

Notice of request for more information
Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Company Secretary
Kronospan Limited
Maesgwyn Farm
Chirk
Wrexham
LL14 5NT

Application number: PAN 024285

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, duly made on **15 November 2024**. The information requested should be sent to the following address by **11 December 2025**.

Information should be sent to:

Karen Dunn
Permitting Service
Natural Resources Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

| Name | Date |
|-------------------|-------------------|
| Karen Dunn | 31/10/2025 |

Authorised on behalf of Natural Resources Wales

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Schedule

- Operator to clarify the proposed emission limit values at WESP 32 (A28). In Kronospan Supporting Information revision R4 Table 5 outlines the following:

Table 5: Proposed ELVs from WESP 32 – when OSB driers only operating

| Pollutant | Upper BAT-AEL (mg/Nm ³) | Proposed ELV (mg/Nm ³) |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------|------------------------------------|
| Oxides of nitrogen (NO and NO ₂ expressed as NO ₂) | 250 | 200 |
| Particulate matter | 30 | 20 |
| Total volatile organic compounds | 400 | 400 |
| Formaldehyde | 20 | 20 |
| <i>Notes:</i> Emission concentrations expressed as dry air, 273K, 101.3kPA, 18% reference oxygen content. | | |

Within the Operating Techniques Baseline report Table 13 outlines the following as per the document, proposed changes highlighted in yellow.

Table 13: Board manufacturing emission limits

| Emission point ref | Source | Parameter | Limit (mg/Nm ³) |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-----------------------------|
| A28 ⁽⁶⁾ | WESP 32 Unit stack – press abatement and the Resin 3,4 and 5 paper impregnation plant previously from emission points A5 and A6 | Particulate matter | 15 |
| | | Total volatile organic compounds | 30 |
| | | Formaldehyde | 5 |
| | | Oxides of nitrogen (NO and NO ₂ expressed as NO ₂) | 5 |
| A28 ⁽⁷⁾ | WESP 32 Unit stack – only emissions from OSB 1 and 2. Press abatement diverted to short stack and Resin 3,4 and 5 paper impregnation plant offline. | Particulate matter | 200 |
| | | Total volatile organic compounds | 20 |
| | | Formaldehyde | 200 |
| | | Oxides of nitrogen (NO and NO ₂ expressed as NO ₂) | 10 |

Please provide clearly what emission limits in respect of the relevant BAT-AELS are being applied for with this variation as there are differences within the application documents.

- Clarity is required around point 10 of the variation application, on page 5 of the supporting information R4 states, ‘two additional emission points to allow for the common MDF fibre cyclone dump stacks’. There appears to be no further information regarding these in the supporting information R4. Section 1.3.3 titled ‘MDF Press Rejects’ of the operating techniques document highlights a

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proposed change however there is no mention of cyclones. Please advise if the cyclones are existing on the MDF process or are new. Section 1.3.3 needs further information or reference to these new / existing cyclones. Please provide further information regarding the emission points proposed BAT-AELS and monitoring. It is also unclear from the proposed emission point plan the location of the two additional emission points.

3. Point ten as discussed in the above are absent from the environmental risk assessment. Please advise in respect of the two additional emission points if the consideration regarding the new/existing emission points as part of the environmental risk assessment.
4. There is no mention of the two additional emission points in respect of point ten of the proposed change, within the dispersion modelling assessment. Please advise where these have been considered in the assessment.
5. The emission point plan refers to Bab Driers which are proposed OSB Drier 1 & 2 in the application. Reference A5 and A6 are also still within the permit as NRW understands they are needed in the event of certain operating conditions. In the event of the WESP 32 being offline, the reactions VITS would go on stop and emissions can still take place at points A5 and A6. Please confirm if the NAIRB wet scrubbers are decommissioned along with the emission points and they are no longer in place or in use. The proposed emission point plan states 'removed' for both A5 and A6. Please update plan accordingly.
6. Please provide clarity regarding section 2.3.1 of the supporting information document R4 which refers to Point Source Emissions to Air. Point 3 references the emissions to WESP32 which includes direct heat driers OSB 2 and OSB 3. Should this be OSB 1 and 2 it is a typographical error from Bab Driers 2 and 3.
7. Operating Techniques Baseline Report Section 2.3.5 Table 14 refers to the existing W1 discharge limits except for COD as a proposed emission limit value (ELV). The current environmental permit has an ELV for BOD and no COD. Is the operator proposing a COD limit for the existing W1 discharge by way of this variation.
8. Operating Techniques Baseline Report Table 13 has the proposed changes highlighted in yellow. It is understood that A31 will include OSB press abatement or emissions from the 'short stack' when not directed to WESP 32. Please clarify in your response as it appears there is no proposed change to A31 as referenced as 'combined press abatement'. Is the referenced 'short stack' the permitted emission point A31.

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9. In the BAT assessment (BAT19) you state that for the new press for the OSB manufacturing line will include in duct quenching, control of the press and waste gases collected will go through a scrubber and a WESP. Also, the proposed PMDI does not contain formaldehyde. NRW understands from the supporting document that the OMP was updated for OSB however under Section 4.2.3.1 and BAT 19 of that document OSB does not include emissions/abatement from the press hall for the proposed OSB manufacturing line. Please provide clarification and further information.
10. Supporting document variation application point 3. Storage and use of hydrogen peroxide within WESP 21 and WESP 32 to oxidise TVOCs (if needed). NRW understands that the trials in WESP 21 and 32 have progressed and are currently taking place on emissions from the press hall. Please clarify if the proposed use of hydrogen peroxide is also intended for the wet abatement other than WESP 32 for the OSB manufacturing line to oxidise TVOC if required. Also, please advise on the procedure linked to the EMS for the use of hydrogen peroxide in WESP 21 and 32.
11. For the newly proposed chemical and reagent storage, please advise if there are any breather / pressure relief valves on the proposed new tanks. If present, it is noted that these have not been considered as potential sources of odour in the risk assessment or OMP regarding fugitive emissions. Further information is required in respect of this aspect of the application.
12. Kronospan Odour Registry is missing from the application submission Annex D of the OMP in respect of the proposed chemicals for the OSB variation. Please can a copy be provided.
13. Within the Operating Techniques document Table 5 titled 'permitted wastes for particleboard manufacturing' please clarify if this should include OSB. It is noted that the proposed new waste codes are also intended for use in OSB and have been included in yellow in this table. Please advise if OSB is an omission in the title or are they particleboard only. Please advise which waste codes are for OSB.

End of Schedule.

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