

Compliance Assessment Report CAR_NRW0052634

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: 07/08/2026 between 10:40 and 11:45.

Parts of permit assessed: see below.

NRW Lead Officer: Victoria Taylor, accompanied by Libby Hughes.

Report sent to: Operations Director, Operations Director, on 19/08/2026.

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)	
IR2C - Installations - Operations - Operating techniques	Assessed (A)	
IR3A(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR4A - Installations - Information - Records	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
IR4A	See Action 1 and 2 below	30/09/2026

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.

At this time, we do not intend to take any further action.

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 prepared by a Natural Resources Wales (NRW) regulating officer following two site inspections.

Site Inspection 27 July 2026

This was an unannounced inspection following up from a number of WIRS received about dust and odour. The weather on the day of the inspection was hot, dry and sunny, and antecedent weather conditions were similar for several weeks.

Prior to arriving on site NRW officers observed site operations from an elevated vantage point. Stack emissions were rising in a southerly direction. No dust plumes could be seen from this point and the dust suppression system (permanent water misters) was clearly operational.

NRW officers conducted olfactory monitoring along Colliery Road, Holyhead Road, Maes Y Waen and Crogen. A faint chocolate odour was detected at the junction of Colliery Road and Holyhead Road. A very mild wood odour was noted at the site entrance; no other apparent odours were detected.

In the Maes Y Waen area, it was noted that some parked vehicles had evidence of dust, bird excrement and cobwebs whilst others appeared cleaner. There was nothing to suggest that a large deposition of dust /fibres had occurred.

Immediately following the off-site monitoring, NRW officers visited the Kronospan log yard and were accompanied by the Operations Director, Environmental Coordinator, Production Director and Log Yard Manager.

The permanent water misters around the recycled timber area were operational, spraying for 30 seconds at 1minute intervals, this correlated with the off-site observations. The water bowser was in use and the log yard roads and log yard access road were damp /wet.

The shredder was out of commission at the time of the inspection and has reportedly been so since the 23 July 2026. Whilst there was a build-up of recycled material it was not generating dust. The high speed conveyor line was also out of operation and consequently the water cannon in this area was not in use. The stockpiled material adjacent to the conveyor line was greater than 300mm and not an apparent source of dust.

No issues were noted during the visit.

Whilst NRW officers were present on site a report of dust was received directly by the site

from the Maes Y Waen area. NRW could not attribute any dust reports to on-site activities at the time of the inspection.

Lagoon 3 Inspection 7 August 2026

NRW officers attended site to view the status of Lagoon 3, which had been emptied of water and de-silting was approaching completion.

Immediately prior to arriving on site NRW officers undertook olfactory monitoring along Colliery Road, Holyhead Road and Maes Y Waen. No apparent odours were detected.

The Operator confirmed that W1 was not discharging to surface water at the time of the site visit.

NRW officers were accompanied on site by the site Environmental Manager, Environmental Coordinator and Environment Officer, who reported that the lagoon water had been pumped out in the preceding days. The majority of water was pumped to the combined sewer under the Operator's discharge consent and by prior agreement with the sewerage undertaker. Residual water was directed into Lagoons 1 and 2. The silt was removed by a specialist contractor, tested and disposed of by a licensed waste contractor to a suitable waste receiving facility.

Action 1 - Provide NRW with the details of the silt analysis and the final waste receiving facility.

At the time of the visit all water, silt and vegetation had been removed from Lagoon 3 (the Lagoon) and the base of the Lagoon was clearly visible. The general structure of the Lagoon comprised a flat concrete base, extending upwards by approximately 2 to 3m at roughly a 20 degree angle on all four sides. Whilst a detailed assessment of the integrity of the concrete base and sides was not undertaken, they appeared competent, with no apparent structural defects such as cracks or an uneven finish.

The upper extents of the Lagoon sides comprised what appeared to be an engineered boulder/ rock finish, although it was not possible to ascertain the bedding /fixing material and /or the impermeable layer, if present. The Operator stated that the as-built drawing for the Lagoon had yet to be located and therefore, they could not confirm the construction of the Lagoon.

Action 2 - Locate and review the as-built /final drawing for Lagoon 3 and provide to NRW.

The Operator informed NRW officers that the retention of a freeboard of approximately 40% of the existing capacity of the Lagoon was being considered. The purpose of this freeboard would be to provide capacity for the capture of firewater runoff, if required, in the future.

Recommendation 1 - Given there is uncertainty regarding the final construction detail of the Lagoon, it is recommended that specialist advice is sought with regard to the construction of the Lagoon prior to introducing the 40% freeboard. In particular, consideration should be given to the prolonged drying of any impermeable clay layer (if present) and the impact on the integrity of the Lagoon.

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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.