

Air Quality Impact Assessment of Emissions to Atmosphere from Timet Capacity Mechanism Power Plant



November 2015

Amec Foster Wheeler Environment
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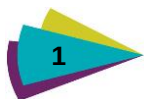
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Document revisions

No.	Details	Date
1	Final Report 15103i1	March 2015
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Executive summary

Purpose of this report

This report has been produced for the purpose of assessing the potential impacts on local air quality of emissions associated with the installation of engines generating electrical power at a site owned by Timet UK Ltd near Waunarlwydd, Swansea. The total capacity of the installation will be 40 MW. This assessment forms part of the planning application for the development.

About the assessment

The plant will be operated by GF Energy Ltd and will generate electricity under the Capacity Mechanism to meet intermittent shortfalls in generating capacity on the National Grid. This will be one of several such facilities operated by GF in the UK. The engines will be operated on natural gas. On average the plant will operate for around 5 hours per day at peak times, and around 1250 hours per year (based on historical data and projections from DECC).

The dispersion of emissions in this assessment is predicted using an appropriate dispersion model, with results presented in tabular form and as contours of ground level concentrations on a background map of the area. The assessment considers short and long-term effects in relation to the air quality standards set in legislation and in Government and international guidance. The pollutants covered by the assessment are oxides of nitrogen (NO_x as NO_2) and carbon monoxide (CO). Other pollutants, including particulate matter (PM_{10} and $\text{PM}_{2.5}$) and sulphur dioxide (SO_2), have been screened out as unlikely to be of concern.

This assessment assumes the engines operate for full, hourly periods to predict both the long-term and short-term impacts of engine emissions. Concentrations were calculated for each hourly period during the typical availability windows. This approach ensures that those meteorological conditions conducive to producing elevated ground level concentrations of pollutants are appropriately considered. However, given that the engines will only run for about 5 hours a day and about 1250 hours per year, additional post-processing of raw modelled output has been undertaken, when appropriate.

Summary of conclusions

The impact assessment demonstrates that, under the anticipated operational profile of the plant, exceedances of any AQS, EAL, critical level or critical load are unlikely, or where exceedances are predicted due to the existing baseline concentration or deposition rate, the additional contribution from the plant is not considered to be significant. In addition, the impacts at human receptor locations can be defined as 'negligible' following the guidance issued by Environmental Protection UK. On this basis, air quality factors should not be considered a constraint to development of the site for Capacity Mechanism purposes.

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1. Introduction

1.1 Background, aims and objectives

Amec Foster Wheeler Environment and Infrastructure UK Limited has been commissioned by GF Energy Ltd to undertake an assessment of the potential impacts resulting from emissions associated with the installation of engines generating electrical power at a site owned by Timet UK Ltd near Waunarlwydd, Swansea. The total capacity of the installation will be 40 MW. The plant will generate electricity under the Capacity Mechanism to meet intermittent shortfalls in generating capacity on the National Grid. This will be one of several such facilities operated by GF in the UK.

The preferred generating unit is the Jenbacher Type 4 engine (J420). This is a spark ignition engine rated at 1450 kW electrical output, and capable of operating as a back-up unit in the event of a loss of power or to generate commercially exported power continuously. The engines will be operated on natural (mains) gas only with no oil back-up available on site. On average the plant will operate for around 5 hours per day at peak times, and around 1250 hours per year (based on historical data and projections from DECC).

The purpose of this report is to assess the impacts of emissions to air from the proposed installation on local air quality in order to support the planning application for the development.

The dispersion of emissions in this assessment is predicted using an appropriate dispersion model, with results presented in tabular form and as contours of ground level concentrations on a background map of the area. The assessment considers short and long-term effects in relation to the air quality standards set in legislation and in Government and international guidance.

1.2 Site description

The proposed site is located in a mixed-use area of south Wales, with agriculture, industry, commercial and domestic usage in the vicinity. The site is about 1 km north of the village of Waunarlwydd and about 5 km west of the centre of Swansea. The grid reference for the site is 260650, 196383. Figure 1.1 provides a site location map.

Figure 1.1 Site location



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1.3 Sources of information

The information used to assess air quality includes:

- ▶ Process and emissions data provided by GF Energy;
- ▶ Site layout from GF Energy;
- ▶ Baseline air quality data from surveys undertaken by Government bodies, Local Authorities and third parties;
- ▶ Ordnance Survey maps of the local area; and
- ▶ Meteorological data supplied by Atmospheric Dispersion Modelling Limited.

1.4 Report structure

The remainder of the report is set out as follows:

Table 1.1 Report structure

Section	Aims and Objectives
Section 2	Describes the dispersion model, assessment methodology, model inputs and assumptions used in the assessment, and details the ambient air quality in the area
Section 3	Details the assessment criteria
Section 4	Presents an assessment of the potential air quality impacts arising from the site emissions
Section 5	Contains a summary and conclusions of the assessment

2. Assessment methodology

2.1 The dispersion model

The model used in this assessment is the ADMS 5 atmospheric dispersion model developed and validated by Cambridge Environmental Research Consultants (CERC). The model was used to predict the ground level concentration of compounds emitted to atmosphere from the installation. The model has been used extensively throughout the UK for regulatory compliance purposes and is accepted as an appropriate air quality modelling tool by the Environment Agency and local authorities.

ADMS 5 parameterises stability and turbulence in the atmospheric boundary layer by the Monin-Obukhov length and the boundary layer depth. This approach allows the vertical structure of the boundary layer to be more accurately defined than by the stability classification methods of earlier dispersion models. In ADMS, the concentration distribution follows a symmetrical Gaussian profile in the vertical and crosswind directions in neutral and stable conditions. However, the vertical profile in convective conditions follows a skewed Gaussian distribution to take account of the inhomogeneous nature of the vertical velocity distribution in the Convective Boundary Layer.

A number of complex modules, including the effects of plume rise, complex terrain, coastlines, concentration fluctuations, radioactive decay and buildings effects, are also included in the model, as well as the facility to calculate long-term averages of hourly mean concentration, dry and wet deposition fluxes, and percentile concentrations, from either statistical meteorological data or hourly average data.

A range of input parameters is required including, among others, data describing the local area, meteorological measurements and emissions data. The data used in modelling the emissions are given in the following sections of this chapter.

2.2 Process emissions

The installation will consist of 37 engines, each within their own container building, with individual stacks a short distance above the top of the containers. Model input parameters are given in Table 2.1 and Table 2.2. The process data has been derived from manufacturer's performance data provided by GF Energy. Emissions data are based on manufacturer's data of 500 mg Nm⁻³ for NO_x and 1000 mg Nm⁻³ for CO at exhaust reference conditions of 273 K, 101.3 kPa, 5% oxygen content and dry gas. Pollutants other than NO_x and CO have been screened out as unlikely to be of concern.

Table 2.1 Modelled stack characteristics

Parameter	Each engine
Release height (m)	7.2
Flue diameter (m)	0.35
Efflux flow rate (m s ⁻¹)	39
Efflux temperature (°C)	450

Table 2.2 Modelled stack emission rates

Pollutant	Emission rate (per engine) (g s ⁻¹)
NO _x	0.67
CO	1.33

Capacity Mechanism contracts with the National Grid require operators to guarantee that their plant be available at specific times and days of the week, known as 'availability windows'. This means that the engines will not be running continuously. The availability windows vary by season and year-on-year and are not known more than a year or so in advance. For the current modelling, it was assumed that the facility would be used between the times of 07:00 and 21:00. These windows have been reflected in the model setup by setting the emission rate to 100% of the Table 2.2 values during hours of the availability window, and setting the emission rate to zero outside those hours.

This procedure results in the emissions occurring for a total of 5110 hours per year. In fact, the engines will only operate for up to about 1250 hours per year. Therefore, when calculating annual mean concentrations, a correction factor of $1250/5110 \approx 0.24$ has been applied to the raw model results.

Similarly, the facility is only expected to operate for about 5 hours per day when called. Therefore, maximum 8-hour mean concentrations have been calculated by taking the maximum one-hour concentrations and multiplying by $5/8 = 0.625$.

2.3 Meteorology

For meteorological data to be suitable for dispersion modelling purposes, a number of meteorological parameters need to be measured on an hourly basis. These parameters include wind speed, wind direction, cloud cover and temperature. There are only a limited number of sites where the required meteorological measurements are made. The year of meteorological data that is used for a modelling assessment can also have a significant effect on ground level concentrations.

This assessment has used meteorological data recorded at the Mumbles Head meteorological station from 2010 to 2014. The meteorological station is located approximately 10 km south of the site and is the nearest synoptic station to the site offering data in a suitable format for the model. The following figures show wind roses for each year modelled, illustrating the frequency of monitored wind direction and wind speed.

