	EPR Compliance Assessment Report	Report ID: BW9999IG/0246311			
This form will report compliance with your permit as determined by an NRW officer					
Site	CHIRK, PARTICLEBOARD		Permit Ref	BW9999IG	
Operator/ Permit holder	Kronospan Ltd				
Date	22/07/2015		Time in	09:30	Out 15:30
What parts of the permit were assessed	Lagoon project and continuous discharge, bund improvements and inspection, site issues and future developments/Bref conclusions.				
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op
					Water Discharge
Recipient's name/position	Keith Baker - EHS Manager				
Officer's name	Ian Oakes		Date issued	19/08/2015	

Section 1 - Compliance Assessment Summary					
<p>This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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.</p>					
Permit Conditions and Compliance Summary					Condition(s) breached
a) Permitted activities	1. Specified by permit	A			
b) Infrastructure	1. Engineering for prevention & control of pollution	A			
	2. Closure & decommissioning	N			
	3. Site drainage engineering (clean & foul)	A			
	4. Containment of stored materials	A			
	5. Plant and equipment	N			
c) General management	1. Staff competency/ training	N			
	2. Management system & operating procedures	N			
	3. Materials acceptance	N			
	4. Storage handling, labelling, segregation	N			
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	A			
	2. Land & Groundwater	N			
	3. Surface water	A			
	4. Sewer	N			
	5. Waste	N			
f) Amenity	1. Odour	A			
	2. Noise	A			
	3. Dust/fibres/particulates	A			
	4. Pests, birds & scavengers	A			
	5. Deposits on road	A			
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A			
	2. Records of activity, site diary, journal & events	N			
	3. Maintenance records	N			
	4. Reporting & notification	N			
h) Resource efficiency	1. Efficient use of raw materials	N			
	2. Energy	N			
KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

1- Lagoon project and continuous monitoring / discharge.

CAR 0236760 issued 2 April 2015 (and Kronospan letter dated 20 March 2015) were subsequently updated by Kronospan letter dated 18 May 2015. This relates to the Phase I change to floating aerators as opposed to aerators sat on concrete plinths and the use of planted rafts to replace the proposal for bacterial gel attached to pumice. The letter also requested an extension for the discharge limits, which was confirmed by NRW letter dated 27 May 2015 as 31 December 2015.

The decision to move to floating aerators / planted rafts was a consequence of the shallowness of the lagoons with 1 and 2 at approximately 1.5 - 2 m with lagoon 3 a little deeper at approximately 2 m. It is expected that each lagoon will require 2 compressors and 4 aerators (but this may change with experience) with the rafts located around the perimeter. Lagoons 1 and 2 have been cleaned out with Lagoon 3 cleaning being finished as witnessed on the visit (residues taken off site for disposal). The bases of the lagoons are of concrete and in good condition with the 3 sided sloping banks made up of a synthetic membrane keyed at the basal interface. Lagoon 3 incomer 6 mm screen has been recommissioned to capture log yard residues. There have been significant developments in solids removal prior to the continuous monitor (new monitor trialling) at the inlet of lagoons 1 and 2 (inlet cleaned out), which is performing well against 5 mg/l standards for formaldehyde and ammonia.

It was noted from the surface water W1 discharge monitoring Q2 submission dated 21 July 2015 that BOD was 6.8 vs 9.5 mg/l limit, ammonia was 4.96 vs 5 mg/l limit, formaldehyde was 1.67 vs 2 mg/l limit, suspended solids was 79 vs 100 mg/l limit and oil and grease was at the 15 vs 15 mg/l limit. It is expected that the Phase I improvements should improve all the parameters noted, though the oil and grease figure is somewhat of a concern and should be investigated and the monitoring checked.


The Phase I suspended solids value achieved may still not meet the proposed BAT- AEL yearly average limit of 35 mg/l in the BREF draft July 2014 - Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector (which is expected to be signed off later this year for implementation in 4 years time), without the implementation of the Phase II Reed Bed proposal. It is advised that the Section 4 BAT Conclusions (IPPC Bureau Website) be factored into the Permit variations for Phases I and II. The Phase I permit variation should be submitted at your earliest convenience. It is noted that Phase II is out for quotes / further investigation work.

2 - The BREF Draft April 2014 - Large Volume Organic Chemical Industry was also discussed. This was to be finalised in late 2015 but has now been put back to early 2016 and covers the manufacture of formaldehyde. Once ratified industry will have 4 years to comply. Again it is advised that the BREF Conclusions be reviewed (Refer to Section 10 Formaldehyde and Section 17 BAT Conclusions et al) and be given due consideration going forward (for example carbon monoxide monitoring).

3 - Bund improvements are as detailed in Kronospan letter dated 6 July 2015 (and previous with due reference to CIRIA 736) and are in response to COMAH requirements for the safe storage and containment of dangerous substances (work instigated in 2013, reference SVC4261790), in particular: petroleum products, methanol, formaldehyde and Heat Transfer Fluid (biphenyl / diphenyl oxide etc). This letter and previous have been forwarded to the HSE. It is noted that the steel reinforcement to the Formaldehyde Tank 1 bund will be completed shortly, and other repairs were verified by inspection on the day. Although of lower risk the Chipboard Resin and MDF Wax storage connected bunding remains a potential issue due to its integrity (Bilfinger Report WPWD6030274) and should feature in future upgrade work. Gas Oil 1 bund requires a clean out due to oily residues.

4 - The site inspection covered bunding arrangements, Resin Plant, lagoons and the continuous monitoring station and the VITS department. The plant areas inspected were in good condition and exhibited a high standard of housekeeping. It is acknowledged that significant improvements have been made on site with respect to the overall bunding arrangements.

5. It is noted that the operator intends to submit a substantial variation to WCBC Public Protection for 3 gas engines with a combined thermal input of >60 MW.

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Operator/ Permit	Kronospan Ltd	Date	22/07/2015

Section 3- Enforcement Response		Only one of the boxes below should be ticked	
<p>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.</p>			
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.			X
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.			
We will now consider what enforcement action is appropriate and notify you, referencing this form.			

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.