reporting.

NRW Lead Officer: Wayne Grimstead.

Report sent to: Warren Christy, HSE & Systems Manager on 29/04/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
E3 - Emissions - Surface water	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
H2 - Resource Efficiency - Energy efficiency	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
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

2020 Bi Annual Returns

NRW note that the bi annual emissions to air results for 2020 at A0, A1, A3 and A4, were all within limits.

Action 1: With regards to emission point A3 and since the change in binder formulation, could Knauf please confirm in writing, within one calendar month from the date of this CAR form, what is now the source of the formaldehyde and phenol emissions.

With regards to the first round of bi annual W1 results, Knauf notified NRW on 31st July, 2020, advising of a late sampling exercise due to a misunderstanding between sample carrier and laboratory. NRW regulating site officer acknowledged the communication in an email on 20th August advising of a technical breach of the permit but did not propose any further action in respect of this breach. The results were subsequently received and were within limits.

For the avoidance of doubt, Knauf are reminded that all sampling and the reporting of results must be carried out within the time limits set out in the permit as failure to do so may result in a non compliance being recorded.

2020 Performance Indicators

The results for mass release of oxides of sulphur is 0.219 Kg SO₂.

The use of the bypass stack on 2 occasions reflects the number of times that Knauf have notified NRW of planned EP / PPM shutdown and maintenance.

The water usage for 2020 is reported as 99,615 m³. This has reduced considerably from the previous 2 years of 131,259 and 134,340 and is very close to the 2017 figure of 99,769. NRW welcome the downward trend in water usage and trust that one of Knauf's aims and objectives for the forthcoming year is to continue this downward.

Permit Condition 4.2.2 (a)

NRW accept the information contained in the report but request that the document itself is dated in future.

The report states that emission point A4 is no longer in use following the installation of a new filter system on each of the raw materials silos. According to NRW records, this has been the situation since the second half of year 2017. Whilst there is no objection to this in principle and until such time that the permit is varied, it is recommended in future that a footnote be added to the Air2 reporting form explaining why Particulate Matter is no longer recorded at A4.

Continuous Emissions Monitoring (CEMs)

A continuous emissions monitoring system is used on the furnace stack as a direct measurement of Particulate Matter and Oxides of Nitrogen (NO and NO₂ expressed as NO₂). The equipment is serviced and calibrated quarterly, by technicians from the equipment suppliers, using certified gases for the gas calibrations.

NRW Officers, Dr Gareth Richards and Mr Wayne Grimstead, inspected this equipment on 16th December, 2020, during a site visit with Knauf's Mr Warren Christy. NRW understands the CEMs monitoring is linked to Knauf's IT system where the data is extracted and used as part of their reporting process. There were no issues identified during the inspection and there have been no exceedances reported during 2020.

Storm Water

For storm water, the concentrations of Total Suspended Solids, pH, Total Hydrocarbon Oil and Chemical Oxygen Demand (COD) are measured on a six monthly basis as required by the Permit from emission point W1.

During 2020, the W1 sampling was undertaken during the months of June and December and samples were analysed by an independent, UKAS accredited laboratory. The analytical results for both monitoring periods are within the limits.

Conclusion

The site emissions were monitored in accordance with the permit requirements and notably, there were no exceedances during 2020. Knauf have notified NRW in writing on occasions where temporary changes to planned operations took place. That said, Knauf are reminded of the need to give at least 14 days written notice procedure for such changes. NRW also request notification in writing when normal operations have resumed.

In spite of the hugely difficult trading conditions for industry during 2020, Knauf have shown resilience and performed very well from an IED perspective.

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.