

Compliance Assessment Report CAR_NRW0045800

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: Audit,

Reason: Routine.

On: 16/10/2024 - 18/10/2024 between 09:00 and 17:00.

Parts of permit assessed: Dust management Plan.

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

Report sent to: EHS Manager, EHS Manager, on 10/12/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	C3 Minor	Permit Condition 1.1.1
IR1A - Installations - Management - General Management	C3 Minor	Permit Condition 1.1.1(a)
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	Permit Condition 3.6.1(b)
IR1A - Installations - Management - General Management	C3 Minor	Permit Condition 1.1.1(a)
IR1A - Installations - Management - General Management	C3 Minor	Permit Condition 1.1.1

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

Total non-compliances recorded	Total non-compliance score
5	20

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	Action 1 in Section 4	28/02/2025

Criteria	Action needed	Complete by
IR1A	Actions 2, 3 & 4 in Section 4.	28/02/2025
IR3E	Actions 2, 3 & 4 in Section 4	28/02/2025
IR1A	Action 5 in Section 5	28/02/2025
IR1A	Action 6 in Section 4	31/01/2025

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 two day audit on the 16th and 18th October, the objective of which was to assess the operator's control measures for the control of dust emissions from the installation, focussing on the implementation of the Dust Management Plan.

Given the scale and complexity of the operations at the installation the audit was relatively broad in scope, a number of topics/issues were identified that will be followed up via further in depth inspection.

Environmental Management System

The operator holds an ISO14001 accredited Environmental Management System (EMS) and is working towards an Integrated Management System (IMS).

The operator was able to present the most up to date Dust Management Plan (DMP) (Nov 2023) for the site as established through the associated Improvement Condition item.

The levels of awareness of the DMP amongst operational staff was mixed with training having been reportedly delivered via toolbox talks. Whilst it is appreciated that not all employees require in depth knowledge of the DMP itself across all of the site's operations, it is considered that awareness and understanding must be improved.

High level EMS procedures (such as the DMP) are developed and maintained by the Environment, Health and Safety (EHS) team.

All documents are held on a shared drive known as the Site Document Library.

Each department has its own environmental aspects register. The creation and maintenance of procedures relevant to the control of dust emissions is devolved to the five operational departments, with limited oversight from the EHS team. Such documents are held electronically on local folders, and it was apparent that members of the management team had difficulty locating this information.

Weekly Environmental Audits are carried out by each department, including checks on dust control measures. Within each department it was observed that staff have a good understanding and knowledge of environmentally critical plant and equipment.

'Operation Protection Scheme' (OPS) Check sheets are daily routine checks on the process and include dust control measures. The reports are collated and reviewed by the department supervisor/manager. At the end of the week check sheets are sent to engineering administration, with actions registered within a corrective maintenance management system.

It was reported that if any significant dust releases or spillages were observed then the process causing the issue would be stopped, the supervisor notified and, remedial measures albeit temporary measures in some cases taken before the process is brought back on-line. An Environmental Incident Notification would be raised.

This is proceduralised for Environmental Incidents and Near Miss Events.

Planned maintenance is currently managed via 'Ksoft' and an older spreadsheet based system. In time, the operator intends to migrate all maintenance onto Ksoft. Both systems, either automatically or through admin support, generate maintenance tasks for site personnel to complete.

Check sheets are completed, and any corrective maintenance actions are logged in Corrective Maintenance Management System (CMMS).

A morning meeting is held daily. This is attended by the chief engineer, production manager and process engineers. The fixed agenda items include health and safety, environment, quality, and production.

Maintenance check sheets for dust control measures (e.g. filter boxes and blow lines) were not inspected during the audit, this will be followed up through subsequent inspection visits.

Operations

On day two of the audit operational areas were visited including the particle board and MDF control rooms.

Based on discussions with various personnel, it is understood that the MDF 1, 2 and Particle Board production lines and associated processes are heavily interlocked, and operate within defined set points, with limited scope for adjustment by process operatives. Significant modification to the operation of the process lines is reportedly restricted to specific personnel.

The operator is in the process of implementing the full requirements of its commitments made in response to IC49 for the monitoring of filter boxes B01 to B31. During the audit, a number of random filter boxes were discussed with control room operatives and in each case they were able to evidence that differential pressure (DP) readings were displayed on process control screens. As per IC49, work is ongoing to define all set points and ensure alarms are

in place.

CCTV footage of the respective process lines is relayed to the control rooms. At the MDF control room the explosion relief panels can be observed, and the operator uses this footage to verify panel activation process alarms.

Housekeeping across the site was generally to a good standard, no visible ongoing dust releases were observed from any processes during the audit. Whilst weekly environmental audits are carried out that will identify dust spillages, no procedures currently exist setting out the expected level of housekeeping standards.

During inspection of the log yard, weather conditions were dry, following a period of heavy rain. Water sprinklers and misters were in use during the inspection; no dust emissions were witnessed from the log yard.

Staff Training

All new employees must complete a weeklong site induction process where they visit each department to build their operational awareness. They receive induction training, including an induction video covering Environment and Safety issues. The EHS department delivers a presentation that includes the requirements for reporting environmental incidents, although it was noted that the presentation would benefit from the inclusion of specific examples.

Contractors must watch a video and complete an exam which grants site access for 3 years provided there are no attendance gaps greater than 12 months; in which case they must be re-inducted.

DMP training is delivered to new starters upon environmental induction, however. Departmental managers are responsible for continuous training of their staff, with delivery via toolbox talks etc. During the audit, operatives were questioned as to their approaches, and they appeared to be knowledgeable about their roles and responsibilities in relation to dust control. There are however, concerning issues with regard to control and delivery of refresher training.

