

Compliance Assessment Report CAR_NRW0040875

Permit being assessed: JP3632ZH.

For: Barry CHP , held by Dow Silicones UK Limited

At: Wimborne Road - Dock 2, Barry, Vale of Glamorgan, CF63 3DH.

Type of assessment carried out: Report/Data Review, Reason: Routine.

On 03/01/2023.

Parts of permit assessed: Monitoring Returns

NRW Lead Officer: Geraint Harris.

Report sent to: Jude Sartor, Environmental Specialist on 03/01/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
B5 - Infrastructure - Plant and equipment	Action only (X)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Action only (X)	
E1 - Emissions - Air	C3 Minor	Permit Condition 3.1.2
C2 - General Management - Management system and operating procedures	C3 Minor	Permit condition 1.1.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
2	8

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
G1	Action1: Dow need to check that the reported fired boiler emissions are actually referenced to a oxygen concentration of 3% not 15%.	10/02/2023

Criteria	Action needed	Complete by
G1	Action 2: At what load is GT-A operating at? Is the current DAHS capable of separating out part load operations?	10/02/2023
G1	Action 3: Are you able to provide a breakdown on the number of hours HRSG-A and B were operated both below and above the 25tonnes/hr of stream	10/02/2023
B5	Action 4: It is not clear why HRSG-A is not being used with GT-A, is there a fault with HRSG-A.	10/02/2023
G1	Action 5: Has the implementation of the additional Tags to their PI system for real time updates been complete?	10/02/2023
E1	Repair or replace the damaged FD fan.	Already completed
C2	Investigate how the FD Fan became damaged and how this can be prevented or the likelihood of reoccurrence reduced.	10/02/2023

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Dow CHP

Fired Boiler:

The Fired Boiler was operated under an agreement until late February 2022, details on this agreement are stated within CAR_NRW0039934. In March 2022, Dow was able to successfully complete the commissioning of this boiler. As a result, Dow observed a significant drop in NOx emissions with both monthly and daily means dropping from highs above 200mg/m³ to consistently being below 64 mg/m³ between March and September 2022. As it stands, Dow have Improvement condition IC8 within their permit which requires them to submit a written CHP post-commissioning report to NRW for approval. Dow have stated that they intend to submit this report after they have had a prolonged period of operation for optimisation of the HP boiler. Now that consistent and stable operation has been demonstrated, NRW expect to receive this report in early 2023.

The monitoring returns received throughout 2022 for the fired boiler have a subtext below them stating the following:

"(a) All data based on validated hourly average concentrations, excluding start-up and shut-down and periods of malfunction or breakdown of abatement equipment, at 15% O₂, dry, 273.15K, 101.325 kPa".

Action1: Dow need to check that the reported fired boiler emissions are actually referenced to a oxygen concentration of 3% not 15%. **Due 10th of February 2023.**

GT-HRSG-A (Unit A) Emission Point A1:

A Schedule 5 Notice was received on the 26th of April 2022, informing NRW of a breach in daily and monthly mean NOx emission ELV's for emission point A1 during March. Dow state:

"Following a period of extended shutdown for essential statutory inspection and repair work, Unit A was restarted on 4th of March. Initial running identified unexpectedly high NOx results. The unit was run for short periods of time to allow troubleshooting and investigation. The unit was shut down on the 3rd of April while awaiting parts and support from the vendor. An investigation is still ongoing which will fully identify the cause of the higher NOx. The high results were recorded during the troubleshooting and investigation periods".

"Troubleshooting was completed on 5th of April and a new forced draft fan has been placed on order. The impellers were very damaged / missing. We are not sure what the cause of this was. The new fan is due for delivery in August. Once it is installed and the unit is ready to run then the unit will be closely monitored to ensure that the remainder of the unit is operating correctly, and we are able to achieve the required NOx levels".

