



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	12/03/2014			Time in	09:30	Out	15:45
What parts of the permit were assessed	Previous actions, Bilfinger bund inspection report, plant developments and variations v003/4/5, lagoon project, site.						
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	03/04/2014		

Section 1 - Compliance Assessment Summary

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.

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	A	
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	N	
	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	NA	
	5. Deposits on road	NA	
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

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. Bund inspections:

Following submission of the Petroleum Products and Chemicals containment scorecards, which indicated that remedial works to bunds were required, Kronospan was directed to assess the structural integrity against the criteria highlighted in COMAH inspection report 'Secondary and Tertiary containment of 28 March 2013' (in which the operator shall review, in full, the measures for secondary and tertiary containment of COMAH dangerous substances in bulk tanks against the Competent Authority (CA) Containment Policy guidelines).

The structural consultant Bilfinger Industrial Services UK Limited was engaged to carry out the bund investigations and a report was submitted to the CA on 24 December 2013. This meeting was called in part to review the recommendations as highlighted in the report 'Visual Civil Inspection of Bunds'. Present in the meeting were Kronospan plant, engineering and ESH management and the Bilfinger structural engineer who undertook the investigations.

The report was reviewed in detail and the majority of the bunds (without repeating the contents of the report) were found to be of suitable construction and appropriately sized but requiring some remedial works to bring them to an acceptable standard. Remedial works identified include, typically: replacement of perished sealant, break out areas surrounding penetrations and recast, repairs to any impact damage and substantial cracks, checking containment volume is actually 110% and of suitable strength (and if not managing the inventory accordingly).

However, there are bunds that through either construction design (such as unreinforced block work), change of use, size, linkages, damage and/or modifications are considered to have more serious deficiencies, and include: Formaldehyde Tank 1, Gas Oil Tank 1, Gas Oil Tank 2 plus Chipboard Resin 6 and Chipboard Resin 0-4 & MDF Wax.

Action: It was agreed that Kronospan / Bilfinger would update the report to include a programme of remedial works as appropriate and an options appraisal / proposals for those requiring a more fundamental approach. To be submitted to CA by 16 May 2014.

NB: As far as compliance is concerned these bunds are considered subject to COMAH and under review.

2. CHP Biomass project.

The Biomass CHP construction is at a advanced stage with commissioning expected in April 2014. EPR permitting is being undertaken by Wrexham CBC Public Protection.

Action: Kronospan to assess the impact of the Biomass CHP plant on the COMAH safety report and submit to the CA by 16 May 2014.

3. Dark discolouration of the Afon Bradley 7 February 2014.

NRW undertook sampling of the Afon Bradley discharges on the 7 February around W1 and the

samples were found not to exceed the permitted emission limits (results provided).

4. W1 emission limits for ammonia and formaldehyde.

Variation V003 Table 4.2 Emissions to water reduced the ammonia limit from 5 to 3.5 mg/l and formaldehyde from 2 to 1.5 mg/l. In an exchange of letters 10 Aug 2011 from Kronospan and response 11 August 2011 from NRW it was agreed to relax the limits (back to the original limits) during the lagoon project implementation and subsequent variation for up to a period of 12 months. As this arrangement has now lapsed I confirm that these limits are considered extended until 31 December 2014 (pending lagoon variation).

5. Implementation of V003 and V004 resin plant modifications.

The plant manager went through the changes introduced through these variations, which are summarised as: replacement of an 46m³ reactor, replacement of two 15m³ reactors with a 46m³ reactor (to give 2 x 46m³ and 2 x 15m³ reactors), introduction of a 300 tonne urea silo to replace bulk handling and new plant control systems.

6. Implementation of V005 new surface water lagoon.


The plan was to concrete out the log yard and filter the run-off water and settle in a new 4000m³ storm water lagoon, which would overflow to the existing lagoons provided W1 emissions limits could be met. The settled water would then be pumped to the Canal water treatment plant for treatment and reuse as process water. The log yard will not now be concreted and as such the run-off water is not considered suitable for reuse and the project put on hold.

Action: Kronospan to summarise current status and issues going forward and submit a report to NRW by 16 May 2014.

7. Lagoon continuous discharge, effluent treatment and reed bed project.

The project has been subject to delay primarily due to securing suitable continuous monitoring equipment (formaldehyde in particular). The project is still in phase I monitoring with installation of equipment on the discharge W1 imminent (linked to 4).

Action: Kronospan to summarise current status and issues going forward and submit a report to NRW by 16 May 2014.

 Cyfoeth Naturiol Cymru Natural Resources Wales	EPR Compliance Assessment Report	Report ID: BW9999IG/0206229	
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Site	CHIRK, PARTICLEBOARD	Permit	BW9999IG
Operator/ Permit	Kronospan Ltd	Date	12/03/2014

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.			
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.

