

Compliance Assessment Report CAR_NRW0049536

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: 01/10/2025 between 10:00 and 15:30.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood, accompanied by Stuart Ross.

Report sent to: Chris Emery, Operations Director, on 14/10/2025.

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)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	Action only (X)	
IR3C - Installations - Emissions and monitoring - Odour	Action only (X)	
IR3D - Installations - Emissions and monitoring - Noise and vibration	Action only (X)	

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?

Criteria	Action needed	Complete by
IR3A(2)	see text below	31/10/2025
IR3C	see text below	31/10/2025
IR3D	see text below	31/10/2025

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.

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 follows a planned visit to site on the 1st October 2025 to undertake a handover visit between regulatory inspectors and get an update from Kronospan on various matters.

Officers met with the Operations Director and Environmental Coordinator. Various operational and engineering staff were also present on site to assist with discussions relating to specific areas of the site.

Both the Operator and NRW provided an update on staff changes. The current EHS Manager is leaving. The Operator has recruited a H&S Manager and are looking to recruit a dedicated Environment Manager. Following staff changes within NRW's Industry Regulation team the lead regulating officer for NRW is also changing from Stuart Ross to Rebecca Harwood.

Odour

An update was provided in relation to the ongoing odour trials on the CEATEC scrubbers serving the raw board presses, as directed to WESP32. The Operator has been dosing the three scrubbers with hydrogen peroxide since June 2025 and more recently undertaken odour and VOC monitoring at various dosing rates to determine the effectiveness of this on emissions. The trial is ongoing with further odour monitoring scheduled.

Action 1: The Operator shall provide a report to NRW based on their findings of the odour trial by the 31st October 2025.

WESP21 continues to be dosed with hydrogen peroxide.

Air Emissions - Incident Report 01/09/25

An incident report was received on the 1st September 2025 reporting a blue haze from WESP32 and the MDF2 cyclones.

Blue haze is described in the Wood Based Panel Board BAT reference (BREF) document and is associated with air emissions released into the atmosphere, which contain a combination of water vapour, aerosols of condensed volatile organic compounds (VOC) and wood dust, to create the phenomenon 'blue haze'.

At Kronospan, the blue haze is principally associated with emissions from WESP32 that receives emissions from the raw board presses serving the MDF and particleboard lines. The VOC emissions are largely derived from the wood itself during the heating and pressing cycle, with a contribution from the resins used to bind the wood particles. WESP32 also receives some emissions from the paper impregnation plant.

The emissions monitoring data collected between 2023 to date show that (with two exceptions) particulate and total VOC (TVOC) emissions from all emission points are compliant with their respective emission limit values that are set by the Wood Based Panel BREF.

NRW discussed this incident with Kronospan during a routine inspection on the 5th September 2025 and further information was subsequently provided on abatement plant and continuous emissions data (where available) for the 1st September 2025. No issues were identified with the operation of the MDF2 process and biomass boiler K8 at this time.

Biomass boiler K7 combustion conditions were stable but it was noted that the high and low voltages for the Electrostatic Precipitator (ESP) were fluctuating. This data was discussed with the electrical engineer on the 1st October 2025 who stated that voltage fluctuations are normal, with the ESP operating as expected. It was reported that the ESP is subject to inspection by the Original Equipment Manufacturer (OEM) during every annual shutdown, including in May 2025.

Action 2: Please ensure a copy of the most recent OEM inspection report for the K7 boiler ESP is available for review at the next NRW inspection.

N.B Routine emissions monitoring for K7 shows that particulate emissions remain compliant with the permitted emission limit value.

The Operator reported that there were no issues with the operation of WESP32 on the 1st September 2025. It is noted that particulate emissions from WESP32 are routinely compliant with the respective emission limit values.

Officers are reviewing the general operation of WESP32 against the permit requirements. This will be addressed in a future compliance assessment report.

Noise

The Operator stated that they had completed noise monitoring at a property to the west of the site. This had indicated an impulsive sound potentially linked to the RCF tower filter boxes. Officers were able to hear the noise when stood adjacent to the filters. Following the site inspection, Officers visited the lane to the west of the site and could hear an intermittent impulsive sound not dissimilar to that observed from the RCF tower filter boxes. However, given there are multiple sources of impulsive sound at the installation, the exact source is not definitive based on this observation alone.

Since the inspection the Operator has, through a period of plan shutdown, identified that

the impulsive noise may be linked to a different component of the particleboard process. NRW are expecting an update from the Operator in relation to the findings, including any actions to be completed.

Action 3: An update should be provided to NRW by the 31st October 2025.

Improvement condition 40 (IC40) required the Operator to produce and submit a Noise Management Plan (NMP) to NRW in line with relevant standards. In response to this submission, NRW subsequently required the operator to provide an updated Noise Impact Assessment which has recently been received. This is currently being reviewed by our noise monitoring specialists and a separate CAR form will be issued in response to IC40 compliance.

Dust

A Regulation 36 notice was issued to the Operator on the 15th September 2025 following the previous inspection in September. Officers will assess compliance with the notice following the expiry of the notice to ensure the necessary steps have been completed.

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.