

Compliance Assessment Report CAR_NRW0047894

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: 01/04/2025 between 10:50 and 15:20.

Parts of permit assessed: Dust Management.

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

Report sent to: Chris Emery, Operations Director, on 03/04/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	Permit Condition 3.2.1
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
2	8

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	<p>Action 1: Implement short term suitable dust abatement technologies to appropriately control dust emission from the shredder. Action 1 completion date 18/04/25.</p> <p>Action 2: Implement long term suitable dust abatement technologies to appropriately control dust emission from the</p>	30/06/2025

Criteria	Action needed	Complete by
	shredder. Rereview procedures and train staff for the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. Action 2 completion date 30/06/25.	
IR1A	Action 3: Implement long term suitable dust abatement technologies to appropriately control dust emission from the grading yard. Rereview procedures and train staff for the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. Action 3 completion date 18/04/25.	18/04/2025

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 following an unannounced site inspection by the Natural Resources Wales (NRW) regulating officers Paul Challender and Stuart Ross.

The NRW Officers first viewed the site from an elevated position near Chirk airfield and witnessed dust rising from a location to the rear of the dust extraction vents of the KRONOPLUS operation. This dust appear to be associated with tipping operations from a shovel loader. After a tip of material, the dust was rising to a height and drifting to the north western corner of the log yard.

The NRW Officers proceeded to the western flank of the site and walked up the boundary fence line adjacent to the railway making further observations.

The RCF receipt area was in the process of receiving deliveries. Recent temporary improvements requested in Action 2 of CAR_NRW0046536 to the wet abatement in this area appeared to be mitigating the potential for dust emission from this activity. Work on implementing long term solutions is progressing as per Action 1 of CAR_NRW0046536.

At the north western corner of the log yard boundary, on site plant operations could be heard

and a continuous emission of fine dust particles was witnessed, with intermittent increases in density which appeared to be precipitated a short time after a scraping sound which the NRW Officers speculated was the loading shovel operation observed earlier. Dust with wood fibres could be seen in the air and accumulating on surfaces including on the surface of the canal.

The NRW Officers entered the site and were accompanied to the log yard by site directors and a member of the Environment Health & Safety Team. The loading shovel operation was identified to have been loading of the on-site shredder with RCF materials. This operation had not been subject to any dust suppression. Further observations were made in external wood handling areas. The grading yard for the log sorting area was dusty at the time of the visit and had not been included in a recent round of damping from the on site bowser. Here, continuous vehicle movements were causing dust to be airborne and windblown.

Dust from the shredder has been attributed to the dust observed offsite. Appendix B of the Dust Management Plan (DMP) states that water suppression as per BAT 23d of the Wood Based Panels BReF should be utilised as a control method. This has not been applied and a compliance score as been raised.

Score: IR3B - Emissions of substances not controlled by emission limits. Permit Condition 3.2.1. Score C3.

Action 1: Implement short term suitable dust abatement technologies to appropriately control dust emission from the shredder. *Action 1 completion date 18/04/25.*

Action 2: Implement long term suitable dust abatement technologies to appropriately control dust emission from the shredder. Rereview procedures and train staff for the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. *Action 2 completion date 30/06/25.*

The dust control on the grading yard has not been accounted for in the DMP. Furthermore, no dust suppression had been applied despite a recent round of the site bowser and obvious dust emissions from this area. A compliance score has been raised.

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

Action 3: Implement long term suitable dust abatement technologies to appropriately control dust emission from the grading yard. Rereview procedures and train staff for the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. *Action 3 completion date 18/04/25.*

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.