

Compliance Assessment Report CAR_NRW0043946

Licence being assessed: WA/067/0006/006.

For: Process Water -Kronospan Ltd., Chrik, held by Kronospan Ltd.

At: .

Type of assessment: Site Inspection, Reason: Routine.

On 21/03/2024, between 13:30 and 15:00.

Parts of licence assessed: 9.3 - monitoring equipment. 9.6 - submission of monitoring data.
9.7 location of borholes 9.9 borehole maintenance

NRW Lead Officer: Philip Barrett, accompanied by Victoria Griffin, Julian Whitehead.

Report sent to: Chelsey Barker, Contact for licence holder (Kronospan Ltd), on 17/04/2024.

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

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
WR-D1 - Water Abstraction - Environmental monitoring and Information - Recording	C4 No impact	9.3 - The Licence Holder shall install continuous groundwater level monitoring equipment on observation boreholes "A1", "B" and "D" (as shown on the map) for the period that the licence remains in force.
WR-D1 - Water Abstraction - Environmental monitoring and Information - Recording	C4 No impact	9.5 Manual groundwater level measurements shall be taken within the boreholes marked as "W2", "W3", "A1", "B", "C" and "D" on the map, on a weekly basis for the period that this licence remains in force. The measurements shall be taken using equipment of a high professional standard and from a consistent datum point on each of the boreholes. The dipping datum point shall be clearly marked at each

Part of licenced activity assessed (criteria)	Assessment result	Licence condition
		borehole and a description identifying each point submitted to the NRW in writing.
WR-B1 - Water Abstraction - Abstraction measurement and records - Means of measurement	Action only (X)	
WR-C4 - Water Abstraction - Surface/groundwater level and protected flow - Reporting	Action only (X)	
WR-C4 - Water Abstraction - Surface/groundwater level and protected flow - Reporting	Action only (X)	
WR-D1 - Water Abstraction - Environmental monitoring and Information - Recording	Action only (X)	

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

2. What action is required?

Criteria	Action needed	Complete by
WR-D1	Ensure the monitoring equipment on borehole "B" is seated correctly and secure to capture accurate data.	01/06/2024
WR-D1	Include borehole "W3" in the weekly manual dipping of all boreholes associated to the licence.	11/04/2024
WR-B1	Complete a method statement to show the points of measurement for each borehole. This should be provide to NRW and anyone involved in carrying out the weekly manual level monitoring.	01/06/2024
WR-C4	Submit the weekly level records from the 1st April 2024 to nrp.northmid@cyfoethnaturiolcymru.gov.uk by the 14th day of the month for the previous months records.	14/05/2024
WR-C4	Provide the weekly level data for the period 1st April 2023 - 31st March 2024 to nrp.northmid@cyfoethnaturiolcymru.gov.uk	01/06/2024
WR-D1	Remove the reference to borehole "C" during any variation or renewal of the licence.	31/03/2027

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 or civil sanctions being imposed depending on the circumstances of the offence.

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

A visit was carried out on the 21st March 2024 to the abstraction that takes place from groundwater at Kronospan under licence WA/067/0006/006.

It was explained that this abstraction isn't currently being used, which has been the case since 2019. There aren't currently any plans to use this abstraction, but the licence is being retained in case it is needed in the future following a review of water usage at the site.

The location of the boreholes relating to this licence are listed in condition 9.7 the licence as:

"W2" – SJ 28690 38613

"W3" – SJ 28991 38183

"A1" – SJ 28689 38679

"B" – SJ 28977 38369

"C" – SJ 28930 38371

"D" – SJ 29025 38093

The point of abstraction is borehole "W3", with the remaining boreholes being utilised within this licence as monitoring points.

Condition 9.1 of the licence states:

The Licence Holder shall install continuous groundwater level monitoring equipment on observation boreholes "A1", "B" and "D" (as shown on the map) for the period that the licence remains in force.

The monitoring equipment was found to be in place on the required boreholes, but the connection of the equipment in borehole "B" to the pipework appeared to be damaged. Please can you ensure the equipment is fixed in place securely to ensure the highest standard of data is captured. This should be carried out by the 1st June 2024

Condition 9.5 of the licence states:

Manual groundwater level measurements shall be taken within the boreholes marked as "W2", "W3", "A1", "B", "C" and "D" on the map, on a weekly basis for the period that this licence remains in force. The measurements shall be taken using equipment of a high professional standard and from a consistent datum point on each of the boreholes. The dipping datum point shall be clearly marked at each borehole and a description identifying each point submitted to the NRW in writing.

It was confirmed that the boreholes are manually dipped on a Thursday each week, with the exception of borehole "C" and "W3". The reason for this is that borehole "C" is no longer in place, and borehole "W3" hasn't been monitored since the abstraction was stopped.