Figure 2.1 2010 wind rose

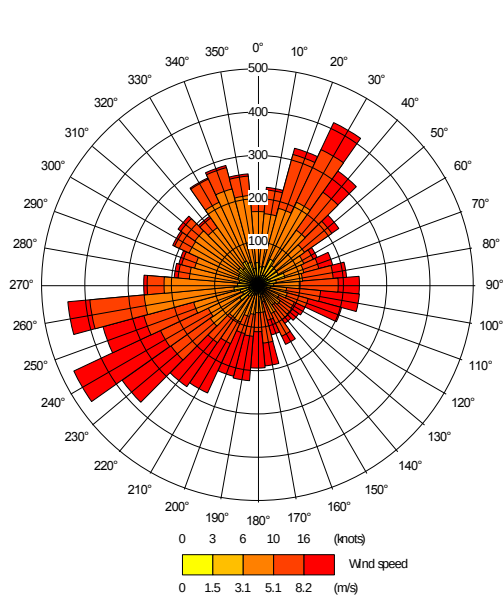


Figure 2.2 2011 wind rose

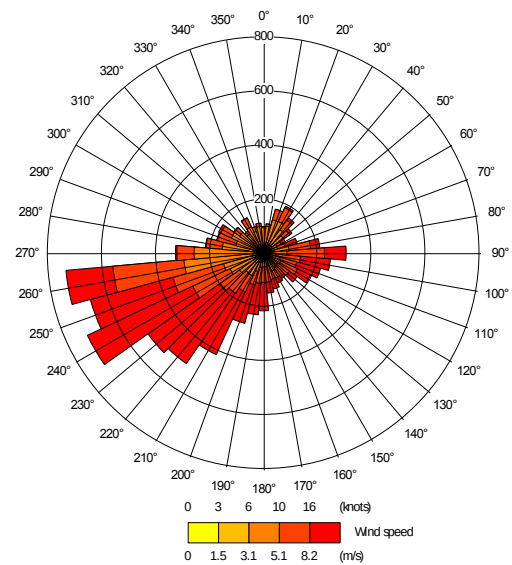


Figure 2.3 2012 wind rose

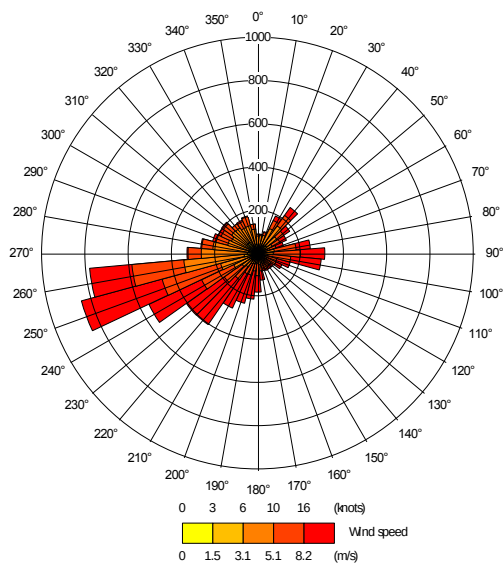


Figure 2.4 2013 wind rose

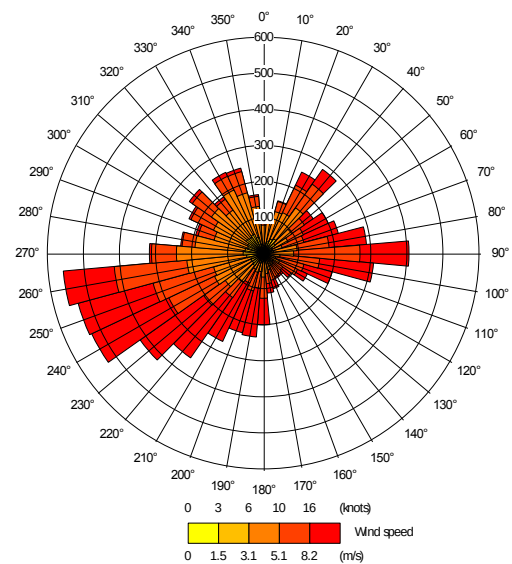
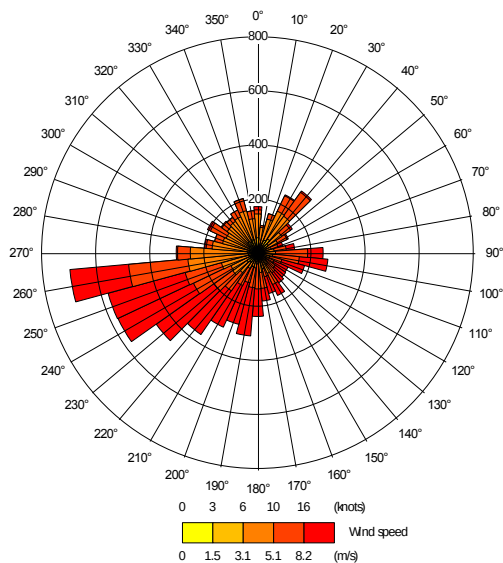


Figure 2.5 2014 wind rose



2.4 Surface characteristics

The predominant surface characteristics and land use in a model domain have an important influence in determining turbulent fluxes and, hence, the stability of the boundary layer and atmospheric dispersion. Factors pertinent to this determination are detailed below.

Surface roughness

Roughness length, z_0 , represents the aerodynamic effects of surface friction and is defined as the height at which the extrapolated surface layer wind profile tends to zero. This value is an important parameter used by meteorological pre-processors to interpret the vertical profile of wind speed and estimate friction velocities which are, in turn, used to define heat and momentum fluxes and, consequently, the degree of turbulent mixing.

The surface roughness length is related to the height of surface elements; typically, the surface roughness length is approximately 10% of the height of the main surface features. Thus, it follows that surface roughness is higher in urban and congested areas than in rural and open areas. Oke (1987) and CERC (2003) suggest typical roughness lengths for various land use categories (Table 2.3).

Table 2.3 Typical surface roughness lengths for various land use categories

Type of Surface	z_o (m)
Ice	0.00001
Smooth snow	0.00005
Smooth sea	0.0002
Lawn grass	0.01
Pasture	0.2
Isolated settlement (farms, trees, hedges)	0.4
Parkland, woodlands, villages, open suburbia	0.5-1.0
Forests/cities/industrialised areas	1.0-1.5
Heavily industrialised areas	1.5-2.0

Increasing surface roughness increases turbulent mixing in the lower boundary layer. With respect to elevated sources under neutral and stable conditions, increasing the roughness length can have complex and conflicting effects on ground level concentrations:

- ▶ The increased mixing can bring portions of an elevated plume down towards ground level, resulting in increased ground level concentrations close to the emission source; and
- ▶ The increased mixing increases entrainment of ambient air into the plume and dilutes plume concentrations, resulting in reduced ground level concentrations further downwind from an emission source.

The overall impact on ground level concentration is, therefore, strongly correlated with the distance of a receptor from the emission source.

Surface energy budget

One of the key factors governing the generation of convective turbulence is the magnitude of the surface sensible heat flux. This, in turn, is a factor of the incoming solar radiation. However, not all solar radiation arriving at the Earth's surface is available to be emitted back to atmosphere in the form of sensible heat. By adopting a surface energy budget approach, it can be identified that, for fixed values of incoming short and long wave solar radiation, the surface sensible heat flux is inversely proportional to the surface albedo and latent heat flux.

The surface albedo is a measure of the fraction of incoming short-wave solar radiation reflected by the Earth's surface. This parameter is dependent upon surface characteristics and varies throughout the year. Oke (1987) recommends average surface albedo values of 0.6 for snow covered ground and 0.23 for non-snow covered ground, respectively.

The latent heat flux is dependent upon the amount of moisture present at the surface. Areas where moisture availability is greater will experience a greater proportion of incoming solar radiation released back to atmosphere in the form of latent heat, leaving less available in the form of sensible heat and, thus, decreasing convective turbulence. The modified Priestly-Taylor parameter (α) can be used to represent the amount of moisture available for evaporation. Holstag and van Ulden (1983) suggest values of 0.45 and 1.0 for dry grassland and moist grassland respectively.

Selection of appropriate surface characteristic parameters for the site

A detailed analysis of the effects of surface characteristics on ground level concentrations by Auld *et al.* (2002) led them to conclude that, with respect to uncertainty in model predictions:

"...the energy budget calculations had relatively little impact on the overall uncertainty".

In this regard, it is not considered necessary to vary the surface energy budget parameters spatially or temporally, and annual averaged values have been adopted throughout the model domain for this assessment.

As snow covered ground is only likely to be present for a small fraction of the year, the surface albedo of 0.23 for non-snow covered ground advocated by Oke (1987) has been used whilst the model default α value of 1.0 has also been retained.

In view of the mix of built-up and open land around the site, a roughness length of 0.75 m was used.

2.5 Buildings

Any large object has an impact on atmospheric flow and air turbulence within the locality of the object. This can result in maximum ground level concentrations that are significantly different (generally higher) from those encountered in the absence of buildings. The building 'zone of influence' is generally regarded as extending a distance of $5L$ (where L is the lesser of the building height or width) from the foot of the building in the horizontal plane and three times the height of the building in the vertical plane.

The containers housing the engines could influence the airflow close to the emissions sources. The engine containers consist of a large number of buildings grouped closely together, so for the purposes of modelling they have been simplified down to just four buildings. Table 2.4 details the buildings as they are included in the model. ADMS performs further simplification, reducing the buildings to a single effective building, the parameters of which depend on wind direction.

Table 2.4 Buildings modelled

Building	X (m)	Y (m)	Height (m)	Length (m)	Width (m)	Angle (°)
Building1	260661	196414	3	12	23	180
Building2	260653	196391	3	12	31	180
Building3	260650	196376	3	12	39	180
Building4	260644	196353	3	12	51	180

2.6 Terrain

The concentrations of an emitted pollutant found in elevated, complex terrain differ from those found in simple level terrain. There have been numerous studies on the effects of topography on atmospheric flows. The UK ADMLC provides a summary of the main effects of terrain on atmospheric flow and dispersion of pollutants (Hill *et al.*, 2005):

- ▶ *"Plume interactions with windward facing terrain features:*
 - ▶ *Plume interactions with terrain features whereby receptors on hills at a similar elevation to the plume experience elevated concentrations;*
 - ▶ *Direct impaction of the plume on hill slopes in stable conditions;*
 - ▶ *Flow over hills in neutral conditions can experience deceleration forces on the upwind slope, reducing the rate of dispersion and increasing concentrations; and*
 - ▶ *Recirculation regions on the upwind side of a hill can cause partial or complete entrainment of the plume, resulting in elevated ground level concentrations.*
- ▶ *Plume interactions with lee sides of terrain features:*

- ▶ *Regions of recirculation behind steep terrain features can rapidly advect pollutants towards the ground culminating in elevated concentrations; and*
- ▶ *As per the upwind case, releases into the lee of a hill in stable conditions can also be recirculated, resulting in increased ground level concentrations.*
- ▶ *Plume interactions within valleys:*
 - ▶ *Releases within steep valleys experience restricted lateral dispersion due to the valley sidewalls. During stable overnight conditions, inversion layers develop within the valley essentially trapping all emitted pollutants. Following sunrise and the erosion of the inversion, elevated ground level concentrations can result during fumigation events; and*
 - ▶ *Convective circulations in complex terrain due to differential heating of the valley side walls can lead to the impingement of plumes due to crossflow onto the valley sidewalls and the subsidence of plume centrelines, both having the impact of increasing ground level concentrations."*

These effects are most pronounced when the terrain gradients exceed 1 in 10, i.e. a 100 m change in elevation per 1 km step in the horizontal plane. Some of the gradients surrounding the site are above this criterion, so terrain data from the Ordnance Survey's Panorama dataset was included in the model.

2.7 Modelled domain and receptors

Modelled domain

A 2 km × 2 km Cartesian grid centred on the site was modelled, with a receptor resolution of 20 m, to assess the impact of atmospheric emissions from the site on local air quality. This resolution is considered suitable for capturing the maximum process contribution from site emissions, given that the receptors of interest are more than 100 m from the source.

In addition, a 30 km × 30 km Cartesian grid centred on the site was modelled, with a receptor resolution of 300 m, to supplement the specific receptors more than 1 km from the site (particularly the ecological receptors).

Human receptors

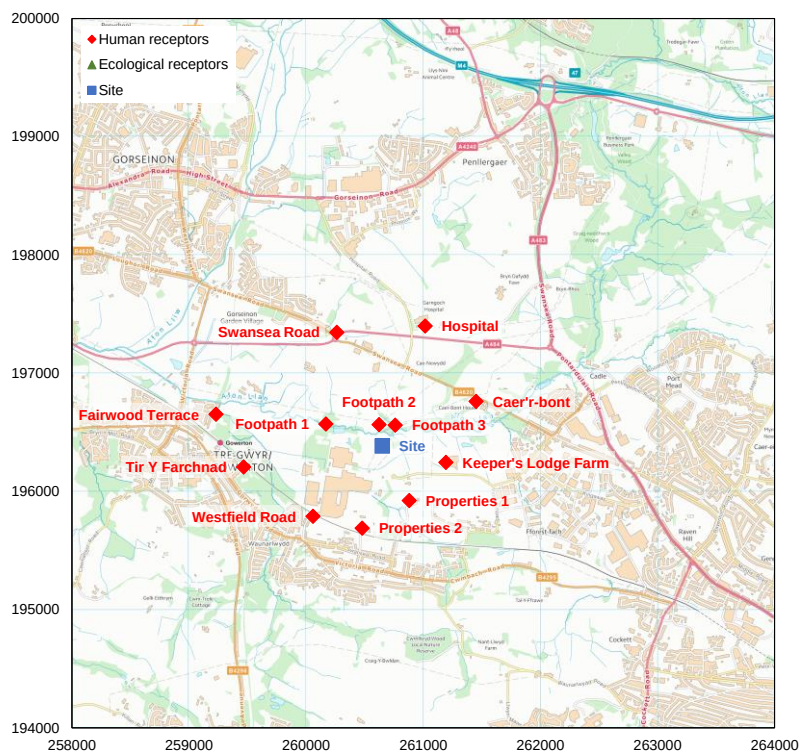
The receptors considered were chosen based on locations where people may be located and judged in terms of the likely duration of their exposure to pollutants and proximity to the site, following the guidance given in Section 3 of this report. Details of the locations of human receptors are given in Table 2.5 and Figure 2.6 below. Note that the Footpath 1–3 receptors are only relevant locations for 1-hour averaging periods, not for 8-hour averaging periods or annual means.

