

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

Site	Connah's Quay Power Station EA/EPR/MP3337SH/V004		Permit Ref	MP3337SH	
Operator/ Permit holder	E.ON UK PLC				
Date	16/09/2014		Time in	10:00	Out 16:15
What parts of the permit were assessed	Operator Self Monitoring - Emissions to Surface Water				
Assessment	Audit	EPR Activity:	Installation: X	Waste Op:	Water Discharge:
Recipient's name/position	Andy Black				
Officer's name	Stuart Ross		Date issued	05/11/2014	

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

a) Permitted activities			Condition(s) breached
b) Infrastructure	1. Specified by permit	N	
	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	
c) General management	5. Plant and equipment	N	
	1. Staff competency/ training	A	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
d) Incident management	4. Storage handling, labelling, segregation	N	
	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
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	N	
	2. Energy	N	

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

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

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 16/12/14
 JB DMS

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

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

This Compliance Assessment Report covers an Operator Monitoring Assessment (OMA) audit of operator self monitoring (emissions to surface water W1 & W2).

Please refer to the OMA report for full findings, actions and recommendations.

No permit non compliance identified / recorded.



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Operator/ Permit	E.ON UK PLC	Date	16/10/2014

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 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			

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 the Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The 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.

The 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

The 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 607 0987.

OMA Report – Discharges to Water – EPR

Summary sheet	
Permit Number: MP3337SH	Compliance Officer: Stuart Ross
Operator: E.ON UK Plc	Auditor (if different):
Discharge point(s): W1, W2	Others Present: Andy Black, Simon Render
OMA Sections	SCORE
OMA 1 – Management of monitoring	92
OMA 2 – Periodic monitoring and test laboratories	N/A
OMA 3 – Continuous monitoring	85
OMA 4 – Quality assurance	88
	OVERALL SCORE 88%
OVERALL SITE ASSESSMENT COMMENTS	Letter
	Variation
	Enforcement
<p>In summary water quality monitoring at emission points W1 & W2 is undertaken to a high standard. There is a comprehensive management system in place to ensure Continuous Water Monitoring equipment is well maintained and calibrated. Staff show an excellent understanding of the monitoring requirements as set out by the Environmental Permit and MCERTs scheme.</p> <p>There are a number of areas for improvement, most notably the creation of a documented laboratory procedure / work instruction for the makeup of oil in water standards and the auditing of staff & contractors who have monitoring responsibilities.</p> <p>Please refer to the audit sections below for actions and recommendations.</p>	Date of audit: 16/09/14
	Signed: <i>Stuart Ross</i>
	Date: 05/11/14

OMA Report – Discharges to Water – EPR

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	4	Effective and controlled monitoring procedures in place. No laboratory procedure / method for oil in water standard.
B. Organisational structure for monitoring	5	Roles and responsibilities well defined. Sufficient resources available for monitoring.
C. Schedules and planning of monitoring, including contingencies	5	No periodic sampling required. Continuous Water Monitoring (CWM) equipment collects data on each discharge. Calibration and maintenance of CWM is scheduled through SAP.
D. Monitoring records and use of monitoring data	4	Monitoring results are currently trended. Control charts have been developed but are not yet fully introduced. Real time alarms in place for limit exceedances. Automated penstock shut off in event of emission limit exceedances.
E. Understanding the requirements of the permit and monitoring methods	5	Personnel show excellent understanding of monitoring requirements.
OMA 1 – SCORE	23/25	92%
SUMMARY COMMENTS FOR OMA 1		
<p>Site holds ISO14001 Environmental Management System</p> <p>Operational Procedure 3004 'Reporting requirements releases to water' includes instructions on how to complete spreadsheets and complete QA.</p> <p>No operational procedure / instruction in place for make up of oil/water calibration standard. Refer to section OMA3 for actions.</p> <p>Process CWMs and laboratory methods are also used to check effluent quality prior to discharge.</p>		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	N/A	
B. Certification of equipment	N/A	
C. Measurement methods and standards <i>Critical Element</i>	N/A	
D. Calibration methods <i>Critical element</i>	N/A	
E. Frequency of maintenance and calibration	N/A	
F. Reliability of equipment (data availability)	N/A	
G. Breakdown response	N/A	
H. Traceability	N/A	
OMA 2 – SCORE		
SUMMARY COMMENTS FOR OMA 2		
<p>No periodic sampling required by Environmental Permit.</p> <p>E.ON have contract with ISO 17025 UKAS accredited laboratory as contingency.</p>		

