

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

Site	Queensferry Mineral Fibre Works	Permit Ref	BR9383ID		
Operator/Permit holder	Knauf Insulation Ltd				
Regime	Installations				
Date of assessment	31/03/2019	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Emissions monitoring 2019 Q1, Part A & B notifications				
Lead officer's name	McGregor-Andrew, Sian				
Accompanied by					
Recipient's name/position	Graham Jones/ Process and Energy Manager	Date issued	21/06/2019		

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
E1 - Emissions - Air	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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

Emissions monitoring Q1 - January to March 2019

The 2019 Q1 monitoring report for quarterly testing of emission points A and G was received on 16/04/2019 in compliance with condition 4.2.3 of the permit. Monitoring was undertaken as required by condition 3.3.1.

Emission point A:

SO2: High SO2 readings on 9th February and elevated readings for NOx and CO during month 2 relate to an O2 probe fault and motherboard failure generating erroneous correction factors. The data for the period following the repairs to the equipment is within permitted limits and reflect the values seen in month 1 and 3 of the reporting period, and the operator states that the uncorrected data indicates emissions remained within normal levels, therefore the elevated SO2 reading is not considered to be a breach of the emission limit value. EP_EX223 was submitted as required by 4.3.1.

Chlorides: The lime dosing plant for emission point A was still under construction at the time of the Q1 emissions testing for Chlorides, as previously agreed the system is to be operational by the end of Q1. The plant has been commissioned and operator training is in progress. EP_EX224 was submitted as required by condition 4.3.1 as the average result of the three manual spot samples was 50.1mg/m3. No score attributed to this exceedance as the planned improvements remain within the agreed action plan timescales.

All other parameters are within permitted limits. It is noted that a new form titled Air 1h has been created for quarterly reporting of Chlorides for emission point A.

Emission point G:

Monitoring results for particulate matter and ammonia comply with emission limit values. As stated in the monitoring report one of the three measured values for ammonia was above the ELV but the average was compliant with requirements of permit condition 3.1 and Table S3.1. The elevated value was recorded during manufacture of a particular thickness and density of product.

Action: At the next round of monitoring please continue record the manufacturing operations during measurement of emissions so that the impact of manufacturing of various types of product on emissions can be characterised. **by 31/10/2019.**

Part A/Bs

EP_EX_218 Part B - request to withdraw received on 03/05. Agreed as the average of three samples taken on 17/10 was below the required ELV. Single higher reading appears to relate to a period of downtime where the oven was empty just prior to monitoring, increasing the temperature until product was passed through the oven again which may have caused emissions from product binder to increase until temperature returned to normal.

EP_EX_224 Part B received 24/04/2019 details above. complete.

WIRS:

WIRS1900457, 22/01/2019 - report of windblown litter in the ditch bordering the site. Incident had already been noted on site and was resolved promptly.

Actions from previous CAR:

ongoing - review of emissions from cupola syphon should continue to be reviewed as part of the planned sack replacement programme.

1. Part B for EP_EX_214 was submitted on 25/04/19. Burner set-point temperature has been increased to improve stability of abatement. It is noted that the CEMS and OsiPi data vary slightly due to data processing methods so the Part A notification and quarterly reporting result varied slightly. - complete
2. Part B for EP_EX_215 was submitted on 25/04/19. Short-term data loss during equipment change-over. Emissions data outside this period was stable. - complete
3. Part B for EP_EX_216 was received on 25/04/2019. Elevated CO readings appear to be an error, with data 'freezing' for less than 1 hour. Enviro Technology investigated but no cause was identified. complete
4. Part B for EP_EX_217 received 07/05/2019. additional testing not available in Q4, to be reviewed at Q2 monitoring round. extraction impact jets were operating correctly, ceilcote and circulation flow pumps all operational with no indication of issues with air or water flow- complete.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035269**

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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.