For the purposes of assessing air quality impacts, workplace locations have been excluded from the assessment in accordance with Schedule 1, Part 1, Paragraph 2 of the Air Quality Standards Regulations 2010. These Regulations are detailed in Section 3 of this report and do not differentiate between whether this is a workplace location under the control of the operator, or an off-site workplace location.

Table 2.5 Details of modelled human receptors

ID	Receptor Name	Easting (m)	Northing (m)	Height (m)
1	Keeper's Lodge Farm	261193	196246	1.6
2	Properties 1	260879	195923	1.6
3	Properties 2	260478	195689	1.6
4	Westfield Road	260058	195789	1.6
5	Tir Y Farchnad	259466	196207	1.6
6	Fairwood Terrace	259229	196652	1.6
7	Swansea Road	260261	197346	1.6
8	Hospital	261016	197398	1.6
9	Caer'r-bont	261451	196761	1.6
10	Footpath 1	260168	196569	1.6
11	Footpath 2	260622	196565	1.6
12	Footpath 3	260760	196560	1.6

Figure 2.6 Location of modelled human receptors



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Ecological receptors

The Environment Agency's Horizontal Guidance Note H1 Annex F requires detailed dispersion modelling to be carried out based on local receptors. With regard to ecological receptors H1 Annex F states:

"Note that conservation sites need only be considered where they fall within set distances of the activity:

- ▶ *Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within 10 km of the installation (or 15 km coal or oil-fired power station); and*
- ▶ *Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Local Nature Reserves (LNRs), local wildlife sites and ancient woodland within 2 km of the location.*

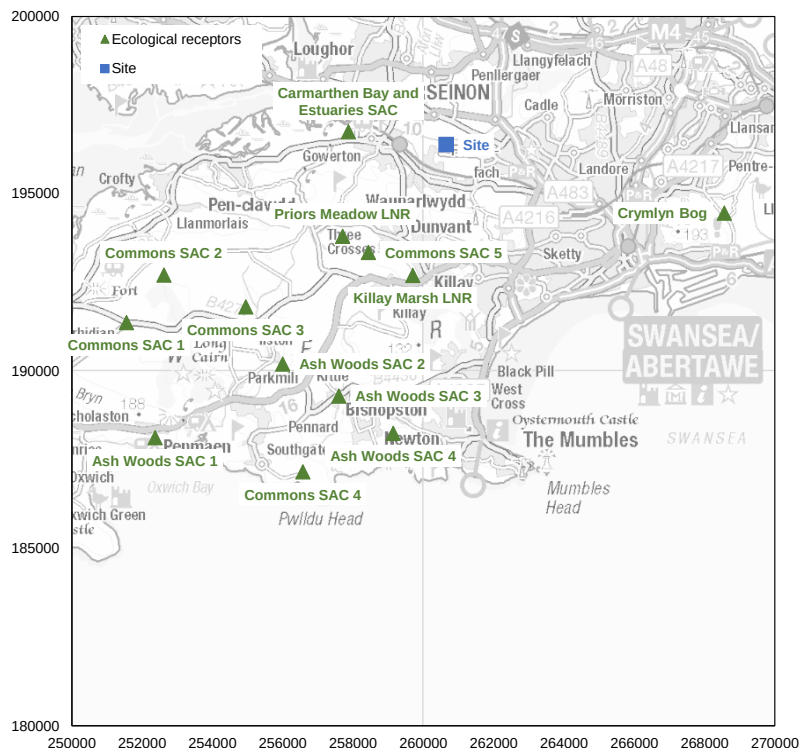
Some larger emitters may be required to screen to 10 km or 15 km for SSSIs."

Following the above guidance, the following ecological receptors have been included in the assessment (Table 2.6 and Figure 2.7). Although several of these are outside the above criteria, they have been included for definiteness.

Table 2.6 Details of modelled ecological receptors

Receptor Name	Easting (m)	Northing (m)	Height (m)	Receptor Type
Carmarthen Bay and Estuaries SAC	257866	196746	0	Marine areas, Sea inlets (82.1%) Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (13.7%)
Crymlyn Bog SAC	268559	194455	0	Bogs, Marshes, Water fringed vegetation, Fens (86%)
Gower Ash Woods SAC 1	252365	188124	0	Broad-leaved deciduous woodland (90.6%)
Gower Ash Woods SAC 2	255997	190197	0	Broad-leaved deciduous woodland (90.6%)
Gower Ash Woods SAC 3	257595	189297	0	Broad-leaved deciduous woodland (90.6%)
Gower Ash Woods SAC 4	259142	188247	0	Broad-leaved deciduous woodland (90.6%)
Gower Commons SAC 1	251553	191368	0	Heath, Scrub, Maquis and Garrigue, Phygrana (75.2%)
Gower Commons SAC 2	252616	192709	0	Heath, Scrub, Maquis and Garrigue, Phygrana (75.2%)
Gower Commons SAC 3	254947	191811	0	Heath, Scrub, Maquis and Garrigue, Phygrana (75.2%)
Gower Commons SAC 4	256573	187161	0	Heath, Scrub, Maquis and Garrigue, Phygrana (75.2%)
Gower Commons SAC 5	258434	193349	0	Heath, Scrub, Maquis and Garrigue, Phygrana (75.2%)
Killay Marsh LNR	259700	192700	0	Wet woodland, swamp and marsh, fen, wet heath, drier grassland and woodland
Priors Meadow LNR	257700	193800	0	Secondary mixed deciduous and wet woodland and lowland meadow

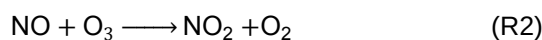
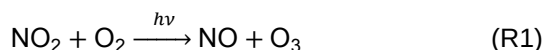
Figure 2.7 Location of modelled ecological receptors



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2.8 Conversion of NO to NO₂

Emissions of NO_x from combustion processes are predominantly in the form of nitric oxide (NO). Excess oxygen in the combustion gases and further atmospheric reactions cause the oxidation of NO to nitrogen dioxide (NO₂). NO_x chemistry in the lower troposphere is strongly interlinked in a complex chain of reactions involving Volatile Organic Compounds (VOCs) and Ozone (O₃). Two of the key reactions interlinking NO and NO₂ are detailed below:



where $h\nu$ is used to represent a photon of light energy (i.e. sunlight).

Taken together, reactions R1 and R2 produce no net change in O₃ concentrations, and NO and NO₂ adjust to establish a near steady state reaction (photo-equilibrium). However, the presence of VOCs and CO in the atmosphere offer an alternative production route of NO₂ for photolysis, allowing O₃ concentrations to increase during the day with a subsequent decrease in the NO₂:NO_x ratio.

However, at night, the photolysis of NO₂ ceases, allowing reaction R2 to promote the production of NO₂, at the expense of O₃, with a corresponding increase in the NO₂:NO_x ratio.

Near to an emission source of NO, the result is a net increase in the rate of reaction R2, suppressing O₃ concentrations immediately downwind of the source, and increasing further downwind as the concentrations of NO begin to stabilise to typical background levels (Gillani and Pliem 1996).

Given the complex nature of NO_x chemistry, the Environment Agency's Air Quality Modelling and Assessment Unit (AQMAU) have adopted a pragmatic, risk based approach in determining the conversion rate of NO to NO₂ which dispersion model practitioners can use in their detailed assessments (Environment

Agency, no date). AQMAU guidance advises that the source term should be modelled as NO_x (as NO₂) and then suggests a tiered approach when considering ambient NO₂:NO_x ratios:

- ▶ **Screening Scenario:** 50% and 100% of the modelled NO_x process contributions should be used for short-term and long-term average concentration, respectively. That is, 50% of the predicted NO_x concentrations should be assumed to be NO₂ for short-term assessments and 100% of the predicted NO_x concentrations should be assumed to be NO₂ for long-term assessments;
- ▶ **Worst Case Scenario:** 35% and 70% of the modelled NO_x process contributions should be used for short-term and long-term average concentration, respectively. That is, 35% of the predicted NO_x concentrations should be assumed to be NO₂ for short-term assessments and 70% of the predicted NO_x concentrations should be assumed to be NO₂ for long-term assessments; and
- ▶ **Case Specific Scenario:** Operators are asked to justify their use of percentages lower than 35% for short-term and 70% for long-term assessments in their application reports.

In line with the AQMAU guidance, this assessment has used the 'Worst Case Scenario' approach in determining the conversion rate of NO to NO₂ as a robust assumption.

2.9 Deposition

The predominant route by which emissions will affect land in the vicinity of a process is by deposition of atmospheric emissions. Ecological receptors can potentially be sensitive to the deposition of pollutants, particularly nitrogen and sulphur compounds, which can affect the character of the habitat through eutrophication and acidification.

Deposition processes in the form of dry and wet deposition remove material from a plume and alter the plume concentration. Dry deposition occurs when particles are brought to the surface by gravitational settling and turbulence. They are then removed from the atmosphere by deposition on the land surface. Wet deposition occurs due to rainout scavenging (within clouds) and washout scavenging (below clouds) of the material in the plume. These processes lead to a variation with downwind distance of the plume strength, and may alter the shape of the vertical concentration profile as dry deposition only occurs at the surface.

Near to sources of pollutants (<2 km), dry deposition is generally the predominant removal mechanism for pollutants such as NO_x, SO₂ and NH₃ (Fangmeier *et al.* 1994; Environment Agency, 2011). Dry deposition may be quantified from the near-surface plume concentration and the deposition velocity (Chamberlin and Chadwick, 1953);

$$F_d = v_d C(x, y, 0)$$

where:

F_d = dry deposition flux ($\mu\text{g m}^{-2} \text{s}^{-1}$)

v_d = deposition velocity (m s^{-1})

$C(x, y, 0)$ = ground level concentration ($\mu\text{g m}^{-3}$)

Environment Agency guidance AQTAG06 (Environment Agency, 2011) recommends deposition velocities for various pollutants dependent upon the habitat type (Table 2.7).

Table 2.7 Environment Agency recommended deposition velocities

Pollutant	Deposition Velocity (m s ⁻¹)	
	Grassland	Forest
NO ₂	0.0015	0.003
SO ₂	0.012	0.024
HCl	0.025	0.06
NH ₃	0.02	0.03
HNO ₃	0.04	0.04
SO ₄ ²⁻ (Sulphate aerosol)	0.01	0.01

Source: Environment Agency (2011)

In order to assess the impacts of deposition, habitat-specific critical loads and critical levels have been created. These are generally defined as (e.g. Nilsson and Grennfelt, 1988);

"...a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge."

