

## Compliance Assessment Report CAR\_NRW0051240

**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:** 30/03/2026 - 02/04/2026 between 11:20 and 13:30.

**Parts of permit assessed:** See Report.

**NRW Lead Officer:** Kathryn Bradshaw, accompanied by Stuart Ross, Hannah Ibbotson.

**Report sent to:** Site Manager, Site Manager, on 09/04/2026.

### 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)	
IR2B - Installations - Operations - The site	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1

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

Total non-compliances recorded	Total non-compliance score
2	8

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	Action 1 - Review operating procedures for the mobile dust suppression unit to ensure it operates reliably.	30/04/2026

Criteria	Action needed	Complete by
IR1A	Action 2 - A review of the DMP is required to ensure it includes appropriate measures to prevent and where that is not possible, minimise dust emissions on the log yard, including through the management of stockpile heights, dust suppression techniques and their maintenance as applicable.	30/04/2026

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) has been raised following an unannounced site inspection primarily to observe stack monitoring of dioxins and investigate a number of Wales Incident Reports (WIRS) received by NRW for dust and odour.

#### **Site Visit 30/03/26**

Prior to arriving on site NRW officers observed site operations from an elevated vantage point. A large pile of what appeared to be virgin timber was visible although no dust plumes could be seen being generated from site operations. NRW officers also conducted olfactory monitoring along Holyhead Road, Maes Y Waun, Station Avenue and Castle Road. A moderate MDF odour was detected past the site entrance to the south of the site and along Station Avenue. Further down Station Avenue a moderate chocolate odour was detected.

Site officers visited the log yard and viewed the K7 boiler fuel storage area which contained MDF fibre, shredded MDF and complete MDF boards. The fuel was relatively dry with no contamination issues noted. The shredded MDF stored in this area was relatively dry and gave rise to wood dust when agitated by hand. Dust was witnessed when the material was handled by the loading shovel and became windblown due to the blustery wind conditions. A significant quantity of MDF refiner fibre was being stored in the adjacent compound which was slightly damp. This gave rise to small amounts of dust when agitated by hand and loading shovel but much less than the shredded MDF. This has the potential to generate larger volumes of dust when this material dries. Wind blown dust was evident in the areas around the K7 boiler fuel storage areas. The yard was covered in wood particles,

some damp but others had dried in the sunny windy conditions.

The mobile dust suppression unit was in place in the K7 boiler fuel stockpile bay but wasn't working and had reportedly broken down due to MDF fibre/wood dust entering the water tank and blocking the filter. Staff were working on this unit when we were in the log yard to try and bring it back into use. The log yard manager reported that the dust suppression unit had stopped working in the morning of the day of our visit and that it was operational the previous day, this was not verified during our visit. No other water suppression systems were in use in this area during our visit. A build up of fine wood material could be seen on the log walls surrounding the boiler fuel storage areas.

It is unclear whether regular planned preventative maintenance has been carried out on the mobile dust suppression unit, however it should have been operated in a manner that prevents the water tank becoming full of dust i.e. the lid provided for the tank should be fitted appropriately. This is a breach of permit condition 1.1.1 and attracts a non compliance score of C3.

**Action 1** - Review operating procedures for the mobile dust suppression unit to ensure it operates reliably.

A large pile of chipped virgin timber was present on the yard this reportedly followed the use of a mobile chipper to chip oversize and regular roundwood for MDF production. The dedicated (fixed) wood chipper has been shut down for maintenance / repair. The Log Yard Manager estimated that the stockpile was 9m tall, in exceedance of a 7m limit. The stockpile was higher than any other materials, including piles of roundwood which make it more liable to give rise to wind-blown dust. The material in the lower part of the stockpile was damp to the touch and did not easily give rise to dust when handled or when moved by the front loading shovel.

The Dust Management Plan (reference KC/EHS/PRO/017.A1. V1) does not state what the maximum storage piles are for virgin chipped wood. The plan states the following;

*'Maximum heights for stockpiles are clearly established and not exceeded'*.

However, a document submitted by Kronospan entitled 'Stockpile Heights, Separation Distances and Fire Walls' states that chipped roundwood will not be stored more than 7m high.

The failure to manage stockpile heights is in breach of permit condition 1.1.1 and attracts a non compliance score of C3.

**Action 2** - A review of the DMP is required to ensure it includes appropriate measures to prevent and where that is not possible, minimise dust emissions on the log yard, including through the management of stockpile heights, dust suppression techniques and their maintenance as applicable.

The operator explained that a road sweeper is used around the site during weekdays and regular high level inspections of roof areas are conducted. The DMP states that the log yard roadways are scraped regularly. Good housekeeping of the log yard would not only benefit a reduction in diffuse emissions but also lower the load of wood dust in the surface water run-off. General housekeeping and the DMP will be audited in detail during future

compliance visits.

NRW officers viewed the K7 boiler fuel bunker which contained MDF fibre and shredded MDF with no contamination noted.

NRW also visited the control room to view K7 boiler operation, no issues were identified and boiler temperatures were in excess of 850 degrees Celsius.

MCERTS monitoring contractors were on site conducting concurrent dioxin and furan monitoring at the K7 exhaust (lower platform) and MDF 2 cyclones as required by the Regulation 36 Notice. Both monitoring locations were visited, and monitoring technicians reported no issues with the monitoring exercise.

### **Site Visit 02/04/26**

This was an unannounced inspection following up from a number of WIRS (2603304, 2603294, 2603290, 2603282, 2603269, 2603252, 2603227, 2603226) received about dust and odour.

Prior to arriving on site NRW officers observed site operations from an elevated vantage point. The pile of virgin timber had been significantly reduced from the previous visit on Monday. No dust plumes could be seen from this point.

NRW officers conducted olfactory monitoring along Chapel Lane, Holyhead Road, Maes Y Waun, Station Avenue and Castle Road. A faint chocolate odour was detected at the entrance to Maes Y Waun, a faint MDF odour was detected at the primary school and on the hospital car park.

NRW officers visited the log yard where the mobile dust suppression unit mentioned above was in operation in the K7 boiler fuel storage area and the water mist cannon in the adjacent storage area. The shredder used for MDF board was not in use as it was awaiting repair. The mobile chipper was in operation used for virgin roundwood and the stockpile seen on the previous visit had been significantly reduced. No visible dust was seen during this operation.

Officers also visited the RCT storage area where the permanent water misters were in operation but no activities were ongoing at the time. The water bowser was also viewed driving along the main access road to the log yard.

No other issues were noted during the visit.

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.