

## Compliance Assessment Report CAR\_NRW0041822

**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 11/05/2023 between 02:00 and 03:30.

Parts of permit assessed: Amenity - Noise

**NRW Lead Officer:** Paul Challender, accompanied by Stuart Ross.

**Report sent to:** Chelsey Barker, Deputy HSE Manager on 26/05/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F2 - Amenity - Noise	Action only (X)	
F2 - Amenity - Noise	C3 Minor	Permit Condition 3.4.1. KC/EHS/PRO/017 Vers. 6.

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

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?

Criteria	Action needed	Complete by
F2	Action 1: Submit the weekly check for the process that the Aerzen Delta Blower located in the "Chip Prep" area serves, as per the Routine Maintenance of Plant section of The Noise Prevention and Reduction procedures list in KC/EHS/PRO/017 Vers. 6. In addition, submit maintenance records and noise records for the Aerzen blower.	30/06/2023
F2	Action 2: Enforce the closed door policy across the operational site. Provide details to NRW regarding how the closed door policy will be enforced including a management audit of staff compliance.	30/06/2023

Action criteria codes are listed in the 'Important information' section below.

### 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**

Natural Resources Wales (NRW) officers Paul Challender and Stuart Ross attended Chirk to conduct noise assessments from 10/05/23 at 2205 hrs to 11/05/23 at 0330 hrs. This time frame included entering the permitted site to observe noise within the permitted boundary from 0200 hrs to 0315 hrs on 11/05/23; during their time onsite the officers were escorted by the shift manager.

During the officers time in Chirk, Kronospan was audibly operational. The officers took measurements with a class 1 sound level meter throughout their deployment at various locations. The sounds detected from Kronospan was subjectively perceived with elements that could be described as broadband, tonal, impulsive and intermittent. There was also a contribution of industrial sound from an adjacent facility which, appeared to be both broadband and tonal.

On entering the Kronospan site some sources of sound detected in Chirk appeared to be readily identifiable this included sounds from fork-lift trucks (FLT) in the despatch yard and sound from the pulse air jets. FLT could be heard traversing the despatch area, their forks could be heard banging, reversing alarms could be heard, horns were in use and FLT were witnessed idling without a driver being present.

The broadband and tonal sounds identified offsite were more difficult to ascribe to a particular item of equipment however, several noisy items of plant were encountered which may contribute to noise perceived off site these included the sawmill in-feed and a Aerzen Delta Blower located in the "Chip Prep" area. The operator should assess these items of plant and the potential for lowering their contribution to the noise generated by the site's processes.

Furthermore, several doors were open around the installation. These included a roller shutter door on the plastics/melamine facing building and two vehicle/plant access roller shutter doors were completely open on the Thermal Oil Room. The Thermal Oil Room contains processes that generate a significant sound pressure level. These doors were found to be open despite a closed door policy being in force and communicated via tool box talks etc....

Noise management is currently controlled under Procedure KC/EHS/PRO/017 Vers. 6 Dust Noise Odour Management Plan. This plan identifies that Routine Maintenance of Plant and a closed door policy is to be followed. Contravention of this procedure has precipitated breaches and details are listed below.

**Score:** (F2) Noise. KC/EHS/PRO/017 Vers. 6. Permit Condition 3.4.1. Action Only.

**Action 1:** Submit the weekly check for the process that the Aerzen Delta Blower located in the "Chip Prep" area serves, as per the Routine Maintenance of Plant section of The Noise Prevention and Reduction procedures list in KC/EHS/PRO/017 Vers. 6. In addition submit maintenance records and noise records for the Aerzen blower.

**Score:** (F2) Noise. KC/EHS/PRO/017 Vers. 6. Permit Condition 3.4.1. CCS 3.

**Action 2:** Enforce the closed door policy across the operational site. Provide details to NRW regarding how the closed door policy will be enforced including a management audit of staff compliance.

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.