

Compliance Assessment Report CAR_NRW0046765

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: Incident Response (Incident number 2501025).

On: 28/02/2025 between 13:00 and 16:05.

Parts of permit assessed: Various.

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

Report sent to: Chris Emery, Director, on 31/03/2025.

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
IR1A - Installations - Management - General Management	C3 Minor	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
IR1A	<p>Action 1 - Remove spilt materials from the middle road tank farm bund and complete an inspection of bund floor and wall integrity. Provide NRW with copy of your findings along with any necessary remedial measures and associated timescales for completion by 25/04/25.</p> <p>Action 2 - Complete an investigation to identify the root cause(s) of this issue, use the findings to implement a</p>	25/04/2025

Criteria	Action needed	Complete by
	<p>suitable maintenance regime, procedures and staff training to ensure all on site bunds are kept free of liquids and detritus (including management of rainwater accumulation) and maintained in good condition. Provide NRW with a summary of your review and remedial actions by 25/04/25.</p> <p>Action 3 - Repair the wax leak and investigate the root cause of both this and the resin leak logged on Safety Culture in 2024. Provide NRW with a summary of your investigation and remedial actions by 25/04/25.</p>	
IR1A	Action 4 - Review process water handling arrangements across the site and implement procedures and staff training to ensure process water does not pose a risk of contamination to the environment. Provide NRW with a summary of your review and remedial actions by 25/04/25.	25/04/2025

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 follows an unannounced site inspection by NRW Officers Stuart Ross and Paul Challender on 28/02/25.

Dust Incident Reports

The purpose of the inspection was to investigate eight incident reports received from members of the local community between 24th and 27th January 2025 regarding dust/residue present on cars and windows. Some later reports enquired about a potential resin leak at Kronospan.

Based on the information provided by reporters, it appears most likely that the alleged deposit occurred overnight between 23rd and 24th of January but there is some uncertainty regarding this.

The first report of dust received by NRW on 24th January followed the arrival of storm

Éowyn. The incident was attended by Kronospan who noted that some of the dust was consistent with windblown material from the site roadways and external storage piles, but that much of the material was not of wood-based origin.

One reporter shared photographs of dust on windows that appeared consistent with dust observed on cars and windows at other locations in the region during this period of unsettled weather.

NRW Officers were present on site 23rd January completing a planned site inspection and viewed the site from an elevated location close to the resin plant, at this time there was no evidence of any dust releases or a resin leak.

Resin Plant Inspection 28/02/25

During this inspection NRW officers met with the EHS Manager, Resin Plan Manager and a resin plant operative. All three individuals were questioned as to whether there had been a resin leak at the factory during this period and it was reported that no such event occurred.

It was however explained that between 20th - 26th January the resin plant had been shutdown and unable to produce any resin due to a mechanical problem with the urea prill bucket elevator that transfers prill from the ground level loading bay to the top of the storage silo. During this period resin was imported to site by road tanker - no issues were reported with this operation.

During the inspection Officers accessed the top of urea silo where the defective drive system was located. It was explained that a crane was used to remove the shaft from drive system for a work shop repair and this involved stripping down the components of the system. Additionally a portion of the roof on top of the silo was removed to allow for crane access.

Small amounts of white urea prill dust was present at the top of the silo (partially enclosed) and may have been spilt during the repair work. It was explained that urea prill is not a particularly dusty material and the task itself was not particularly dusty. In the opinion of Officers, the quantity of dust potentially released by the repair operation was unlikely to lead to an offsite impact. The chronology of events to complete the repair do not strongly correlate with incident reports.

A visual inspection of resin tanks and associated connecting pipework was completed and no obvious signs of a resin leak or repair work were evident. Kronospan reported that there was a wax leak from a tank access hatch and this was evident having set hard in the bund. This leak was at ground level and highly unlikely to cause an on offsite impact.

Kronospan's internal environmental incident recording system 'Safety Culture' was inspected and the record contained no entries for a resin leak in 2025. An entry was made in October 2024 for a leak from a resin tank hatch into the bund.

