

Compliance Assessment Report CAR_NRW0046148

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: Report/Data Review,

Reason: Routine.

On: 31/12/2024.

Parts of permit assessed: Emissions Monitoring, Notifications, Annual Reports.

NRW Lead Officer: Stuart Ross.

Report sent to: Chris Emery, Director, on 20/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
1	4

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
IR3A(2)	Subject to outcome of WI BATC Permit Review	Already

Criteria	Action needed	Complete by
		completed
IR3E	Action 1 - Complete emissions testing for Hg, metals, dioxins and ammonia at emission point A29 in Quarter 1 2025, To include one round of quarterly monitoring on all 4 cyclones. A further round of annual monitoring shall be completed later in the year to represent 2025.	31/03/2025
IR3E	Action 2 - Kronospan must investigate the root cause of the MDF 1 monitoring platform failure and implement measures as necessary to prevent a recurrence of this issue, including at other similar monitoring platforms. Please report your findings and actions to NRW by 31/03/25.	31/03/2025
IR3E	Action 3 - Monitoring shall be completed as soon as safe access can be gained to the MDF1 monitoring ports.	31/03/2025

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 (CAR) has been raised by the Natural Resources Wales (NRW) regulating officer to report on Kronospan's routine emissions monitoring returns for the period 01/10/24 - 31/12/24 (Quarter 4) and annual reports.

Emissions monitoring and reporting has been assessed against the monitoring requirements set out in in Schedule 3 and 4 of the permit and associated permit conditions.

Quarter 4 Emissions Monitoring

1.1 Emissions to Air

Emission Points A1, A5, A6, A16, A17 & A18

Annual emissions testing has been completed at all emissions points during 2024 and identified that emissions were compliant with their respective Emission Limit Values (ELVs).

Emission points A5 and A6 are not in use.

Monthly TVOC monitoring was completed at emission point A1 and identified emissions were in compliance.

As per Compliance Assessment Report ref. CAR_NRW0044870, the permit states that the monthly monitoring frequency of TVOC at emission point A1 may be reduced to once a year if the emissions are proven to be sufficiently stable.

It continues to be recommended that Kronospan review TVOC data at emission point A1 and advises NRW of its proposed monitoring frequency going forward.

Emission Point A19 (Gas Turbine 1)

Quarterly, emissions testing 01/11/24 identified that emissions were in compliant.

Emission Point A20 (Gas Turbine 2)

Quarterly emissions testing is required at this emission point when it is brought into use for periods which aggregate to >28 days. The monitoring return states that there was no testing this quarter.

Emission Points A21 - A25 (Gas Engines)

Testing is required quarterly, emissions testing 22/11/24 identified that emissions were compliant. Emission points A24 and A25 are not active as engines have not been installed.

Emission Point A26 (K7 Biomass Boiler)

Quarterly emissions testing 28/10/24 identified that NOx emissions exceeded the ELV.

NOx, 703.3 mg/m³ (ELV 250 mg/m³)

This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3.

The operator submitted a Schedule 5 notification.

K7 is currently subject to a BAT review and on completion new ELVs and Improvement Conditions relating to emissions control will be set.

Emission Point A27 (K8 Biomass Boiler)

Quarterly extractive and continuous emissions monitoring identified that emissions were compliant throughout the period.

Emission Point A28 (WESP 32)

Quarterly, emissions testing 20/10/24 identified that emissions were compliant.

Emission Point A29 (MDF 2 Cyclones)

Quarterly, emissions testing at cyclone 3 on 05/11/24 identified that emissions were compliant.

The permit includes a requirement for the annual monitoring of Hg, metals, dioxins and

ammonia, plus that that one round of quarterly monitoring per year includes all 4 cyclones. No such monitoring data had been presented for 2024.

Upon querying this with the operator it was reported that *'Annual testing for A29 was incomplete in Q4 due to production outages at the time of testing – this will be completed in Q1 and Q4 2025'*

Action 1 - Complete emissions testing for Hg, metals, dioxins and ammonia at emission point A29 in Quarter 1 2025. To include one round of quarterly monitoring on all 4 cyclones. A further round of annual monitoring shall be completed later in the year to represent 2025.

Monitoring should be scheduled at the start of the quarter where possible to reduce the risk of missed monitoring and to allow for re-scheduling due to unforeseen circumstances.

Emission Point A30 (MDF 1 Cyclones)

No emissions testing was completed this quarter.

Upon querying this with the operator it was reported that *'The sampling platform around the MDF 1 cyclones is structurally compromised; scaffolding is being erected in Q1 to allow access for the necessary repair works to be undertaken. Until the platform is structurally safe, the sample ports cannot be accessed safely and no monitoring can take place'*.

This issue was also verbally highlighted to NRW during a site inspection 23/01/25.

Action 2 - Kronospan must investigate the root cause of the MDF 1 monitoring platform failure and implement measures as necessary to prevent a recurrence of this issue, including at other similar monitoring platforms. Please report your findings and actions to NRW by 31/03/25.

Action 3 - Monitoring shall be completed as soon as safe access can be gained to the MDF 1 monitoring ports.

If monitoring is not completed at MDF1 in Q1 2025, then NRW will review its position on this matter.

Emission Point A31 (Press Abatement)

Emission point not in use this quarter.

Emission Point A32 (WESP 21)

Quarterly emissions testing 31/10/24 identified that emissions were compliant.

The permit includes a requirement for the annual monitoring of Hg, metals and dioxins but this was not originally presented in any returns for 2024.

Upon querying this with the operator it was reported that *'annual testing for A32 was completed in Q3 but not reported at the time'*. This data was subsequently provided and no issues were noted with the reported values

Further to Action 4 set in the previous Compliance Assessment Report for monitoring returns

(ref. CAR_NRW0044870) the operator was required to review quality control processes to ensure monitoring data is reported accurately in accordance with the permit. A response to the action was received 14/02/25 and will be reviewed separately.

1.2 Emissions to Surface Water

Emission Point E1

No discharges reported during the reporting period.

Emission Point W1

An error was noted on the original submission and this was highlighted to the operator. The form was subsequently amended and resubmitted. Refer comments above regarding the accurate submission of data.

Emissions compliant.

1.3 K7 & K8 Incinerator Bottom Ash (IBA) and Air Pollution Control Residues (APCr)

K7 and K8 biomass Boiler IBA Loss On Ignition <5% (Compliant)

2024 Annual Reports

The following annual reporting forms were received;

- Performance 1
- Energy 1
- Water usage 1
- The annual report, as required by permit condition 4.2.2.

No issues were noted with these reports.

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.