

Compliance Assessment Report CAR_NRW0042554

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: 29/09/2023.

Parts of permit assessed: Schedule 5 Notifications Part ABs Q3 2023..

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
IR1A - Management - General management	C3 Minor	1.1.1
IR1A - Management - General management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
2	8

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
IR1A	Update procedures to reflect measures to prevent recurrence.	Already completed
IR1A	Refer details section.	31/10/2023

Compliance 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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Schedule 5 Notification Part ABs Q3 2023

1. 3 July 2023 Explosion panel activated on Filter Box B24 Chip preparation

Notification Part A was submitted on 3 July relating to an explosion panel activation on Filter Box B24 Chip preparation building TST 2 detected at 14:47. *This resulted in the release of approximately 50 kgs of recycled timber fines (0.2 mm) mostly in the first ten seconds, however, the fan had a ramp down of one minute in total. The explosion panel sensor activated on overpressure (and stopped the fan) with the cause likely to be related to wet material blinding the filter bag.*

Email from Kronospan dated 4 July attributes 5 dust incident reports to this event over the period 3 - 4 July.

A Notification Part B was submitted on the 10 July, to add: *Filter bags confirmed as being blinded by wet material. In the previous 48 hours a number of sparks had been detected which had activated the fire detection equipment and deluged the area with water.*

Measures taken to prevent recurrence

Procedure now states that filters bags have to be checked following a spark detection and subsequent water deluge.

Compliance

Failure to minimise the risk of pollution (release of dust due to filter bags being blinded by wet material) is considered to be a breach of condition 1.1.1 with respect to operations and maintenance (in particular) and attracts a non-compliance score of C3.

1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints: and (b) using sufficient competent persons and resources.

Action

Update procedures to reflect measures to prevent recurrence - completed.

2. 6 August 2023 Holed preproduction sifter dust blow line

A Notification Part A was submitted on 6 August relating to releases of dust from a holed sifter dust blow line detected at 14:20. *Upon detection the blow line was immediately stopped and a temporary repair completed to cover the leak on the underside of the blow line. The area is being washed down and cleaned.*

Emails from Kronospan dated 8 and 15 August attribute 19 dust and odour incident reports

to this event over the period 6 - 7 August.

A Notification Part B was submitted on the 23 August 2023, to add: *25mm diameter hole on the underside of the blow line which was located on a straight section of the blow line approximately 2m after an elbow and after an inspection hatch. The hole appears to have been caused due to abrasion from material within the blow line.*

This blow line was identified as high priority for preventative maintenance work, due to the abrasiveness of the material it transports and high location. The elbow section prior to the area the hole formed and the internals of the cyclone downstream from it had a ceramic lining applied to them in July 2022. It is theorised that the work to reinforce the elbow section caused an area of turbulent air within the blow line.

The area was last inspected prior to the release on 04/08/2023 by the Particleboard Technologist. The best estimate of quantity of wood dust released is 60 kgs.

The work Kronospan are part way through to reinforce the elbows and potential weak spots along blow lines is ongoing. Previously retrofitted blow lines will be inspected during upcoming plant shutdowns to verify if the same abrasion is occurring elsewhere.

Measures taken to prevent recurrence

Temporary repair was completed at 14.55

During next shutdown, on 05/09/23, the blow line pipe section will be replaced.

Compliance

Failure to minimise the risk of pollution (releases of dust from a holed blow line) is considered to be a breach of condition 1.1.1 with respect to operations and maintenance (in particular) and attracts a non-compliance score of C3.

1.1.1 The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints: and (b) using sufficient competent persons and resources.

Action

As this is a repeat incident of blow line failure the original action deadline (reference CAR_NRW0042318) to provide an update on blow line inspections and replacement by 31 October 2023 still stands and should include any lessons learned from these events.

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.