In the opinion of NRW Officers, there is no evidence of a resin leak that could lead to an offsite impact. It is concluded that the offsite dust was most likely a combination of wind blown material from Kronospan and general environmental dust during a period of unsettled weather including gale force winds. Actions to address the control of dust in the

log yard are covered in Compliance Assessment Report CAR_NRW0046536.

Middle Road Tank Farm Bund

The bund was inspected and a significant area of the bund floor was covered with a layer of wax, water and general detritus akin to rubble, all of which appeared to have been in situ for some time - see attached photographs.

It was difficult to inspect the length of the bund as at the time of the inspection the middle road was partially flooded with process waste water (refer section below). The Resin Plant Manager also reported that it was custom and practice for the residual wax content of tanker hoses to be tipped into the bund.

For a bund to remain effective in the event of a spill it must be structurally sound and free of liquids and debris that reduce its storage capacity. This requires regular inspection and maintenance. If the bund floor is obscured it cannot be inspected for defects. The EHS manager was unaware of the poor condition of the bund.

NRW considers the inspection and maintenance of the bund to be inadequate leading to its unacceptable condition. This is in breach of permit condition 1.1, attracting a non compliance score of C3.

Action 1 - Remove spilt materials from the middle road tank farm bund and complete an inspection of bund floor and wall integrity. Provide NRW with copy of your findings along with any necessary remedial measures and associated timescales for completion by 25/04/25.

Action 2 - Complete an investigation to identify the root cause(s) of this issue, use the findings to implement a suitable maintenance regime, procedures and staff training to ensure all on site bunds are kept free of liquids and detritus (including management of rainwater accumulation) and maintained in good condition. Provide NRW with a summary of your review and remedial actions by 25/04/25.

Action 3 - Repair the wax leak and investigate the root cause of both this and the resin leak logged on Safety Culture in 2024. Provide NRW with a summary of your investigation and remedial actions by 25/04/25.

N.B NRW will complete a more in depth inspection of on site secondary containment arrangements in due course. In the interim it is recommended that Kronospan reviews its secondary containment arrangements against CIRIA 736.

Waste Water Disposal - Middle Road

A bowser was observed discharging a brown foamy liquid, reportedly MDF chip wash water, directly onto the yard at the end of the middle road adjacent to the middle road sump. This liquid was overwhelming the sump and partially flooding the middle road in several inches of liquid. No attempt was made to pipe the discharge directly into the sump. See attached photograph.

N.B MDF Chip wash water is authorised to be discharged to sewer from this sump.

NRW has reviewed a visual bund inspection report reference 'BILFINGER Project No:

WPWD6030274 October 2013' that was provided to NRW as part of the V008 permit consolidation.

Section 3 of the report states that 'The road drains in Middle road have been sealed and this area now drains to a sump which is emptied by pumping to a tanker. If the liquor is contaminated it is sent for off site disposal. The volume of liquor which can be contained in this way on middle road has been calculated to be approximately 88m³. This effectively provides tertiary containment for tanks on middle road should any overtopping of bunds occur'

Whilst it is noted that the drains on middle road are apparently sealed, it remains possible that waste water may enter other drains in the vicinity or lead to contamination of ground through liquids penetrating defects in the site roads and kerbs etc. Unnecessarily filling the tertiary containment also hinders the ability to contain a major loss of primary / secondary containment in this area. This practice was not condoned by the EHS manager.

NRW considers that the discharging of process water onto the site road does not minimise the environmental risk from site operations and is in breach of permit condition 1.1 attracting a non compliance score of C3.

Alternative arrangements such as the controlled bleed of process water directly to sewer would avoid this issue. This could be achieved via a direct piped discharge.

Action 4 - Review process water handling arrangements across the site and implement procedures and staff training to ensure process water does not pose a risk of contamination to the environment. Provide NRW with a summary of your review and remedial actions by 25/04/25.

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.