



KRONOSPAN LIMITED
Chirk Wrexham LL14 5NT U.K.
T 01691 773361 F 01691 778544
info@kronospan.co.uk www.kronospan.co.uk

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Mr P Wright
Team Leader – Industrial Regulation – North & Mid Wales
Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ

4 July 2016

Dear Paul

Re: Formalin Process Gas Release

As you know we received an EPR Compliance Assessment Report dated 8 January 2016 and this was followed by a warning letter dated 13 June 2016.

At the recent CELG liaison meeting Ian Oakes explained to members that the air quality modelling had shown the only potential impact was possibly odour. This was the first time that we had been informed of the results and so, bearing in mind the fact that no complaints were received, we feel that the C2 categorisation which is for a non-compliance which could have a significant environmental effect is inconsistent with these findings and extremely harsh.

This also then leads to me questioning the decision to issue a warning letter, especially as we have over many years demonstrated our commitment to positively engage with yourselves at all levels, and this cannot be a one way exercise.

Yours sincerely

C.J. Ryan
Group Secretary

