



EPR Compliance Assessment Report

Report ID: MP3337SH/0196288

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	05/12/2013	Time in	10:20	Out	16:30
What parts of the permit were assessed	Operator Monitoring Assessment (OMA) - Emissions to Air Operator Self Monitoring				
Assessment	Audit	EPR Activity:	Installation	X	Waste Op
Recipient's name/position	Andrew Black		Water Discharge		
Officer's name	Stuart Ross, Aled Zachary		Date issued	16/12/2013	

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	N	
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	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
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	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	A	
	3. Maintenance records	A	
	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

If the Total No Breaches is greater than zero, then please see Section 3 for details of 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

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

Comments

This Compliance Assessment Report follows an Operator Monitoring Assessment (OMA) Audit of operator self monitoring for emissions to air only This included emission points A1 - A4 (subject to LCPD) and emission points A11 & A12.

The operator last had an OMA (Air) audit in March 2010 which confirmed that effective provisions for monitoring were in place with independent verification through QAL 2 and AST reports, showing the monitoring was sound.

Since that audit there have been some significant improvements, particularly through the installation of MCERTS accredited CEMS and Evirosoft CEMSuitev4 data handling system on emission points A1 – A4.

Monitoring procedures have been improved since the last audit. Recent AST / QAL 2 reports show monitoring continues to be reliable.

Monitoring was found to be in accordance with the requirements of the Environmental Permit and MCERTS scheme.

No non compliances were identified.

Please refer to the OMA report for further details.



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Operator/ Permit	E.ON UK PLC	Date	05/12/2013

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

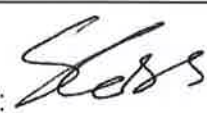
The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days 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 – Emissions to Air - EPR

Summary sheet		
Permit Number: MP3337SH	Compliance Officer: Stuart Ross	
Operator: E.ON UK PLC	Auditor (if different): Stuart Ross & Aled Zachary	
Emission Point(s): A1 – A4, A11 & A12	Others Present: Andrew Black (Environment Manager), Simon Render (Environment Advisor), Ian Jones (EC&I Engineer).	
OMA Sections		SCORE
OMA 1 – Management of monitoring		96
OMA 2 – Periodic monitoring and test laboratories		97
OMA 3 – Continuous monitoring		97
OMA 4 – Quality assurance		96
		OVERALL SCORE
		96.5%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
The operator last had an OMA (Air) audit in March 2010 which confirmed that effective provisions for monitoring were in place with independent verification through QAL 2 and AST reports, showing the monitoring was sound. Since that audit there have been some significant improvements, particularly through the installation of MCERTS accredited CEMS and Evirosoft CEMSuitev4 data handling system on emission points A1 – A4. Monitoring procedures have been improved since the last audit. Recent AST / QAL 2 reports show monitoring continues to be reliable. These changes reflect the current score of 96.5%. There is little more the operator can do apart from maintain the very high standard of performance.		
Date of audit: 05/12/13		
Signed: 		
Date: 16/12/13		

OMA Report – Emissions to Air - EPR

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	The site EMS is accredited to ISO14001. There are several procedures for monitoring. LMI 2014 covers the majority of requirements including EN14181.
B. Organisational structure for monitoring	5	Procedure LMI 2009 comprehensively details roles and responsibilities. Organogram in procedure LMI 2014 provides additional detail as to structure for monitoring responsibilities. Provision for a deputy in place (site chemist).
C. Schedules and planning of monitoring, including contingencies	5	Scheduling of monitoring and CEMS maintenance is managed through SAP reflecting requirements of the permit and LMI 2014. QAL 2 and AST are scheduled at correct frequencies. SSPs provided by E.ON New Build & Technologies ('ENT'). Missed sampling cannot be closed down on SAP until complete. SAP tasks reviewed during daily meeting.
D. Monitoring records and use of monitoring data	4	Control charts are used to track data trends for all emission points. Data reviewed during quarterly SHEQ meeting. Control chart for unit 4 inspected. However, no documented procedures for data review were presented
E. Understanding the requirements of the permit and monitoring methods	5	Operator has excellent understanding of monitoring requirements. Site Environment Manager has MCERTS level 1 certificate which is further supported by the Environment Advisor who holds MCERTS level 2 (Team Leader) certificate with 8 years experience in stack monitoring. Training matrix in place. All monitoring implemented as required.
OMA 1 – SCORE	100%	96%
SUMMARY COMMENTS FOR OMA 1		
LMI 2009 provides details regarding the assigned responsibilities for the operation and maintenance of MCERTS equipment.		

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1D - A procedure for monitoring data review should be developed or included within existing procedures.

