

Compliance Assessment Report

Report ID:
CAR_NRW0031583

This form will report compliance with your permit as determined by an NRW officer

Site	Pont-y-Felin EPR/BR8212IK	Permit Ref	BR8212IK		
Operator/Permit holder	Knauf Insulation Ltd				
Regime	Installations				
Date of assessment	29/03/2017	Time in	10:00	Out	15:00
Assessment type	Audit				
Parts of the permit assessed	Operator Monitoring Assessment (OMA)				
Lead officer's name	Griffiths, David				
Accompanied by	Andy Collins				
Recipient's name/position	Warren Christy/ HSE Manager	Date issued	05/05/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

This OMA focused on the monitoring of emissions to air (periodic and CEMs) from the Stack Emission Release Points A0, A1, A3 & A4 at Knauf Insulation Ltd, Cwmbran, Glass Mineral Wool Works.

Knauf (operator), NWG Environmental Services (Monitoring Test Consultant) and KAN Development (CEMS service provider) have shown that provisions for periodic and continuous monitoring are generally well managed, providing reliable monitoring data. There is definite scope for improvement with the general day to day management of monitoring on site; however, competency of periodic & continuous monitoring, records, staff, and quality assurance were all high. This has resulted in a good overall score of 80%.

Several observations and recommendations are noted in this audit, which Knauf (as well as NWG Environmental Services & Kan Development) should take into account for future monitoring management and on-going quality assurance.

OMA1A A manual covering all aspects of monitoring arrangements, with links to more detailed procedures, work instructions and records would be highly beneficial.

OMA1B It is **recommended** that roles and responsibilities relating to monitoring are clearly defined & documented. It is also recommended that a deputy is put in place regarding monitoring provisions (periodic and continuous) in order to improve resilience.

OMA1D It is **recommended** that the operator puts in place documentation/procedures for validating monitoring data including provisions for tracking trends e.g. control charts.

OMA1E Some additional monitoring training would be beneficial for operator staff involved in monitoring management (even if they have done it previously, as a refresher, particularly as standards & guidance are constantly evolving). The Source Testing Association (<http://www.s-t-a.org/training/>)

holds relevant one day training courses for operators including:

- Regulatory Monitoring Requirements for Process Operators
- BS EN14181 quality assurance of an AMS (covering the CEMs and parallel testing)

It is recommended that Knauf staff involved in monitoring to attend either one or both of these courses before the next OMA.

OMA2A For monitoring provisions on Emission Point A1 (Furnace), it would be advantageous for the operator to install mono-rails where available to ensure all sampling ports can be accessed, and that the manual sampling trains do not need to be broken up prior to being put

into the stack. Monitoring provisions from Emission Point A4 (Batch Plant) are being reviewed during the rebuild phase.

NWG ES can also amend their SSP template to reflect that homogeneity is not required on Emissions Point A1 (Furnace), due to the stack having a sampling plane area of $<1.0\text{m}^2$.

OMA3D It was noted on the Procal 2000 Series Continuous Emission Monitor analyser MCERTS certificate, which it stated that the P2000 analyser has a maintenance interval of 1 months, which includes full zero and span/calibration checks. Knauf Cwmbran currently has a quarterly (every 3 months) calibration/maintenance (including QAL3 checks) schedule in place.

Recommendation: The operator should seek clarification of the calibration frequency regarding on-going maintenance and compliance (i.e. QAL3 checks) with the CEM manufacturer of all the CEM analysers to ensure the appropriate frequency of on going maintenance interval/calibration is taking place

OMA4D & E: It is recommended that the operator carries out routine auditing of the contractor monitoring reports and SSP, as well as the contractor sampling. It would also be beneficial to audit CEMs service provider (KAN Development) periodically to ensure ongoing compliance with continuous monitoring maintenance.

EPR Compliance Assessment Report

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Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.