

## Compliance Assessment Report CAR\_NRW0048504

**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:** 23/06/2025 between 10:00 and 15:00.

**Parts of permit assessed:** Various.

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

**Report sent to:** Chris Emery, Director, on 29/07/2025.

### 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	Action only (X)	
IR2E - Installations - Operations - Improvement programme	Assessed (A)	
IR3A(3) - Installations - Emissions and monitoring - Emissions to land	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	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
IR1A	Operator has taken remedial action.	Already completed
IR1A	CAR_NRW0046765 - Actions 1- 4 (Deadlines Extended)	31/07/2025
IR3A(3)	Action 1 - Provide NRW with timescales for the completion of the IBA storage bunker and measures taken to store APCr in dry conditions to prevent leachate formation.	31/08/2025
IR3C	Action 2 - Kronospan to provide NRW with the press abatement hydrogen peroxide dosing trial methodology and associated timescales for completion for the purposes of determining the efficacy of hydrogen peroxide dosing in reduce odour emissions from the process.	31/07/2025
IR3B	CAR_NRW0046536 - Action 1 (Deadline Extended)	31/08/2025
IR3B	CAR_NRW0047894 - Action 2 (Deadline Extended)	31/08/2025

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 Compliance Assessment Report has been raised following a planned meeting with Kronospan Ltd to review a number of actions raised in previous Compliance Assessment Reports, Improvement Conditions and other matters.

### **1.Outstanding Actions - Compliance Assessment Reports**

The following items were discussed and revised timescales were agreed as appropriate.

#### **CAR NRW0046536**

*Action 1 - Implement long term suitable dust abatement technologies to appropriately control dust emission from the unloading of RCF. Rereview procedures and train staff for*

*the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. To be completed by 31/05/25.*

During the inspection this action was discussed with Kronospan who stated that challenges procuring the required equipment had led to delays. On 30/06/25, Kronospan wrote to NRW to advise that the long term dust abatement measures required by Action 1 above will be installed within 8 weeks.

We agree to extend the deadline to 31/08/25. Please note that failure to meet the new deadline may result in an enforcement notice being issued.

#### **CAR NRW0047894**

*Action 2: Implement long term suitable dust abatement technologies to appropriately control dust emission from the shredder. Rereview procedures and train staff for the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. Action 2 completion date 30/06/25.*

*Action 3: Implement long term suitable dust abatement technologies to appropriately control dust emission from the grading yard. Rereview procedures and train staff for the implemented long term dust abatement. Submit evidence of infrastructure improvements and procedural changes to NRW. Action 3 completion date 18/04/25.*

We agree to extend the deadline for Action 2 to 31/08/25. Please note that failure to meet the new deadline may result in an enforcement notice being issued. Please note that failure to meet the new deadline may result in an enforcement notice being issued.

For Action 3 above, Kronospan report that '*dust suppression in the grading yard will continue to utilise the water bowser and increased housekeeping routines. The Sawmill Operator in the grading line has been given an hour at the end of each shift to ensure deposits in the area are cleaned up. This has been added to their OPS checks*'. The response to this action will be subject to future inspection by NRW.

#### **CAR NRW0046765**

*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.*

*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.*

Kronospan reported that the middle lane bund has been inspected by an operative, cleaned and is due to be relined.

Kronospan has not provided a response to Actions 1-4 above within the required timescale. We agree to extend the deadline to 31/07/25. Please note that failure to meet the new deadlines may result in an enforcement notice being issued.

#### **CAR NRW0046964**

*Action 4 - Kronospan to submit an action plan with associated timescales for completion to NRW with the steps it will take to store IBA and APC residues in a manner that prevents the contamination of land, ground and surface waters. Please do so by 14/02/25.*

Kronospan has previously provided a response to this action and this was discussed during the meeting. Quotes for the IBA bunker improvement works have been received and CAPEX is due to be signed off with work due to commence as soon as possible. Kronospan is exploring options for the dry storage of APCr.

**Action 1** - Provide NRW with timescales for the completion of the IBA storage bunker and measures taken to store APCr in dry conditions to prevent leachate formation. Please do so by 31/08/25.

#### **Improvement Conditions**

A discussion of live Improvement Conditions (ICs) was held.

IC40 - Noise Management Plan - Kronospan intends to submit a revised plan by 31/07/25.

IC53 - W1 Monitoring Improvements - refer CAR\_NRW0048681 for comment and timescales for completion.

There was a short discussion of the new ICs introduced by permit variation V011 - if Kronospan requires any clarification as to the requirements of these ICs then please inform NRW accordingly.

#### **Press Abatement - Hydrogen Peroxide Dosing Trial**

Kronospan reported that the company intends to trial the dosing of the press abatement plant with hydrogen peroxide with the objective of reducing odour emissions. This will follow a similar process for trialling the dosing on WESP21 that now continues to be dosed at what Kronospan considers to be the optimal dosing rate.

It was agreed that Kronospan will develop a methodology for the press abatement trial (dosing rates, odour and VOC monitoring etc) and provide this to NRW by 31/07/25 along

with associated timescales for completion.

Kronospan also reported that an inspection of the press abatement plant is to be conducted by the Original Equipment Manufacturer with the objective of determining whether there are any opportunities for improvement.

**Action 2** - Kronospan to provide NRW with the press abatement hydrogen peroxide dosing trial methodology and associated timescales for completion for the purposes of determining the efficacy of hydrogen peroxide dosing in reducing odour emissions from the process. Please do so by 31/07/25.

### **Schedule 5 Notifications**

#### WESP21 ERV Activation

On 18/06/25 Kronospan reported that an emergency stop button on a walkway was accidentally pressed by a contractor during maintenance work, diverting emissions to the emergency stack with cyclone abatement (not WESP) whilst the dryer drum was emptied of material.

It was reported that the emergency stop button was partially shrouded. The button has been repositioned away from the walkway and to a slightly higher level to bring it out of the working area but remains in an appropriate location for personnel safety / emergency purposes.

#### MDF2 Refiner High Pressure Steam Leak

On 10/04/25 NRW received 8 noise reports from members of the public regarding noise from the factory. Kronospan submitted a schedule 5 notification.

*The notification states that 'on 09/04/25 at 03:15 refiner 2 stopped with a fault on the discharge screw - a bearing had failed. The high pressure steam was isolated at the main manifold as well as 2 valves on the plug screw (situated on the next level of the refiner). The refiner operator also opened the drain valve associated with the 2 steam valves on the plug screw.*

*At 07:05 on 10/04/25 the refiner operator reinstated the high pressure steam. Due to the steam drain remaining open, high pressure steam created a noise that escaped to atmosphere, this lasted for 25 minutes. The steam drain valve was closed at 07:30*

*The operator had opened the 2 valves on the plug screw first and then walked down to the main manifold to open the valve and reinstate the high pressure steam, thus they did not hear the high pressure steam leaking from the drain valve.*

*A sign has been installed above the steam drain valve to ensure that the drain valve is closed before operating the main steam isolation valves. The work instruction for reinstating high pressure steam has been reviewed and revised and has been trained to all operations that undertake this task'.*

NRW considers the procedural deficiency to be a breach of permit condition 1.1 attracting a

non compliance score of C3. No further actions required.

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.