It is important to distinguish between a critical load and a critical level. The critical load relates to the quantity of a material deposited from air to the ground, whilst critical levels refer to the concentration of a material in air. The UK Air Pollution Information System (APIS) provides critical load data for ecological sites in the UK.

The critical loads used to assess the impact of compounds deposited to land which result in eutrophication and acidification are expressed in terms of kilograms of nitrogen deposited per hectare per year (kg N ha⁻¹ y⁻¹) and kilo-equivalents deposited per hectare per year (keq ha⁻¹ y⁻¹). The unit of 'equivalents' (eq) is used for the purposes of assessing acidification, rather than a unit of mass. The unit eq (1 keq ≡ 1,000 eq) refers to molar equivalent of potential acidity resulting from e.g. sulphur, oxidised and reduced nitrogen, as well as base cations. Essentially, it means 'moles of charge' and is a measure of how acidifying a particular chemical species can be.

To convert the predicted concentration in air of NO₂, SO₂, NH₃, or HNO₃, the following algorithm is used.

$$DR_i = C_i v_{d_i} f_i$$

Where:

DR_i = annual deposition of N or S (kg N ha⁻¹ y⁻¹ or kg S ha⁻¹ y⁻¹)

C_i = annual mean concentration of the i th chemical species (μg m⁻³)

v_{d_i} = deposition velocity of i th species (Table 2.7)

f_i = factor to convert from μg m⁻² s⁻¹ to kg ha⁻¹ y⁻¹ for the i th species

Table 2.8 provides the relevant conversion factors as extracted from AQTAG06.

Table 2.8 Environment Agency factors for converting modelled deposition rates

Pollutant	Conversion factor ($\mu\text{g m}^{-2} \text{s}^{-1}$ to $\text{kg ha}^{-1} \text{y}^{-1}$ for the <i>i</i> th species)	
	Of	f_i
NO_2	N	96
SO_2	S	157.7
HNO_3	N	70.1
NH_3	N	259.7

Source: Environment Agency (2011)

In order to convert deposition of N or S to acid equivalents, the following relationships can be used:

- ▶ $1 \text{ keq ha}^{-1} \text{y}^{-1} = 14 \text{ kg N ha}^{-1} \text{y}^{-1}$; and
- ▶ $1 \text{ keq ha}^{-1} \text{y}^{-1} = 16 \text{ kg S ha}^{-1} \text{y}^{-1}$.

With respect to wet deposition, Environment Agency (2011) states:

"It is considered that wet deposition of SO_2 , NO_2 and NH_3 is not significant within a short range."

Therefore, the assessment only considers dry deposition of nitrifying and acidifying N and S compounds. The grassland deposition velocities from Table 2.7 are used for the ecological receptors in this assessment.

2.10 Special treatments

Other treatments

Specialised model treatments, for short-term (puff) releases, coastal models, fluctuations or photochemistry were not used in this assessment.

2.11 Existing ambient data

Continuous monitoring data

The City and County of Swansea has ten continuous monitoring stations within its borders, of which five measure NO_2 (a sixth, Morfa, closed in May 2011) (Swansea 2014). Most of these are roadside locations within the urban area of Swansea. One, Cwm Level Park, is an urban background location within the urban area of Swansea, approximately 5 km east of the Timet site; between 2009 and 2013 this site measured annual mean NO_2 levels between $18.5 \mu\text{g m}^{-3}$ and $23.4 \mu\text{g m}^{-3}$. These locations are considered generally unrepresentative of relevant receptors near the Timet site.

Passive monitoring data

The City and County of Swansea operates an extensive passive monitoring network consisting of diffusion tubes recording concentrations of NO_2 at approximately 250 locations within the district (Swansea 2014). All of these are at locations classified as roadside and are within urban areas, so are considered unrepresentative of relevant receptors near the Timet site.

Defra mapped background concentrations

Defra, through its contractor Ricardo-AEA, maintains a nationwide model (the Pollution Climate Mapping (PCM) model) of existing and future background air quality concentrations at a 1 km grid square resolution. The data sets include annual average concentration estimates for NO_x, NO₂, PM₁₀, PM_{2.5}, CO, SO₂ and benzene. The PCM model is semi-empirical in nature: it uses data from the national atmospheric emissions inventory (NAEI) to model the concentrations of pollutants at the centroid of each 1 km grid square but then calibrates these concentrations in relation to actual monitoring data.

Annual mean background data from the PCM model for the receptors considered in this study is detailed in Table 2.9.

Table 2.9 Mapped annual mean background concentrations (µg m⁻³)

Receptor	NO _x	NO ₂	CO	Receptor	NO _x	NO ₂	CO
Keeper's Lodge Farm	12.31	9.61	218	Carmarthen Bay and Estuaries SAC	9.57	7.63	196
Properties 1	11.66	9.13	213	Crymlyn Bog SAC	13.36	10.37	225
Properties 2	11.66	9.13	213	Gower Ash Woods SAC 1	6.26	5.07	151
Westfield Road	11.66	9.13	213	Gower Ash Woods SAC 2	7.28	5.88	163
Tir Y Farchnad	10.76	8.53	207	Gower Ash Woods SAC 3	7.90	6.34	171
Fairwood Terrace	10.76	8.53	207	Gower Ash Woods SAC 4	8.38	6.72	186
Swansea Road	12.76	9.95	220	Gower Commons SAC 1	6.35	5.15	153
Hospital	13.60	10.57	222	Gower Commons SAC 2	6.39	5.19	157
Caer'r-bont	12.31	9.61	218	Gower Commons SAC 3	6.91	5.59	159
Footpath 1	10.38	8.19	214	Gower Commons SAC 4	6.67	5.39	163
Footpath 2	10.38	8.19	214	Gower Commons SAC 5	8.77	7.02	188
Footpath 3	10.38	8.19	214	Killay Marsh LNR	10.98	8.70	194
				Priors Meadow LNR	8.04	6.46	180

Background deposition rates

The Air Pollution Information Service (APIS) website provides estimates of background deposition rates of nitrogen and sulphur. The background deposition rates for the ecological receptors considered in this study are detailed in Table 2.10.

Table 2.10 Background deposition rates

Receptor	Nitrogen deposition (kg N ha ⁻¹ y ⁻¹)	Acid deposition of nitrogen equivalents (keq ha ⁻¹ y ⁻¹)	Acid deposition of sulphur equivalents (keq ha ⁻¹ y ⁻¹)
Carmarthen Bay and Estuaries SAC	14.42	1.03	0.17
Crymlyn Bog SAC	11.48	0.82	0.15
Gower Ash Woods SAC 1	16.80	1.20	0.17
Gower Ash Woods SAC 2	23.24	1.66	0.19
Gower Ash Woods SAC 3	20.44	1.46	0.18
Gower Ash Woods SAC 4	20.44	1.46	0.18
Gower Commons SAC 1	11.48	0.82	0.15
Gower Commons SAC 2	11.48	0.82	0.15
Gower Commons SAC 3	11.48	0.82	0.15
Gower Commons SAC 4	11.62	0.83	0.15
Gower Commons SAC 5	13.30	0.95	0.15
Killay Marsh LNR	13.30	0.95	0.15
Priors Meadow LNR	23.24	1.66	0.19

Local Air Quality Management

The City and County of Swansea, under its Local Air Quality Management (LAQM) obligations, continually reviews and assesses concentrations of key air pollutants in the borough to ascertain the requirement, or otherwise, to declare an Air Quality Management Area (AQMA) (Swansea 2014). Following the review and assessments undertaken to date, the Council has declared an AQMA for annual mean NO₂ covering three parts of Swansea:

- ▶ along a section of the A483 near the junction with the A4216 at Fforest-fach Cross, approximately 2 km east of the Timet site;
- ▶ around the junction of the A4118 with the A4216 in Sketty, approximately 4 km south-east of the Timet site; and
- ▶ the Hafod district of central Swansea, approximately 5 km east of the Timet site.

The included receptors, particularly Keeper's Lodge Farm and Caer'r-bont, will bound the contribution from the site at the AQMAs.

Background concentrations and deposition rates used in the assessment

Annual mean background concentrations and deposition rates for the receptors have been derived from the data in Table 2.9 and Table 2.10. The annual average process contribution is added to the annual average background concentration to give a total concentration at each receptor location. This total concentration can then be compared against the relevant Air Quality Standard/Objective (AQS/O) and the likelihood of an exceedance determined.

It is not technically rigorous to add predicted short-term or percentile concentrations to ambient background concentrations, since peak contributions from different sources would not necessarily coincide at the same time or at the same location. Without hourly ambient background monitoring data available it is difficult to

make an assessment against the achievement or otherwise of the short-term assessment criteria. For the current assessment, conservative short-term ambient levels have been derived by applying a factor of two to the annual mean background data as per the recommendation in Environment Agency Horizontal Guidance H1 Annex F.

There are three other sources of emissions close to the site, namely Aleris Recycling, Timet UK Ltd and Green Frog Power 214 Ltd. Because of their proximity to the site (and to potentially sensitive receptors), they have been modelled explicitly and added to the background. The Aleris Recycling and Timet UK Ltd sources are listed on the Environment Agency's Pollution Inventory as releasing less than 100 t of NO_x per year each, and have been modelled using estimated stack characteristics and assuming a constant NO_x emission rate of 100 t/year.

Information on the Green Frog Power 214 Ltd installation was obtained from the operator to enable it to be modelled with the same level of accuracy as the subject of this assessment. The Green Frog Power 214 Ltd installation is a Short-Term Operating Reserve (STOR) facility, which is similar to the Capacity Mechanism plant in that it operates for short periods (a few hours per year, approximately 400 hours) when electricity demand exceeds generating capacity. For the purpose of calculating short-term concentrations, it has been assumed that both plants operate at the same time, so the maximum 1-hour concentration results include contributions from both sources.

2.12 Sensitivity analysis and uncertainty

Sensitivity analysis

Wherever possible, this assessment has used worst-case scenarios, which will exaggerate the impact of the emissions on the surrounding area, including emissions, operational profile, ambient concentrations, meteorology and surface roughness. This assessment has considered 5 years of meteorological data, with data reported from the year(s) predicting the highest ground-level concentrations at the nearest sensitive receptor for comparison with the AQS.

In addition, a specific sensitivity test has been run to assess the impact of the surface roughness parameter. For the 2010 met year, receptor concentrations have been calculated using roughness lengths of 0.2 m and 1.5 m in addition to the main 0.75 m used in the main assessment. This used a different configuration of engines that is currently proposed, so results are not exactly the same as those presented elsewhere in this report, but they demonstrate the effect of roughness length on modelled concentrations. The results are given in Table 2.11. This shows that, as expected, at the distances of interest, the increased mixing with larger roughness lengths reduces concentrations. Over the wide range of lengths used in the test, from 0.2 m (representative of pasture or the lower end of agricultural land) to 0.75 (representative of parkland, woodlands, villages, open suburbia) and 0.75 to 1.5 (representative of forests, cities, industrialised areas), the effect is typically up to about 20%. The difference tends to be slightly larger at greater distances from the source, although the correlation is not strong ($R^2 = 0.20$).

