

Compliance Assessment Report CAR_NRW0049368

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: 05/09/2025 between 10:00 and 14:45.

Parts of permit assessed: Various.

NRW Lead Officer: Stuart Ross, accompanied by Kathryn Bradshaw.

Report sent to: Chris Emery, Director, on 25/09/2025.

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	1.1.1
IR1A - Installations - Management - General Management	Action only (X)	
IR2E - Installations - Operations - Improvement programme	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Action only (X)	
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
IR1A	Kronospan to review its management system (including	31/10/2025

Criteria	Action needed	Complete by
	resources) and take necessary steps to ensure permit non compliance brought to its attention by NRW is addressed in a timely manner. Provide NRW with a summary of the review and steps taken / to be taken to address this issue. To be provided by 31/10/25..	
IR1A	As agreed, provide the following information to NRW by 10/10/25. A copy of the middle road bund integrity inspection findings along with any necessary remedial measures and associated timescales for completion. Confirmation that the bund floor has been reinstated to ensure it provides an impermeable barrier. The revised procedure for bund inspection, rainwater management and responsibilities for rectifying defects.	10/10/2025
IR2E	Action 3 (new) - Determine a representative sample collection point for continuous emissions monitoring equipment to service emission point W1 and provide NRW with an action plan with associated timescales for completion to fully implement the monitoring requirements as per IC53. Please do so by 10/10/25.	10/10/2025
IR3C	Kronospan to provide NRW with an update as to progress and findings to date of the press abatement hydrogen peroxide dosing trial. Please provide this information to NRW during the site inspection planned for 01/10/25.	01/10/2025
IR1A	Provide NRW with the design detail and timescales for implementation for the transfer of MDF chip water from the refiner to the Middle Road pit. Please do so by 10/10/25.	10/10/2025

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 site inspection at Kronospan Ltd 05/09/25 to review a number of actions raised in previous Compliance Assessment Reports, Improvement Conditions and other matters.

1.Review of Actions - Compliance Assessment Reports

The following actions were discussed. Actions from previous Compliance Assessment Reports are copied in *italic*. Where new actions have been set this is stated accordingly.

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 a previous inspection 23/06/25 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 would be installed within 8 weeks.

NRW agreed to extend the deadline to 31/08/25 and advised that failure to meet the new deadline may result in an enforcement notice being issued.

During this inspection it was determined that whilst some limited progress has been made to meet the action, the requirements remain unmet. A Regulation 36 notice was issued to the company 15/09/25 requiring steps to be taken to ensure permit compliance is achieved within specified timescales.

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.

During a previous inspection 23/06/25 this action was discussed with Kronospan and it was determined that the requirements of the action had not been met. NRW agreed to extend the deadline to 31/08/25 and advised that failure to meet the new deadline may result in an enforcement notice being issued.

During this inspection it was determined that the action requirements remain unmet. A Regulation 36 notice was issued to the company 15/09/25 requiring steps to be taken to ensure permit compliance is achieved within specified timescales.

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 provided a written response to Actions 1-4 on 31/07/25 as requested in the previous Compliance Assessment Report reference CAR_NRW0048504.

For the original Actions 1 & 2 as copied above, Kronospan stated that -

'The Middle Road tank farm area was cleaned w/c 03/03/25, with all liquid and debris removed from the bunds. This allowed inspection of the internals of the bund walls and floor. The cleaning work slightly damaged the bund floor in some places and this is being reinstated and levelled and is due to be complete by the end of August.

Civils work has been completed on the exterior of the bund wall to restore its structural integrity and enhance its containment performance by targeted repointing of joints and removal of old paintwork.

The root cause of the excessive liquids and debris was found to be inadequate inspection. The area is now inspected by two departments on a weekly basis and actions taken if liquid is present within the bund. A site procedure is currently being reviewed and improved to include the specific arrangements for each bund in terms of inspection, rainwater management and responsibilities for rectifying defects. This will be shared with NRW on completion, by the end of August.'

Action 1 (New) - As agreed, provide the following information to NRW by 10/10/25.

- A copy of the middle road bund integrity inspection findings along with any necessary remedial measures and associated timescales for completion.
- Confirmation that the bund floor has been reinstated to ensure it provides an impermeable barrier.
- The revised procedure for bund inspection, rainwater management and responsibilities for rectifying defects.

For Action 3 as copied above - the response is complete - no further action.

For Action 4 as copied above, Kronospan stated that -

'Following a review of the site processes that generate process water, the following waters

have been identified:

1. *MDF Refiner – chip wash water (generated during the preparation of virgin wood chips for fibre production). For further detail, please refer to response for CAR_NRW0048681, Action 3.*

2. *Biomass Boilers & Gas Engines – blowdown waters (generated to maintain boiler efficiency via the removal of impurities that could lead to scaling / corrosion). Blow down waters are directly discharged into the drainage system that leads to Middle Road Pit for discharge.*

The handling arrangements for the Refiner chip wash waters are currently being reviewed and improved to be aligned with the blowdown waters (such that discharges are direct to the drainage system).

Blowdown water generation is automated through the relevant plant control system. On review it is not considered that a procedure is required for this activity as there is no human interaction with the discharges from these areas.

The site also utilise a tractor / bowser for dust suppression (wetting of road surfaces) and removal of rain water from bunded areas. Bund waters are tested for likely contaminants and used within the MDF waste water treatment plant. A work instruction is being developed to formalise this process and ensure that waters are emptied from the tanker in a controlled manner'.