OMA Report – Discharges to Water – EPR

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CWMs <i>Critical element</i>	3	With the exception of oil in water, the CWMs for all parameters are located at final discharge point. Sampling locations and facilities appear fit for purpose.
B. Certification of CWMs	3	pH CWM is MCERTs certified. MCERTs is not available for salinity, chlorine dioxide & chlorite CWMs. Temperature is measured by thermocouple at final discharge.
C. Measurement methods and standards <i>Critical element</i>	5	CWMs used for relevant determinands. Change management procedures in place.
D. Calibration methods <i>Critical element</i>	5	CWMs are suitably calibrated. Documented calibration procedures in place.
E. Frequency of maintenance and calibration	5	Calibration as per manufacturer's recommendations. AMCO and Scotmass complete majority of calibration. Organised via SAP. Calibration certificates available.
F. Reliability of equipment (data availability)	5	Routine emissions monitoring data is collated and reviewed. No notable gaps in data observed. Routine monitoring data routinely reported without omissions.
G. Breakdown response	5	Maintenance carried out by third party contractors. AMCO are based on site 24/7 and hold spares on site. 24/7 call out contract in place with Scotmass who provide spares.
H. Traceability	3	Traceable calibration standards used for pH - buffer solutions stored on site and in date. Scotmass (instrument manufacturer) provide chlorine dioxide/chlorite standards. Oil in water standard prepared in on site lab - traceability of laboratory mass and volume measurements not demonstrated. No lab procedure available for preparation of oil in water standard.
OMA 3 – SCORE	34/40	85%

SUMMARY COMMENTS FOR OMA 3

1. The oil in water CWM (Turner Designs TD4100) is currently located on the outfall of the 'SDX' pit prior to discharge with the purge waters. The SDX pit is the most likely point to receive any oil contaminated water and therefore the operator monitors compliance with the permitted limit at this location. Whilst this is not technically in line with the requirements of the permit it is an acceptable alternative provided checks are maintained for the presence of oil on the purge ponds prior to discharge.

Recommendation - When this analyser is due for replacement, a feasibility study should be completed for monitoring oil in the combined final discharge. If deemed feasible the oil and water analyser shall be relocated to monitor the combined final effluent.

2. Temperature is monitored via thermocouple on the final discharge and is subject to in house calibration – records maintained.
3. MCERTs conformity certificate issued by Sira for flow monitoring. The maximum discharge rate is limited by an orifice plate - it is understood the maximum permitted discharge rate cannot be exceeded.
4. No procedure available for the make up of oil in water standard within onsite laboratory. Traceability of fundamental measurements e.g. mass and volume (e.g. glassware) not demonstrated.

Action – Develop and implement a procedure for the makeup of the oil in water standard for CWM calibration. Ensure staff are suitably trained. Provide a copy of the procedure to Natural Resources Wales by 31/12/14.

Action – Review traceability of laboratory measurements (mass & volume etc) to national standards where calibration standards are prepared in house. Report you findings and any required actions to Natural Resources Wales by 31/12/14.

5. Prior to discharge purge water is sampled and analysed in the onsite lab to check it will meet the permitted limits. If analysis indicates a potential emission breach the discharge will be suspended and the cause investigated. Discharge windows are tidal dependant and the release is controlled via the DCS / control room operator. Alarms are in place to ensure the discharge takes place within the permitted time window. Recent improvements have been made following an incident whereby discharge occurred outside the permitted window (refer Compliance Assessment Report dated 03/11/14).

OMA Report – Discharges to Water – EPR

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	N/A	No periodic sampling required by permit. No in house sample analysis completed. Not assessed.
B. Internal data quality control	4	CWM data trended and reviewed. Control charts are being implemented to review data.
C. Competence of monitoring personnel	5	Monitoring personnel deemed competent. E.ON maintenance delivery and AMCO contractors have completed MCERTs awareness training courses. Training matrix in place.
D. Auditing of monitoring	3	A high level audit programme is in place including in house OMA. However, no plan / documented evidence was provided to demonstrate the auditing of E.ON staff or contractors against in house procedures / operational instructions, e.g. routine maintenance and calibration.
E. Audit compliance	5	Where audits are completed, corrective actions are logged, allocated and tracked using 'action base' system. Evidence from recent OMA audit viewed.
F. Reporting	5	Monitoring data is logged and controlled by limited site personnel. Reporting of data is to a high standard meeting the permit requirements.
OMA 4 – SCORE	22/25	88%
SUMMARY COMMENTS FOR OMA 4		
<p>1. Action - Develop and implement an audit plan and methodology for the auditing of site personnel and contractors responsible for carrying out monitoring (management & technical). Auditors should be competent in monitoring requirements and ideally be independent of the activity being audited. Please inform Natural Resources when this action has been completed (no later than 31/12/14).</p>		