This demonstrates that while it is important to use a sensible value for roughness length (e.g. not to use 1.5 m in a rural area), staying within the range of recommended values for a land-use type will not have a large effect on the modelling results.

Table 2.11 Modelled NO_x concentrations for different roughness lengths

Receptor	Annual mean NO _x			% Difference from 0.75 m	
	0.2 m	0.75 m	1.5 m	0.2 m	1.5 m
Keepers Lodge Farm	2.44	2.45	2.40	0.3%	-1.4%
Properties 1	2.26	2.53	2.08	11.7%	-8.1%
Properties 2	1.13	1.14	1.07	1.0%	-5.1%
Westfield Road	0.88	1.04	0.77	17.9%	-12.0%
Tir Y Farchnad	0.41	0.42	0.39	3.9%	-3.8%
Fairwood Terrace	0.37	0.43	0.34	14.3%	-8.6%
Swansea Road	0.43	0.47	0.42	7.7%	-4.2%
Hospital	0.56	0.59	0.54	5.4%	-3.8%
Caer-r-bont	1.39	1.61	1.25	15.7%	-10.4%
Footpath 1	1.90	2.11	1.78	11.2%	-6.1%
Footpath 2	10.14	9.62	9.96	-5.1%	-1.8%
Footpath 3	13.63	13.67	12.95	0.3%	-5.0%
Carmarthen Bay SAC	0.13	0.15	0.12	15.6%	-7.7%
Crymlyn Bog	0.04	0.05	0.04	25.5%	-7.3%
Gower Ash Woods 1	0.01	0.01	0.01	14.8%	-13.1%
Gower Ash Woods 2	0.03	0.03	0.02	11.0%	-11.7%
Gower Ash Woods 3	0.03	0.03	0.03	9.7%	-7.9%
Gower Ash Woods 4	0.02	0.02	0.02	1.2%	1.0%
Gower Commons SAC 1	0.01	0.02	0.01	20.1%	-12.5%
Gower Commons SAC 2	0.02	0.02	0.01	25.2%	-10.8%
Gower Commons SAC 3	0.02	0.02	0.02	22.0%	-13.9%
Gower Commons SAC 4	0.02	0.02	0.02	9.3%	-6.6%
Gower Commons SAC 5	0.08	0.09	0.07	19.3%	-13.9%
Killay Marsh LNR	0.08	0.09	0.08	3.0%	-3.9%
Priors Meadow LNR	0.05	0.06	0.04	22.9%	-14.3%

Model uncertainty

Process emissions have been modelled under expected operation using the standard steady state algorithms in ADMS to determine the impact on local human receptors. In order to model atmospheric dispersion using standard Gaussian methods, the following assumptions have to be made and limitations accepted:

- ▶ Conservation of mass - the entire mass of emitted pollutant remains in the atmosphere and no allowance is made for loss due to chemical reactions or deposition processes (although the standard Gaussian model can be modified to include such processes, as is the case with ADMS). Portions of the plume reaching the ground are assumed to be dispersed back away from the ground by turbulent eddies (eddy reflection);
- ▶ Steady state emissions - emission rates are assumed to be constant and continuous over the time averaging period of interest; and
- ▶ Steady state meteorology - no variations in wind speed, direction or turbulent profiles occur during transport from the source to the receptor. This assumption is reasonable within a few kilometres of a source but may not be valid for receptor distances in the order of tens of kilometres. For example, for a receptor 50 km from a source and with a wind speed of 5 m s^{-1} it will take nearly three hours for the plume to travel this distance during which time many different processes may change (e.g., the sun may rise or set and clouds may form or dissipate affecting the turbulent profiles). For this reason, Gaussian models are practically limited to predicting concentrations within ~20 km of a source.

As a result of the above, and in combination with other factors, not least attempting to replicate stochastic processes (e.g., turbulence) by deterministic methods, dispersion modelling is inherently uncertain, but is nonetheless a useful tool in plume footprint visualisation and prediction of ground level concentrations. The use of dispersion models has been widely used in the UK for both regulatory and compliance purposes for a number of years and is an accepted approach for this type of assessment.

This assessment has incorporated a number of worst-case assumptions, as described above, which will result in an overestimation of the predicted ground level concentrations from the process. As a result of these worst-case assumptions, the predicted results should be considered the upper limit of model uncertainty for a scenario where the actual site impact is determined. Therefore, the actual predicted ground level concentrations would be expected to be lower than those reported in this assessment and, in some cases, significantly lower.

3. Assessment criteria

3.1 Relevant legislation and guidance

EU legislation

Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe

Directive 2008/50/EC (the 'Directive'), which came into force in June 2008, consolidates existing EU-wide air quality legislation (with the exception of Directive 2004/107/EC) and provides a new regulatory framework for PM_{2.5}.

The Directive sets limits, or target levels, for selected pollutants that are to be achieved by specific dates and details procedures EU Member States should take in assessing ambient air quality. The limit and target levels relate to concentrations in ambient air. At Article 2(1), the Directive defines ambient air as:

"...outdoor air in the troposphere, excluding workplaces as defined by Directive 89/654/EEC where provisions concerning health and safety at work apply and to which members of the public do not have regular access."

In accordance with Article 2(1), Annex III, Part A, paragraph 2 details locations where compliance with the limit values does not need to be assessed:

"Compliance with the limit values directed at the protection of human health shall not be assessed at the following locations:

- a) any locations situated within areas where members of the public do not have access and there is no fixed habitation;*
- b) in accordance with Article 2(1), on factory premises or at industrial installations to which all relevant provisions concerning health and safety at work apply; and*
- c) on the carriageway of roads; and on the central reservation of roads except where there is normally pedestrian access to the central reservation."*

UK legislation

The Air Quality Standards Regulations 2010

The Air Quality Standards Regulations 2010 (the 'Regulations') came into force on the 11 June 2010 and transpose Directive 2008/50/EC into UK legislation. The Directive's limit values are transposed into the Regulations as 'Air Quality Standards' (AQS) with attainment dates in line with the Directive.

These standards are legally binding concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. The standards are based on the assessment of the effects of each pollutant on human health including the effects of sensitive groups or on ecosystems.

Similar to Directive 2008/50/EC, the Regulations define ambient air as;

"...outdoor air in the troposphere, excluding workplaces where members of the public do not have regular access."

with direction provided in Schedule 1, Part 1, Paragraph 2 as to where compliance with the AQS' does not need to be assessed:

"Compliance with the limit values directed at the protection of human health does not need to be assessed at the following locations:

- a) any location situated within areas where members of the public do not have access and there is no fixed habitation;*
- b) on factory premises or at industrial locations to which all relevant provisions concerning health and safety at work apply; and*
- c) on the carriageway of roads and on the central reservation of roads except where there is normally pedestrian access to the central reservation."*

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

The 2007 Air Quality Strategy for England, Scotland Wales and Northern Ireland provides a framework for improving air quality at a national and local level and supersedes the previous strategy published in 2000.

Central to the Air Quality Strategy are health-based criteria for certain air pollutants; these criteria are based on medical and scientific reports on how and at what concentration each pollutant affects human health. The objectives derived from these criteria are policy targets often expressed as a maximum ambient concentration not to be exceeded, without exception or with a permitted number of exceedances, within a specified timescale. At paragraph 22 of the 2007 Air Quality Strategy, the point is made that the objectives are:

"...a statement of policy intentions or policy targets. As such, there is no legal requirement to meet these objectives except where they mirror any equivalent legally binding limit values..."

The AQOs, based on a selection of the objectives in the Air Quality Strategy, were incorporated into UK legislation through the Air Quality Regulations 2000, as amended.

Paragraph 4(2) of The Air Quality (England) Regulations 2000 states:

"The achievement or likely achievement of an air quality objective prescribed by paragraph (1) shall be determined by reference to the quality of air at locations –

- a) which are situated outside of buildings or other natural or man-made structures above or below ground; and*
- b) where members of the public are regularly present."*

Consequently, compliance with the AQOs should focus on areas where members of the general public are present over the entire duration of the concentration averaging period specific to the relevant objective.

The Environment Act 1995

Part IV of the Environment Act 1995 requires that Local Authorities periodically review air quality within their individual areas. This process of Local Air Quality Management (LAQM) is an integral part of delivering the Government's AQOs.

To carry out an air quality Review and Assessment under the LAQM process, the Government recommends a three-stage approach. This phased review process uses initial simple screening methods and progresses through to more detailed assessment methods of modelling and monitoring in areas identified to be at potential risk of exceeding the objectives in the Regulations.

Review and assessments of local air quality aim to identify areas where national policies to reduce vehicle and industrial emissions are unlikely to result in air quality meeting the Government's air quality objectives by the required dates.

For the purposes of determining the focus of Review and Assessment, Local Authorities should have regard to those locations where members of the public are likely to be regularly present and are likely to be exposed over the averaging period of the objective.

Where the assessment indicates that some or all of the objectives may be potentially exceeded, the Local Authority has a duty to declare an AQMA. The declaration of an AQMA requires the Local Authority to implement an Air Quality Action Plan (AQAP), to reduce air pollution concentrations so that the required AQOs are met.

Other guideline values

In the absence of statutory standards for the other prescribed substances that may be found in the emissions, there are several sources of applicable air quality guidelines.

Air Quality Guidelines for Europe, the World Health Organisation (WHO)

The aim of the WHO Air Quality Guidelines for Europe (WHO, 2000) is to provide a basis for protecting public health from adverse effects of air pollutants and to eliminate or reduce exposure to those pollutants that are known or likely to be hazardous to human health or well-being. These guidelines are intended to provide guidance and information to international, national and local authorities making risk management decisions, particularly in setting air quality standards.

Environmental Assessment Levels (EALs)

The Environment Agency's Horizontal Guidance Note H1 provides methods for quantifying the environmental impacts of emissions to all media. H1 Annex F contains long and short-term Environmental Assessment Levels (EALs) and Environmental Quality Standards (EQS) for releases to air derived from a number of published UK and international sources. For the pollutants considered in this study, these EALs and EQS are equivalent to the AQS and AQOs set in force by the Air Quality Strategy for England, Scotland Wales and Northern Ireland.

The H1 guidance note includes an additional EAL of relevance to this assessment, namely a limit of $75 \mu\text{g m}^{-3}$ on daily mean NO_x at ecological receptors. This is based on guidance from the World Health Organization (WHO, 2000), which says:

“Experimental evidence exists that the CLE [critical level] decreases from around $200 \mu\text{g/m}^3$ to $75 \mu\text{g/m}^3$ when in combination with O_3 or SO_2 at or above their critical levels. In the knowledge that short-term episodes of elevated NO_x concentrations are generally combined with elevated concentrations of O_3 or SO_2 , $75 \mu\text{g/m}^3$ is proposed for the 24 h mean.”

3.2 Air quality impacts of the process

The atmospheric emissions of the following pollutants have been identified as requiring detailed dispersion modelling:

- ▶ Oxides of nitrogen (NO_x as NO_2); and
- ▶ Carbon monoxide (CO).

A brief description of each pollutant is given in Table 3.1.