Regarding CAR_NRW0048681, Action 3 (as copied below), Kronospan state that -

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.

'The chip wash water from the Refiner is to be piped into Middle Road pit directly from the current tank at the Refiner. The design of this system is currently being confirmed by our Engineering team to ensure the system is adequately sized and that the most appropriate solution is implemented. The system will be controlled via level sensors within the current tank to ensure protection against overfilling. A design drawing is currently being prepared and will be shared with NRW once finalised'.

NRW welcomes this proposal but no further information as to its design and timescales for implementation have been received since July 2025.

Action 2 (new) - Provide NRW with the design detail and timescales for implementation for the transfer of MDF chip water from the refiner to the Middle Road pit. Please do so by 10/10/25.

CAR NRW0048681

This compliance report includes actions related to Improvement Condition IC53 - W1 Monitoring Improvements.

NRW has not received a response to Actions 1 and 2 in report CAR)NRW0048681 as

copied below.

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.

During the inspection it was determined that the W1 monitoring requirements as agreed in accordance with IC53 are still not yet operational. The EHS manager was not present during the inspection and it was difficult to determine what work remains outstanding to bring the monitoring equipment into operation.

It was clear that the sample collection line between the W1 outfall and the analysers has not been installed and a discussion was held regarding the the positioning of the line to ensure representative sampling of the discharge without potential influence from the Afon Bradley at the W1 headwall, particularly during high river levels. This issue may similarly affect flow measurement.

Should the W1 headwall be an unsuitable location, it is possible that the sample collection point may require relocation, potentially to the outlet of the lagoons prior to entry into the discharge pipeline - if this can be shown to be a representative location. Repositioning the sample point may have implications for the re-positioning of the monitoring cabinet and therefore timescales for completion of the response to IC53.

It was agreed that Kronospan will seek expert advice on this matter and then provide NRW with a action plan to bring the IC53 monitoring arrangements into operation as soon as possible.

Due to ongoing delays in meeting the requirements of meeting IC53, NRW may serve an enforcement notice if satisfactory progress is not made.

Action 3 (new) - Determine a representative sample collection point for continuous emissions monitoring equipment to service emission point W1 and provide NRW with an action plan with associated timescales for completion to fully implement the monitoring requirements as per IC53. Please do so by 10/10/25.

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.

CAPEX for the IBA bunker has been signed off but a work order has not yet been placed. IBA continues to be stored in sealed, covered skips that is environmentally protective.

Kronospan has reduced the quantities of APCr stored on site and is to utilise a trailer for dry storage of APCr pending collection for disposal.

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.

The root cause of the cracks found in the monitoring platform structural supports was due to metal fatigue and vibration. The platform was installed in 1992 and is original. To ensure safe access for monitoring at this location, an entirely new platform is required – to maintain access in the meantime, the scaffold platform will remain. The new design will comply with EN 15259, so far as is structurally possible, and therefore remove deviations currently in place during quarterly monitoring at these emission points.

Inspections of the other monitoring platforms earlier in the year found no concerning deterioration / damage as was evident on the MDF 1 platform. This included the MDF 2 platform, WESP 21, WESP 32, Formalin, GT1, GT2, and the Gas Engines.

Inspections of platforms have historically been undertaken during monthly safety audits by the plant management team. However, these audits have a wide / general focus and inspections may not be detailed enough to identify structural issues, such as those identified at MDF 1. Going forward, to ensure timely identification of structural defects a dedicated annual inspection of the site's monitoring platforms will be undertaken by a competent person(s).

This action is complete.

Improvement Conditions

IC40 - Noise Management Plan - Kronospan submitted an updated noise impact assessment and asset register following completion of background noise monitoring in Chirk.

This included the following information that is not subject to technical review by NRW.

CJA4897 Kronospan Chirk Partial Shutdown Environmental Noise Measurements 2024 Rev 0,

CJA4831 Kronospan Chirk NIA April 2025 Rev 2,
Appendix D Kronospan Noise Register_V2.

IC53 - W1 Monitoring Improvements - refer comments above regarding
CAR_NRW0048681

Press Abatement - Hydrogen Peroxide Dosing Trial

On 31/0725 Kronospan provided a methodology for the press abatement trial along with associated timescales for completion.

Action 4 (new)- Kronospan to provide NRW with an update as to progress and findings to date of the press abatement hydrogen peroxide dosing trial. Please provide this information

to NRW during the site inspection planned for 01/10/25.

General Management

Permit condition 1.1 requires that -

The operator shall manage and operate the activities: (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and (b) using sufficient competent persons and resource'

We note that Kronospan is increasingly failing to meet deadlines for the completion of actions arising from NRW Compliance Assessment activities and associated on site improvement works. In some cases multiple extensions to action deadlines have been agreed and were then missed. In the case of dust control, this has led to a Regulation 36 Enforcement Notice being issued as detailed in this report.

Failure to effectively manage, track and complete actions to minimise the risk of pollution from the installation, including those arising from non-conformances brought to Kronospan's attention by NRW, is breach of permit condition 1.1 and attracts a non compliance score of C3.

Further delays to the completion of actions may result in an escalation of compliance scores and our enforcement response.

Action 5 (new) - Kronospan to review its management system (including resources) and take necessary steps to ensure permit non compliance brought to its attention by NRW is addressed in a timely manner. Provide NRW with a summary of the review and steps taken / to be taken to address this issue. To be provided by 31/10/25.

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.