

Compliance Assessment Report CAR_NRW0048681

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: 13/05/2025 between 10:00 and 15:30.

Parts of permit assessed: Various.

NRW Lead Officer: Stuart Ross, accompanied by Victoria Taylor.

Report sent to: Chris Emery, Director, on 30/06/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Installations - Operations - Permitted activities	Assessed (A)	
IR2E - Installations - Operations - Improvement programme	Action only (X)	
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR1A - Installations - Management - General Management	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
IR2E	Action 1 - Kronospan to complete the commissioning of the	19/07/2025

Criteria	Action needed	Complete by
	new lagoon discharge monitoring equipment as detailed in IC53 by 19/07/25 and inform NRW that this has been completed.	
IR3E	Action 2 - Kronospan to write to NRW by 19/07/25 to confirm that the monitoring requirements set out in the table above are correct based on the IC53 response.	10/07/2025
IR1A	Action 3 - Provide NRW with the steps Kronospan will take to transfer MDF chip wash water to sewer in a manner that prevents releases to soil and groundwater. Please do so by 31/07/25.	31/07/2025
IR1A	Action 4 - Kronospan to provide NRW with a copy of the boiler operating / start - procedure procedure that was in force on the date of the inspection, boiler operator training records, findings of a root cause investigation and measures taken to prevent a recurrence of this issue. Please do so by 31/07/25.	31/07/2025

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 has been raised following an onsite inspection 13/05/25. This was arranged to discuss surface water management and monitoring issues, including a discussion of Improvement Conditions (ICs) IC50, IC51 and in particular, IC53.

Kronospan has submitted responses to IC50 and 51 that are currently being assessed, NRW will respond in due course.

IC53 - Emission Point W1 Monitoring Improvements

A response to this IC was received 12/02/24 and subsequently accepted by NRW. Since that time, Kronospan has been in the process of procuring monitoring equipment and completing on site works to deliver the agreed monitoring improvements.

The W1 outfall was visited during the inspection. It was observed that a new monitoring cabin has been positioned next to the outfall with monitoring instrumentation installed within. Further work to electrical systems, plumbing, ventilation and heating was ongoing.

Kronospan intends to install the sample collection line in the W1 discharge channel prior to the penstock which is acceptable to NRW. It was advised that the line must be positioned such that it collects a representative sample of the lagoon discharge. In particular, that it avoids collecting detritus from the channel bottom and also that it does not include any back flow from the Afon Bradley. It was also advised that steps should be taken to prevent external sample lines freezing in cold weather conditions.

Kronospan are in the process of contacting CSA Group to obtain MCERTS certification for the flow meter installation.

On 23/06/25 Kronospan reported that instrument commissioning is due to start w/c 30/06/25 with the intention that the system provides emissions monitoring data from mid July.

The changes to emissions monitoring will alter some of the requirements set out in Table S3.5 of the Environmental Permit.

In the interests of avoiding any ambiguity caused by the agreed changes, NRW has reviewed table S3.5 against the IC53 response and produced a consolidated monitoring table. Once Kronospan has reported to NRW that the new monitoring equipment has been commissioned these monitoring requirements will apply going forward. NRW will update table S3.5 at the next variation, possibly as part of the OSB determination should this be granted.

Parameter	Limit	Reference Period	Monitoring Frequency	Method	
pH	6 - 9	Continuous	Daily when discharging	MCERTS instrument	
BOD	9.5 mg/l	Flow Proportional Composite	3 times per week.	BS EN ISO 5815-1:2019	
TSS	100 mg/l	Flow Proportional Composite	Daily when discharging	EN 872: 2005	
TSS	40 mg/l	Flow Proportional Composite	Average of samples collected over 1 year	EN 872: 2005	

Ammonia	5 mg/l	Flow Proportional Composite	Daily when discharging	BS ISO 23695:2023 ISO 7150-1 1984
Oil and Grease	15 mg/l	Flow Proportional Composite	Daily when discharging	SCA The determination of Hydrocarbon oils in waters by solvent extraction IR absorption and gravimetry ISBN 0117517283
Formaldehyde	2 mg/l	Flow Proportional Composite	Daily when discharging	SCA The determination of formaldehyde, other volatile aldehydes and alcohols in water
Discharge Volume	None	Continuous	When discharging	MCERTS instrument
TOC	None	Continuous	When discharging	MCERTS instrument
Turbidity	None	Continuous	When discharging	MCERTS instrument

Note

1. No Emission Limit Values have been changed.
2. One flow proportional composite sample shall sent to an MCERTS accredited laboratory once per week for pH, BOD, TSS, ammonia, oil and grease and formaldehyde analysis.

Action 1 - Kronospan to complete the commissioning of the new lagoon discharge monitoring equipment as detailed in IC53 by 19/07/25 and inform NRW that this has been completed.

Action 2 - Kronospan to write to NRW by 19/07/25 to confirm that the monitoring requirements set out in the table above are correct based on the IC53 response.

MDF Chip Wash Water

During the inspection, waste water from the MDF chip wash process was observed flowing down a site road between the refiner building and the middle road pit. Chip wash water is permitted to discharge to sewer via the middle road pit but it is not acceptable for process water containing organic load to flow across the concrete road as it may penetrate defects in the road surface and kerbs. A pipe is not in place to transfer chip wash water to sewer and this issue is reportedly a regular occurrence.

An action was raised in Compliance Assessment Report reference CAR_NRW0046765 relating to a review of process water handling arrangements following the previously observed use of a bowser to discharge chip wash water onto the yard near the middle road pit. The action had a due date of 25/04/25 and NRW has not received a response.

Following a meeting 23/06/24 it was agreed that this action is extended to 31/07/25.

An additional action is now placed on Kronospan.

Action 3 - Provide NRW with the steps Kronospan will take to transfer MDF chip wash water to sewer in a manner that prevents releases to soil and groundwater. Please do so by 31/07/25.

NRW considers that the regular flow of MDF chip wash water across 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.

Boiler K8 Start-up

At the time of the inspection boiler K8 was in the process of starting up after a major maintenance outage. The control room was visited to find out more about the start up process.

The boiler operator reported that the boiler was firing on gas and that wood granulate would be introduced next. When questioned by NRW as to at what temperature the granulate was to be introduced to the boiler, the answer was 400 degrees Celsius. As granulate is a waste, the permit requires that the combustion chamber must be at least 850 degrees Celsius before waste feed commences.

Kronospan has subsequently stated that the boiler operating procedure clearly states that the boiler must be at 850 degrees Celcius before waste can be introduced.

Action 4 - Kronospan to provide NRW with a copy of the boiler operating / start - procedure procedure that was in force on the date of the inspection, boiler operator training records, findings of a root cause investigation and measures taken to prevent a recurrence of this issue. Please do so by 31/07/25.

Upon review of this information non compliance scores may be applied.



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.