The daily and monthly mean ELV's for HRSG-A are 75 and 80 mg/m³ respectively. During March, April and August Dow reported the following emissions:

- March daily 118.57mg/m³ monthly 113.11mg/m³
- April daily and Monthly 115.32 mg/m³
- August daily 114.18mg/m³ and 109.43 mg/m³

The following text is taken from page A2 of the JEP Protocol (Electricity Supply Industry – IED Compliance Protocol for Utility Boilers and Gas Turbines (LCP BREF Update), Joint Environmental Programme):

- **Validated 24-hour Average** - An LCP daily (24h) average is calculated for all calendar days as the arithmetic mean of the LCP validated hourly averages. At least 6 hours of validated data is required to form a daily average for reporting purposes.
- **Validated Monthly Average** - An LCP validated monthly average is the arithmetic mean of the LCP validated hourly averages (including any that could not be included in the LCP validated daily averages). At least 72 hours of validated data is required to form a monthly average for reporting purposes (or at least three complete LCP validated daily averages are available within that month).

As is stated above, at least 6 hours of validated data is required to form a daily average for reporting purposes and 72 hours for monthly. Dow have been asked several times if the elevated emissions in March and April constitute valid emissions data. Within Dow's CHP quarterly (Q3) monitoring returns, Dow have reported that the emissions in April are as a result of 5 hours of operation. Therefore, the elevated emissions in April do not constitute a breach in daily or monthly permit ELV's, since they are less than the validated 24-hour average requirements. With regards to the elevated NOx emissions in March, through subsequent emails, Dow have reported that Unit A was operated less than 72 hours (69.48 hours) in the month. Therefore, the elevated emissions do not constitute a breach of the monthly mean ELV. However, with regards to the daily ELV, Dow have responded saying that *"The reports from Envirosoft also do not show us very much in terms of hourly or daily data"*. With regards to this incident, Dow haven't been able to demonstrate if the emissions in March qualify as validated hours or not. **Consequently, due to the limited impact on the environment a Category 3 noncompliance is being issued for an exceedance in the daily mean NOx emission during March. This is being issued against permit condition 3.2.1**

With regards to August, both the ELV'S for daily and monthly have been exceeded. According to Dow, "Unit A was started up and ran above 25 te/hr steam for 43 hours during August in order to commission the FD fan

and ensure the rest of the system would be fully operational when required after the shutdown” *They were unable to test the GT at this point as the GT system had been “racked out” electrically isolated during turnaround preparations.* Therefore, this period of operation of high NOx emissions does not constitute a breach in the monthly NOx ELV since less than 72 hours was recorded. As for the daily ELV, the exceedance is as a result of commissioning of the FD fan and so can be considered other than normal operating conditions (OTNOC) and so does not constitute a breach in the permit conditions. Prior to the BREF permit review Dow had higher permitted NOx emissions from their CHP and so previous assessments and modelling mean that the current elevated NOx emissions will have limited impact on the local air quality.

With regards to the damaged impellers, a picture provided by Dow showed significant damage to the impeller blades. Permit condition 1.1.1 requires “the operator to manage and operate their activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints” In this incidence Dow are unsure as to how such significant damage has occurred. However, Dow should be operating and maintaining their plant to prevent or minimise such incidents. Therefore, **a noncompliance category 3 score, against permit condition 1.1.1 for failure to operate an effective management system that minimises the risk of pollution.**

GT-HRSG-A Part load Operations:

With regards to Unit A, Dow state “after TAR we have struggled to run at higher rates or run the GT due to issues with the burners and the air/gas flow “blowing” the flames out or away from the flame sensors. This unit is currently limited to 30mWh to prevent the issue. Running in FD mode sometimes >25te/hr steam, sometimes < 25te/hr steam – with NOx averaging 85-90 mg/m³”.

