

Compliance Assessment Report CAR_NRW0045602

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: 27/09/2024 between 10:00 and 14:30.

Parts of permit assessed: Refer details section.

NRW Lead Officer: Stuart Ross, accompanied by Paul Challender.

Report sent to: Chris Emery, Director, on 11/11/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2E - Installations - Operations - Improvement programme	Action only (X)	

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
IR2E	Refer details section	29/11/2024

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 site meeting held between Kronospan and NRW on 27/09/24 to discuss actions arising from previously issued Compliance Assessment Reports, predominantly relating to Improvement Condition (IC) Items.

Compliance Assessment Report reference CAR_NRW0044339

'Action 2: Action from CAR_NRW0043325 to undertake further CEN/TS 17638:2021 formaldehyde monitoring (scope to be agreed) of MDF1 & 2 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'

A response was not received by the required deadline, further to the operator's request for an extension it is agreed that this action is now extended to 29/11/24.

'Action 3: Kronospan to confirm to NRW that IC49 Action Timeline has been completed by 27 September 2024'

A response was not received by the required deadline. The operator has reportedly made substantial progress in meeting the requirements of IC49 but states that the remaining outstanding work has been delayed due to prioritisation on more pressing improvement condition items.

It is agreed that the action deadline is extended to 13/12/24.

Compliance Assessment Report reference CAR_NRW0043736

With regard to IC53

'Action: Provide a written summary of progress with MCERTS proposals by 30 Sept 2024'

A response was not received by the required deadline, however during the meeting the operator provided a verbal update and reported that the procurement of monitoring instrumentation has proven more challenging than expected leading to a significant delay in meeting the original proposal.

Further to subsequent discussion it is agreed that the action deadline is extended to 29/11/24.

Compliance Assessment Report Reference 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'.

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'.

The above actions were discussed during the inspection and a written submission submitted to NRW by email later that day, details of which are summarised below.

Kronospan committed to conducting visual assessments of dust abatement plant during start up and shut down operations, as well as emissions monitoring during these periods, to ascertain if the abatement plant remain effective outside of normal operation.

A summary of this work as reported by Kronospan is provided below.

Visual Assessments were carried out throughout the June / July / August period, the site routinely carried out visual assessments of dust abatement plant during planned and unplanned stoppages and the subsequent return to service.

Initially, the visual assessments were carried out in June methodically at each emission point in turn through controlled stoppages of the plant for a period sufficient to allow all associated equipment to come to a complete halt. Each process was then returned to service under normal operating conditions. Personnel were positioned at the exhaust of the assessed emission point for a 15 minute period prior to the controlled stoppage, to ensure that they had a baseline for comparison, and remained throughout the assessment period until the process had fully returned to a state of normal operation.

The process was then repeated at each dust filtration emission point (B01-B31) in less controlled conditions by the activation of local emergency stops, in an attempt to simulate breakdown or emergency situations that may arise.

The visual assessments conducted across the site did not identify any abatement plant that was ineffective during start up or shut down conditions.

Emissions Monitoring Additional emissions testing was carried out at the following emission points: A29 MDF 2 dryer cyclones, A30 MDF 1 dryer cyclones, A32 WESP 21. Each of the above abatement plant take approximately 30 minutes to complete start up and shut down operations and as such monitoring took place in triplicate over a 90 minute period.

The table below summarises the results of this monitoring with the first 30 minutes of the testing period undertaken during shut down conditions, the second 30 minutes was under start up conditions, and the final 30 minute period commenced once each process confirmed normal operating conditions were established.

Emission Point	Shut Down		Start Up		Normal Operation	
	Date /Time	Result (mg/m ³)	Date /Time	Result (mg/m ³)	Date /Time	Result (mg/m ³)
MDF 1	04/06/2024	0.37 ±	04/06/2024	3.92 ±	04/06/2024	4.20 ±
	14:17-14:47	0.61	14:59-15:29	0.80	15:40-16:10	0.86
MDF 2	04/06/2024	0.90 ±	04/06/2024	3.61 ±	04/06/2024	3.86 ±
	09:10-09:40	0.68	09:55-10:25	0.72	10:48-11:18	0.77
WESP 21	05/06/2024	0.62 ±	05/06/2024	0.86 ±	05/06/2024	0.87 ±
	09:35-10:05	0.18	10:22-10:52	0.25	10:55-11:25	0.26

Kronospan conclude that the results displayed above show that the abatement plant remain effective at controlling particulate emissions to atmosphere during start up and shut down operations

IC40 - Noise Management Plan

NRW has commented upon the resubmitted IC40 submission in Compliance Assessment Report Reference CAR_NRW0042962 and the below action was applied:

Resubmit the NMP ensuring its measures are informed by a suitable NIA and BAT assessment. In addition, address the bullet-pointed comments listed in Part 4 of this CAR form in relation to the current version (01 November 2023 Noise Management Plan S2376-0270-0017RSF) of the NMP.

Kronospan had requested a meeting be arranged between Kronospan, their acoustic consultant and NRW regulating officer with the NRW Air Quality & Noise Team (AQNT). This meeting has now been scheduled for 20/11/24.

WESP 21 - Odour Dosing Trials

Kronospan reported that the odour dosing trials continue and at the time the visit continuous dosing at 500L per day with further emissions testing (VOC, OU) scheduled the following week.

It was subsequently agreed the Kronospan will provide NRW with an update on the findings of the WESP21 dosing trials to date (summary of trials & data) and proposals moving forward by 29/11/24.

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.