It was agreed that the weekly monitoring of borehole "W3" will be added to the monitoring programme going forward. As borehole "C" is no longer in place, it should not be referred

to in the licence. This should be addressed in any variation or renewal that takes place. The latest this should take place is following the expiry of the licence on the 31st March 2027, should the licence be renewed.

The boreholes that are in place were dipped during the visit to measure groundwater levels. The datum points for each of these isn't currently clearly marked (as per condition 9.5). It was agreed that a method statement will be created containing a description of each borehole and pictures showing the point of measurement. This is to ensure accurate measuring takes place each week. This should be provided to NRW by 1st June 2024.

The readings taken at each borehole during the visit were as follows:

A1 - 8.69m from top of pipe
W2 - 7.63m from top of grating
B - 32.30m from top of pipe
W3 - 35.175m from top of pipe/tap
D - 33.17m from top of pipe

Condition 9.6 of the licence states:

The weekly groundwater level records specified in Condition 9.5 above, together with the time and date of measurement, shall be recorded by the Licence Holder in term of both metres Below Datum (mBD) and metres Above Ordnance Datum (mAOD) and shall be submitted to the NRW by the 14th day of the month following the month to which those records relate.

It was confirmed that the submission of the groundwater level records isn't currently taking place. There was some uncertainty as to where the readings should be sent to by the given date of each month. Licence WA/067/0005/015 is the other abstraction licence at the Kronospan site. This licence has the contact details for submitting level readings written into it. These are:

Natural Resources Planning Officer
North and Mid Natural Resources Planning
Natural Resources Wales
Chester Road
Buckley
Flintshire
CH7 3AJ
Tel: 0300 065 3000
Email: nrp.northmid@cyfoethnaturiolcymru.gov.uk

I would ask that the same contact details are used for submitting the required groundwater level records for this licence from the 1st April 2024 going forward. Please can you backdate this to include the level data for the period 1st April 2023 to 31st March 2024. This should be carried out by 14/05/24.

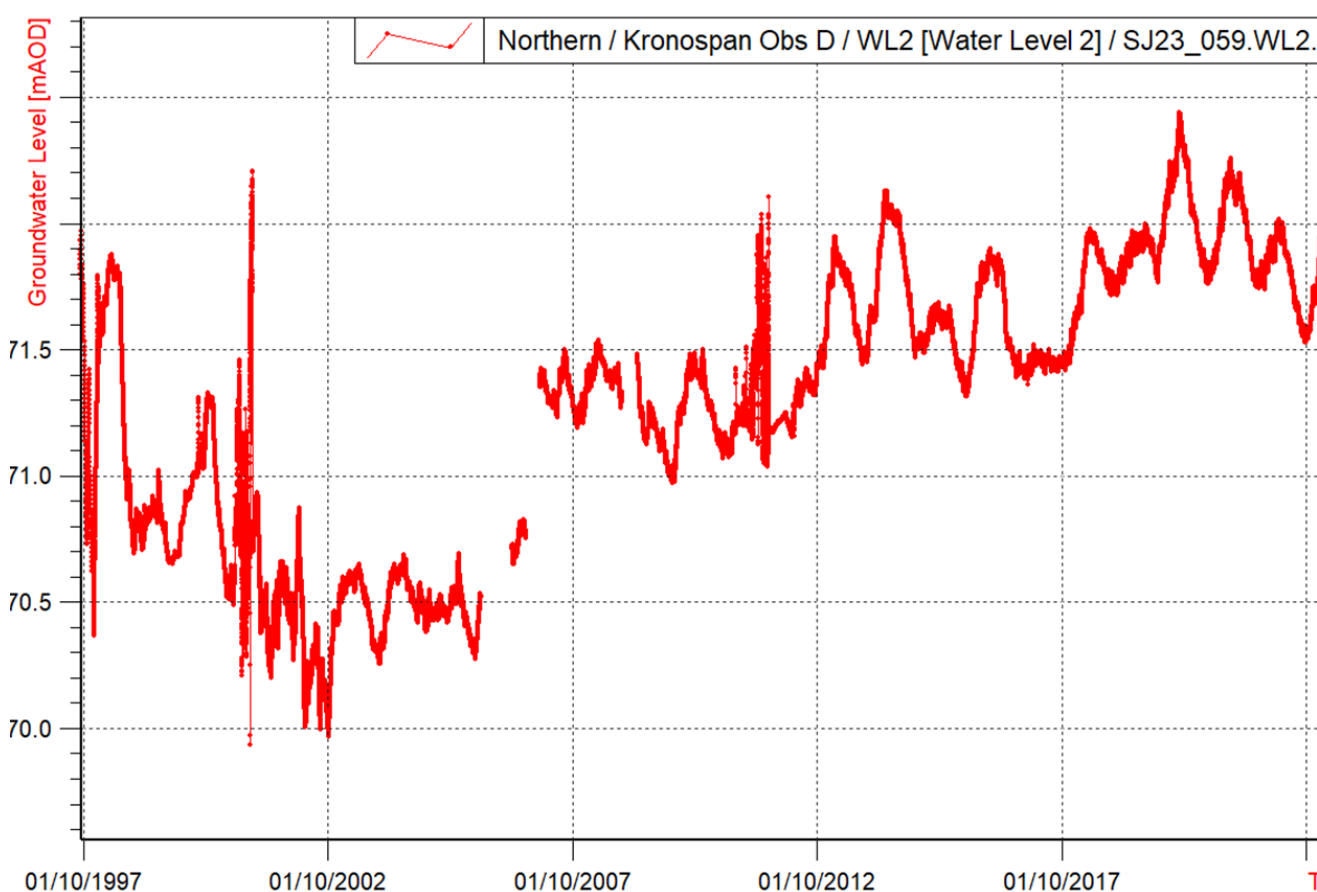
Condition 9.2 of the licence states:

