

Compliance Assessment Report CAR_NRW0048932

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: Report/Data Review,

Reason: Routine.

On: 23/07/2025.

Parts of permit assessed: Routine Emissions Monitoring and Reporting.

NRW Lead Officer: Stuart Ross.

Report sent to: Chris Emery, Director, on 25/07/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C4 No impact	4.3.1(b)
IR3E - Installations - Emissions and monitoring - Monitoring	Action only (X)	
IR1A - Installations - Management - General Management	C3 Minor	1.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.6.1

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

Total non-compliances recorded	Total non-compliance score
6	16.2

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
IR4B	Action 1 - Ensure Monitoring Returns are submitted in accordance with permit requirements. Provide Form Residue 1.	15/08/2025
IR3A(2)	Action 2 - complete improvement condition programme as specified in the permit (ongoing requirement).	25/07/2025
IR4C	Action 3 - Submit a Schedule 5 Notification for Boiler K8 TOC ELV exceedances in March 2025.	15/08/2025
IR3E	Action 4 - Ensure two rounds of quarterly monitoring at all 4 MDF 2 cyclones is completed in 2025.	31/12/2025
IR1A	Action 5 - Review, and where necessary make improvement to procedures, staff training and resources to ensure future compliance with the reporting and notification requirements of the permit.	29/08/2025
IR3A(2)	Refer Action 3	15/08/2025
IR3E	Refer CAR_NRW0046148 - 'Action 2 - Kronospan must investigate the root cause of the MDF 1 monitoring platform failure and implement measures as necessary to prevent a recurrence of this issue, including at other similar monitoring platforms. Please report your findings and actions to NRW by 31/03/25'. As agreed, the deadline for completing this action has been extended to 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 (CAR) has been raised by the Natural Resources Wales (NRW) regulating officer to report on Kronospan's routine emissions monitoring returns for the period 01/01/25 - 31/03/25 (Quarter 1).

Emissions monitoring and reporting has been assessed against the monitoring requirements set out in in Schedule 3 and 4 of the permit and associated permit conditions.

Quarter 1 Emissions Monitoring

Emissions Monitoring returns were received 01/05/25, but were incomplete and included data from the previous quarter. This was highlighted to the operator and returns were resubmitted 30/06/25. However upon review of the resubmitted returns it was identified that 'Form Residue 1' had not been provided.

Failure to provide Q1 monitoring returns on time (by 28 April) is in breach of permit condition 4.2.3 attracting a non compliance score of C4.

Action 1 - Ensure Monitoring Returns are submitted in accordance with permit requirements, Provide Form Residue 1 by 15/08/25.

1.1 Emissions to Air

Emission Points A1, A5, A6, A16, A17 & A18

Annual emissions testing has been completed at all emissions points during 2024 and identified that emissions were compliant with their respective Emission Limit Values (ELVs).

Emission points A5 and A6 are not in use.

As per Compliance Assessment Report ref. CAR_NRW0044870, the permit states that the monthly monitoring frequency of TVOC at emission point A1 may be reduced to once a year if the emissions are proven to be sufficiently stable.

It continues to be recommended that Kronospan reviews TVOC data at emission point A1 and advises NRW of its proposed monitoring frequency going forward.

Emission Point A19 (Gas Turbine 1)

Quarterly emissions testing 27/02/25 identified that emissions were in compliance with permitted Emission Limit Values (ELVs)

Emission Point A20 (Gas Turbine 2)

Quarterly emissions testing is required at this emission point when it is brought into use for periods which aggregate to >28 days. The monitoring return states that there was no testing this quarter.

Emission Points A21 - A25 (Gas Engines)

Testing is required quarterly, emissions testing 26/02/25 identified that emissions were compliant. Emission points A24 and A25 are not active as engines have not been installed.

Emission Point A26 (K7 Biomass Boiler)

Quarterly emissions testing 28/02/25 identified that NOx emissions exceeded the permitted ELV.

NOx, 906.0 mg/Nm³ (ELV 250 mg/Nm³)

This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3.

The operator submitted a Schedule 5 notification.

