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Ref: DS/230/002
26th August 2016

Permit Receipt Centre
Natural Resources Wales
29 Newport Road
Cambria House
Cardiff
CF24 0TP

For the attention of Permit Receipt Centre

Dear Sirs,

Viridis 178 Swansea Environmental Permit Application
Land at Titanium Road, Swansea SA5 4SF
Reference: EPR-CP3630AJ

Further to the receipt of the Draft Licence, we hereby have the following comments and observations.

Schedule 1 – Operations

Table S1.1 Activities

Having a restriction of 5 hours each day is unmanageable for both our business and most importantly for National Grid. Our Emissions to air modelling has been modelled on 8 hours per day and impacts on local receptors are negligible to slight. In reality we very infrequently run as many as 8 hours per day. Often we do not run at all especially in summer months. The annual cap of hours is accepted but our running profile as described cannot be restricted to any daily cap. If as happened in 2008 for several weeks there was a problem with the nuclear power plants we could be required to run for 24 hours in exceptional circumstances. If a Capacity Mechanism call is required by National Grid due to an extreme shortfall in the power system, we will inform NRW as soon as reasonably possible of that call.

Table S1.3 Pre-operational measures

PO1

It takes us 16 weeks to build our power plants, submitting a report 3 months before the commencement of commissioning will prove problematic. Due to our rapid build process we would be submitting a report just as we are about to start our civils construction. All of the required data for the generator was contained within the permit application and will be installed and commissioned as per this data sheet.

First of all, is this condition required? We do not see the benefit of it? If it is, could we provide this following commissioning of our first generator. To enable us to commission we would require a gas feed to the generator. The gas feed is not normally connected until circa 2 to 3 weeks before the whole site is fully commissioned and live to the electrical grid. Therefore could we ask that a report is provided 2-3 weeks prior to the site being fully commissioned?

The last sentence within PO1, referring to hydrocarbon and formaldehyde is not relevant to our generator and we therefore ask that this be omitted. These pollutants are not included within the medium combustion plant directive(MCPD).

PO3

Again as per PO1, could we ask that the reporting timescale be made 2-3 weeks before the site is fully commissioned. Again the generator will be built, installed and commissioned as per the data sheet supplied in the Permit Application.

Can we simply put forward a basic 1 page summary including the main points?

Table S1.4 Improvement programme requirements

IC 1

Please can the submission of the report be changed from "on the commissioning of the installation" to "on the completion of the commissioning of the installation". This is to be consistent with the description under the heading "Date" under IC 1.

This program seems pointless in our situation if we already are obligated to complete the necessary emissions reporting as stated in PO 3. We would have already proved that we meet the ELV values as specified in the permit which is the primary concern onsite.

IC 2

Please could the reporting timescale be changed to 4 years to tie in with Paragraph 1.2 under the heading Conditions.

We have a few comments on the content of the report.

Could we outline the number of annual operation hours only.

Could we omit unburnt hydrocarbon and formaldehyde from the report as these are not required by the MCPD or emissions limits within the permit.

Schedule 3

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.

Both the NOx and CO readings need to be accompanied with an appropriate O2 reference value – in this case 15% O2.

Schedule 4

Table S4.1 Reporting of monitoring data.

Could we change the reporting period from starting 1 January to starting 1 October. This is to enable us to monitor our annual running hours over the summer and be readily available with a new annual allowance for the winter peak period.

Table S4.2 Annual production/treatment

Could the units for net power generated be changed to MWh

Table S4.3 Performance parameters

Can the Raw material item be removed? – we can simply have gas energy use in MWh.

Operating Hours – The assessment frequency needs to be changed to Annually to link in with Condition point 4.2.2. Can the total number of runs be omitted and the number of runs >2hrs be changed to 6 hours or preferably removed.

Table S4.4 Reporting forms

To mimic the changes stated in the previous paragraph.

Schedule 6 Interpretation.

Please can we change "year" to calendar year ending 30th September.

The concentrations of substances in emissions to air needs to be updated to reflect the data sheets submitted within the Permit Application.

We need to state the correct O2 reference at 15%.

If you have any queries or require any further information on the above please do not hesitate to contact me 01675 437774 or email me david@gfeg.co.uk

Kind Regards,



David Sheppard,
Design Manager