No abstraction shall take place if the groundwater level, as measured from the designated

reference point on observation borehole "D" falls below 68.5m AOD (dip of 36.875 metres). In addition, no abstraction shall take place which causes the groundwater level, as measured from the designated reference point on observation borehole "D" to fall below 68.5m AOD (dip of 36.875 metres). This condition will also apply to any agreed replacement borehole.

The level data is entered onto a spreadsheet that will flag up when levels are below a set point. As a precautionary approach, the level at which the spreadsheet will flag an issue is set above those shown in the condition above.

Natural Resources Wales monitor the groundwater levels at borehole "D" through the use of a data logger, which is downloaded every 4 months. This records groundwater levels in the borehole every hour. A review of the data can be found on the graph below, which indicates the lowest groundwater level to be 69.9 mAOD during the period 1997 - present.



In line with the conditions of the licence, the boreholes were found to be safely accessible and secure with a lockable cover.

Following the visit, a review of the annual returns data was carried out and found the annual quantities abstracted to be as follows:

2015 to 2016 - 50,979 cubic metres
 2016 to 2017 - 59,728 cubic metres
 2017 to 2018 - 29,606 cubic metres
 2018 to 2019 - 865 cubic metres

2019 to 2020 - 0 cubic metres (nil return)
2020 to 2021 - 7 cubic metres
2021 to 2022 - 0 cubic metres (nil return)
2022 to 2023 - 0 cubic metres (nil return)

The return quantities for this period are within the maximum licence annual quantity limit of 236,520 cubic metres per year.

The last meter reading submitted was 295065 m3. A picture of the meter was taken during the visit, but the reading isn't clearly visible due to the reflection on the plastic cover. This will be assessed on the next compliance inspection.

If you would like to discuss any of the above further, please do not hesitate to contact me on the details below.

Phil Barrett
0300 065 3670
Philip.barrett@cyfoethnaturiolcymru.gov.uk

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 licence is issued to you under the Water Resources Act 1991 as amended by the Water Act 2003. You have a responsibility to comply with the conditions of your licence and prevent pollution/harm to 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.

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
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property

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

In line with our guidance, we may suspend non-compliance for up to six months to allow time for remedial action to be taken. These will be re-instated if the action is not completed.

Full list of Water resource action criteria (used in section 1 and 2):**WR A: Abstraction specified by Licence**

- WR-A1 Source of supply
- WR-A2 Points of abstraction
- WR-A3 Means of abstraction
- WR-A4 Purposes of abstraction
- WR-A5 Period of abstraction
- WR-A6 Quantities
- WR-A7 Land
- WR-A8 Other specified on licence

WR B: Abstraction measurement and records

- WR-B1 Means of measurement
- WR-B2 Recording
- WR-B3 Reporting

WR C: Surface / Groundwater level and protected flow

- WR-C1 Minimum hands-off flow/level requirements
- WR-C2 Flow/level measurement devices
- WR-C3 Recording
- WR-C4 Reporting

WR D: Environmental monitoring and information

- WR-D1 Recording
- WR-D2 Reporting
- WR-D3 Notifications

WR E: Fish and eel passage

- WR-E1 Infrastructure specified by licence
- WR-E2 Maintenance and records

WR F: Discharge

- WR-F1 Point of discharge
- WR-F2 Infrastructure
- WR-F3 Measurement
- WR-F4 Recording
- WR-F5 Reporting

WR G: Impoundment specified by licence

- WR-G1 Inland water to be impounded
- WR-G2 Manner and extent of impoundment
- WR-G3 Point(s) of impoundment
- WR-G4 Construction and removal requirements
- WR-G5 Other specified on licence

WR H: Borehole infrastructure

- WR-H1 Infrastructure and accessibility
- WR-H2 Maintenance and calibration

Enforcement response

Any licence condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution or civil sanctions. 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 (Mon to Fri 08:00 – 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.