

## Compliance Assessment Report CAR\_NRW0049841

**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:** 03/11/2025 between 14:15 and 15:45.

**Parts of permit assessed:** Logyard operations.

**NRW Lead Officer:** Rebecca Harwood, accompanied by Kathryn Bradshaw.

**Report sent to:** Chris Emery, Director, on 25/11/2025.

### 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	C2 Significant	1.1.1
IR4A - Installations - Information - Records	Action only (X)	
IR4C - Installations - Information - Notification	C3 Minor	4.3.1

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

Total non-compliances recorded	Total non-compliance score
2	35

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	see text below	31/12/2025
IR4A	see text below	31/12/2025
IR4C	see text below	31/12/2025

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.**

**We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.**

### 4. Details of our assessment

This Compliance Assessment Report (CAR) follows an unannounced inspection of the site on the 3 November 2025 following an incident in the logyard on the 13 October 2025 when smouldering material was detected within the boiler fuel pile.

Officers met with the Operations Director, Environmental Coordinator and Logyard Manager.

Details regarding the incident, provided by the Operator state that:

*"Temperature monitoring was undertaken by Logyard personnel at approximately 07:00hrs on 13<sup>th</sup> October 2025. A reading of 75.8°C was recorded on the boiler fuel pile with the Logyard Manager subsequently informed. The Logyard Manager immediately inspected the area and noted steam escaping from the old boiler fuel pile. At 08:15 Logyard Manager informed Fire Department Manager of the increased temperatures and visible steam and used a break glass activation point, summoning the onsite Emergency Response Team (ERT). The EHS Manager was also contacted to stop any discharge from the logyard to lagoon 3, so water could be contained and tested.*

*The on-site ERT attended the incident arriving on scene approx. 08:28. After an initial assessment of the scene, the Incident Commander carried out a Dynamic Risk Assessment of the area, Logyard Manager had already stopped vehicles from entering the Logyard.*

*With the support of the Logyard Manager, Operations Director and Production Director, the initial assessment confirmed the exact location and found smouldering material had developed within the boiler fuel near to a log containment wall to the western side (Rail-Siding) of the stockpile.*

*The wind direction at the time was Northerly.*

*From the information available, the decision for the best way forward in dealing with this situation was to dampen down the log wall/boiler fuel material from the south side, whilst removing the log wall from the west side using the log grabs. The removed logs were relocated into the quarantine area.*

*Once the log wall had been removed on the west side, this provided the opportunity for bucket loaders to start removing boiler fuel, therefore providing the ERT with a safe access route to the log wall area. The ERT located on the south side could then be withdrawn allowing additional bucket loaders and grabs to remove boiler fuel stockpile and start*

*removing the log wall, putting in place additional firebreaks as well as providing a secondary firefighting access. Minimal fire water was required.*

*The action plan effectively reduced the amount of smouldering material and allowed the ERT to continue damping down, ensuring the incident did not protract further. Material suspected of being hot or containing known hot spots was removed to the quarantine area and spread out, the ERT having already set up a ground monitor to dampen down any hot spots. The log grabs continued to remove the log wall from the south side. The logs were placed in the quarantine zone and wet down.*

*Temperatures were monitored closely and the incident brought to a close approximately at 11:19 with the area handed back shortly after to the Logyard Manager and his team.*

*No complaints have been received for this event, EHS Manager attended the Lodgevale area and confirmed no odour could be detected."*

Officers visited the logyard and viewed the boiler fuel stockpile. It was stated that the material (K8 boiler fuel) had been in-situ in excess of 3 months and had effectively started to compost creating the hot spot. The Operator stated that weekly temperature monitoring is undertaken.

Officers requested to view the temperature monitoring records. These indicated that temperature monitoring was not taken on all stock piles on the 5 October 2025 due to access issues. This appeared not to have been reported by the monitoring personnel at the time and therefore no temperature measurements were taken the week prior to the incident. Records from the previous weeks showed temperatures gradually increasing.

Whilst on site Officers viewed a copy of the work instruction KC/LOGY/WI0053 - Temperature Monitoring of the Logyard Stock. This states that "*If any residue stockpile records a temperature of +50 degrees Celsius temperature measurements are to be increased to every 48 hours until the material has been processed or removed from the area.*" It goes on to state that "*If any residue stockpile records a temperature of +60 degrees Celsius then temperature measurements are to be increased to every 24 hours until the material has been processed or removed from the area.*"

This procedure was not followed following the results obtained on the 19 September 2025, 25 September 2025 or 2 October 2025 when results of 52.1°C, 63.4°C and 70.1°C respectively were recorded. Had the procedure been followed in September then the hot spot would not have developed further, thereby reducing the risk of a fire and the potential impact to the environment.

Failure to follow work instruction KC/LOGY/WI0053 has potential to cause a significant environmental impact, accordingly a **C2 compliance score has been raised against condition 1.1.1 General Management.**

It should be noted that the procedure was followed in respect of the measures taken when the elevated temperature of 75.8°C was detected on the 13 October 2025.

**Action 1:** Investigate the reason why the initial elevated temperature readings recorded in September were not acted upon and why there was no follow up monitoring undertaken

when the stockpiles could not be accessed. An update should be provided to NRW by 31/12/2025.

**Action 2:** Ensure all relevant staff are trained in the correct work instructions to ensure that procedures are followed when elevated temperatures have been detected in logyard stock piles.

Officers will review training records and continued compliance with the WI at future inspections.

### Notifications

As detailed above, it is noted that Kronospan followed procedure in terms of the incident response measures taken following the detection of the elevated stockpile temperature on the 13 October 2025.

However, Kronospan did not notify NRW of this incident in accordance with permit condition 4.3.1 as copied below. Nor was a Schedule 5 notification received in accordance with permit condition 4.3.2.

*4.3.1 (a) Natural Resources Wales shall be notified without delay following the detection of: (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or **may** cause significant pollution.*

*4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.*

Having considered the circumstances of the smouldering event, NRW considers that at the point of detection by site personnel, this incident had the potential to escalate into a fire that may cause significant pollution.

A notification was not received from the Operator at the time of the incident. **A C3 compliance score has been raised against Condition 4.3.1 Notification.**

**Action 3:** The Operator shall review their procedures for notifying NRW in relation to incidents that may cause significant pollution in line with condition 4.3 Notifications.

Officers will review the notification procedures and associated training records during a future inspection.

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.