

## Compliance Assessment Report CAR\_NRW0040813

**Permit being assessed:** BW9999IG.

For: Chirk Particleboard Factory, held by Kronospan Ltd

At: Chirk Particleboard Holyhead Road , Chirk, Wrexham, Clwyd, LL14 5NT.

**Type of assessment carried out:** Site Inspection, Reason: Routine.

On 30/11/2022 between 09:30 and 14:00.

Parts of permit assessed: Press Abatement visit 30 November 2022, Update on monitoring returns, Total VOC emission limit value WESP21, Improvement Conditions and Schedule 5 - Notification.

**NRW Lead Officer:** Ian Oakes, accompanied by Rebecca Harwood.

**Report sent to:** Chris Emery, Director on 16/12/2022.

### 1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B1 - Infrastructure - Engineering for prevention and control of emissions	Assessed (A)	
C2 - General Management - Management system and operating procedures	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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**

**Kronospan Limited – Press Abatement visit 30 November 2022, Update on monitoring returns, Total VOC emission limit value WESP21, Improvement Conditions and Schedule 5 - Notification.**

**1. Press abatement site visit 30 November 2022**

A site inspection of the press halls, press abatement plant, roof stack monitoring platform, bypass valve and ductwork and WESP32 was carried out on 30 November 2022, this included discussions relating to maintenance, plant operations and procedures (process schematics were provided).

The 3 process lines (Particleboard, MDF1 and MDF2) share common process characteristics. Mats formed in the pre-presses are subjected to high pressure and temperature in the Controll presses to compress the mat to the required thickness and density as the resin cures.

The Controll presses are fitted with water fog systems for fire suppression. Fugitive emissions are extracted by local exhaust ventilation prior to release to atmosphere via venturi scrubbers. All 3 process line emissions combine into a single stack, emission point A31.

The monitoring of emissions at A31 is carried out from a platform on the roof with the first round of monitoring for the consolidated permit issued 4 October 2022 due in Q4.

As the discharge point of the original stack is estimated to be about 4 – 5 metres above the monitoring platform (roof levels varying) a bypass duct has been installed to take the emissions to WESP32 emission point A28 (63 m elevation) to improve dispersion.

If quarterly stack monitoring at A31 is carried out when the wind is in an easterly direction then the potential for odours off site increase, so monitoring under such conditions should be avoided. A more permanent solution being investigated is to reposition the monitoring to an accessible (for personnel and equipment) elevated horizontal section of the bypass duct to WESP32.

WESP32 currently acts as an elevated emission point for press abatement and does not in itself have any other function. BAB Dryers No.2 and No.3 are currently mothballed.

No permit non-compliances were identified.

**2. Monitoring review Q1 2021 to Q3 2022 to bring the monitoring review up to date. Q4 2022 onwards will be subject to the NRW consolidated permit issued 4 Oct 2022.**

Annual monitoring and reporting requirements for emission points A1 – A25 to air (for the Formaldehyde plant emissions control system, Resin and Impregnation plants' two wet scrubbers, three thermal oil heaters, two gas turbines and three gas engines (with a further two permitted but not installed)) and emission point W1 to surface water (Afon Bradley) were assessed for submissions relating to the period Q1 2021 to Q3 2022.

Monitoring for all emission points and parameters required by condition 3.5.1 was undertaken (except non-operational combustion plant) and the results reported within the timescales required by condition 4.2.3 of

the permit.

Monitoring of emissions to air and surface water were submitted Q1 2021 to Q3 2022 as required and results for the emission points were within the emission limit values specified by condition 3.1.2.

### **3. Total Volatile Organic Compounds (TVOC) emission limit value for A32 (WESP21/Chip Dryer 4).**

This concerns the transposition of the emission limit value for Condensable VOC 130 mg/l from the Wrexham permit to Total VOC 130 mg/m<sup>3</sup> in the NRW consolidated permit rather than the value for Total VOC of 200 mg/m<sup>3</sup>, which was submitted and modelled (with reference to the Wood-based panels Best Available Techniques (BAT) Conclusions).

Accepting that the Total VOC will give a higher value than Condensable VOC and the fact that it was submitted and modelled we consider it reasonable to accept Total VOC 200 mg/m<sup>3</sup> as the emission limit value going forward and update the permit accordingly (at the next variation).

In the meantime, we suggest that a Part A/B be submitted should the Total VOC 130 mg/m<sup>3</sup> limit be exceeded referencing this position (Compliance Assessment Report).

### **4. Improvement Conditions NRW IC24, IC25 and IC26.**

IC24, IC25 and IC26 and were submitted on 4 November 2022 (within the required timescales).

NRW IC24: *“The Operator shall provide a written report for emission point A33 [WESP21/Chip Dryer 4 Emergency stack], describing all the process conditions that trigger the need to use each stack and the expected duration of each type of release. The report shall also provide the frequency of each process occurrence per stack, for each of the calendar years 2017 – 2021 inclusive. The report shall also provide justification of why use of these emission points is necessary, together with a feasibility assessment of any alternative operating techniques that have been considered.”*

NRW IC25: *“The Operator shall provide Natural Resources Wales with a copy of the procedure that covers the temperature monitoring of all stockpiles of combustible material stored on site”.*

NRW IC26: *“The Operator shall provide Natural Resources Wales with a copy of the procedure that covers the monitoring and recording of temperature within the biomass silos and the frequency of these checks and / or written methodology covering the management of the biomass silos to ensure material remains for 3 days maximum”.*

These submissions have been reviewed and are considered complete subject to audit.

As noted in the Improvement Conditions covering letter IC29 (due 4 Jan 2023) will further expand on the operation of WESP21.

### **5. Schedule 5 – Notification of the use of emission point WESP21/Chip Dryer 4 Emergency stack A33 for 40 minutes from 05:45 13 Nov 2022.**

Description provided by the Operator:

*“At 05:45 on the 13/11/2022 the dryer 4 emissions went to the WESP 21 emergency stack for a period of 40 minutes, this was due to a fault on the WESP 21 fire system. An air compressor airline connected to the WESP 21 fire system had failed which led to the pressure in the fire system dropping and activating a low pressure alarm which stops operation of the WESP 21.”*

*The dryer was running with a load of ~ 50 te at the time and required a period of 40 minutes to complete a controlled stop. Repairs have been made to the compressed airline and the system has been tested and put back on line.*

*Dryer 4 was brought back on line at 09:30 into full production with emissions abated as normal through the WESP 21. No resident complaints were received as a result of this incident”.*

The use of permitted A33 emergency stack followed the procedures outlined in the NRW IC24 submission whereby should certain situations arise then Chip Dryer 4 exit is switched from WESP21 to the emergency stack as a ‘designed in’ safety feature. The emergency stack still benefits from the dryer’s 8 cyclones, which reduce the particulate emissions prior to discharge. Under normal conditions WESP21 would provide the additional abatement to bring overall emissions to BAT levels.

It is noted that the wood chips would not have had resin or other chemicals applied at this stage. Though the emissions released would contain particulates and volatile organic compounds at levels unlikely to meet the emissions limit for WESP21 at A32 this would be for a relatively short period of time and decreasing as the dryer is emptied.

Therefore, the use of A33 as notified and operated in accordance with the permit and NRW IC24 is not considered a breach of permit condition 3.2.1

*“Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The Operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions”.*

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](mailto: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](mailto: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.