

Compliance Assessment Report CAR_NRW0052767

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: 20/08/2026 between 11:05 and 13:10.

Parts of permit assessed: various.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Chris Emery, Operations Director, on 03/09/2026.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3C - Installations - Emissions and monitoring - Odour	Assessed (A)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	C3 Minor	3.2.1
IR1A - Installations - Management - General Management	C3 Minor	1.1.1
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	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
IR3B	see Action 1	17/09/2026
IR1A	see Action 1	17/09/2026
IR1E	see Action 2	30/09/2026
IR1A	see Actions 3 & 4	09/09/2026

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.

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 follows an unannounced inspection of the site on 20 August 2026.

Odour

An odour assessment was undertaken prior to the site inspection covering Chirk Green, Lodgevale, Maes Y Waun, Station Avenue and Castle Road. A mild wood odour was noticeable along the lower end of Station Avenue, near the town, and a chocolate odour was noted at the entrance to Mondelez.

Site Inspection

The site inspection covered the surface water lagoons, logyard and boiler operations. The regulatory officer met with the Production Director, Environmental Coordinator, Environmental Officer and Logyard Manager. A number of processes at the site were off during the visit. Both MDF2 and particleboard lines were down and the sawmill was not operational. The chipper was also not operating and no shredding activities were taking place.

Drainage

The Operator has completed the emptying and cleaning of the lagoons. Further works are being undertaken to repair pipes and plan for future cleans. The Operator confirmed that the lagoons would be cleaned annually and that a procedure was being developed. W1

was not discharging at the time of the inspection.

A large area of the logyard is currently being resurfaced, and a new drain has been installed to take surface water from a newly installed sump in the chipper area to the far corner of the logyard (by the logyard reception area). This then discharges to Lagoon 3 via a penstock and the pre-existing screen.

Debris was noted around the logyard sump and at the discharge gate prior to the logyard penstock. The construction contractor is currently cleaning the logyard sump daily. NRW recommends that this continues once construction has finished and the operation and maintenance of the sump is handed over to the Operator. A further finer mesh screen could be installed to avoid material entering the pipework and causing blockages. The gate by the logyard penstock also requires regular cleaning and maintenance.

The logyard penstock for discharging to the lagoon is controlled by the Environmental Officer. Logyard staff may operate it as necessary under instruction from the environment department.

Procedures are being updated to reflect the new drainage layout, operation and responsibilities. NRW may review these during future visits.

Surface water pooling was noted in Zone 1. The Operator stated that the drainage in this area was being reviewed.

Logyard

A bark trailer was observed being loaded during the visit. Visible dust clouds were seen rising from the trailer during this activity. There is no dust suppression in use when loading bark.

A walking floor trailer was discharging into the recycled timber / C&D compound, and again, visible dust clouds were noted. The mist air system was being serviced, and although in operation, the wind was blowing the mist away from the trailer, limiting its effectiveness. The water cannon was not in use.

There is the potential for offsite wind blown fugitive dust emissions because of the lack of dust suppression. **This has been scored a category 3 breach of permit condition 3.2.1 (compliance criteria (IR3B) Emissions of substances not controlled by emission limits).**

The Operator stated that one of the two water cannons used to dampen down operations had been damaged and that there was only one available for use. This was situated by the shredder for the K7 boiler fuel. Neither the shredder nor the water cannon were in use at the time of the visit.

The Dust Management Plan (KC/EHS/PRO/017.A1 Dust MP, R3, 01/10/2025) states *"Mobile water suppression cannons are positioned to dampen material during HGV offloading."* The water cannon was not in place during the offloading of the recycled timber trailer and visible dust emissions occurred.

The Operator stated that the water cannons are hired and they were waiting for the company to come and look at the damaged water cannon. There was no backup or contingency in place to deal with the failure of the water cannon. **This has been scored a category 3 breach of permit condition 1.1.1 (compliance criteria (IR1A) General Management) for not following the Dust Management Plan and lack of contingency.**

Action 1: Review contingency arrangements for dust suppression equipment and update the Dust Management Plan to ensure effective dust control measures remain available during equipment breakdown, maintenance or failure by 17/09/2026. A dust management plan audit will be undertaken by NRW following this.

Boiler operation

Fuel within the K7 boiler fuel compound and bunker was inspected, no contamination was noted. The fuel sample bag for the trailer discharging to the grate at the time of the inspection was in the boiler control room; this confirmed that moisture testing had been completed as this was recorded on the sample bag.

Contractors were clearing out the bund below the K7 boiler, this is the emergency pit should there be a thermal oil leak. There was a disab on site removing material and this was being taken off site for disposal. Some larger waste material from this bund had been added to the IBA skip incorrectly. This was dealt with at the time of the visit and the contractors were going to remove these items for correct disposal.

Action 2: The Operator should ensure that all wastes are disposed of correctly and that contractors are adequately supervised.

No issues were identified with the operation of the K7 or K8 boilers. The Operator stated that a bank of bag filters within the K8 abatement system had been replaced following particulate spikes identified on the CEMS. No emissions exceedances were reported and the work was undertaken as a proactive intervention by the Operator.

Incident report feedback

A discussion was held regarding the lack of responses to recent incident reports. It is unclear why there is such a delay in the Operator providing NRW with investigation responses. Responses to July and August incidents remained outstanding at the time of the inspection.

Action 3: A review of the complaint / incident investigation procedure should be undertaken to ensure that responses are submitted to NRW in a timely manner. As a minimum responses should be provided weekly.

Action 4: Provide responses for the outstanding incident reports by 09/09/2026.

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.