

Compliance Assessment Report CAR_NRW0050165

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: 15/12/2025.

Parts of permit assessed: Q3 monitoring returns.

NRW Lead Officer: Kathryn Bradshaw.

Report sent to: Operations Director, Operations Director, on 22/01/2026.

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	C3 Minor	3.6.1
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
IR3E - Installations - Emissions and monitoring - Monitoring	C3 Minor	3.6.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2

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

Total non-compliances recorded	Total non-compliance score
6	24

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
IR3E	Ensure all parameters for emission point A22 are tested as per Schedule 3 Table S3.2	31/03/2026
IR3A(2)	Complete improvement condition programme as specified in the permit (ongoing requirement).	30/06/2026
IR3A(2)	Investigate the root cause of the particulate emission breach and report back to NRW by 31st March 2026.	31/03/2026
IR3A(2)	Tracking of individual metals contents will be carried out to ascertain whether there is a trend in increasing values for Chromium and Nickel, or any other metal.	31/03/2026
IR3E	Ensure all parameters for emission point A27 are tested as per Schedule 3 Table S3.3	31/03/2026
IR3A(2)	Provide a more detailed root cause analysis of this issue as breaches of this ELV have occurred in previous years – Q4 2023 and Q1 2024	31/03/2026

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 July to September 2025 (Quarter 3).

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 (V11). This varied permit has been used to assess compliance in this CAR report.

Quarter 3 2025 Emissions Monitoring

Q3 monitoring returns were originally received on 31/10/2025 in compliance with permit condition 4.2.3. Following an initial review queries were raised and these were then

resubmitted on 15/12/2025.

1. Emissions to Air

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

As per Compliance Assessment Report NRW0049732 it was agreed that monitoring of TVOC at emission point A1 can now be conducted annually and this was completed in Q2 2025.

Emission points A5 and A6 are not in use.

Monitoring was not undertaken at emission points A16, A17 and A18 during this 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 Q3 as the turbines were not operational for more than 28 days.

Emission Points A21 - A25 (Gas Engines)

Emissions monitoring was undertaken on emission point A21 and results were in compliance with the ELVs.

Emissions monitoring was not undertaken on emission point A22 as it was stated in the submission that it was not operational for more than 28 days.

However this is not stated in the permit and this is in breach of permit condition 3.6.1 and attracts a score of C3.

Action: Ensure all parameters for emission point A22 are tested as per Schedule 3 Table S3.2

Emissions monitoring was undertaken on emission point A23 and results were in compliance with the ELV's.

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

Emission Point A26 (K7 Biomass Boiler)

NO_x and particulate matter ELVs were exceeded during the quarterly emissions testing.

NO_x – 1032 mg/Nm³ (ELV 250mg/Nm³). This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3.

Particulate Matter – 89.7mg/Nm³ (ELV 30mg/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 NOx emissions (amongst others) from Boiler K7.

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

Action: Investigate the root cause of the particulate emission breach and report back to NRW by 31st March 2026.

Emission Point A27 (K8 Biomass Boiler)

Continuous monitoring data was compliant with the ELVs.

The heavy metals ELV was exceeded during this quarter.

Antimony, Arsenic, Lead, Chromium, Cobalt, Copper, Manganese, Nickel & Vanadium and their compounds (total) – 0.61mg/Nm³ (ELV 0.45mg/Nm³). This is a breach of permit condition 3.1.2 and attracts a score of C3.

The operator submitted a Schedule 5 notification with the monitoring returns which stated the following;

Breakdown of contribution of all metal results for Q3 to the total show high results for Chromium and Nickel compared to other metals, and to previous quarterly results. Other emissions from the boiler were in control and no issues with boiler fuel / lime dosing or operations are recorded for the time of the testing.

K8 Boiler fuel includes materials from yard and sweep off areas that may contain metal fines or materials containing metals that cannot be separated or detected.

The operator has identified the following measures to prevent any further breaches of this ELV;

K8 emission are directed through Dryer 4 / WESP 21 before venting to atmosphere. This applies additional abatement (metals results are significantly lower).

Tracking of individual metals contents will be carried out to ascertain whether there is a trend in increasing values for Chromium and Nickel, or any other metal.

The following parameter was not tested for during this quarter:

- Dioxin-like PCBs (WHO-TEQ Humans / Mammals, Fish, Birds)

No explanation has been provided and this is in breach of permit condition 3.6.1 and attracts a score of C3.