On 04/06/2025 permit variation number V011 was issued following the completion of the Waste Incineration BAT Conclusions review.. The varied permit includes Improvement Conditions (ICs), in particular IC59 requires the operator to determine and operate measures to minimise NOx emissions (amongst others) from boiler K7.

Action 2 - complete improvement condition programme as specified in the permit.

Emission Point A27 (K8 Biomass Boiler)

Quarterly extractive emissions monitoring identified that emissions were compliant throughout the period.

Continuous monitoring data was compliant with the exception of the following TOC half hourly ELV exceedances (ELV 30mg/Nm³).

17/03/25 30.2 mg/m³

18/03/25 33.2 mg/m³

The daily average was compliant.

These ELV exceedances are in breach of permit condition 3.1.2 and attract a single non compliance score of C3.

A Schedule 5 Notification was not received for these exceedances - this is in breach of permit condition 4.3.1(b) and attracts a non compliance score of C4.

Action 3 - Submit a Schedule 5 Notification for Boiler K8 TOC ELV exceedances in March 2025 by 15/08/25.

Emission Point A28 (WESP 32)

Quarterly, emissions testing 07/03/25 identified that emissions were compliant with permitted ELVs.

Emission Point A29 (MDF 2 Cyclones)

Quarterly, emissions testing at cyclone 3 on 05/03/25 identified that emissions were compliant with permitted ELVs.

The permit includes a requirement for the annual monitoring of Hg, metals, dioxins and ammonia, plus that that one round of quarterly monitoring per year includes all 4 cyclones.

No such monitoring data was presented for 2024.

Therefore, the following action was set in the previous monitoring data Compliance Assessment Report reference CAR_NRW0046148.

'Action 1- Complete emissions testing for Hg, metals, dioxins and ammonia at emission point A29 in Quarter 1 2025. To include one round of quarterly monitoring on all 4 cyclones. A further round of annual monitoring shall be completed later in the year to represent 2025'.

On 01/05/25, NRW received annual monitoring data for A29, having been collected from cyclone 3 between 04/03/25 and 05/03/25. Emissions were in compliance with the permitted emission limit values. The this aspect of the action has been met.

Action 4 - Ensure two rounds of quarterly monitoring at all 4 cyclones is completed in 2025.

Emission Point A30 (MDF 1 Cyclones)

No emissions testing was completed this quarter.

The operator has previously stated that *'The sampling platform around the MDF 1 cyclones is structurally compromised; scaffolding is being erected in Q1 to allow access for the necessary repair works to be undertaken. Until the platform is structurally safe, the sample ports cannot be accessed safely and no monitoring can take place'.*

NRW has been in regular contact with the operator regarding this issue and it was known that safe access to the platform was not achieved in Q1.

Failure to monitor this emission point in Q1 is in breach of permit condition 3.6.1 and attracts a non compliance score of C3.

At the time of writing it is known that the operator has completed emissions monitoring in Q2 2025 and no emission limit exceedances have been reported via Schedule 5 notification.

In the previous monitoring review the following action was set -

'Action 2 - Kronospan must investigate the root cause of the MDF 1 monitoring platform failure and implement measures as necessary to prevent a recurrence of this issue, including at other similar monitoring platforms. Please report your findings and actions to NRW by 31/03/25'.

As agreed, the deadline for completing this action has been extended to 31/07/25.

Emission Point A31 (Press Abatement)

Emission point not in use this quarter.

Emission Point A32 (WESP 21)

Quarterly emissions testing 18/02/25 identified that emissions were compliant with the

permitted ELVs.

1.2 Emissions to Surface Water

Emission Point E1

No discharges reported during the reporting period.

Emission Point W1

Emissions compliant with permitted ELVs throughout the period.

1.3 K7 & K8 Incinerator Bottom Ash (IBA) and Air Pollution Control Residues (APCr)

Not received (to be assessed) - refer comments at top of this section regarding late returns.

2.0 Environmental Management System

NRW considers that the failure to report monitoring data on time and to provide Schedule 5 Notifications as required by the permit for ELV exceedances is a breach of permit condition 1.1 attracting a non compliance score of C3.

Action 5 - Review, and where necessary, make improvement to procedures, staff training and resources to ensure future compliance with the reporting and notification requirements of the permit. Please do so by 29/08/25.

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.