Cyfoeth Naturiol Cymru / Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: MP3337SH/0192203

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

Site	Connah's Quay Power Station EA/EPR/MP3337SH			Permit Ref	MP3337SH		
Operator/ Permit holder	E.ON UK PLC						
Date	31/10/2013			Time in	00:00	Out	00:00
What parts of the permit were assessed	Routine Monitoring Returns and notifications						
Assessment	Report/data review	EPR Activity:	Installation X	Waste Op		Water Discharge	
Recipient's name/position	Andy Black						
Officer's name	Stuart Ross			Date issued	01/11/2013		

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	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	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	A	
	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

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

OK FOR PUBLIC REGISTER SRC 29/11/13

COPIED TO PUBLIC REGISTER JB EDRM

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.

This Compliance Assessment Report covers a review of routine emissions monitoring data for July - September 2013, and the 2012 environmental noise assessment.

1. Emissions to Air

Thank you for providing the quarterly report.

I note that the invalidation log for unit 4 was not submitted - please submit by 08/11/13.

Emission Points A1, A2, A3, and A4 - emissions fully compliant throughout the period.

Emission Points A11 & A12 - Annual periodic monitoring last completed 21st June 2012 - scheduled for completion October 2013.

Emission point A11 (Gas Treatment Plant Thermal Oxidiser) - on 31/07/13 carbon monoxide was recorded as 10.20mg/m3 over a single 10 minute averageing period (limit of 10mg/m3).

Part A and B notifications received - thank you.

The cause is reportedly due to the presence of higher than expected concentrations of longer chain hydrocarbons within the off gas in adition to a fuel control valve serving the thermal oxider being in a manual mode opposed to automatic which reduced the abailty to manipulate the plant to avoid such exceedances. Root cause analysis has been completed and a nummer of options are being considered to prevent a recurrence.

Further to you e-mail accompanying the Part B notification, I can confirm that LCPD uncertainties cannot be applied to the thermal oxidiser and apply only to the LCPD emission points (A1 - A4). Please refer to schedule 4 of your permit for further information, including the application of invalid half hourly averages during periods of malfunction or maintenance of the the emissions monitoring system.

The measurement uncertainty of the continuous emission monitor may be subtracted from the result but the uncertainty has not been provided. Please provide the CEM uncertainty value to allow permit compliance to be assessed.

2. Emissions to Water (Emission points W1 W2)

a)Monitoring (excluding Chlorine Dioxide & Chlorite)

No emission limit breaches recorded during this period.

W1 - temperature of discharge at upper limit during this period but did not exceed the temperature differential.

b)Chlorine Dioxide / Chlorite Emissions Monitoring

Residual chlorine dioxide concentrations were low thoughout this period for both emission points W1 and W2. Future results can be reported in form water 1 only.

Chlorite (Absolute limit)

Maxiumum readings have been provided over a 24hr period for both daily discharges and all maximums (with one exception) were all well within the permitted limit of 10mg/l. On 26/06/13 a result of 10.3 mg/l was obtained, although results from the purge ponds for the same period were 0.9 and 0.85mg/l suggesting the overall discharge result may be erroneuous.

In your supporting information you state that data collected in June from the purge pond outfall (emission monitor 09-CTE167AT) is considered erroneous due to calibration and installation issues. This comment requires further explanation as to why the data was unreliable. Please provide comment by 08/11/13.

In future the maximum result the the quarter can be reported in form water 1 (daily breakdown not necessary). If the emission limit is exceeded during the period each such result shall be provided.

Chlorite (3 hourly Average)

The permit requires that the average residual chlorite ion concentration shall be based on the value of all instantaneous chlorite readings over a maximum 3 hour discharge period. The maximum average obtained during the quarter shall be reported to NRW. If the emission limit is exceeded during the period each associated result shall be provided. Please include in form water 1 only.

On this occasion the daily maximum readings for both daily discharges have been averaged and all fall below the emission limit of 5mg/l showing compliance. All future reports must meet the requirements detailed in the above paragraph.

3. Improvement Condition Deadlines

Further to your request to extend the deadline for meeting the requirements of IC20, I agree in accordance with permit condition 2.5.1 to extend the timescale to 31/12/13.

In the interim the timescale for IC21 will remain as 31/12/13 until such time that you are in a position to provide a more suitable date.

4. Environmental Noise Report

Thank you for providing the environmental noise survey report completed November 2012.

The report includes a reccomendation that remedial work is completed on the Purge Pond Cooling Tower gearbox / motor as soon as practicable as it was giving rise to additional off site noise at Woodfield 'Railway' Cottages. Please can you clarify/confirm what remedial action was taken?

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	Report ID: MP3337SH/0192203	
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	MP3337SH
Operator/ Permit	E.ON UK PLC	Date	31/10/2013

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.

RECEIVED
01 NOV 2013

From: Ross, Stuart
To: Black, Andrew
Cc: Bradford, Julie
Subject: NRW 31-10-2013 Compliance Assessment Report
Date: 01 November 2013 16:15:56
Attachments: NRW 31-10-2013 Compliance Assessment Report.pdf

Andy

Please find attached a Compliance Assessment Report following a review of your most recent monitoring returns.

As you will see, I need you to provide the uncertainty for the thermal oxidiser CO CEM to allow a proper assessment of the apparent emission breach.

I have also taken some time looking through the chlorine dioxide and chlorite data and have requested some further information from you. I think it would be worth us discussing the future reporting requirements for these determinands so we are clear on what needs to be reported and how.

Can you also confirm that where the chlorine dioxide / chlorite measured value is repeated at the same value this is in fact the instrument limit of detection? There is a significant amount of repetitive data throughout the reports that I assume relates to the LOD?

I have tried calling you this afternoon to discuss but there was no answer.

Have a good weekend.

Regards,

Stuart