



Date: 20<sup>th</sup> August 2018

Planning Department  
Bridgend County Borough Council  
Civic Offices  
Angel Street  
Bridgend  
CF31 4WB

Dear Sirs,

**Ref: Consultation Response from Coychurch Higher Community Council 02/08/2018 regarding  
Planning Application P/18/520/FUL**

For completeness, please find ROCKWOOL's comments to the items outlined in the above consultation response enclosed. Each item has been addressed individually.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ian Kellie'.

Ian Kellie  
Operations Director



1. It was confirmed by Rockwool that productivity is being increased by 10%. However, Members of the public felt this was quite misleading as this refers only to the number of jobs. Production actually means that there will be an increase of 2/3rds and this needs to be made absolutely clear to the general public.

**ROCKWOOL response:**

The factory has been operating below capacity for many years. Production is increasing to match the capacity created by the expansion in 2008. No new capacity is being created by our proposed redevelopment.

2. The number of lorries is due to increase from 6.3 to 11. This presents a number of concerns:
  - a. In relation to the new entrance, it is very close to the bend in the road so lorries will be doing an 'S' type manoeuvre going into the site which is going to be dangerous. Wern Fawr Road is simply not suitable for nearly double the number of heavy trucks.
  - b. The road by the bridge on the B4280 was narrowed after the pavement was taken away. It is a 60mph road and not wide enough at that point for two vehicles especially if they are travelling at speed. This needs to be dealt with before the increase in lorries and it is felt that a similar level of expenditure should be spent to resolve this as was spent on historical applications.

**ROCKWOOL response:**

A traffic assessment has been completed and submitted to Bridgend CBC. Integral to this are that:

- an assessment was made in 2007/8 for the level of additional ROCKWOOL related vehicles that would be required to meet the demands of the factory producing at full capacity - no new capacity is being created by our proposed redevelopment; and
- visibility splay for the proposed new entrance have been designed and submitted as part of the application.

As part of the application process, we welcome feedback from the Council to ensure that our proposals meet the needs of ROCKWOOL and the local community.

The condition of the local highways network is a matter for Bridgend CBC to comment on.

3. Currently, lorries are parking overnight on local roads and the drivers sleeping in their cabs. This is now likely to increase with the increased number of lorries. Rockwool say that they 'remind' drivers that this is not acceptable. How is this going to be monitored?

**ROCKWOOL response:**

We take this matter very seriously and continue to work with our hauliers to stop this practice. We have made it expressly clear that this is unacceptable and repeat offenders will be warned that their contracts will be at risk.



4. The planned hardstanding is over 4 fields that already have very poor drainage. If a large area is concreted over, what will happen to the run-off water?

ROCKWOOL response:

The drainage of the existing site has been thoroughly assessed in liaison with Bridgend CBC and the drainage system for the proposed site designed accordingly. Deep swales have been proposed, incorporating an overflow system from one to the other and the discharge drainage rate has been agreed with Bridgend CBC. The ditch to South will prevent surface run-off to highway.

5. The current conveyor belt is very noisy. The new conveyor belt is going to be running 24 hours a day. How does Rockwool know how noisy the new belt is going to be when it's only be tested theoretically? Also, there will be the added noise of the extra vehicles back and for. The actual noise levels have not actually been tested so how can residents be given assurances on something that is only theory?

ROCKWOOL response:

Noise measurements of the existing conveyor were made and, along with other noise sources, were used in the noise impact assessment submitted to Bridgend CBC. The new conveyor will be enclosed and insulated with high performance acoustic materials in order that noise should not be an issue. The existing conveyor will also be covered in quarter 4 2018, which should further limit the potential for noise issues arising from this location.

6. Will the existing hardstanding be utilised?

ROCKWOOL response:

Yes.

7. A major concern is pollution and what chemicals are actually coming out of the stacks. Who is monitoring this, how often and where does this information go? Who is it shared with? What effect does the pollution have on livestock and is this monitored?