The operator struggled to provide evidence and examples of training and when documents were located, they were substandard. The EHS Manager was surprised at the quality and content. Again, this is an example of poor central control from site management in ensuring that training and supporting documents (work instructions, departmental procedures) that are the responsibility of the departments are indeed in line with the overarching DMP and EMS. More oversight and review from the EHS Department is required to control the devolved practices of the departments.

Score: IR1A - General management. Permit Condition 1.1.1. Score C3

Action 1: Implement a system of proceduralised control whereby departmental environmental management documents and practices are subject to oversight from the central EHS Department including official, named sign-off. Submit to NRW by 28/02/25

A selection of dust abatement plant was inspected. Comments and observations regarding

issues identified are discussed below.

Melamine Filter Boxes

Upon viewing the Melamine Filter Boxes at 1430 hrs there was clear evidence of a significant dust deposit on the roof below and to the west the filter boxes. At the time of the inspection the operator was unaware of this issue or the cause.

The Melamine Filter Boxes contain an array of filter bags, and the filter boxes are subject to DP monitoring. The presence of DP monitoring should enable the operator to monitor bag blinding, and/or bag failure. This dust emission however, had gone undetected by the operator until the area was physically observed.

The operator stated that they would instigate an investigation into this failure.

Post-audit, the regulating officers were provided with the daily check sheets and an inspection report for the Melamine Filter Box. This inspection report had taken place at 1530 hrs on 17/10/24 and contained a significant number of photographs taken of the roof evidencing that the roof was free of dust at that time. The operator found that the emitted material was concordant with the material collected by the filter boxes. Their inspection identified that three filter bags had failed which, were blanked off upon discovery. The DP readings, however, did not indicate an issue. The operator's dust filter contractor had been instructed to attend site to perform corrective maintenance and install reinforced socks to cope with the specific material believed to have caused the failure of the three filter bags.

NRW has concerns that DP monitoring and DP action limits for this filter box are ineffective at present, as it has proven itself ineffective as a burst bag detection methodology in this instance. In addition, preventative maintenance may not be suitable in its present implementation, this includes the use of filter socks that are not fit for purpose.

This release has attracted a non-compliance score for the uncontrolled release of dust from the filters and the root cause has been determined as the ineffective monitoring for pressure drops by the implemented DP system and maintenance deficiencies.

Score: IR1A - General management. Permit Condition 1.1.1(a). Score C3

Score: IR3E - Monitoring. Permit Condition 3.6.1(b), Schedule 3, Table S3.8. Score C3

Action 2: Revise and review the DP arrangement at the Melamine Filter Boxes to ensure they are environmentally protective. Provide the outcomes in writing to NRW. Provide the preventative maintenance procedures that apply to this filter box to NRW by 28/02/25.

Action 3: Review the filter sock specifications for site-wide filter boxes to ensure reliable operation. Provide a summary of your review findings and any associated improvement actions to NRW by 28/02/25.

Kronoplus Filter Boxes

At Kronoplus it was established that in August 2024 there had been a leak from two small holes on the blow line serving the filter box dust silo. Upon identification the filter boxes were shut down and a repair was carried out. Whilst the initial incident appears to have been suitably managed, it was apparent that the EHS department was unaware of this incident

which may have potential for an offsite impact.

The dust release from the blow line was identified at 0804 hrs on 22/08/24. Information provided during the audit shows that the incident was reported to the EHS department as near miss, discussions on the day established that the EHS manager was unaware of this report.

NRW contends that this is an incident, not a near miss and as the EHS department was unaware of the incident this will lead to ineffective environmental complaint investigation, this may also hinder effective remedial measures to prevent a recurrence.

The EHS manager agreed that this should have been reported to the EHS department as an incident rather than a near miss. This example indicates that there are issues with the communication from departmental management to the EHS departmental and how oversight and control is exerted by the EHS department to ensure compliance with the environmental permit.

NRW will follow up in subsequent inspections.

Score: IR1A - General management. Permit Condition 1.1.1(a). Score C3

Action 4: Review internal incident reporting procedures and how they interface with complaint investigations. Provide details of this completed review to NRW by 28/02/25.

Kronoplus Filter Box Dust (Waste)

During the inspection the Kronoplus filter boxes were reviewed, and the Department Manager was available to discuss the process flow. Dust collected by the Kronoplus filter box is derived from treated wood.

Discussions took place as to the end destination of this waste stream. It was identified that the material was destined to be utilised as animal bedding as an end use. Treated wood *cannot* be utilised to produce animal bedding.

This issue was raised with Kronospan site management. Kronospan was advised to cease sending this material to an animal bedding end use with immediate effect. Kronospan acknowledge this concern and immediately moved to cease this waste transfer. Confirmation of this cessation has since been communicated to the NRW regulating officers.

This finding raises concerns regarding compliance with the [Duty of Care Code of Practice as issued under Section 34 of the Environmental Protection Act 1990](#) and the application of the [Technical Guidance WM3](#) and the control of waste flow in the EMS. This finding will form the basis of waste audits at the Kronospan site in the coming calendar year and has generated the compliance score and action below.

Advice and Guidance: Although not a permit requirement, competency schemes exist for waste management activities. The operator may wish to explore training members of staff to an appropriate competence level. Please review [Regulatory guidance note 5: operator competence](#) and note the “*Approved industry schemes*” for further details.

Score: IR1A - General management. Permit Condition 1.1.1. Score C3

Action 5: Provide to NRW the latest copy of Waste Management (Procedure KC/EHS/PRO/015) and any supporting documents in relation to Duty of Care and WM3 requirements for review by 31/01/25.

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.