

Compliance Assessment Report CAR_NRW0039317

Permit being assessed: BS6149IQ.

For: Pencoed Rockwool EPR/BS6149IQ, held by Rockwool Ltd

At: Rockwool Ltd , Bridgend , Mid Glamorgan , CF35 6NY.

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

On 31/12/2021.

Parts of permit assessed: Annual returns

NRW Lead Officer: Richard Taylor.

Report sent to: Victoria Hillman, SHE Manager on 10/02/2022.

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)	

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

Rockwool Ltd

Permit BS6149IQ

Annual Round-up for 2021.

Reports received

- Q4 Air Emissions, Oct, Nov, and Dec 2021.
- Q4 Water Emissions Q4
- Q4 Waste returns.
- 2nd Biannual results for Metals, NOx, Particulates, Phenols, TOC's, Amines, Ammonia, Formaldehyde.
- 2nd Biannual RSM results for Particulates, Phenols, TOC, Ammonia, Formaldehyde Particulates.
- Rockwool Annual report for 2021.
- Annual Water
- Annual Energy
- Annual H2S
- Annual HCL
- Annual HF
- Annual Particulates
- Annual Performance

All permit limits were complied with during 2021.

Note – Rockwool routinely approach permit limits and have occasionally exceeded them before the uncertainty factor is disappplied. There is not enough contingency in the system to allow the disapplication of the uncertainty factor to enable the site to meet reporting limits. Permit limits were complied with but only because the uncertainty factor allowed for the reading to be below the limit.

For the 2nd Biannual reports, stacks A4, A5, A6, A7, A8, A21, A22, A23, and A25 were measured.

- A4 Ammonia – The average before the uncertainty factor was applied was 48.93mg/m3 against a permit limit of 50mg/m3. Site reported the average figure with the uncertainty factor already taken off as 42.6.
- A19 Group 1 metals for 12th July 2021 had an exceedance of 1.95 mg/m3 against a permit limit of 1mg/m3. The permit requirements are for the average of 3 spot samples meaning that the reportable average was 0.74mg/m3 which was reported after the uncertainty factor was taken off was 0.7mg.m3 – within permit limits
- Likewise Group 2 metals had an individual exceedance of the average figure with 2.11 mg/m3 on 12th July, but when the average is applied this was under the permit limit 2mg/m3 with 0.82 which was further reported at 0.8mg/m3 when the uncertainty factor is taken off.

For the RSM reports, points A12, A13a, A13b, A13c, and A14 were measured.

- For Ammonia at points A12, A13a and A14, each reading exceeded the permit limit of 40mg/m3 but when the uncertainty was disappplied, each average conformed with the permit limit. Site should not be using the uncertainty figure being removed as a means of reaching the compliance limit. It would be more prudent to work towards the permit limit value without having to apply the factors to remain compliant. It would also give some headroom in the system.

Annual Water – Site noticeably used approximately 3% harvested rainwater to use as process water.

Annual Report – This satisfies permit condition 4.2.2, accepted in full.

- Emissions to air for the 3 lines at Rockwool were all within permit limits. Line 1 provided 47

operational days data for 2021. Line 2 provided 318 days, and Line 3 produced 225 days for continuous emission monitors (CEMS) data.

- For periodic measurements, there was one exceedance out of 606 measurements. This was for Ammonia in Biannual report 1 at A12 which was dealt with in the last CAR form.

Actions from previous CAR form

1. Rockwool were tasked with a review of their reporting procedures to ensure that all permit condition non-compliance, incidents, and events with potential for environmental impact are notified to NRW without delay. Rockwool responded by the deadline 31st Dec 2021- by implementing the identified improvements and providing a summary of outcomes to NRW. This also included training personnel and a streamlined reporting system detailed in ROCKWOOL's Environmental Work Instruction 15 ("NRW Notification of Environmental Incident / Breakdown or Breach of Limit"). Issue complete.

2. Site sent amended EPRTTR emissions data totals in previous years for entry into the EPRTTR database. We will attempt to enter the amended data onto the EPRTTR spreadsheets either by direct entry or by working through Ricardo on Rockwool's behalf. Issue ongoing.

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.