

Compliance Assessment Report CAR_NRW0048449

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: 24/04/2025 between 10:10 and 14:10.

Parts of permit assessed: Waste Management.

NRW Lead Officer: Kathryn Bradshaw, accompanied by Paul Challender, Carter Shone.

Report sent to: EHS Manager, EHS Manager, on 06/06/2025.

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	1.1
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2B - Installations - Operations - The site	Assessed (A)	

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
IR1A	See actions in report	29/08/2025

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 was a pre-arranged site visit to undertake a waste management audit.

The following policies and procedures were used as reference during the audit;

- KC.ORG.EHS.PRO.015 – Waste Management
- KC.ORG.EHS.PRO.015.A – Waste duty of care
- KC.ORG.EHS.WI.018 – Storage and Disposal of Waste
- KC/LOGY/DOC/008 – Supplier's specification for Recycled Timber
- Response to Action 6 in CAR_NRW0045917

The site accepts two different waste streams to be used in the production process;

- Virgin wood that has been processed (03 01 05)
- Recycled wood (19 12 07)

Incoming wood wastes from a variety of suppliers have already been quality checked and logged on to the site's internal system. These suppliers have been pre-approved before their arrival on site. Once a load arrives it is visually inspected via cameras located on a gantry at the entrance point to the wood/log storage area. The loads are visually inspected for dust, charred and treated wood. Once this inspection is passed staff will take representative samples from the load at 6 points. These samples then undergo a moisture and particle size test to ensure that the load conforms to KC/LOGY/DOC/0008. If the samples pass the vehicle will unload into the storage area. Site staff will then visually inspect as the vehicle is unloading. If any non-conforming loads are found in any part of these checks it will be refused or downgraded.

The procedure KC/LOGY/DOC/0008 references Regulatory Position Statements (RPS) 249 & 250 in the suggested production tips section, these have now been withdrawn and need to be removed from this procedure. RPS 249 & 250 were only applicable in England. In future, ensure any Regulatory Position Statements are applicable in Wales and/or seek advice from your regulatory officer.

The timber storage area/log yard was viewed and the water cannons were in use as a vehicle was unloading some finer material to suppress any dust that was being generated. No visible dust was seen in this area at the time of the inspection.

The recycled wood (19 12 07) is used in the chipboard process.

The conveyors that take wood into the storage silos were not operational at the time of the visit due to a breakdown and a waste contractor was on site pumping out water from the

pits of the conveyors.

We visited the Kronoplus building where lacquer and water waste (08 01 20) is generated. This is pumped into an IBC and once full is moved to the IBC storage area.

The IBC storage area is within a concreted bund which appeared to be in good condition. Other site liquid wastes are stored in this area prior to off-site disposal, including caustic and formalin washings, urea/resin and water. The majority of these liquid wastes had their own site waste labels on, to identify what was in the IBC's, however some of these labels were blurred or the writing had rubbed off. Identification of these wastes are important for onward transfer to correctly classify the hazardous components of the waste.

Recommendation

1) Improve the labelling of wastes stored in the IBC storage area

The storage area was full and the site were awaiting a collection on the day of the visit to remove some of these wastes.

Some items of waste electrical and electronic equipment (WEEE) were also being stored in this area which has no weatherproof covering. The guidance states the following for the storage of WEEE waste:

You must use weatherproof covering to store any items that may be reused as whole appliances or may have components recovered from them for reuse. The type of covering will depend on the types and quantities of waste but must ensure the WEEE is protected from the weather. It could be as simple as a lid or cover over a container for small items but in other cases may require the construction of a roofed building.

Recommendation

2) Review the storage of WEEE wastes depending if any parts are destined for re-use

Small tipper skips are used within the factory for a variety of waste streams including MDF, chipboard, impregnated paper and plastics, which are then tipped into large Roll On Roll Off (RORO) skips. This process is managed primarily by a waste contractor who is on site most days. RORO skips moved off site will be weighed and loads logged by the weighbridge at the site entrance. An extract from the spreadsheet entitled E8 Movement 2025 was provided to cover dates from 14/04/25 to 26/04/25 was provided which shows all wastes removed on those dates.

