

This form will report compliance with your permit as determined by an NRW officer

Site	Pembroke Power Station	Permit Ref	EPR/DP3333TA		
Operator/ Permit holder	RWE Generation UK PLC				
Date	19 January 2015	Time in	N/A	Out	N/A
What parts of the permit were assessed	Environmental Monitoring (EPR)				
Assessment	Choose an item.	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Dafydd Williams				
Officer's name	Karen Dunn	Date issued	19/01/15		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our [Compliance Classification Scheme](#) (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your [local office](#).

Permit Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	A	
h) Resource efficiency	1. Efficient use of raw materials	A	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk), A = Assessed or assessed in part (no evidence of non-compliance), N = Not assessed, NA = Not Applicable

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

Introduction

This CAR form includes:

1. The review of environmental monitoring submissions required by Conditions under 3.5 and 4.2 of the permit made from May 2014 to date (19 January 2015).
2. A review of the Water Efficiency Audit and Waste Minimisation Review dated September 2014 as required by the agreed operating techniques linked to permit condition 2.3.

Environmental Monitoring

In brief condition 3.5 requires the operator to undertake monitoring as specified in the tables in Schedule 3 of the environmental permit. Condition 4.2 then requires the operator to submit the reports of the monitoring and assessment to the regulator for the reporting periods specified in Schedule 4 table S4.3.

From May 2014 to date the operator has submitted the results of the monitoring results required by the above conditions. The submissions were made on time and in compliance with the environmental permit.

Action: Operator to include the units in the results column on the EPR return Water 1.

Water Efficiency Audit and Waste Minimisation Review

The operation of the power station passed to RWE in September 2012. In the supporting document linked to the operating techniques in the permit is a commitment to undertake a waste minimisation and a water efficiency audit, within the first 2 years of the issue of the permit. It was agreed in an NRW audit in June 2014 that the operator would submit these documents in September 2014.

Both the documents were submitted as agreed and also link to permit conditions 1.4 (Avoidance, recovery and disposal of waste produced by the activities) and 1.3 (Efficient use of raw water) which are subject for review at least every four years.

Recommendation: Operator to ensure the review dates of these documents are included in the sites EMS.


Waste minimisation review – In short in August 2014 a review of the waste management practices was carried out on site. It is considered that the installation is not a large waste producer and good practice was observed as part of this review. However some areas for improvement were identified and documented in the report and these relate to signage, availability of recycling bins to ensure correct segregation and staff awareness. Furthermore ad hoc inspections of waste segregation practices are undertaken during safety and environmental walks of the power station. Clearly the operator has reviewed the waste streams that are

produced on site and considered their fate for any areas for improvement in line with the environmental permit.

Water efficiency audit – In brief there are 3 main sources of water usage at the power station cooling water, raw water and potable water. The audit examined all areas of water usage on site and shows that both the use of raw and potable water has decreased on site since 2012 although the use of potable water on site is not significant. The use of water for generation of steam in the HRSG and in particular blowdown was discussed in the NRW June 2014 audit and clearly the operator has undertaken a number of internal initiatives since the commissioning of the station which has contributed to the reduction of water used. The main water usage is for cooling water which is non-consumptive and the report concludes that any reduction would have implications in respect of efficiency leading to higher carbon dioxide emissions per unit of energy generated.

It should be noted that the operator has reduced raw water usage on site by approximately 44000m³ per year since commissioning. In the main this has been linked to the upgrading of key valves on site (please see audit ref: 5638 June2014) to minimise water loss. The audit report also states that should the operator identify any cost effective sustainable and practicable opportunities to reduce water usage on site these will be implemented.

[End]

	EPR Compliance Assessment Report	Report ID: 5734	
This form will report non-compliance with your permit as determined by an NRW officer			
Site	Pembroke Power Station	Permit	DP3333TA
Operator/ Permit	RWE Generation UK PLC	Date	19/01/15

Section 3- Enforcement Response	Only one of the boxes below should be ticked
You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.	

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	
We will now consider what enforcement action is appropriate and notify you, referencing this form.	

Section 4- Action(s)

Where a non - compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			
No non-compliances were identified however the following action and recommendation has been included on this CAR.			
		Action: Operator to include the units in the results column on the EPR return Water 1.	N/A
		Recommendation: Operator to ensure the review dates of these documents are included in the sites EMS.	

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

● We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

● Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). NRW may also use and/or disclose it in connection with:

- offering/providing you with its literature/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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official **Complaints** and **Commendations** procedure, phone our general enquiry number **0300 065 3000** (Mon to Fri **08.00–18.00**) and ask for the **Customer Contact team** or send an email to enquiries@naturalresourceswales.gov.uk If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on **(0845) 601 0987**.