Table 3.1 Summary of the pollutants assessed

Pollutant	Description and effect on human health and the environment	Principal Sources
Oxides of Nitrogen (NO_x)	Nitrogen dioxide (NO ₂) and Nitric oxide (NO) are both collectively referred to as oxides of Nitrogen (NO _x). It is NO ₂ that is associated with adverse effects on human health. Most atmospheric emissions are in the form of NO which is converted to NO ₂ in the atmosphere through reactions with Ozone. The oxidising properties of NO ₂ theoretically could damage lung tissue, and exposure to very high concentrations of NO ₂ can lead to inflammation of lung tissue, affect the ability to fight infection. The greatest impact of NO ₂ is on individuals with asthma or other respiratory conditions, but consistent impacts on these individuals is at levels of greater than 564 µg m ⁻³ , much higher than typical UK ambient concentrations.	All combustion processes produce NO _x emissions, and the principal source of NO _x is road transport, which accounted for 32% of total UK emissions in 2008. Emissions from power stations contributed a further 20%.
Carbon Monoxide (CO)	The toxicity of CO results in it binding avidly to haemoglobin and thus reducing the oxygen carrying capacity of the blood. In very high doses, the restriction of oxygen to the brain and heart can be fatal. At lower concentrations, CO can affect higher cerebral function, heart function and exercise capacity.	The principal source of CO is emissions from petrol vehicles, accounting for 54% of total UK emissions in 2008.

3.3 Criteria appropriate to the assessment

Air Quality Standards, Objectives, Guidelines and Critical Levels

Table 3.2 sets out those AQS, AQOs and EALs that are relevant to this assessment.

Table 3.2 Air Quality Standards, Objectives and Environmental Assessment Levels

Pollutant	AQS/AQO/EAL	Averaging Period	Value (µg m ⁻³)
NO ₂	AQS	Annual mean	40
	AQS	1-hour mean, not to be exceeded more than 18 times a year (equivalent of 99.79 Percentile)	200
NO _x : Ecological Receptors	AQS	Annual mean	30
	EAL	Daily mean	75
CO	AQS	8-hour mean	10,000
	EAL	1-hour mean	30,000

Critical Loads relevant to the assessment

The Air Pollution Information Service (APIS) contains information on applicable critical loads for various habitats and species.

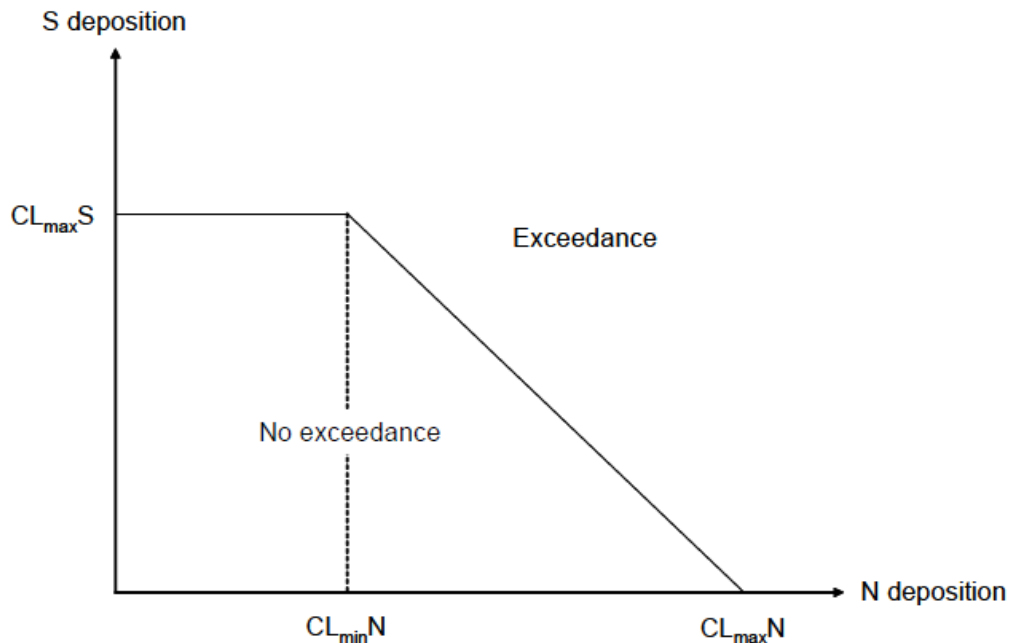
Eutrophication critical loads are given as a range and have units of kg N ha⁻¹ y⁻¹. Generally, the lower end of the range should be used as a conservative assessment. The critical loads for acidification are more complicated, in that both the nitrogen and sulphur deposition fluxes must be considered at the same time. Therefore, a critical load function is specified for acidification, via the use of three critical load parameters:

- ▶ CL_{max}S — the maximum critical load of sulphur, above which the deposition of sulphur alone would be considered to lead to an exceedance;
- ▶ CL_{min}N — a measure of the ability of a system to "consume" deposited nitrogen (e.g. via immobilisation and uptake of the deposited nitrogen); and

- ▶ $CL_{max}N$ — the maximum critical load of acidifying nitrogen, above which the deposition of nitrogen alone would be considered to lead to an exceedance.

These three quantities define the critical load function shown in Figure 3.1.

Figure 3.1 Schematic Critical Load function for acidity



Source: Environment Agency (2011)

Information held on the APIS website has been reviewed in order to identify the main habitat/species features and their site relevant critical loads. Information is only available for the designated sites (i.e. SACs, SSSIs etc.), not for Local Nature Reserves with no other designation. Table 3.3 summarises this information.

Table 3.3 Relevant Critical Load data for the assessment

Designated sites	Main notified habitat/species features in the assessment area	Minimum nutrient nitrogen deposition critical load (kg N ha ⁻¹ y ⁻¹)	CLmaxS (keq ha ⁻¹ y ⁻¹)	CLminN (keq ha ⁻¹ y ⁻¹)	CLmaxN (keq ha ⁻¹ y ⁻¹)
Carmarthen Bay and Estuaries SAC	Atlantic salt meadows; Salicornia and other annuals colonizing mud and sand; Estuaries	20	N/A	N/A	N/A
Crymlyn Bog	Transition mires and quaking bogs	5	0.342	0.321	0.661
Gower Ash Woods SAC	Tilio-Acerion forests of slopes, screes and ravines	15	0.322	0.142	0.666
Gower Commons SAC	Euphydryas aurinia - Marsh fritillary butterfly; European dry heaths; Northern Atlantic wet heaths with Erica tetralix; Coenagrion mercuriale - Southern damselfly; Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) - Purple moor-grass meadows	10	0.16	0.223	0.526

3.4 Significance criteria

Although no formal procedure exists for classifying the magnitude and significance of air quality effects from a new development, guidance issued by Environmental Protection UK (2015) suggests ways to address the issue. In the EPUK guidance, the magnitude of impact due to an increase/decrease in annual mean NO₂ is described using the criteria in **Error! Reference source not found..** These criteria take into account both the change in concentration at a receptor brought about by a new development as a percentage of the assessment level, and the actual concentration at that receptor.

Note that the EPUK (2015) guidance uses some of the same terminology as guidance previously issued by EPUK (2010), but with different and more onerous definitions. In the new guidance, the thresholds for each of the descriptors are substantially lower than in the old guidance, so for example it is harder for an installation to be rated as having 'negligible' impact.

The guidance makes clear that the purpose of these descriptors is to provide a common language for describing the impacts of a development. It says:

- ▶ *“The overall significance is determined using professional judgement. For example, a ‘moderate’ adverse impact at one receptor may not mean that the overall impact has a significant effect. Other factors need to be considered.”*

Table 3.4 Impact descriptors for increases in annual mean NO₂ and PM₁₀ concentration (assessment level = 40 µg m⁻³)

Absolute concentration with scheme, relative to assessment level	Increase in concentration relative to assessment level				
	0% (<0.2 µg m ⁻³)	1% (0.2–0.6 µg m ⁻³)	2–5% (0.6–2.2 µg m ⁻³)	6–10% (2.2–4.0 µg m ⁻³)	>10% (>4.0 µg m ⁻³)
75% or less (<30.2 µg m⁻³)	Negligible	Negligible	Negligible	Slight	Moderate
76–94% (30.2–37.8 µg m⁻³)	Negligible	Negligible	Slight	Moderate	Moderate
95–102% (37.8–41.0 µg m⁻³)	Negligible	Slight	Moderate	Moderate	Substantial
103–109% (41.0–43.8 µg m⁻³)	Negligible	Moderate	Moderate	Substantial	Substantial
110% or more (>43.8 µg m⁻³)	Negligible	Moderate	Substantial	Substantial	Substantial

The table is intended to be used by calculating percentages relative to the assessment level and then rounding the percentages to whole numbers. For convenience, the above table gives equivalent absolute concentrations for the case where the assessment level is 40 µg m⁻³ (e.g. for annual mean NO₂ or annual mean PM₁₀).

Public exposure

Guidance from the UK Government and Devolved Administrations makes clear that exceedances of the health based objectives should be assessed at outdoor locations where members of the general public are regularly present over the averaging time of the objective. As in Section 3.1, this also excludes workplaces. Table 3.5 provides an indication of those locations that may or may not be relevant for each averaging period.

Table 3.5 Examples of where the Air Quality Objectives should apply for human receptors

Averaging Period	Objectives should apply at:	Objectives should generally not apply at:
Annual mean	All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, care homes etc.	Building facades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term.
8-hour mean	All locations where the annual mean objectives would apply, together with hotels. Gardens of residential properties ¹ .	Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term.
1-hour mean	All locations where the annual mean and 24 and 8-hour mean objectives would apply. Kerbside sites (e.g. pavements of busy shopping streets). Those parts of car parks, bus stations and railway stations etc. which are not fully enclosed, where the public might reasonably be expected to spend one hour or more. Any outdoor locations at which the public may be expected to spend one hour or longer.	Kerbside sites where the public would not be expected to have regular access.

¹ For gardens, such locations should represent parts of the garden where relevant public exposure is likely, for example where there is a seating or play areas. It is unlikely that relevant public exposure would occur at the extremities of the garden boundary, or in front gardens, although local judgement should always be applied.

4. Assessment of impact

This section sets out the results of the dispersion modelling and compares predicted ground level concentrations against the assessment criteria detailed in Section 3. The predicted concentrations resulting from the process (i.e. the process contribution (PC)) are presented along with background concentrations and the percentage contribution that the predicted environmental concentrations (PEC) would make towards the relevant standard, objective or guideline value.

4.1 Meteorological data sensitivity analysis

As described in Section 2.3, results were calculated separately for five different years of meteorological data ('met year'). For each of the specific receptors and for each pollutant measure, the met year giving the highest concentration was determined, and the corresponding concentration is the one presented here. In other words, each of the individual results are the worst case for that measure. For plotting the concentration isopleths, a single met year was chosen, namely the year producing the highest annual mean NO₂ concentration at any point in the model domain. This means that some results in the tables of specific receptors will not accord exactly with the contour bandings on the figure (they will be higher in the tables).