Action: Ensure all parameters for emission point A27 are tested as per Schedule 3 Table S3.3

Emission Point A28 (WESP 32)

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A29 (MDF 2 Cyclones)

All parameters were in compliance with the permit ELV's except for formaldehyde. The ELV is 15mg/Nm³ and the result for Q3 was 16.5mg/Nm³. However once the uncertainty of 3.2mg/Nm³ is taken into account the result is below the ELV.

Emission Point A30 (MDF 1 Cyclones)

All parameters were in compliance with the permit ELV's except for formaldehyde. The ELV is 15mg/Nm³ and the result for Q3 was 27.4mg/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 with the monitoring returns which stated the following;

Production records and process parameters during the monitoring period have been reviewed and it is noted that MDF1 was preparing to change products as the time of the second, high result run.

The change however did not result in the nose lifting, but did cause some reject board as the product specifications were changed (these were dimension changes, not composition/resin).

These are the only production/operation changes that coincided with the testing although it does not explain the changes in formaldehyde output. We will review communication between the press and testers to ensure that all testing is carried out under stable production conditions.

Action: Provide a more detailed root cause analysis of this issue as breaches of this ELV have occurred in previous years – Q4 2023 and Q1 2024 by 31st March 2026.

Emission Point A31 (Press Abatement)

Emission point not in use this quarter.

Emission Point A32 (WESP 21)

All parameters were in compliance with the permit ELV's except for formaldehyde. The ELV is 10mg/Nm³ or 15mg/Nm³ if >85% feedstock being used is recovered wood. The site submitted a Schedule 5 notification which stated that production was running at 86.6% recovered wood feedstock for the process. When the uncertainty value of 4.9mg/Nm³ is taken into account the result is below the ELV.

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)

Q3 IBA and APCr monitoring returns were received on 31/10/2025.

The Loss on Ignition (LOI) result for K7 bottom ash was 5.1% slightly above the limit of 5%.

An action was set in CAR Form NRW0049732 to investigate the cause of previous elevated LOI results with a deadline date of 13th November 2025. No response to this has been received to date and this action is overdue, please submit a response as soon as possible.

The Schedule 5 Notification for the Q3 exceedance states

We have investigated the potential causes of this issue and are unable to determine why the sample result was high.

Factors that would affect LOI within the bottom ash have remained consistent, for example: the furnace temperature, and no other process or operating issues have been recorded or tracked over the day the sample was taken.

Due to the location of the sample point there is the possibility of contamination from wood particles from cleaning and pre-processing activities, these maybe contributing to the erroneous results.

The sampling WI and process will be reviewed to ensure minimisation of contamination entering the samples.

NRW will continue to monitor the results of the IBA, review combustion conditions and may review the sampling WI and process at a future visit.

The LOI result for K8 bottom ash was in compliance with the limit.

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 required for the permit condition assessed to avoid non-compliance. No non-compliance scored at this time
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(1) – Emissions to water
- IR3A(2) – Emissions to air
- IR3A(3) – Emissions to 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.

Disputing the Content of this Compliance Assessment Report Form

If you disagree with the content of this Compliance Assessment Report form, you should submit your concerns, in writing, to the regulating officer who issued it within **15 working days** of its issue. This will be treated as a **Stage 1 review**.

If you are not satisfied with the outcome of the stage 1 review, you may request a **Stage 2 appeal**. This request must be submitted **within 21 working days** of receiving the response from the stage 1 review.

Further details on our review and appeal process are available at: [Natural Resources Wales / Appeal a regulatory decision from Natural Resources Wales](#)

Concerns Not Related to the Content of this Compliance Assessment Report Form

If your concerns do not relate to the content of the Compliance Assessment Report form, you should first attempt to resolve the issue with the regulating officer or their line manager.

If the issue remains unresolved, please contact our **Customer Contact Team**:

- **Telephone:** 0300 065 3000 (Monday to Friday, 09:00–17:00)
- **Email:** enquiries@naturalresourceswales.gov.uk

They will provide details on how to escalate your concerns through our **Complaints and Commendations procedure**.

If you are dissatisfied with our response, you may contact the **Public Services Ombudsman for Wales**:

- **Telephone:** 0300 790 0203
- **Email:** 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.