Compliance Assessment Report CAR_NRW0052053

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: 05/05/2026.

Parts of permit assessed: Monitoring returns.

NRW Lead Officer: Rebecca Harwood.

Report sent to: Chris Emery, Operations Director, on 10/09/2026.

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)	
IR4B - Installations - Information - Reporting	C4 No impact	4.2.3
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	C3 Minor	3.1.2
IR4C - Installations - Information - Notification	C3 Minor	4.3.1
IR3A(2) - Installations - Emissions and monitoring - Emissions to air	C3 Minor	3.1.2

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

Total non-compliances recorded	Total non-compliance score
6	47.1

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
IR4B	Action 1	28/10/2026
IR3A(2)	Action 2	04/10/2026
IR3A(2)	see text below - ongoing investigation	14/09/2026
IR3A(2)	Action 3	30/09/2026
IR4C	Action 3	30/09/2026
IR3A(2)	no further action	Already completed

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

Review of emissions monitoring Q1 2026 (January - March 2026)

Emissions monitoring and reporting has been assessed against the monitoring requirements set out in Schedules 3 and 4 of the permit and associated permit conditions.

Emissions monitoring data covering the period 1 January to 31 March 2026 was initially received on 05/05/2026. A further update to include the results from emission point A26 was received on 15/06/2026. The monitoring data was submitted in accordance with permit condition 4.2.3 but was submitted late. **This has been scored a category 4 breach of condition 4.2.3 under subheading IR4B Reporting.**

Action 1: Ensure all monitoring returns are submitted in accordance with the permit.

1. Emissions to Air

Emission Points A1, A5, A6, A16, A17 & A18

Emission points A5 and A6 are not in use.

Emissions monitoring was undertaken at emission points A1, A16, A17 and A18 during this quarter and the results were compliant with the ELVs.

Emission Point A19 (Gas Turbine 1) & Emission Point A20 (Gas Turbine 2)

Monitoring was undertaken at emission point A19 during this quarter and the results were

compliant with the ELVs. There was no quarterly emissions testing for A20 as the turbines were not operational for more than 28 days.

Emission Points A21 - A25 (Gas Engines)

Emissions monitoring was undertaken at emission points A21, A22 and A23 and results were compliant with the ELVs.

Emission points A24 and A25 are not active as the engines have not been installed.

Emission Point A26 (K7 Biomass Boiler)

NOx and Dioxin ELVs were exceeded during quarterly emissions testing undertaken on 18/03/2026. All other results were compliant with the ELVs.

NOx - 274 mg/Nm^3 (ELV 250 mg/Nm^3). **This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3 against compliance criteria (IR3A(2)) Emissions to air.**

Action 2: Complete improvement condition programme as specified in the permit (ongoing requirement).

Dioxin - 2.4 ng/Nm^3 (ELV 0.09 ng/Nm^3). **This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C2 against compliance criteria (IR3A(2)) Emissions to air.** This was the highest result recorded during the quarter. Further results from the enhanced monitoring are shown in the table below, within the 'Additional Emissions Monitoring - A26 (K7 biomass boiler) and A29 (MDF2 cyclones)' section of this CAR.

A Part A Schedule 5 notification relating to the above exceedances was received on 17/4/2026 with the Part B received on 15/06/2026. The Operator stated that *"Works are ongoing to reduce Oxygen ingress into the boiler, improve material flows and introduce further abatement technologies and monitoring systems."*

NRW will continue to review the effectiveness of any changes.

Enhanced monitoring at emission point A26 remains in place via a Regulation 36 enforcement notice. This notice also requires the Operator to investigate the measures needed to reduce the formation of dioxins and furans within the boiler and to provide a plan demonstrating how compliance will be achieved.