4.2 Human health effects

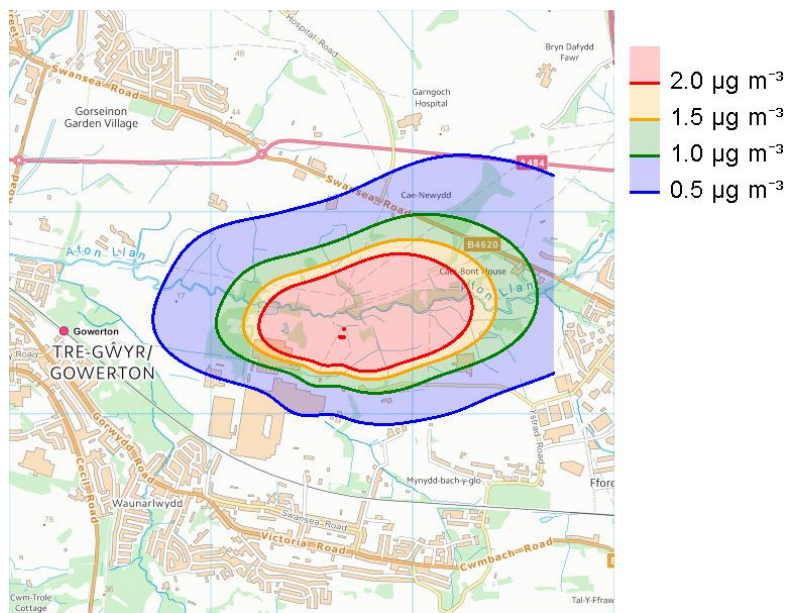
Nitrogen dioxide (NO₂)

Predicted concentrations of annual mean NO₂ are given in Table 4.1, and contours are shown in Figure 4.1 and Figure 4.2 for the near field and far field respectively.

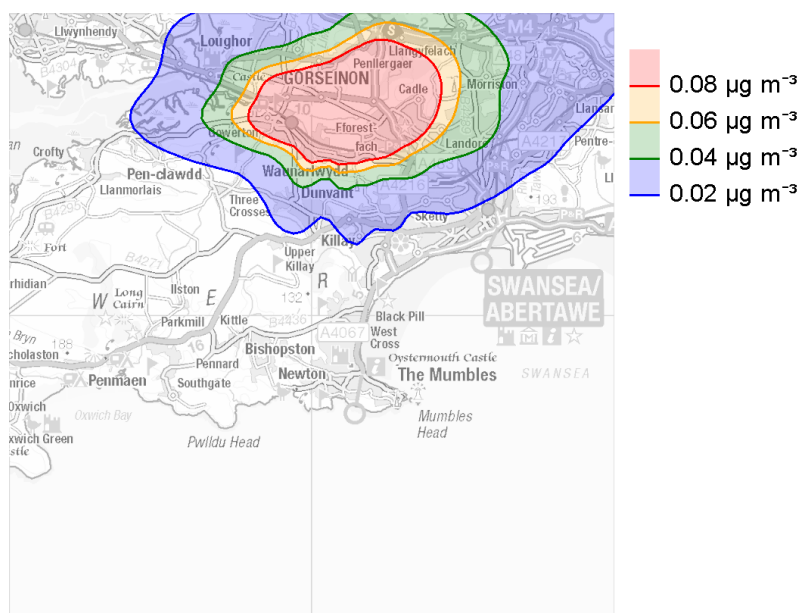
The maximum annual mean NO₂ PEC at any relevant human receptor location is predicted as 19.77 µg m⁻³ or 49.4% of the AQS at Keeper's Lodge. This receptor also experiences the greatest change in concentrations from baseline levels, namely 1.55 µg m⁻³. Under the EPUK criteria, the impact of the installation on annual mean NO₂ concentrations is 'negligible' at all relevant receptors. This impact is not considered to be significant.

Table 4.1 Maximum PCs and PECs for annual mean NO₂

Receptor	Annual mean NO ₂				
	AQS (µg m ⁻³)	PC (µg m ⁻³)	PEC (µg m ⁻³)	% PEC of AQS	Descriptor
Keeper's Lodge Farm	40	1.55	19.77	49.4%	Negligible
Properties 1	40	1.22	16.74	41.8%	Negligible
Properties 2	40	0.63	12.84	32.1%	Negligible
Westfield Road	40	0.49	11.75	29.4%	Negligible
Tir Y Farchnad	40	0.32	10.24	25.6%	Negligible
Fairwood Terrace	40	0.25	9.85	24.6%	Negligible
Swansea Road	40	0.28	11.48	28.7%	Negligible
Hospital	40	0.36	12.51	31.3%	Negligible
Caer'r-bont	40	1.19	16.52	41.3%	Negligible

Figure 4.1 NO₂ annual mean process contribution with 2011 meteorology — near field

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Figure 4.2 NO₂ annual mean process contribution with 2011 meteorology — far field

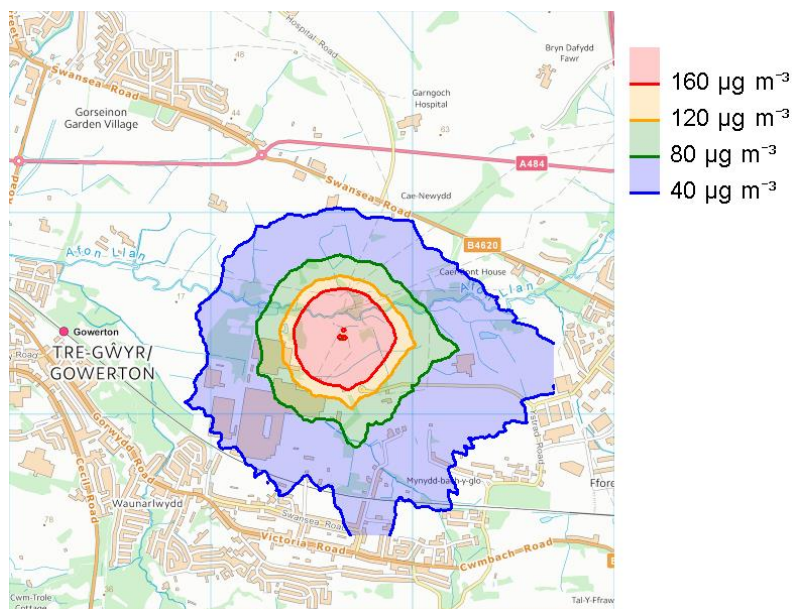
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Predicted concentrations of the 99.79 percentile 1-hour mean NO₂ are given in Table 4.2, and contours are shown in Figure 4.3 (for the near field only, since it is not relevant for ecological receptors).

The maximum 99.79 percentile 1-hour mean NO₂ PEC at any relevant human receptor location is predicted as 222.71 µg m⁻³ or 119.7% of the AQS at the Footpath 2 receptor. As previously noted, this is based on the pessimistic assumption that the plant is operating during those hours that give the highest concentrations, so these numbers are overestimated. For there to be relevant exposure, a member of the public would need to be present for a total of 18 hours per year while the plant is operating, the wind is blowing towards the footpath and the other meteorological conditions are such as to produce unusually high concentrations there. Such events are expected to coincide very infrequently.

Table 4.2 Maximum PCs and PECs for 99.79th percentile 1-hour mean NO₂

Receptor	99.79 percentile 1-hour mean NO ₂			
	AQS ($\mu\text{g m}^{-3}$)	PC ($\mu\text{g m}^{-3}$)	PEC ($\mu\text{g m}^{-3}$)	% PEC of AQS
Keeper's Lodge Farm	200	73.82	93.05	46.5%
Properties 1	200	72.87	91.14	45.6%
Properties 2	200	39.31	59.80	29.9%
Westfield Road	200	35.86	55.81	27.9%
Tir Y Farchnad	200	20.28	37.94	19.0%
Fairwood Terrace	200	16.66	34.26	17.1%
Swansea Road	200	20.69	41.74	20.9%
Hospital	200	20.14	43.72	21.9%
Caer'r-bont	200	36.80	58.37	29.2%
Footpath 1	200	57.90	74.28	37.1%
Footpath 2	200	222.71	239.37	119.7%
Footpath 3	200	194.86	217.37	108.7%

Figure 4.3 NO₂ 99.79th percentile 1-hour mean process contribution with 2010 meteorology

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Carbon monoxide (CO)

Predicted concentrations of annual mean CO and the maximum rolling 88-hour mean CO are given in Table 4.3.

The maximum 1-hour mean CO PEC at any relevant human receptor location is predicted as 1930 $\mu\text{g m}^{-3}$ or 6.4% of the EAL at the Footpath 2 receptor. The maximum rolling 8-hour mean CO PEC at any relevant human receptor location is predicted as 685 $\mu\text{g m}^{-3}$ or 6.9% of the AQS at the Keeper's Lodge receptor. On this evidence, emissions of CO from the installation are likely to have a negligible impact on human health.

Table 4.3 Maximum PCs and PECs for CO

Receptor	Maximum 1-hour mean CO				Maximum rolling 8-hour mean CO			
	EAL ($\mu\text{g m}^{-3}$)	PC ($\mu\text{g m}^{-3}$)	PEC ($\mu\text{g m}^{-3}$)	% PEC of AQS	AQS ($\mu\text{g m}^{-3}$)	PC ($\mu\text{g m}^{-3}$)	PEC ($\mu\text{g m}^{-3}$)	% PEC of AQS
Keeper's Lodge Farm	30,000	562	1076	3.6%	10,000	218	685	6.9%
Properties 1	30,000	575	1074	3.6%	10,000	215	665	6.7%
Properties 2	30,000	496	972	3.2%	10,000	117	556	5.6%
Westfield Road	30,000	339	813	2.7%	10,000	88	524	5.2%
Tir Y Farchnad	30,000	292	732	2.4%	10,000	58	478	4.8%
Fairwood Terrace	30,000	178	612	2.0%	10,000	42	462	4.6%
Swansea Road	30,000	318	795	2.6%	10,000	98	557	5.6%
Hospital	30,000	543	1044	3.5%	10,000	200	665	6.7%
Caer'r-bont	30,000	363	844	2.8%	10,000	91	541	5.4%
Footpath 1	30,000	448	938	3.1%	N/A	N/A	N/A	N/A
Footpath 2	30,000	1408	1930	6.4%	N/A	N/A	N/A	N/A
Footpath 3	30,000	1280	1880	6.3%	N/A	N/A	N/A	N/A

4.3 Ecological effects

Critical Levels

Table 4.4 and Table 4.5 present the assessment of predicted NO_x concentrations against established critical levels for the ecological receptors considered in this study.