We viewed the area where Air Pollution Control Residues (19 01 07*) are stored on site. These wastes are stored outside on impermeable concrete ground but without any weather protection. The storage of this waste has been discussed and scored in a previous CAR form – CAR_NRW0045964.

The stores warehouse area was inspected where small battery wastes and fluorescent tubes were stored in separate containers. There was also a small wheelie bin to collect oily rags which are then transported to a RORO skip where all oily rags and absorbents are collected for the whole site. A large wheelie bin was also located in this area for the storage of bagged separately collected waste streams. There was a certain amount of contamination in these bags which are collected by the site services team before removal

off-site.

Toluene soaked block (03 01 04*) waste is generated from the quality control laboratory in the MDF production area. The waste was stored inside a metal bunded container within the production area. A separate container was used to store the toluene for the test.

In the MDF production area there were two tipper skips for MDF and particle board wastes. One of the tipper skips was labelled with plastics but actually contained particle board waste.

Recommendation

3) Continue to implement and improve waste segregation across all areas of the site

Outside the MDF production area was storage for rejected MDF board and also the board crusher. Once crushed these boards can then be fed back into the MDF process.

The following wastes are mirror hazardous wastes:

- resin and water (08 04 16)
- lacquer and water (08 01 20)
- impregnated paper (16 03 06)
- MDF waste (03 01 05)

As per Technical Guidance WM3 waste holders have a duty to determine if a “mirror entry” waste is hazardous or non-hazardous. Evidence of the classification of these wastes were requested during the audit.

A laboratory analysis from 2017 was provided for resin and water (08 04 16) which demonstrated that this waste was non-hazardous. The Safety Data Sheet (SDS) for the lacquer and water (08 01 20) waste was provided and due to the dilution of the product has been assessed as non-hazardous. During the audit the SDS provided by the department was issued on 13/11/24 and contains the Hazard statement H317. The SDS provided following the audit is dated 30/07/20 with no hazard statements. A review of these documents is required to ensure the waste is being assessed against the current product that is in use.

No information has been provided for the impregnated paper which is coded as 16 03 06 – organic wastes other than those mentioned in 16 03 05*, which is removed from site by ASH waste.

No records could be found for the analysis and classification of the MDF waste (03 01 05). It states in section 6.3 Classification, of the Waste Management Procedure (KC.ORG.EHS.PRO.015) that “Records of classification are held by the EHS Department indefinitely”.

Score

This attracts a C3 score for non-compliance against the management system, permit condition 1.1.

There is no specific mention in the procedure of the use of WM3 or how mirror wastes are

determined if they are hazardous or non-hazardous.

As per KC.ORG.EHS.PRO.015 Waste Management, Section 3.2 states the EHS department has responsibility for auditing waste contractors to provide due diligence. These audits were requested for the following waste contractors:

- Tudor Griffiths Group
- Acumen
- Qualitech
- Boden Davies

Completed audits were received for all the above except Tudor Griffiths Group. No records of this audit could be found but an audit is due to be scheduled in the coming months. There is limited detail in the audits provided however the EHS department have been working on a new audit template which was provided for Veolia which will improve and provide more detail on the duty of care audits.

It is not stated in the procedure what level of training and competency staff are required to have to undertake the duty of care audits.

A variety of waste transfer notes and consignment notes were requested. These have been reviewed and no issues found.

Actions Required

1. Review and update the Waste Management Procedure to include:

- i. Training and competency requirements for duty of care audits
- ii. Assessment as well as classification of wastes to ensure mirror entries are correctly classified

Provide a copy of the updated procedure to NRW by **29th August 2025**.

2. Provide the assessment and classification for impregnated paper (16 03 06) and MDF waste (03 01 05) by **29th August 2025**. Ensure records of these are kept in future.
3. Ensure the correct SDS are used when assessing wastes produced - **ongoing**
4. Review and update KC/LOGY/DOC/008 to remove the reference to RPS 249 & 250 and provide an updated copy by **29th August 2025**
5. Complete the duty of care audit for Tudor Griffiths and forward to NRW by **26th September 2025**

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.