Emission Point A27 (K8 Biomass Boiler)

Continuous monitoring data was compliant with the ELVs except for a particulate matter exceedance on 04/02/2026 - a result of 7.61 mg/Nm^3 against the ELV of 7.5 mg/Nm^3. **This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3 against compliance criteria (IR3A(2)) Emissions to air.**

A Schedule 5 notification was received on 05/02/2026. The Part A stated *"Spikes detected*

in the bag filter, bags to checked and replaced." The Part B, received on 03/03/2026 stated *"K8 emissions were being monitored as per standard OP when the operators reported spikes in the particulate reading and the daily average was trending upwards. Before remedial actions could be taken to reduce the particulates the waste had to be taken off the grate meaning the daily average stayed above the daily limit. At the earliest opportunity K8 was taken off line to investigate the bag filter this resulted in 30 bags changed in section 20/21, out of 900 bags total in the filter house. During January an additional 200 bags where replaced as preventative maintenance. We will ensure continual monitoring of the PM levels and react to increasing trends indicating reduction in filter efficiency."*

No further action is required at this stage.

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A28 (WESP 32)

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A29 (MDF 2 Cyclones)

All parameters were compliant with the ELVs except for formaldehyde. The result from Cyclone 1 was 32.5 mg/Nm^3 against an ELV of 15 mg/Nm^3. **This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3 against compliance criteria (IR3A(2)) Emissions to air.**

NRW has not received a Schedule 5 notification relating to this exceedance. **This is a breach of permit condition 4.3.1 and attracts a non-compliance score of C3 against compliance criteria (IR4C) Notifications.**

Action 3: Investigate the root cause of the exceedance and submit a completed notification by 30/09/2026.

Emission Point A30 (MDF 1 Cyclones)

All parameters were compliant with the ELVs. Nb: The formaldehyde result for Cyclone 2 was above the ELV, however, once the uncertainty has been taken into account the result is compliant.

Emission Point A31 (Press Abatement)

Emission point not in use this quarter.

Emission Point A32 (WESP 21)

All parameters were compliant with the ELVs.

Additional Emissions Monitoring - A26 (K7 biomass boiler) and A29 (MDF2 cyclones)

Additional emissions monitoring was undertaken during Q1 at emission points A26 and A29

in accordance with the Regulation 37 and Regulation 36 enforcement notices issued following the A26 emission exceedances recorded in November 2025. This required dioxins, furans and heavy metals to be monitored concurrently at A26 and A29.

The results are summarised below:

Date	Dioxins & Furans (ELV at A26 0.09ng/Nm^3)		Cadmium & Thallium (ELV at A26 0.03mg/Nm^3)		Heavy Metals (ELV at A26 0.45mg/Nm^3)	
	K7 (A26)	MDF2 (A29)	K7 (A26)	MDF2 (A29)	K7 (A26)	MDF2 (A29)
11/02/2026	2	0.016	0.0073	<0.0015	0.35	0.035
17/02/2026	0.35	0.01	0.013	<0.0025	0.41	0.039
18/03/2026	2.4	0.15	0.0084	<0.0010	0.33	0.033
30/03/2026	0.018	0.002	-	-	-	-

The Cadmium / Thallium and Heavy Metals results were below the ELVs within the permit.

The exceedances for dioxin and furans from emission point A26 are above the ELV and are a breach of permit condition 3.1.2. All dioxin and furan exceedances at A26 obtained during Q1 2026 have been consolidated, in accordance with NRW scoring guidance, into a single C2 score (see *1. Emissions to Air - Emission Point A26 (K7 Biomass Boiler)* above).

The emissions from the K7 biomass boiler are ducted to the MDF2 cyclones and emitted to air at this point. Although there is no ELV set for A29 for dioxin and furans the results from this emission point are below the ELV of 0.09ng/Nm^3 set for A26, except for the 18/03/2026.

2. Emissions to Surface Water

Emission Point E1

No discharges reported during the reporting period.

Emission Point W1

Emissions were compliant with the ELVs for emission point W1. It is noted that the BOD, ammonia and formaldehyde results were close to their respective ELVs during Q1.

3. K7 & K8 Incinerator Bottom Ash (IBA) and Air Pollution Control Residues (APCr)

The Loss on Ignition (LOI) results for K7 and K8 bottom ash were below the 5% limit.

APCr residues results for K8 were also received.

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.