

Compliance Assessment Report CAR_NRW0049732

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: 21/10/2025.

Parts of permit assessed: Monitoring returns.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Chris Emery, Director, on 30/10/2025.

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

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| IR3E - Installations - Emissions and monitoring - Monitoring | Assessed (A) | |
| IR4B - Installations - Information - Reporting | C3 Minor | 4.2.3 |
| IR4C - Installations - Information - Notification | C3 Minor | 4.3.1 |
| IR1A - Installations - Management - General Management | C3 Minor | 1.1 |
| IR3A(2) - Installations - Emissions and monitoring - Emissions to air | C3 Minor | 3.1.2 |
| IR3A(2) - Installations - Emissions and monitoring - Emissions to air | C3 Minor | 3.1.2 |
| IR3A(2) - Installations - Emissions and monitoring - Emissions to air | C3 Minor | 3.1.2 |
| IR3A(2) - Installations - Emissions and monitoring - Emissions to air | C3 Minor | 3.1.2 |
| IR3A(1) - Installations - Emissions and monitoring - Emissions to water | Assessed (A) | |
| IR3H - Installations - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive | C3 Minor | 3.1.2 |

| Part of permitted activity assessed (compliance criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| (includes LCP) | | |

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

| Total non-compliances recorded | Total non-compliance score |
|--------------------------------|----------------------------|
| 8 | 32 |

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 | see Actions 1, 2 & 3 | 13/11/2025 |
| IR4C | see Actions 1, 2, 5 & 6 | 13/11/2025 |
| IR1A | see Actions 1 & 2 | 31/12/2025 |
| IR3A(2) | see Action 4 | 04/10/2026 |
| IR3A(2) | see Action 4 | 04/10/2026 |
| IR3A(2) | see Action 5 | 13/11/2025 |
| IR3A(2) | see Action 5 | 13/11/2025 |
| IR3H | see Action 6 | 13/11/2025 |

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) follows the submission of Kronospan's routine emissions monitoring returns for the period April - June 2025 (Quarter 2).

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.

A permit variation was issued to the Operator on the 4 June 2025. For the purposes of this

CAR the previous version - V10 - has been used to assess compliance.

Quarter 2 Emissions Monitoring

Q2 monitoring returns were received on 04/09/2025. Failure to provide the monitoring returns on time (by 28 July) is in **breach of permit condition 4.2.3** attracting a non compliance score of C3. Notifications relating to emission exceedances were also not submitted at the time resulting in a **breach of permit condition 4.3.1** attracting a non compliance score of C3.

Action 1: Ensure future monitoring returns and notifications are submitted in accordance with the permit requirements.

As stated in CAR NRW0048932, NRW consider that the root cause of the failure to report monitoring data on time and to provide Schedule 5 Notifications as required by the permit for emission limit value (ELV) exceedances is a **breach of permit condition 1.1** General Management, attracting a non compliance score of C3.

Action 2: Procedures, staff training and resources should be reviewed to ensure future compliance with the reporting and notification requirements of the permit.

1. Emissions to Air

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

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. TVOC was monitored in Q2 and the result compliant with the ELV. Based on the data provided to date, NRW consider that TVOC emissions to be sufficiently stable and therefore agree to continued annual monitoring.

Emission points A5 and A6 are not in use.

Monitoring was not undertaken at emission points A16, A17 and A18 during the quarter.

Emission Point A19 (Gas Turbine 1) & Emission Point A20 (Gas Turbine 2)

The monitoring return states that there was no quarterly emissions testing during Q2.

Action 3: As previously requested, the Operator should confirm why quarterly emissions monitoring was not undertaken at emission points A19 and A20 by 13/11/2025. This information should be provided on future monitoring returns should emissions monitoring not be undertaken.

Emission Points A21 - A25 (Gas Engines)

Emissions monitoring was undertaken on emission points A21, A22 and A23, results were

below the ELVs within the permit.

Emission points A24 and A25 are not active as the engines have not been installed.

Emission Point A26 (K7 Biomass Boiler)

NO_x and CO ELVs were exceeded during the quarterly emissions testing.

NO_x - 362.3mg/Nm³ (ELV 250mg/Nm³). This is a **breach of permit condition 3.1.2** and attracts a non-compliance score of C3.

CO - 641.3mg/Nm³ (ELV 150mg/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 with the monitoring return. As noted in CAR NRW0048932 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 NO_x emissions (amongst others) from boiler K7.

Action 4: Complete improvement condition programme as specified in the permit (ongoing requirement).

Emission Point A27 (K8 Biomass Boiler)

Continuous monitoring data was compliant with the ELVs.

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A28 (WESP 32)

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A29 (MDF 2 Cyclones)

Emissions testing was undertaken across all 4 cyclones during Q2. This closes out Action 1 from CAR NRW0046148 and covers the annual monitoring requirement for 2024.

TVOC and Formaldehyde ELVs were exceeded during the quarterly emissions testing on cyclone 1.

TVOC - 141.7 mg/Nm³ (ELV 120mg/Nm³). This is a **breach of permit condition 3.1.2** and attracts a non-compliance score of C3.

Formaldehyde - 34.1mg/Nm³ (ELV 15mg/Nm³). This is a **breach of permit condition 3.1.2** and attracts a non-compliance score of C3.

Action 5: As previously requested, further information relating to the investigation undertaken at the time of the emission exceedances is required. The Part B should be updated and resubmitted to NRW by 13/11/2025.

Although emissions exceedances were also seen on cyclone 3 once the measurement

uncertainty has been taken into account these were compliant.

These results cannot be used for the annual monitoring requirements for 2025 and a further round of annual monitoring shall be completed.

Emission Point A30 (MDF 1 Cyclones)

Emissions testing was undertaken across the 2 cyclones during Q2. Results were compliant with the permitted ELVs.

Emission Point A31 (Press Abatement)

Emission point not in use this quarter.

Emission Point A32 (WESP 21)

Quarterly emissions testing was undertaken and emissions were compliant with the permitted ELVs.

2. Emissions to Surface Water

Emission Point E1

No discharges reported during the reporting period.

Emission Point W1

Emissions were compliant with the permitted ELVs.

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

Q1 and Q2 IBA and APCr monitoring returns were received on 04/09/2025.

The Loss on Ignition (LOI) result for K7 bottom ash was above the limit of 5% in Q2. A result of 5.9% was recorded. This is a **breach of permit condition 3.1.2** and attracts a non-compliance score of C3. A Schedule 5 notification has not been received, this is a **breach of permit condition 4.3.1** attracting a non compliance score of C3, consolidated.

Action 6: The Operator should investigate the cause of the elevated LOI and submit a Schedule 5 notification in accordance with the permit. If the Part B cannot be completed by 13/11/2025 then an update should be provided to NRW by that date with details of when the completed Schedule notification will be received.

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.