Taking the above into consideration, NRW need to ascertain how this affects the reporting of emissions limits. As already mentioned in CAR _NRW0039934, Chapter III of the IED requires compliance with the Annex V ELV’s from 70% load for daily and monthly ELV’s. For the annual limit, BAT-AELs apply only when the Dry Low NOx (DLN) system is ‘effective’. The E-DLN can be agreed to be equal to or greater than the 70% ISO Base Load for compliance with the annual mean, provided that compliance with the IED Daily and Monthly ELV’s can be maintained above 70% load. Dow were unable to establish a cohesive plot in which to establish a site-specific Effective-DLN load point. Therefore, they have requested that the start-up and shutdown thresholds stated with Table S1.4 (below) of the permit, be utilised. Since Dow operate their gas turbines at full load and given that they ramp up quickly to full load it has been agreed that the thresholds in permit Table S1.4 can apply. However, it now appears that unit A is not being ramped up to full load. Dow will, therefore, need to investigate what load unit A is currently operating at. Operating below 70% load has implications for permit compliance, since below this level, it becomes progressively more difficult to achieve base load NOx and CO ELVs. The approach to operation below 70% load is subject to a site-specific BAT determination and an air quality assessment. However, the following general guidance is given here, with compliance based on a daily ELV only for the part load operation:

- Base load ELVs apply to emissions in the load range 70% to base load;
- Part load ELVs apply to emissions in the load range MSUL to base load.
- In each case above, the hourly average emission concentrations and the daily averages are calculated in the usual way using the two different load thresholds (MSUL and 70%). Base load ELVs apply to operation above 70% of ISO base load. Part load ELVs apply to all operation from MSUL to base load and then back to Minimum Shutdown Load (MSDL).
- If there are no operating hours above 70% load, the emissions from that day do not contribute to the monthly, daily and percentile ELV’s that apply to the high load range.
These emissions are reportable against the part load daily ELV only.

Dow have not previously requested alternative GT part load operation BAT ELVs, so the Chapter III and LCP

Bref AELs apply across all operating loads. If Dow do undertake part load operations, then that should be reported separately as “Part Load Operation” but the data will be compared with the full load (>70%, >E-DLN load) ELVs.

Action 2: At what load is GT-A operating at? Is the current DAHS capable of separating out part load operations? **Due 10th of February 2023.**

Action 3: Are you able to provide a breakdown on the number of hours HRSG-A and B were operated both below and above the 25tonnes/hr of stream. **Due 10th of February 2023.**

Table S1.4 Start-up and Shut-down thresholds		
Emission Point and Unit Reference	“Minimum start-up load” discrete processes	“Minimum shut-down load” discrete processes
A1 and A3 LCP60 - gas turbines 1A and 1B in turbine exhaust gas (TEG) mode	Shaft speed >95% and/or generator breaker CLOSED; and/or by-pass damper OPEN to boiler	Shaft speed <95% and/or generator breaker OPEN; and/or by-pass damper CLOSED to boiler
A1 and A3 LCP60 - gas turbines 1A and 1B in supplementary firing (SF) mode	Shaft speed >95% and/or generator breaker CLOSED; and/or Boiler steam flow rate >32 tonnes/hour	Shaft speed <95% and/or generator breaker OPEN; and/or Boiler steam flow rate <32 tonnes/hour
A1, A2 and A3 LCP60 – boilers HRSG-001A, HP boiler and HRSG001B in auxiliary firing/fresh/ambient air/forced draft (FD) mode	Flame ON/fuel valves OPEN and/or steam outlet valve OPEN/vent valve CLOSED; and/or boiler steam flow rate >25 tonnes/hour; 31%	Flame OFF/fuel valves CLOSED and/or steam outlet valve CLOSED/vent valve OPEN; and/or boiler steam flow rate <25 tonnes/hour; 31%

GT-HRSG-B (Unit B) Emission Point A3:

Dow have been unable to run their GT on unit B since the middle of March due to a defect on the top throat damper. Consequently, only the HRSG, in forced draft mode, has been operated since March. Dow state that *“With Unit A, out of commission until August at the earliest, we have been running Unit B in FD mode at the higher level of NO_x for a prolonged period. Obviously for many reasons it is in Dow’s best interest to run the GT’s, it’s certainly not that we are choosing not run them. We’d love to be generating electricity right now”*

