

Compliance Assessment Report CAR_NRW0052282

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: Check Monitoring/Sampling,

Reason: Routine.

On: 16/06/2026 between 11:00 and 13:00.

Parts of permit assessed: 3.6.1(a).

NRW Lead Officer: Libby Hughes, accompanied by Rebecca Harwood, George Nuttall.

Report sent to: Chris Emery, Operations Director, on 09/07/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.6.1(a)
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	C3 Minor	3.6.1(a)
IR4A - Installations - Information - Records	Action only (X)	
IR1A - Installations - Management - General Management	Action only (X)	

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
IR3A(1)	See Actions 1 and 2 below	16/07/2026
IR3A(1)	See Actions 1 and 2 below	16/07/2026
IR4A	See Action 3 below	16/07/2026

Criteria	Action needed	Complete by
IR1A	See Actions 4 and 5 below	31/08/2026

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 has been prepared following several visits to Kronospan to undertake water samples. The purpose of the visits was to assess compliance with the discharge limits for W1, and to observe the cleaning out of the lagoons.

26th May 2026

No discharge was taking place from W1 at the time of the visit, but the operator confirmed that plans were in place for emptying and cleaning the lagoons as soon as there was a sufficient dry spell in the weather. Officers requested that Kronospan advise NRW when discharge was likely to be occurring via W1 so that sampling could take place.

9th June 2026

Discharge was occurring from the lagoons at the time of the visit. Formal samples were obtained from the discharge point W1. These were divided and one set of samples left with Kronospan. The second set was sent to NRW's laboratory for analysis.

IR3A(1) Emissions to Water

Results of some of the samples taken by NRW on 9th June have been received and have been assessed against the limits set out in **Table S3.5 - Point source emissions to water**.

- Ammoniacal Nitrogen had a value of **8.96 mg/l**, which is in excess of the permit limit of 5 mg/l.
- BOD had a value of **11.4 mg/l**, which is in excess the permit limit of 9.5 mg/l.

These two exceedances of permit limits have resulted in two separate C3 scores against Compliance Category IR3A(1) above, one for each exceedance.

All other results received were within permitted limits. It should be noted that results of the GCMS sample have not yet been received, and may be discussed in a future CAR form.

Action 1: As per the Schedule 5 Notification received on 15th June please provide NRW with your in-house BOD results by 16th July 2026.

Action 2: The operator should investigate the reason behind the elevated BOD level and ensure future results are compliant with permit requirements before discharge.

Spot checks of in-house testing may be undertaken by officers during future inspections.

16th June 2026

During this visit there was no discharge taking place. Lagoon 1 was in the process of being emptied; contractors were onsite pumping the sludge from the bottom of the lagoon and removing it from site. It was noted that the base of the lagoon slopes downwards away from the lagoon's discharge point, so sludge was contained.

Lagoon 2 still contained water at the time of the visit. NRW understood that Lagoon 2 would be de-sludged once Lagoon 1 has been completed.

It was observed that the discharge pipe from Lagoon 1 was damaged.



Action 3: Please forward the effluent sample analysis results of the testing carried out by the contractors from Lagoons 1 and 2 by 16th July 2026.

Action 4: Inform NRW when the date for cleaning of lagoon 3 is confirmed.

Action 5: Produce an action plan for the repair of the discharge pipe in Lagoon 1.

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.