

## Compliance Assessment Report CAR\_NRW0038430

**Permit being assessed:** BR9383ID.

For: Queensferry Mineral Fibre Works , held by Knauf Insulation Ltd  
At: Chemistry Lane , Queensferry, DEESIDE, Flintshire, CH5 2DA.

**Type of assessment carried out:** Report/Data Review, Reason: Routine.  
On 23/06/2021.

Parts of permit assessed: Q1 Return Submissions and Part A & B Submissions

**NRW Lead Officer:** Berwyn Williams.

**Report sent to:** Graham Jones, Environment, Energy & Compliance Manager on  
21/07/2021.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
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	C3 Minor	3.1.2
E1 - Emissions - Air	C3 Minor	3.1.2

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

Total number of non-compliances recorded	Total non-compliance score
2	8

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
G1	During failures of Durag dust emission main probe, the stand-by probe should be ready to cover such failures. Need to ensure CEMS probe replacement procedures are improved to avoid the need for shutdown to replace.	20/08/2021
E1	Need to improve the understanding for the reasons of the numerous incidents of increased SO2 levels and how to bring them into ELV limits while maintaining product chemistry requirements.	20/09/2021

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.

**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

Environmental Monitoring - Q1 January to March 2021

All emissions monitoring was undertaken as required by condition 3.3.1 and Tables S3.1 and S3.2. All monitoring submissions were made within the timescales required by condition 4.2.3.

**Emission Point A:** Particulate matter, NOx and CO emissions monitoring were compliant with the permitted limits for Q1.

EP\_EX\_257 Part A and Part B notifications submitted on 22/02/21 and 02/03/21 respectively identified temperature measurement from Durag probe failed. The spare probe was fitted on 25/2/2021. Other measurements from the probe were unaffected. The probe measures emissions from stack A cupola after oxidizer, specifically dust, pressure, flow and temperature. Temperature is used in correction calculations for the emissions with ELVs.

EP\_EX\_261 Part A and follow up email notifications submitted on 19/03/21 identified a failure of Durag dust monitoring probe due to contamination, affecting results affected between 16th to 28th March) Spare prob was still away for repair since previous issue on 25/02/21.

**CCS Category 3 breach, criteria G1 Monitoring of emissions and reporting, condition 3.1.2**

**Action:** Provide details of procedures for managing CEMS data for start-up and shut down periods to ensure emissions to air are accurately recorded by 20/08/2020. This should include ensuring duty and standby probes are maintained to ensure cover if a probe fails.

SO2 emissions monitoring

EP\_EX\_258, 259, 260 Part A notifications submitted on 04/03/21, 10/03/21 and 18/03/21 respectively along with a Part B that identified that elevated SO2 emissions was as a result of Cupola batch composition (stone/slugs%) being changed in consultation with their corporate technical specialist. These resulted in minor exceedances of the permitted limit

as a result of the switch in batch.

The following actions then gave them stable operation with SO<sub>2</sub> levels back within permitted ELV

- Changed the proportions of stone and coke in the batch to the cupola furnace
- Changed the quality (mainly size and fines related) of stone and coke
- Repaired the duct carrying cupola fume to heat exchange and oxidizer burner systems

There is still some sub-standard coke to process.

Emission limit 1350mg/m<sup>3</sup>.

Daily average of CEMS measurements at reference conditions: **1424 mg/Nm<sup>3</sup>** on 9/3/21.

### **CCS Category 3 breach, criteria E1 emissions to Air, condition 3.1.2**

**Action:** Need to improve the understanding for the reasons of the numerous incidents of increased SO<sub>2</sub> levels and how to bring them into ELV limits while maintaining product chemistry requirements. Complete Extractive monitoring for SO<sub>2</sub> and report findings to NRW by 20/09/21.

### **Outstanding action from previous CAR NRW0037316**

**Action 5** - Knauf Insulation must ensure lime dosing remains effective to ensure consistent ELV compliance. Please continue to assess effectiveness of lime feeding unit and report back your observations and any necessary remedial action to NRW by 19/02/21.

This action is now superceded by the further batching issues, which are covered at a later date, so can consider this closed for the purposes of the CAR outstanding action.

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.