Compliance Assessment Report CAR_NRW0052751

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: 28/07/2026.

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	Assessed (A)	
IR4C - Installations - Information - Notification	Action only (X)	
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(1) - Installations - Emissions and monitoring - Emissions to water	Assessed (A)	
IR3H - Installations - Emissions and monitoring - Monitoring for the purposes of the Industrial Emissions Directive (includes LCP)	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
3	39

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
IR4C	see Action 2 below	30/09/2026
IR3A(2)	see Action 1 below	04/10/2026
IR3A(2)	enforcement notice in place	14/09/2026
IR3H	see text below	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 Q2 2026 (April - June 2026)

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

Emissions monitoring data covering the period 1 April to 30 June 2026 was received on 28/07/2026 in accordance with condition 4.2.3.

1. Emissions to Air

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

Emission points A5 and A6 are not in use. Monitoring at emission points A1, A16, A17 and A18 is required annually. This was completed during Q1 2026.

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

Emissions 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 & Furan ELVs were exceeded during quarterly emissions testing undertaken on 18/05/2026. All other results were compliant with the ELVs.

NOx - 276 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.**

A Schedule 5 notification was received on 21/07/2026. The Part B notification states that the delay in reporting the exceedance was due to an error in the initial monitoring report "*This exceedance was not detected initially as there was an error in the third party report – the summary table showed NOx being in limits, but on further review as part of Q2 reporting, it became apparent that the detailed results did not tally with the summary values. A reissue of the report was requested."*

The notification also states *"Continued efforts to control excess oxygen and reduce the correction factor. Repairs to combustion air flaps are scheduled for the August production stop. Continued use and optimisation of SNCR system for scrubbing of NOx emissions."*.

Action 1: Any works undertaken should be detailed as part of the IC59 submission.

Action 2: The Operator should review their procedures to ensure that monitoring data is reviewed upon receipt and issues addressed immediately to avoid any future delays in notification to NRW.

Dioxins & Furans - 0.82 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 within the 'Additional Emissions Monitoring - A26 (K7 biomass boiler) and A29 (MDF2 cyclones)' section of this CAR.

A Schedule 5 notification was received on 19/06/2026 detailing ongoing actions being undertaken as part of the enforcement notices issued to the Operator.

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.

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)

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A30 (MDF 1 Cyclones)

Quarterly emissions testing results were compliant with the ELVs.

Emission Point A31 (Press Abatement)

Emission point not in use during Q2 2026.

Emission Point A32 (WESP 21)

Quarterly emissions testing results were compliant with the ELVs.

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

Additional emissions monitoring was undertaken during Q2 at emission points A26 and A29 in accordance with the Regulation 36 enforcement notice issued following the restart of the K7 Biomass Boiler in March 2026. This required concurrent monitoring of dioxins and furans twice monthly, and heavy metals monthly at emission points A26 and A29.

The Q2 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)
13/04/2026	0.15	0.013	0.0037	0.0012	0.19	0.052
18/05/2026	0.82	0.001	0.0037	<0.0011	0.12	0.015
26/05/2026	0.41	0.012	-	-	-	-
08/06/2026	0.37	0.0022	-	-	-	-

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

There has been a reduction in dioxin and furan concentrations from A26, however, emissions continued to exceed the ELV of 0.09ng/Nm^3 and further enforcement notices have been issued. The exceedances for dioxin and furans from emission point A26 are in breach of permit condition 3.1.2. All dioxin and furan exceedances at A26 obtained during Q2 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.

2. Emissions to Surface Water

Emission Point E1

No discharges reported during the reporting period.

Emission Point W1

Officers attended site on the 09/06/2026 to obtain a sample from the W1 discharge. This sample was split with the Operator. The results are shown below.

Parameter	NRW result	Kronospan result	ELV
BOD	11.4 mg/l	16.7 mg/l	9.5 mg/l
Ammonia	8.96 mg/l	8.11 mg/l	5 mg/l

A separate CAR was issued in relation to these exceedances obtained by NRW (CAR NRW0052282). The Operator's monitoring results have therefore been consolidated with these previous non-compliances. Actions relating to these exceedances are also detailed within CAR NRW0052282.

All other parameters were compliant with the permitted emission limit values for emission point W1.

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

The Loss on Ignition (LOI) result for K7 bottom ash was below the 5% limit at 4.6%.

The Loss on Ignition (LOI) result for K8 bottom ash was 5.1%, above the 5% limit. **This is a breach of permit condition 3.1.2 and attracts a non-compliance score of C3 against compliance criteria (IR3H) Monitoring for the purposes of the Industrial Emissions Directive (includes LCP).**

The Schedule 5 notification states that the K8 had intermittent waste feed and therefore the sample may not have been representative of stable burning conditions. No further action is required at this stage. The Operator is reminded that samples should be taken during normal operating conditions.

APCr residues results for K8 were also received.

4. Improvement Conditions (ICs)

Discussions have been held with the Operator regarding both IC40 and IC50. Further work is required and therefore the additional information requested is required to be submitted

by 30 September 2026.

A separate CAR has been issued in response to IC56 and IC57.

The Operator is reminded that IC58 and 59 are due at the beginning of October 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.