Table 4.4 Critical Levels assessment of annual mean NO_x

Receptor	Annual mean NO _x			
	Critical Level (µg m ⁻³)	PC (µg m ⁻³)	PEC (µg m ⁻³)	% PEC of Critical Level
Carmarthen Bay and Estuaries SAC	30	0.12	9.71	32.4%
Crymlyn Bog	30	0.03	13.40	44.7%
Gower Ash Woods SAC 1	30	0.01	6.27	20.9%
Gower Ash Woods SAC 2	30	0.02	7.31	24.4%
Gower Ash Woods SAC 3	30	0.03	7.93	26.4%
Gower Ash Woods SAC 4	30	0.02	8.41	28.0%
Gower Commons SAC 1	30	0.01	6.37	21.2%
Gower Commons SAC 2	30	0.01	6.41	21.4%
Gower Commons SAC 3	30	0.02	6.93	23.1%
Gower Commons SAC 4	30	0.02	6.69	22.3%
Gower Commons SAC 5	30	0.07	8.85	29.5%
Killay Marsh LNR	30	0.07	11.07	36.9%
Priors Meadow LNR	30	0.04	8.09	27.0%

Table 4.5 Critical Levels assessment of daily mean NO_x

Receptor	Daily mean NO _x			
	Critical Level ($\mu\text{g m}^{-3}$)	PC ($\mu\text{g m}^{-3}$)	PEC ($\mu\text{g m}^{-3}$)	% PEC of Critical Level
Carmarthen Bay and Estuaries SAC	75	10.69	29.99	40.0%
Crymlyn Bog	75	5.19	32.83	43.8%
Gower Ash Woods SAC 1	75	2.88	16.44	21.9%
Gower Ash Woods SAC 2	75	4.27	20.16	26.9%
Gower Ash Woods SAC 3	75	3.99	20.90	27.9%
Gower Ash Woods SAC 4	75	4.59	22.66	30.2%
Gower Commons SAC 1	75	4.68	18.54	24.7%
Gower Commons SAC 2	75	5.40	19.51	26.0%
Gower Commons SAC 3	75	6.54	21.80	29.1%
Gower Commons SAC 4	75	3.69	17.67	23.6%
Gower Commons SAC 5	75	8.97	26.50	35.3%
Killay Marsh LNR	75	8.09	31.53	42.0%
Priors Meadow LNR	75	9.56	27.55	36.7%

Table 4.4 and Table 4.5 indicate that PECs are well below their respective critical levels for all averaging periods and all receptors. In this regard, predicted concentrations at ecological receptors resulting from the installation are not expected to result in adverse effects at these locations.

Critical Loads

As shown in Table 4.6, nutrient nitrogen deposition rates at all of the ecological receptors modelled are predicted to be at most $0.012 \text{ kg N ha}^{-1} \text{ y}^{-1}$, and are nowhere more than 0.25% of the lower critical load of $5 \text{ kg N ha}^{-1} \text{ y}^{-1}$. These deposition rates would not be considered significant, even though most of the receptors are above their critical loads.

Table 4.6 Critical Loads assessment of nitrogen deposition

Receptor	Minimum Critical Load (kg N ha ⁻¹ y ⁻¹)	PC (kg N ha ⁻¹ y ⁻¹)	PEDR (kg N ha ⁻¹ y ⁻¹)	% PC of Critical Load	% PEC of Critical Load
Carmarthen Bay and Estuaries SAC	20	1.20×10^{-2}	14.43	0.06%	72.16%
Crymlyn Bog	5	3.38×10^{-3}	11.48	0.07%	229.67%
Gower Ash Woods SAC 1	15	9.70×10^{-4}	16.80	0.01%	112.01%
Gower Ash Woods SAC 2	15	2.29×10^{-3}	23.24	0.02%	154.95%
Gower Ash Woods SAC 3	15	2.55×10^{-3}	20.44	0.02%	136.28%
Gower Ash Woods SAC 4	15	1.84×10^{-3}	20.44	0.01%	136.28%
Gower Commons SAC 1	10	1.12×10^{-3}	11.48	0.01%	114.81%
Gower Commons SAC 2	10	1.38×10^{-3}	11.48	0.01%	114.81%
Gower Commons SAC 3	10	1.69×10^{-3}	11.48	0.02%	114.82%
Gower Commons SAC 4	10	1.76×10^{-3}	11.62	0.02%	116.22%
Gower Commons SAC 5	10	6.63×10^{-3}	13.31	0.07%	133.07%
Killay Marsh LNR	N/A	7.12×10^{-3}	13.31	N/A	N/A
Priors Meadow LNR	N/A	4.06×10^{-3}	23.24	N/A	N/A

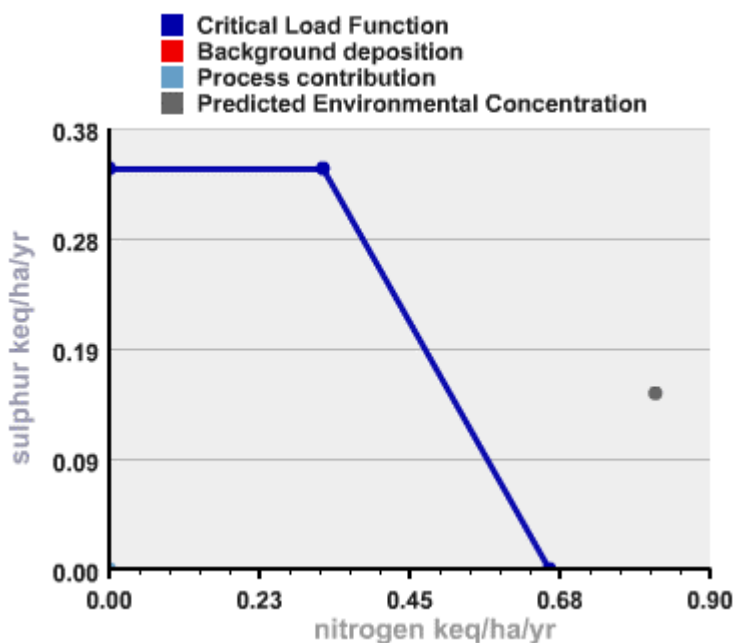
With respect to acid deposition, Table 4.7 gives an assessment of exceedances and Figure 4.4, Figure 4.5 and Figure 4.6 plot these values in relation to the acid deposition critical load function for three receptors from different SACs. Corresponding figures for the other receptors are similar. As with nitrogen deposition, the sites are at exceedance already due to background but the process contribution is tiny and would not be considered significant.

Table 4.7 Critical Loads assessment of acid deposition

Receptor	Exceedance (keq ha ⁻¹ y ⁻¹)			% of CL function		
	PC	Back-ground	PEC	PC	Back-ground	PEC
Crymlyn Bog	no exceedance of CL function	0.31	0.31	0%	146.7%	146.7%
Gower Ash Woods SAC 3	no exceedance of CL function	0.97	0.97	0%	246.2%	246.2%
Gower Commons SAC 5	no exceedance of CL function	0.57	0.57	0%	209.1%	209.1%

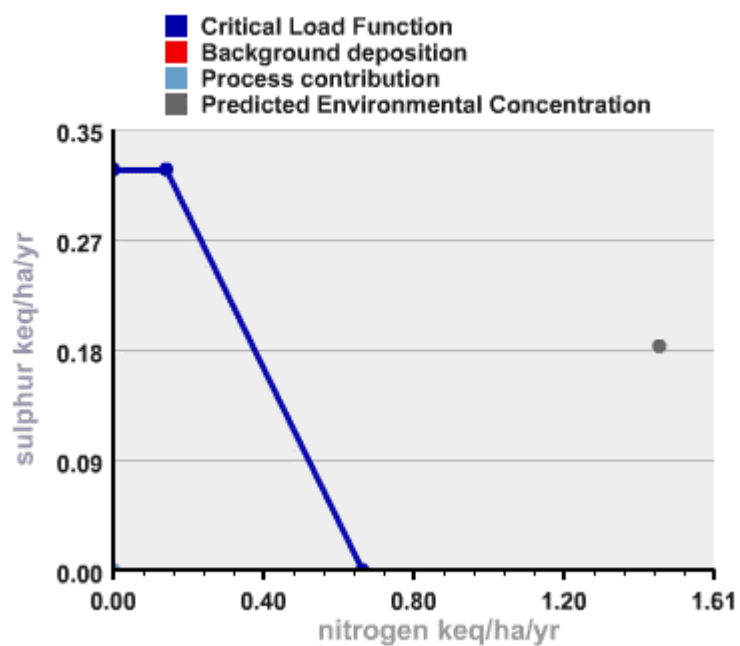
Source: <http://www.apis.ac.uk/critical-load-function-tool>

Figure 4.4 Assessment of acid deposition at the Crymlyn Bog receptor



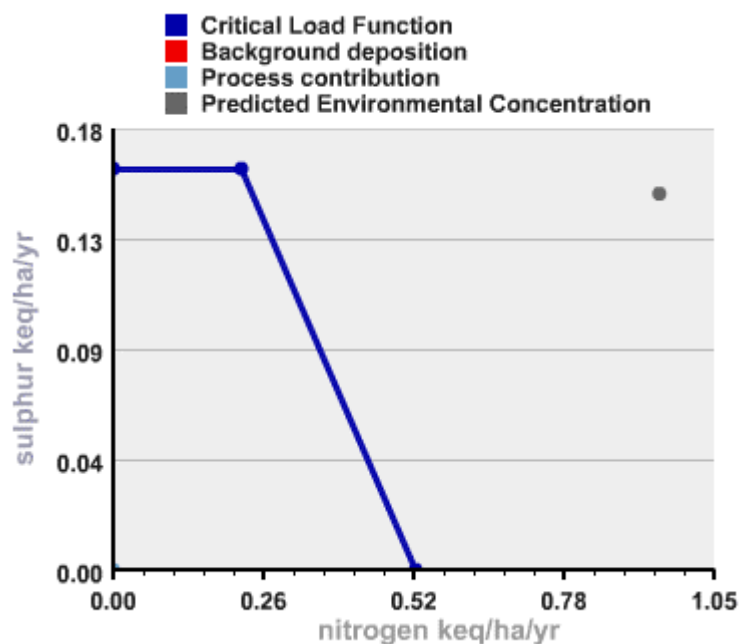
Source: <http://www.apis.ac.uk/critical-load-function-tool>

Figure 4.5 Assessment of acid deposition at the Gower Ash Woods SAC 3 receptor



Source: <http://www.apis.ac.uk/critical-load-function-tool>

Figure 4.6 Assessment of acid deposition at the Gower Commons SAC 5 receptor



Source: <http://www.apis.ac.uk/critical-load-function-tool>

Overall, nutrient nitrogen and deposition rates at ecological receptors resulting from emissions from the installation are not expected to have a significant impact on the integrity of the designated ecological features of the sites.

5. Conclusions

This assessment has used detailed dispersion modelling to undertake an impact assessment of emissions to air from the proposed Timet embedded power plant. The pollutants covered by the assessment are:

- ▶ Oxides of nitrogen (NO_x as NO₂); and
- ▶ Carbon monoxide (CO).

The plant will generate power under the Capacity Mechanism. This assessment assumes the engines operate for full, hourly periods to predict both the long-term and short-term impacts of engine emissions. Concentrations were calculated for each hourly period during the typical availability windows. This approach ensures that those meteorological conditions conducive to producing elevated ground level concentrations of pollutants are appropriately considered. However, given that the engines will only run for about 5 hours a day and about 1250 hours per year, additional post-processing of raw modelled output has been undertaken.

The impact assessment demonstrates that, under the anticipated operational profile of the plant, exceedances of any AQS, EAL, critical level or critical load are unlikely, or where exceedances are predicted due to the existing baseline concentration or deposition rate, the additional contribution from the plant is not considered to be significant. In addition, the impacts at human receptor locations can be defined as 'negligible' following the guidance issued by Environmental Protection UK. On this basis, air quality factors should not be considered a constraint to development of the site for Capacity Mechanism purposes.

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