There are a few areas to discuss regarding Unit B. The first area is the modes of operation. Both Unit’s A and B can be operated in the following modes:

1. GT and HRSG in TEG mode (only the GT running – but exhaust gas goes to boiler) – vent via CEMS to A1/A3 release point – NO_x/CO reporting when not on bypass
2. GT and HRSG in SF mode (GT running and supplementary firing in the boiler) – vent via CEMS to A1/A3 release point – NO_x/CO reporting when steam flow is > 32te/hr
3. HRSG on its own in FD mode (GT not running but boiler firing) - vent via CEMS to A1/A3 release point – NO_x/CO reporting when steam flow is > 25te/hr
4. GT on its own (GT running straight up the bypass stack)– to bypass stack, not done as bypass hours must be minimised – only reporting is how many hours, no CEMS

Dow’s CHP is permitted to run in modes 1 and 2 (CCGT mode) stated above with mode 4 used in an emergency situation (kept to a minimum). The current permit does not account for operating in mode 3, also known as forced draft or auxiliary firing. Therefore, no ELV’s for operating in this mode are present within Dow’s permit. The reason for this is that forced draft mode is not considered a normal mode of operation and actions should be taken to return to CCGT operation as soon as possible. Page 15 of the JEP “For auxiliary firing, the oxygen reference condition for reporting and the boiler ELV reference shall therefore also be increased to 15% O₂ (for short periods when the gas turbine is unavailable). The boiler ELV is taken to be the same numerical value as that applied at 3% O₂. However, in these situations, the Operator shall provide a credible recovery plan for the gas turbine to the Competent Authority and agree a course of action. When a credible recovery plan cannot be agreed, or is not appropriate, then the auxiliary firing then needs to comply with the original boiler ELV at 3% O₂ (for convenience this ELV can be divided by 3 if reporting continues at 15% O₂)”.

In April through to July, Unit B has been operated almost exclusively in forced draft mode due to the issues mentioned previously. Consequently, both the daily and monthly emission concentrations have increased since March. Since Dow have provided a credible recovery plan to bring the GTA back online the boiler ELV is taken to be the same numerical value as that applied at 3% O₂. Therefore, the NO_x emissions for Unit B between April and June are not considered permit breaches. However, it is not BAT to operate in auxiliary mode other than in an emergency. A BAT justification will be sought for operators running in auxiliary mode for situations other than to deal with an emergency. For these situations the Oxygen reference conditions shall be 3%. Therefore, if Dow have intentions to run the auxiliary boiler in a more routine manner, they will need to make a sound justification along with a request to vary their permit.

The BAT-AELs apply only when the Dry Low NO_x (DLN) system is 'effective', as noted at the top of Table 8 of the JEP. The Annual NO_x BAT-AEL is applicable when the plant is operating above 1,500 h/yr. Therefore, this ELV applies where the load varies between E-DLN to baseload. Consequently, when operating in forced draft mode, the NO_x emissions will not count towards the annual mean. However, it is important to note that operating in forced draft mode is considered abnormal operations and so should be kept to an absolute minimum and be accompanied by a credible recovery plan. It is, therefore, important for Dow to remove any monitoring data obtained during forced draft operations from the annual mean.

More recently Unit B was started up on 18th October post shut down period (TAR). Dow state *"GTB would not work and has been taken to Ethos in Scotland to be fixed. There is internal damage to compressor fins that we do not yet know how it happened. We will get a report back from Ethos regarding what happened. The plan is now to transfer the engine from Unit A to Unit B so that we are able to operate 1 GT"*

Action 4: It is not clear why HRSG-A is not being used with GT-A, is there a fault with HRSG-A. **Due 10th of February 2023.**

Modes of Operations Summary

GT only,

- Gas turbines for emergency use that operate less than 500 operating hours per year are not covered by the ELVs. The operator of such plants shall record the used operating hours. If intending on operating >500hrs/year, the GT ELVs apply at 15% Oxygen reference conditions.