ROCKWOOL response:

ROCKWOOL has an operational permit (EPR/BS6149IQ) issued and regulated by Natural Resources Wales (NRW). Air emissions are monitored on a continuous, 6 monthly or annual basis as prescribed by the permit. Reports are submitted to NRW on a quarterly basis. Ambient concentrations of sulphur dioxide (SO<sub>2</sub>) are monitored and the results shared with Bridgend CBC. Measured values are consistently below 5 part per billion, which is well below the World Health Organisation (WHO) air quality limit of 47 parts per billion. Air dispersion models are carried out to assess the potential impact of air emissions on local flora and fauna.



8. Rockwool have stated they are only required to monitor concentration levels of SO2 via emissions. They state they are not required to measure what is ambient. Why is this?

ROCKWOOL response:

We measure many different parameters from the emission points on site, as specified by our permit. Further to this, we are required to measure ambient concentrations of SO<sub>2</sub> outside of the factory site.

9. What other gases/chemicals are emitted via the stacks?

ROCKWOOL response:

The majority is water vapour (steam). In addition to sulphur dioxide, the permit requires measurement of nitrogen oxides, carbon monoxide, particulate matter, hydrogen chloride, hydrogen fluoride, hydrogen sulphide and metals from the cupolas. Other emission points on site have requirements to measure particulate matter, ammonia, phenol, formaldehyde, volatile organic compounds and amines.

10. What about particulate matters? Is this monitored?

ROCKWOOL response:

Yes, from all emission points on site.

11. Rockwool plumes fall on residents, their cars, children's toys etc. however, Rockwool is only aware of this because residents telephone the factory to report it. Why are there no alarms for this? Will this happen with the news system? Residents want this sorted out before any upgrading and increase in output takes place.

ROCKWOOL response:

Our understanding is that this relates to wool tufts. We already have alarms on the exhausts from the five wool filter systems on site, and we are investigating our other emission points to identify improvements and ensure best practice across the board on site.

12. Rockwool Ltd. state the plumes are harmless and bio-soluble. Where is the evidence to support this?

ROCKWOOL response:

Numerous air dispersion models have informed the design of the stack height and emission limit values have been set independently of ROCKWOOL by Natural Resources Wales.

ROCKWOOL insulation products manufactured in the UK are rigorously tested and conform to the EUCEB certification scheme. EUCEB stands for the European Certification Board for Mineral Wool Products, a non-profit association, whose general purpose is to voluntarily certify that manufactured mineral wool fibres have a chemical composition within the ranges of exonerated reference fibres, which have been tested in accordance with the European protocols and have shown to be in conformity with the Note Q of Regulation (EC) No 1272/2008. These tests demonstrate that the fibre is sufficiently bio-soluble to pose no risk to



human health if inhaled. Any fibre accidentally inhaled will be readily dissolved and cleared by the body's natural defences.

13. Rockwool Ltd. state the only alarms they have are on the filters. If the alarms go off, the filters are removed so as not to cause an explosion. How often does this happen how long for and what is contained in the unfiltered emissions that come out of the stacks?

ROCKWOOL response:

There are alarms on a multitude of equipment across site to ensure safe and efficient operation at all times.

Regarding cupola (furnace) operation, normal practice is for the exhaust gases to pass through filters to remove the ash and then pass through the combustion chamber to be oxidised before being released to air via the 75m high stacks. The filter and combustion chamber together are referred to as the abatement system. In extreme circumstances, the abatement system is bypassed for a short period as a control mechanism. All time spent in bypass is recorded automatically and measured in seconds.

By its very nature, the bypassing of the abatement system is an event we try to avoid, so it is not possible to state a meaningful frequency of use. Use of the bypass system for up to 2 minutes is usually sufficient to resolve the issue that caused it. If the situation is more complex, ROCKWOOL operates strict shutdown procedures after 20 minutes (i.e. emptying the contents of the cupola). In 2018 to date, we have recorded use of bypass for 0.02% of production time. The unfiltered emissions contain ash and non-oxidised gases.