

## Compliance Assessment Report CAR\_NRW0050326

**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:** 30/12/2025.

**Parts of permit assessed:** K7 boiler emissions.

**NRW Lead Officer:** Rebecca Harwood.

**Report sent to:** Chris Emery, Operations Director, on 17/03/2026.

### 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	Assessed (A)	
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C2 Significant	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(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C2 Significant	3.1.2
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C2 Significant	3.1.2
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
8	113

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	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR3A(2)	see text below	Already completed
IR4C	see text below	30/01/2026

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.**

**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 the receipt of a Schedule 5 Notification from the Operator on 30 December 2025 relating to emissions monitoring undertaken at the K7 Biomass Boiler, Emission point A26 during November 2025.

It should be noted that the monitoring requirements for Emission point A26 were amended as part of permit variation 11 issued in June 2025. This was the first time a number of the parameters had been monitored at the emission point.

The Schedule 5 Notification highlighted several exceedances. Following a review of the Schedule 5 Notification, NRW requested the original test house reports to be submitted along with the most recent emissions monitoring of the MDF cyclones, as the emissions

from the K7 biomass boiler are generally ducted to the cyclones. This information was also received on 30 December 2025.

The exceedances are detailed below:

**25/11/2025**

Dioxins / Furans (I-TEQ) - 397 ng/Nm<sup>3</sup> (limit 0.09 ng/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C2 non-compliance score.

**26/11/2025**

Particulate Matter - 116 mg/Nm<sup>3</sup> (limit 30 mg/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C3 non-compliance score.

TOC - 546 mg/Nm<sup>3</sup> (limit 30 mg/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C3 non-compliance score.

Carbon Monoxide - 1979 mg/Nm<sup>3</sup> (limit 150 mg/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C3 non-compliance score.

Oxides of Nitrogen (as NO<sub>2</sub>) of 592 mg/Nm<sup>3</sup> (limit 250 mg/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C3 non-compliance score.

**27/11/2025**

Cadmium & Thallium and their compounds (total) - 0.42 mg/Nm<sup>3</sup> (limit 0.03 mg/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C2 non-compliance score.

Heavy Metals and compounds - 18.1 mg/Nm<sup>3</sup> (limit 0.45 mg/Nm<sup>3</sup>). This is a breach of permit condition 3.1.2 and attracts a C2 non-compliance score.

The Oxides of Nitrogen exceedance was not documented on the Schedule 5 Notification and was only noted by Officers on receipt of the test house results. This is a breach of permit condition 4.3.1 Notifications and attracts a C3 non compliance score.

A Regulation 61 notice was issued to the Operator on 2 January 2026 requesting information relating to the operation of the K7 biomass boiler over the period of the exceedances.

Following a review of this information a Regulation 37(1) and (5) Suspension Notice was issued relating to Activity reference AR4 (Biomass Boiler K7) as referenced in Schedule 1, Table S1.1 pursuant to permit condition 2.1.1 on 8 January 2026.

NB: The Suspension Notice allowed for the Operator to restart the K7 Biomass Boiler for the purpose of undertaking emissions monitoring on a date and as agreed with NRW. Following the monitoring the suspension was reinstated until the results had been received and reviewed.

This CAR dated 30 December 2025 records the breaches identified in November 2025 and reflects the regulatory position at the time. The investigation is ongoing. Further scores may

be applied following the conclusion of the investigation and enforcement action.

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](mailto: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](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.