HRSG only (auxiliary firing/ forced draft mode)

- Under emergency (abnormal) conditions, where the GT is taken off-line and where the Operator has a credible plan to recover operation of the GT, the Regulator will permit the operation of the HRSG in auxiliary mode at 15% Oxygen reference conditions.
- It is not BAT to operate a HRSG in auxiliary mode other than in an emergency. A BAT justification should be sought for operators running a HRSG in auxiliary mode for situations other than to deal with an emergency. For these situations the Oxygen reference conditions shall be 3%.

GT with a SF HRSG

- GT ELVs apply. It is not usually necessary to modify the NO_x ELV for modest levels of SF i.e. the gas turbine NO_x ELV generally continues to apply – 15% Oxygen.
- However, if this approach does not adequately take account of SF, the Operator may propose, for agreement by the regulator, an approach in which a weighted NO_x ELV is defined, in mg/MJ, based on the gas turbine and SF heat inputs, in order to accommodate the installed SF technology. This is

based on the Maximum Continuous Ratings (MCR) of the GT and SF, in MW net thermal input, and the respective GT and SF NO_x ELVs, in mg/MJ,

Data Acquisition and Handling:

NRW wanted to understand how quickly Dow can become aware of any permit breaches while operating their CHP. The current data acquisition and handling at Dow is undertaken using a programme owned and developed by Envirosoft. Dow state that “With regard to timelines for reporting. We report CHP data quarterly using the data pulled from the Envirosoft DAHS. The data reports from Envirosoft are not complete until the month has ended. This data is required to be reported 4 weeks following the end of the quarter. If we were to find that the Envirosoft data show a permit breach, then we can only report this when the reports are pulled from Envirosoft. This could lead to an April breach being reported in July. The reports from Envirosoft also do not show us very much in terms of hourly or daily data”. The current set up at Dow means that the Envirosoft programme is configured on a standalone PC in the CHP control room and can only be accessed by physically going to the control room. Dow have been assured by Envirosoft that it does exactly what it needs to do to calculate the averages as per the regulations and since we last talked about it, Dow have now been shown how to get further data out of the system for checking. However, since there is a significant time delay with the current system, Dow have developed a detailed tracking sheet for CHP which pulls in half hourly averages from their Pi data system, which is linked to the DCS and calculates which mode of operation the plant is running in. It shows half hourly data and calculates daily, monthly and YTD averages for each determinant. According to Dow, this Pi tool allows operators look at the plant data from anywhere to check on compliance. It also highlights the importance of monitoring that data on a very frequent basis to the operational support. It is understood that this system is due to be handed over to the relevant operators in due course. This new Pi system will need to serve as an indicative tool, since it is a non-MCERTS DAHS. For compliance purposes the Envirosoft data will need to be used.

On the 16th of June Dow informed NRW that they had a LAND failure on the analyser on Unit B. Once the sensor was replaced the analyser began working again normally. Dow expect to see invalid days between the 7th of June and the 14th of June, This was only picked up when a new shift took control and informed the required personnel. Dow plan on following this up with the production manager to get this added as a task in the log to confirm that the analysers are all functioning correctly. During an MS Teams meeting on the 10th of November 2021, Dow stated that they are planning to add additional Tags to their PI system so that they can get a real time update if and when they record an invalid day.

Action 5: Has this been implemented? **Due 10th of February 2023.**

Monitoring Returns:

Dow Silicones UK Ltd EPR Q2 2022 Reporting Forms

Reporting forms for Q2 2022 were submitted to NRW on the 28th of July as required by reporting condition 4.2.3 of permit JP3632ZH. The exceedances within this report are covered in the text above. There are no further comments to make, and the report has been accepted.

Dow Silicones UK Ltd EPR Q3 2022 Reporting Forms

Reporting forms for Q3 2022 were submitted to NRW on the 28th of October as required by reporting condition 4.2.3 of permit JP3632ZH. The exceedances within this report are covered in the text above. There are no further comments to make, and the report has been accepted.

END.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or 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
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.