

PART B

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26 OCT 2013

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Stuart Ross
Natural Resources Wales
Chester Road
Buckley
CH7 3AG

Andy Black
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25th October 2013

Dear Stuart

Gas Treatment Plant : Emission Point A11

Please find enclosed a completed Form B for the recent emission excursion for Carbon Monoxide from the Gas Treatment Plant thermal oxidiser (A11). A Form A has previously been submitted following an analyser reading of 10.2 mg/m³, which was in excess of the 10 mg/m³ (ten min average) limit.

In reporting this occurrence, there was no application of any levels of uncertainty to this initial reading. Whilst the Connahs Quay Power Station Environment Permit (MP3337SH) details LCPD uncertainties for emission points A1-A4, it fails to detail any degree of uncertainty with regard to any emissions from A11.

Therefore it is intended to apply the LCPD 95% confidence interval for Carbon Monoxide to this reading, which would allow a 10% subtraction for uncertainty. This application would result in a reduction to a maximum emission level of 9.18 mg/m³ which is within the relevant emission limit.

I would be grateful if you could please confirm acceptance of application of LCPD uncertainty levels to this emission point. In particular I would also seek additional guidance from NRW with regard to clarity over the ability to use invalid hours uncertainty to

Note.

LCPD does not
apply to A11.

E.ON UK plc
Registered in
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	INITIALS	DATE
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cover periods of analyser malfunction and / or repair.

Yours sincerely

↳ refers to schedule 4

Andy Black
SHE Team Member

DATE	REVISION	REVISION DESCRIPTION



**Connah's Quay Power Station
Environmental Reporting Form to EA
PART A**

Permit Number	EA/EPR/MP3337SH
Name of Operator	E.ON UK
Location of Installation	Connah's Quay Power Station Kelsterton Road Connah's Quay Deeside CH5 4BP
Time and date of the detection	31 st July 2013

(a) Notification requirements for any malfunction , breakdown or failure of equipment or techniques, accident or fugitive emission which has caused , is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of Incident	19.30 31 st July 2013
Reference or description of the location of the event	Table S4.1b of EPR/MP3337SH defines an emission limit of 10 mg/m ³ for emission point A11 (Thermal Oxidiser) across a ten minute averaging period. For one, single ten minute averaging period (at 19.20pm), emissions rose to 10.20 mg/m ³ before returning to 8.58 mg/m ³ (below the 10mg/m ³ limit) by 19.30 pm
Description of where any release into the environment took place	Exceedance of emission limit for concentration of Carbon Monoxide within emissions to air from emission point A11. Exceedance only occurred for one ten minute average of entire working day
Substance(s) potentially released	Carbon Monoxide
Best estimate of the quantity or rate of release of substance	N/A
Measures taken, or intended to be taken, to stop any emission	Thorough investigation will occur, and strict scrutiny will be carried out to observe procedures during gas treatment plant operation. Possible unexpected occurrence due to higher than expected atmospheric temperatures.
Description of the failure of the accident	Increased temperature of off gas entering thermal oxidiser has appeared to result in slight increase in emissions in excess of 10 mg/m ³ . Exceedance only occurred once, at 10.20 mg/m ³ for one ten minute average of the entire working day.

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/source	A11
Parameter(s)	Carbon Monoxide
Limit	10 mg/m ³
Measured value and uncertainty	N/A
Date and time of monitoring	19.20pm - 19.30pm 31 st July 2013 to to 7pm 5 th Feb
Measures taken or intended to be taken to stop the emission	Instantaneous amendment to offgas flow brought emissions back within regulatory limits. No further exceedance followed.

(c) Notification requirements for the detection of any significant adverse effect	
To be notified within 24 hours	
Description of where the effect on the environment was detected	All
Substance(s) detected	Carbon Monoxide
Concentration(s) of substance(s) detected	N/A
Date of monitoring /sampling	N/A

PART B

Any more accurate information on the matters for notification under Part A.	A full root cause analysis has been completed into the occurrence. The exceedance in emissions occurred as a result of higher than expected levels of longer chain hydrocarbons being contained within the off gas when separated by the gas treatment plant. Additionally following periodic maintenance, a fuel control valve supplying off gas to the thermal oxidiser was still within manual control, rather than automatic leading to a reduced ability to manipulate plant operations during such occasions to avoid exceedance.
Measures taken, or intended to be taken, to prevent a recurrence of the incident	The root cause analysis produced a number of findings requiring a review of plant maintenance strategies, analyser calibrations and investigation into the extent to which increased chain hydrocarbons may become more frequent in BHP gas feed.
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may caused by the emission	Investigation into BHP gas feed, application to EA to amend emission limit from 10 minute average to half-hourly or hourly.
The dates of any unauthorised emissions from the installation in the preceding 24 months.	Loss of containment : 12 th March 2012 GTP CO Exceedance : 7 th Feb 2012 C Transformer Fire : 18 th July 2012

Name*	Andy Black
Post	Environmental Advisor
Signature	A. Black
Date	21/10/2013

*authorised to sign on behalf of E.ON UK plc

From: [Ross, Stuart](#)
To: [Bradford, Julie](#)
Subject: FW: GTP : Emission Point A11 : Form B
Date: 28 October 2013 09:52:26
Attachments: [GTP Form B 25_10_2013.docx](#)
[PtAThermalOXPtA PtB 13_07_2013.doc](#)

From: Black, Andrew [<mailto:Andy.Black@eon-uk.com>]
Sent: 26 October 2013 17:54
To: Ross, Stuart
Cc: Plass, Jason; Felgate, Michael
Subject: GTP : Emission Point A11 : Form B

Stuart

Following our recent telephone conversation, please find enclosed a completed Form B for the recent minor emission exceedance from Emission point A11 (Gas Treatment Plant Thermal Oxidiser).

As explained in the letter, we did not apply any level of uncertainty to the initial exceedance reporting. We would therefore like to apply LCPD uncertainty values and additional ask for guidance with regard to use of
Invalid hours to cover periods of analyser maintenance / breakdown.

I would appreciate a response to these issues from NRW.

Kind Regards

Andy

Andy Black

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