

Compliance Assessment Report CAR_NRW0044148

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: Site Inspection,

Reason: Routine.

On: 26/04/2024 between 10:00 and 13:30.

Parts of permit assessed: Various.

NRW Lead Officer: Ian Oakes, accompanied by Stuart Ross.

Report sent to: Chris Emery, Director, on 17/05/2024.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| IR2A - Installations - Operations - Permitted activities | Assessed (A) | |
| IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits | Action only (X) | |
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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?

| Criteria | Action needed | Complete by |
|----------|---|-------------|
| IR3B | Provide NRW with the findings of the start up shutdown emissions monitoring on MDF1 / 2 Cyclones and WESP 21 | 27/09/2024 |
| IR3B | Provide NRW with the findings of your visual assessment of abatement system function (particulate abatement and | 28/06/2024 |

| Criteria | Action needed | Complete by |
|----------|---|-------------|
| | control) during start-up and shut down. | |

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.

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

This Compliance Assessment Report follows a planned site inspection 26/04/24 made in response to numerous reports from members of the public regarding wood dust deposits on their property. Reports of odour have also been received but the primary purpose of this inspection was to assess dust emissions.

All incident reports received by Natural Resources Wales' incident hotline were forwarded to Kronospan for investigation with investigation findings subsequently returned to NRW. The cause of the dust remains unknown.

Whilst the individual incident investigation findings have been submitted to NRW, it was agreed that Kronospan shall provide NRW with detail of the scope of investigations completed to date and an action plan of the steps to be taken to identify the source(s).

Kronospan responded 10/05/24 and a summary of the investigations to date are copied below.

- 'Dust filtration units (×31): all filtrations units have had exhaust air vents visually inspected for signs of dust release, filter socks visually inspected for signs of damage / aging, differential pressures reviewed with Operators and Managers, explosion panels confirmed to be secured, and the entire structure inspected for pinhole leaks / damage.

- Blowlines (×32 systems totalling 5,929m): each blowline has been inspected for signs of pinhole leaks or excessive wear ensuring that material is contained within them. Particular attention has been paid to those running along rooflines but all blowlines across the site have been checked.

- Conveyors (over 75 systems): the various conveying systems across site have been inspected for signs of leaks and we have confirmed that covers and inspection hatches are secured with explosions panels (where applicable) remaining in place.

- MDF 1 & 2 cyclones: the particulate abatement systems for the MDF dryers have been inspected on numerous occasions, all explosion panel hatches are secured and there are no signs of diminished particulate abatement from the stacks. The recycle cyclones have also been internally inspected and cleaned during a recent plant shutdown.

- *WESP 21 & 32: the wet electrostatic precipitators have been inspected, internally and externally, to ensure continued function.*
 - *Logyard: the movement of material on the Logyard may generate dust that is susceptible to atmospheric dispersion under high / gusty winds. During planned and unplanned production shutdowns raw material deliveries were ceased to ensure stockpiles were kept as low as possible.*
 - *Vehicles leaving site: vehicles leaving the site from the Logyard are required to sweep off in the designated area with their vehicle being inspected by the Weighbridge as they leave site. Vehicles are made to return to the sweep off area if they are not sufficiently clean. Weighbridge personnel have reported no issues with vehicle cleanliness over the past few weeks.*
 - *Site roadways: the road sweeper and site water bowser have been in operation to dampen down roadways and prevent dust / debris from becoming airborne.*
 - *Dust suppressions systems: there are numerous locations where water suppression systems are utilised to prevent dust being released to the atmosphere, in line with the site's dust management plan. These systems have been fully operational throughout the period in which the incident reports have been received.*
 - *Drone: to assist inspection of less accessible parts of the site, Kronospan have utilised a drone to take photographs of roofs and high-level equipment on numerous days. No leaks or evidence of material build-up was apparent'.*
- Kronospan report that 'As the investigation work into the dust reports throughout April was unsuccessful in determining any source points from the site, the origin may have been from outside the plant (at this time of year, there is plenty of natural organic material in the atmosphere) or could possibly have been fugitive. To address this possibility, a number of additional measures are being implemented and further explored.*
- *Most recently, the Logyard layout was redesigned so as to provide better shielding for stockpiles and additional water suppression cannons were added to the recycled timber stockpile. In addition, due to a number of incidents involving blowline leaks over the years, a significant investment has been made to reinforce the wear-prone sections e.g. elbows / bends of blowlines across site with ceramic lining.*

Following your [NRW] visit to site on 26th April, we have committed to the following actions to address the abovementioned issues:

- *We will commit resource over the next month to gain a better understanding of how well our abatement systems function visually during start-up and shut down. This will be undertaken on all dust filtration units, cyclones and blowlines across site via controlled stoppages.*
- *We will commit to an incident response within one working day.*

However, the most effective actions will take slightly longer to achieve:

- *We will conduct emissions monitoring during start-up and shutdown of our main*

abatement plants (MDF 1 / 2 Cyclones & WESP 21) during Q2 2024.

- We continue to work on NRW permit improvement conditions relating to the Logyard

Action 1 - Provide NRW with the findings of your visual assessment of abatement system function (particulate abatement and control) during start-up and shut down. Please do so by 28/06/24.

Action 2 - Provide NRW with the findings of the start up shutdown emissions monitoring on MDF1 /2 Cyclones and WESP 21 by 27/09/24.

N.B Permit notification requirements apply, in the event that the above observations meet the notification criteria as described by the permit then NRW shall be notified accordingly.

Onsite Inspection (NRW)

During the inspection the chipboard manufacturing process was not operational, this has been the case since 24/04/24 due to a fault with the press. MDF1 and MDF2 cyclones were operational on arrival but also went offline during the visit. The MDF2 cyclones went off line whilst NRW Officers were at the top platform of MDF2, MDF reject silos came on line.

The site was viewed at height from the MDF2 cyclone platform that affords a clear view of a significant area of the site buildings, roofs, bag filters, emissions points and other plant and equipment. No dust emissions were observed from any location, nor were there any 'tell tale' signs that a dust release had occurred, for example, through the presence of accumulated dust on flat surfaces. No visible dust releases were observed from the MDF1, MDF2 and MDF reject cyclones.

At ground level, housekeeping was generally to a good standard with minimal loose dust particles on site roads.

Part of the log yard was inspected close to 'chipboard prep' process and recycled timber stockpiles were observed. Whilst the sprinkler systems were operational in this area, some areas of the stockpile surface were dry.

It is noted from the response of 10/04/24 that additional water suppression cannons have been added to the these stockpiles

During the walk through the log yard no dust emissions were observed, including from loading shovels transporting material across the yard.

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.