

Compliance Assessment Report CAR_NRW0042522

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: Report/Data Review,

Reason: Routine.

On: 27/09/2023.

Parts of permit assessed: Improvement Conditions NRW IC35, IC43 and IC54..

NRW Lead Officer: Ian Oakes.

Report sent to: Chris Emery, Director, on 04/10/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2E - Operations - Improvement programme	Assessed (A)	

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

Total 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

Improvement Conditions NRW IC35, IC43 and IC54

1. NRW IC35, as amended by permit V009: *"The Operator shall carry out a review of their waste management systems and procedures against the Best Available Techniques Conclusions (BATc) for the production of Wood - based Panels 'Management of waste and residues'. The findings of this review shall be sent to Natural Resources Wales in writing together with a timetable to implement any necessary changes that are identified. Any relevant waste management procedures and associated documents shall be made available for inspection upon request."*

BAT 11 *In order to prevent or where that is not practicable, to reduce the quantity of waste being sent for disposal, BAT is to adopt and implement a waste management plan as part of the environment management system (see BAT 1) that, in order of priority, ensures that waste is prevented, prepared for reuse, recycled or otherwise recovered.*

Systems and procedures are in place (and reviewed annually) to ensure that the waste hierarchy is applied to all waste streams. Waste wood is segregated at source to ensure that the most appropriate outcome be it prevention, preparation for reuse, recycling or otherwise recovered (including as a fuel) can be achieved.

BAT 12 *In order to prevent the quantity of solid waste being sent for disposal, BAT is to use one or a combination of the techniques given below:*

- a). Reuse internally collected wood residues, such as trimmings and rejected panels, as a raw material.*
- b). Use internally collected wood residues, such as wood fines and dust collected in a dust abatement system and wood sludge from wastewater filtration, as fuel (in appropriately equipped on – site combustion plants) or as a raw material.*
- c). Use ring collection systems with one central filtration unit to optimise the collection of residues e. g. bag filter, cyclofilter, or high efficiency cyclones.*

All wood residues are, 'wherever possible', reused as a raw material or as a fuel (no material is purchased as fuel). There is extensive use of blow lines, silos, bag filters and cyclones to minimise emissions to air. An example of reuse as a fuel is sander dust in the particleboard direct heating dryers.

BAT 13 *In order to ensure the safe management and reuse of bottom ash and slag from biomass firing. BAT is to use all of the techniques given below:*

- a). Continuously review options for off-site and on-site reuse of bottom ash and slag.*
- b). An efficient combustion process which lowers the residual carbon content.*
- c). Safe handling and transport of bottom ash and slag in closed conveyors and containers, or by humidification.*
- d). Safe storage of bottom ash and slag in a designated impermeable area with leachate collection.*

Biomass boiler ash is wetted and stored in a designated area with a concrete floor and 3 sided walls prior to disposal off site. Kronospan is working to improve this area and will install a dedicated leachate collection sump by 30 September 2023.

Boiler ash is currently sent to a hazardous landfill site (reviewed annually) due to lead

content. Options for inclusion in cement, breeze block or road construction is currently not considered to be viable or reliable.

The submission has been reviewed and is considered complete and may be subject to audit, to include (but not limited to):

- Environment Management System as it relates to waste management,
- KC.EHS.PRO.015 - Waste management procedure and KC.EHS.W1.018 - Instruction for the storage and disposal of waste,
- Internal segregation and reuse of waste wood as a raw material or fuel,
- Bottom ash handling and storage, leachate collection and disposals.

2. NRW IC43: *"Please provide revised copies of the Dŵr Cymru Welsh Water Trade Effluent Consents for emission points S1, S2, S3 and S4 listed in Table S3.3 of this Permit. The revised consents are required for record-keeping purposes following the zoning and redesign of the installation's trade effluent drainage system."*

Submitted documents:

- S1 Consent to Discharge Middle Road (2010),
- S2 Consent to Discharge PAL (2010),
- S3 Consent to Discharge MDF Boilers (2012).

S1 is the only active discharge point at present.

S2 and S3 are being modified, consents to be updated prior to reconnection.

S4 has been installed but not connected to the sewer.

Updated copies to be forwarded to NRW when available.

The submission has been reviewed and is considered complete and may be subject to audit.

3. NRW IC54: *"The operator will develop a written commissioning plan for WESP 32 and submit it to NRW for approval. The plan shall include, but not restricted to:*

- A timetable for completion of the re-ducting of A5 and A6 and commissioning WESP 32;*
- Technical steps (including any contingency plans) involved with commissioning of WESP 32 for abatement of resin plant, paper impregnation plant and press abatement emissions;*
- Expected duration of commissioning activities; and*
- Any additional (beyond that required by the permit) monitoring to be undertaken.*

Commissioning shall be carried out in accordance with the commissioning plan as approved".

The commissioning plan timetable as outlined in submission IC54 Appendix 1, was approved by NRW reference Email 8 September 2023 and is on the public register.

An NRW officer visited Kronospan on Friday 29 September to review progress with NRW IC54 & Appendix 1, with comments as follows:

Exhaust gases from the paper impregnation and resin plants have been re-ducted to WESP 32 to combine with the press abatement emission. The WESP was fully operational with both HV electrostatic precipitators and wet scrubbing stages in operation. Emissions testing (quarterly extractives and odour bag samples) have been completed as detailed in the commissioning timetable, with emissions testing due November 2023. The results of this testing will feed into Improvement Condition IC55.

Modifications to the WESP liquor recirculation system have been completed with the objective of reducing raw water consumption for the wet scrubbing stage. These changes have not yet been commissioned. Water consumption will be reduced through improved solids separation and water recovery.

With regard emergency shutdown procedures on WESP 32, it was reported that system alarms and visualisations are complete and control room operatives have been briefed on the steps to be taken in such an event. A formal procedure is currently being finalised.

A plume was evident from WESP 32 during the inspection, no offsite odours were noted down wind of the site with the exception of a minor log yard / fresh wood odour on Holyhead Road.

Action: Provide NRW with a copy of the WESP 32 emergency shutdown procedure by 31/10/23.

The submission has been reviewed and is considered complete and may be subject to audit.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 18:00), or email 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

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.