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OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	4	Sampling facilities appear safe, with guard rails and kick boards installed. Homogeneity tests show samples points are representative (A1 – A4) but the facilities do not meet the platform sizes specified in Environment Agency Technical Guidance Note M1. We recommend samples points are labelled.
B. Certification of equipment	5	ENT use MCERTS certified systems for their reference monitoring – confirmed during UKAS audits for MCERTS accreditation.
C. Measurement methods and standards <i>Critical element</i>	5	Standard Reference Methods (SRM) EN15058 for CO, EN14792 for NOx and EN14789 for oxygen – on latest scope of accreditation.
D. Calibration methods <i>Critical element</i>	5	ENT comply with the calibration methods specified by the above SRM standards.
E. Frequency of maintenance and calibration	5	ENT comply with the calibration methods specified by the above SRM standards.
F. Reliability of equipment (data availability)	5	Periodic monitoring is completed when required – the QAL 2 and AST reports are completed as required.
G. Breakdown response	5	ENT provide for complete availability as required by MCERTS.
H. Traceability	5	Accredited test-laboratory provides for traceability to national standards, verified through UKAS assessments.
OMA 2 – SCORE	34/35	97%
SUMMARY COMMENTS FOR OMA 2		
2a. Refer to summary comments for OMA3 regarding homogeneity testing.		

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OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	4	Sampling facilities appear safe, with guard rails and kick boards installed. Homogeneity tests show samples points are representative (A1 – A4) but the facilities do not meet the platform sizes specified in Environment Agency Technical Guidance Note M1. We recommend samples points are labelled.
B. Certification of CEMs	5	LAND FGAll flue gas analyser fitted to all units (A1 – A4). Siemens Ultramat 23 fitted to A11 for NOx & CO. (Ultramat 6 for SOx). Fully MCERTS compliant - certificates inspected.
C. Calibration methods <i>Critical element</i>	5	Ultramats calibrated by Orbital on 25/10/13 and subject to QAL2. LAND instruments subject to QAL2 and AST. Reports reviewed.
D. Frequency of maintenance and calibration	5	Equipment maintained by LAND and Orbital (Ultramats) as per manufacturers requirements. A1 – A4, QAL 3 zero and span checks completed weekly - results managed using control charts via Envirosoft.
E. Reliability of equipment (data availability)	5	CEMS reliable. Valid data available >98% of the available time. Invalidation of CEMS reported as per permit requirements.
F. Breakdown response	5	Critical spares held on site. 24hr call out available.
G. Traceability	5	QAL 2 and AST tests demonstrate traceability to national standards. Traceable in date span gases used (certificates viewed for unit 2 CEM)
OMA 3 – SCORE	34/35	97%
SUMMARY COMMENTS FOR OMA 3		
3a. In 2010 a duct survey was completed by E.ON Engineering to assess how representative the Gas Turbine Exhaust location is for the collection of SRM and CEM/AMS data. Results show that NOx and O2 readings taken from the GT exhaust were representative of the readings		

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collected from the stack which was itself proven to be homogenous. CO was below detection limit so was not measured. The assessment was completed for unit 1 due to the presence of peregrine falcons near the stack monitoring platform - results are likely to be similar to units 2, 3 and 4 as all plant is identical.

QAL2 last completed Sept – Oct 2010 and showed excellent correlation between SRM and CEMS - results did not differ by more than half the allowable confidence interval at the ELV. Accordingly calibration functions were not applied as allowed by TGN M20.

Clarify LAND CEM model – last QAL 2 states LAND GA950E, E.ON state FGAI

OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	ENT is MCERTS accredited and have EN14181 in their scope of accreditation. UKAS reference 2200.
B. Internal data quality control	4	All CEMS data reviewed with control charts and discussed at quarterly SHEQ meeting. No procedure for data review provided. CEMS data not capped.
C. Competence of monitoring personnel	5	ENT personnel have appropriate MCERTS certification and technical endorsements. Site personnel hold MCERTS Level 1 supported by Level 2 Environment Advisor. Certificates provided for staff training for theory and operation/ service and diagnostics of LAND CEMS.
D. Auditing of monitoring	5	E.ON has developed a monitoring audit procedure based on the EA template. E.ON have audited ENT at other sites but not at Connahs Quay PS - audit scheduled for completion in coming weeks. Mock OMA audit completed at Connah's Quay. SSP reviewed.
E. Audit compliance	5	'Action Base' used to track audit findings and produce reports. Actions/findings reviewed quarterly.
F. Reporting	5	Reporting covered by procedure LMI 3005. CEM data for emission points A1 -4 managed via Envirosoft. No issues with routine reporting.
OMA 4 – SCORE	29/30	96%
SUMMARY COMMENTS FOR OMA 4		
4b – Please develop a procedure to formalise your existing data quality control arrangements. 4f - Procedure LMI 3005 does not cover reporting of emission data for points A11 & A12 – refers to LCPD emission points only. The procedure requires modification to include the reporting requirements for emissions points A11 & A12.		

