

Compliance Assessment Report CAR_NRW0044685

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: 21/06/2024 between 13:10 and 16:00.

Parts of permit assessed: Dust and odour update, permit variation and site inspection.

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

Report sent to: Chris Emery, Director, on 15/07/2024.

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	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

This Compliance Assessment Report follows a site meeting at Kronospan 21/06/24 to discuss the operator's progress against various items and to inspect the external site for dust emissions.

Prior to the site visit, odour was assessed off site and at various locations around the site. A mild processed wood type odour was noted on Holyhead Road.

Dust Action Plan (Actions from CAR NRW0044148)

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.

Kronospan reported that visual assessments had been undertaken and that the assessments did not identify any particular issues. The findings are to be reported to NRW.

Action 1 - At the time of writing the report required by the original Action 1 in CAR_NRW0044148 has not been received and shall be submitted to NRW by 31/07/24.

Kronospan report that extractive particulate emissions monitoring on start-up and shutdown for MDF1, MDF2 and wet electrostatic precipitator WESP21 will commence w/c 24/06/24. These will be in addition to the routine quarterly emissions monitoring round.

Odour Abatement Feasibility Study (Venturi Scrubbers and WESPs)

The WESP 21 hydrogen peroxide (H2O2) dosing trial is due to commence 05/07/24 with incremental periodic extractive testing of VOC and odour emissions.

Action 2 - NRW requests that Kronospan supply an odour action plan letter detailing the scope and methodology of the odour abatement trial along with anticipated timescales for the reporting of findings to NRW. Please do so by 31/07/24.

Formaldehyde Monitoring and ELV Compliance (CAR NRW 0044339)

Action 2 - Action from CAR_NRW0043325 to undertake further CEN/TS 17638:2021 formaldehyde monitoring (scope to be agreed) of MDF1 and MDF2 to better quantify the emissions and submit the findings to NRW with options and timescales to comply with the ELV, is extended to 27 September 2024.

The operator reported that three additional rounds of extractive testing (in triplicate) are to be undertaken on MDF1 and MDF2 w/c 24/06/24. A report will be provided to NRW in due course and in accordance with the action detailed above.

Improvement Conditions 44 - 47 Fire Prevention and Mitigation Plan related

Responses to the above improvement conditions were extended to 31/05/24 but have not been received by NRW. It was agreed that a meeting between NRW and Kronospan will be arranged to discuss this in more detail.

NB: A meeting was held on 4 July and an extension granted for the submission to 31/07/24

Permit Review - Waste Incineration Bref

Following the waste incineration permit review, NRW has produced a draft consolidated varied permit that will be made available for operator review late July 2024.

The consolidated varied permit EPR/BW9999IG/V011 will include tighter emission limit values and additional improvement conditions for Biomass Boilers K7 & K8.

Biomass Boiler K7 has been shutdown since 28/05/24 for annual maintenance and additional works to improve emissions, including the installation of new oxygen monitoring and control and burner to reduce oxides of nitrogen.

Additional improvement to the boiler PLC are planned for September 2024.

Temporary continuous monitoring of carbon monoxide and oxides of nitrogen emissions will be implemented to optimise the boiler emissions.

On Site Inspection

An on site inspection of external areas was completed, no dust emissions were observed from any processes.

A walk around the log yard and associated pre-production processing areas did not identify any dust emissions from stockpiles or the handling of materials. The new sprinkler systems were operational.

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.