

## Compliance Assessment Report CAR\_NRW0048724

**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 2505218).

**On:** 02/06/2025 between 09:00 and 17:00.

**Parts of permit assessed:** Various.

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

**Report sent to:** Chris Emery, Director, on 24/07/2025.

### 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)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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?

No action required.

### 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.

**At this time, we do not intend to take any further action.**

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 unannounced site inspections on Monday 2nd June and Friday 6th June. These were made in response to numerous incident reports received from the local community, in particular regarding odour and to a lesser extent dust emissions from the installation.

### **Monday 2<sup>nd</sup> June 2025**

The Natural Resources Wales (NRW) regulatory inspector, Paul Challender attended Chirk to check on the progress of dust abatement improvements progressing on the log yard in RCF receipt area and the wood shredding area.

Prior to entering the site, the Chirk residential areas were checked as a matter of course and due to a recent uplift in odour and dust reports from the Chirk community.

During the assessments made in the Chirk area on the day, the weather was dry, warm and the wind was westerly. It is in westerly wind conditions when odour and dust reports from Chirk residents increase in number.

Odour was only detected in the vicinity of the Holyhead Road/West View junction. The odour was mild and transient. The odour's character was of that of the press abatement emission from WESP 32.

Dust was identified on some vehicles in the Maes y Waun area. The operator is awaiting the installation of permanent dust abatement infrastructure to the log yard to prevent and minimise the potential for fugitive emission of dust. The log yard was observed prior to entering the site to ensure dust abatement and other wood handling practices were being followed.

Noise was identified in the Llwyn y Cil area to the west of the site. The identified noise was traced to a neighbouring factory and was linked to the emptying of a silo which, is only conducted on weekdays during daytime hours. This factory does not possess an NRW A(1) installation permit and is therefore not regulated by NRW.

The inspecting officer entered Kronospan and met with the Operations Director, Environmental Coordinator, and the Log Yard Manager. RCF deliveries were being accepted as normal and all fitted temporary wet abatement was in operation. The site staff updated the NRW inspector on the progress of the acquisition and installation of the permanent dust abatement solutions.

### **Friday 6th June 2025**

On Friday 6th June the NRW Regulatory inspector Stuart Ross attended Chirk to assess numerous and ongoing odour incident reports received during the week.

Odour was assessed at numerous locations around the factory. During the assessments the weather was dry and warm with a gentle and occasionally gusty west - north westerly

breeze.

At 10:48 the Kronospan factory was observed from an elevated location to the east and it was noted that a white plume was present from WESP 21 and was readily dispersing in a typical fashion.

A hazy emission was evident being released from the WESP32 stack that appeared to be tracking in a south easterly direction and most likely grounding over Chirk. Plumes from MDF1 and MDF2 cyclones were not evident. No unusual emissions were noted from any other stacks, no dust was evident from the log yard operation.

At 11:13 a mild odour was detected at the top of Chirk Green Lane that was characteristic of the Kronospan factory, possibly WESP32 or a combination of on site process sources. At 11:15 a mild to occasionally moderate intensity press abatement type odour was noted in the Lloyds Lane and Chapel Lane area.

At 11:18 the Maes y Waun and Maes Yr Ysgol areas were visited, a chocolate odour was detected - no odour from Kronospan.

At 11:26 a mild 'woody' odour from Kronospan was detected at West View, George Street and Charles Street area.

At 11:30 a more detailed on foot odour assessment was made along the Chapel Lane, Lloyds Lane and Holyhead Road area. At the junction of Lloyds Lane and Holyhead Road (nr. the Chapel) a chemical type odour was present that increased in intensity as the Officer walked towards the site entrance where it became strong and unpleasant over approximately 30m of road. The odour was considered likely to originate from the press abatement / WESP 32. The odour reduced in intensity towards Chirk Court where it became faint. No Kronospan odour was present at the entrance to Maes y Waun.

The inspecting officer entered Kronospan at 12:35 and met the Production Director, Company Secretary and later with the Operations Director.

Given the apparent press abatement / WESP 32 odour detected off site the press hall was visited. The press abatement systems (Ceatec) visual display screens were inspected in the control room and discussed with the process operators - the systems were operating normally and no alarms had been raised.

On the approach to the MDF control room fumes and haze were noted in the building, most likely from the presses- the collection and abatement of press emissions is a matter that will be subject to future planned inspection.

The roof of the press halls was accessed - no visible fugitive emissions were noted from the building, no odour was detected although the location was upwind of much of the press hall. A minor leak from a port on emission point A31 (press abatement 'emergency stack') was noted but was not capable of causing an odour impact - the operator stated that this will be repaired.

The MDF refiner control room was visited to check WESP32 was operating as normal, again display screens were viewed and it was reported that the system was operating normally with the exception of 2 out of 4 fans that had alarmed at around 12:30 and were

temporarily taken out of use. These fans do not affect the abatement of emissions in the WESP but may temporarily reduce the efflux velocity from the stack.

This was discussed and it was agreed that the fault is unlikely to have any significant impact on offsite odour from the WESP. It was also noted that fault had just occurred and that regular odour complaints had been received all week. The operator was in the process of rectifying the fault

The operator has committed to trial the use of hydrogen peroxide dosing as trialled at WESP 21 on the press abatement system. A detailed proposal and methodology is to be provided to NRW by 31/07/25. This issue will be detailed in subsequent Compliance Assessment 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](mailto: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](mailto: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.