

Natural Resources Wales permitting decisions

**Knauf Insulation Limited
Queensferry Mineral Fibre Works
Decision Document**

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Minor Technical Variation

The variation number is:

EPR/ BR9383ID/V011

The operator is:

Knauf Insulation Limited

The Installation is located at:

Queensferry Mineral Fibre Works, Chemistry Lane, Queensferry, Deeside, Flintshire, CH5 2DA

We have decided to issue the variation for Queensferry Mineral Fibre Works operated by Knauf Insulation Limited. The permit number is EPR/BR9383ID.

The variation was of Minor Technical in nature and involved the addition of two waste codes to the permit:

Waste Code	Description
10	Wastes from Thermal Processes
10 02	Wastes from the Iron and Steel Industry
10 02 01	Wastes from the processing of slag
10 02 02	Unprocessed slag

Both waste codes have been proposed in response to a change in the supply chain. Previously, blast furnace slag and steel slag were sourced nationally and classified as a raw material. However, the former supplier can no longer guarantee sufficient provision of the blast furnace slag or steel slag and so the operator has found a new European based source to act as a secondary source.

As the blast furnace slag and steel slag will be transported across national boundaries to get to the Queensferry site, the material will be classified as a waste, under the above inert European Waste Catalogue (EWC) codes.

There are no changes to the permitted annual tonnage, operations or emissions as a result of this variation

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

Key issues of the decision

Receipt of application

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

- Section 3.4 Part A(1)(a) Melting mineral substances in plant with a melting capacity of more than 20 tonnes per day.
 - R5 Recycling/reclamation of other inorganic materials
 - R13 Storage of wastes pending any of the operations R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced.

Legislation

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

All applicable European directives have been considered in the determination of the application.

The site

The operator has provided a plan which we consider is satisfactory, showing the extent of the site.

A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.

Biodiversity, Heritage, Landscape and Nature Conservation

There are no changes to emissions as part of this variation therefore it was not a requirement to assess impacts on conservation sites.

Environmental Risk Assessment.

Air

The Applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health.

As the additional waste codes are replacing an existing raw material, the applicant asserted that there will be no change in point source emissions to air. The applicant identified a minor potential for added fugitive emissions during handling and storage of the material but with sufficient mitigation measures the increase in emissions to air was confirmed to be not significant.

We are in agreement with this approach and assertion.

Emission limits

No additional emission limits are considered necessary.

Water

There will be no change to fugitive or point source emissions to water.

No additional emission limits are considered necessary.

Soil

There was no requirement to assess the condition of the soil as part of the variation.

Odour

There are no changes to odour emissions as part of this variation.

Noise

There are no changes to noise emissions as part of this variation.

Fugitive emissions

There is no expected change to fugitive emissions to surface water, groundwater and sewer. However, the applicant identified a minor potential for the release of fugitive emissions to air, during handling and storage of the new material. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise these fugitive emissions and to prevent pollution from fugitive emissions. No additional emission limits are considered necessary.

Monitoring

There is no additional monitoring required as part of this variation.

Reporting

There is no additional reporting required as part of this variation.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.

The relevant guidance notes include:

- Technical Guidance Note (Monitoring) M1: Sampling Requirements for Stack Emissions Monitoring Version 8 August 2017
- Guidance on the classification and assessment of waste (WM3) Version 1.1 May 2018
- NRW Guidance: How to comply with your environmental permit Version 8 October 2014

The operator will continue to operate in accordance with their approved operational procedure and ISO 14001 Environmental Management System, as per NRW technical guidance note How to comply with your Environmental Permit. The Environmental Management System sets out several key measures to ensure the quality of the material accepted on site, to reduce the possibility of emissions or pollution. Such measures include a comprehensive inspection and maintenance programme, which will adhere to Technical Guidance Note M1, as well as pre-acceptance checks and a Waste Acceptance Procedure, which will follow WM3 Guidance on the classification and assessment of waste.

The variation will result in no changes to the process or operation of the site, other than to the waste acceptance procedure. As there are no significant changes to waste handling, storage or quantities of waste generated on site, no further changes in operational techniques and management are required.

The operator has trialled various raw materials/batch formulations when selecting the new suppliers and determined that the proposed BFS and steels lag supplies are not expected to change the emissions from the process. As a precaution during the initial trial of the material, the operator will monitor emissions from the main stack using CEMS and react accordingly to ensure there are no significant changes to emissions.

The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility.

We consider that the emission limits included in the permit reflect the BAT for the installation.

The permit conditions

Updating permit conditions

We have amended the previous permit conditions as a result of the variation, to reflect the change in waste code, as per table S2.2, and the change in operational techniques, as per table S1.2. We have also amended table S4.3 to add in a waste reporting form.

The operator has agreed that the new conditions are acceptable.

Use of conditions other than those from the template

The permit already contained conditions outside of the standard template. These have been retained in the V011 permit. No other conditions other than those in the template have been added as part of this variation.

Raw materials

We have not specified limits and controls on the use of raw materials and fuels.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

The revised list of permitted waste types is included in table S2.2 Permitted Waste Types and Quantities. We are satisfied that the operator can accept these wastes on the basis that they are replacing a similar non-waste material and the existing operational techniques/mitigation measures used on site still apply. The 10 02 01 and 10 02 02 waste codes which have been added in this variation will have a similar composition to the non-waste material they are replacing, due to process need, and so we are satisfied operations on site will not alter significantly from the existing operations on site.

The operator has demonstrated they have robust waste acceptance procedures in place.

We made these decisions with respect to waste types in accordance with the operational need and justification provided in the application.

Conditions where the consent of another person is needed.

Not applicable

Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table in the permit.

Operator Competence

It was not a requirement to assess operator competence as part of this variation. The operator has not changed.

OPRA

The OPRA score at permit issue is 88. This permit had a fixed charge of £1,311 in accordance with the NRW Environmental Permitting Charging Scheme 2019-2020.

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