

Compliance Assessment Report CAR_NRW0042636

Permit being assessed: NP3037AF.

For: Connah's Quay Power Station , **held by:** Uniper UK Limited

At: Connah's Quay Power Station Kelsterton Road , Connah's Quay, Flintshire, CH5 4BP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 12/10/2023 between 09:00 and 17:00.

Parts of permit assessed: Various.

NRW Lead Officer: Stuart Ross, accompanied by Carter Shone.

Report sent to: Andy Black , Environmental Advisor , on 23/10/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2A - Operations - Permitted activities	Assessed (A)	
IR2C - Operations - Operating techniques	Assessed (A)	
IR2F - Operations - Pre-operational conditions	Assessed (A)	
IR3E - Emissions and monitoring - Monitoring	Action only (X)	
IR3E - Emissions and monitoring - Monitoring	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
0	0

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
IR3E	Uniper to complete root cause analysis as to the cause of incorrect mass emissions reporting (CO) and report its findings and corrective actions to NRW. The report shall also	30/11/2023

Criteria	Action needed	Complete by
	determine whether the issue has impacted on other emissions monitoring data reporting, and whether all such data submitted to NRW since the software was commissioned remains valid.	
IR3E	Provide NRW with a report setting out your intended course of action to monitor oil in water on emission point W1	29/12/2023

Compliance 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

This Compliance Assessment Report follows a routine site inspection and meeting 12th October 2023. Present on behalf of Uniper UK Ltd was the Site Manager and Environmental Advisor. A meeting was held prior to a short inspection of the plant.

Plant Operation

It was reported that Uniper is to extend the the lifetime of the station in its current configuration to around 2030, with significant capital expenditure on plant maintenance and improvement, particularly targeting turbine sets, HRSGs and cooling water systems. Options are being explored for the future of the site thereafter.

Gas Treatment Plant (GTP)

Following the closure of the Point of Ayr Gas Terminal, the onsite GTP ceased operations 30th June 2023. As a result, the station now sources all natural gas from the national transmission network. Following the closure of the GTP, decommissioning work has started that includes the removal of potentially polluting materials, including, but not limited to, fire fighting foam & oils.

Action 1 - As agreed, upon the completion of GTP decommissioning, please provide a report to verify that all potentially polluting materials within the footprint of the GTP compound have been removed, or where they are to remain in situ, the control measures in place to prevent pollution.

The future permitting options for the GTP listed activity and installation foot print were discussed - Uniper is aware of the various options, including variation and partial surrender.

It was agreed that 'nil returns' will be submitted in future with respect to GTP emissions monitoring.

Cooling Water System

Uniper reported that a significant amount of silt has accumulated within the settlement pond and is impacting the station's ability to control cooling water temperature, particularly during warmer weather conditions.

A project is now underway to investigate options to desilt the pond, options may include onsite dewatering, short term temporary storage and subsequent spreading to land for agricultural benefit. Ultimately Uniper will need to establish the options available whilst ensuring compliance with the relevant waste legislation.

As agreed, Uniper may wish to share its final proposal with NRW for discussion when it becomes available.

Uniper also reported that both abstraction make up pumps are currently out of service. This follows several mechanical failures over the past 2 years that has led to the installation and ongoing use of a temporary pump.

Currently, one pump has been repaired and is on site waiting to be returned to service, whilst the other is offsite being repaired. Before the make up pump(s) can be returned to service, a significant quantity of silt accumulated within the wet well needs to be removed to prevent a recurrence as it is believed, although not proven, that increased siltation within the well is likely to be the root cause of pump failure.

The cause of the increase in silt loading is not known but may be related to changes in fluvial processes and has potentially been exacerbated by the on/off use of the smaller temporary pump whilst the permanent pumps have been in and out of service.

Uniper is now assessing the options for de-silting the sump, when the work is complete the permanent make up pumps will be returned to service and their reliability monitored for a period before the temporary pump is removed.

Whilst NRW recognises that Uniper is working to resolve the the current situation which is leading to significant cost and disruption to plant operations, NRW would like reiterate that normal operations need to be resumed as soon as practicable to end the use of temporary diesel generators and to permit the resumption of abstraction metering.

Surface Water Emissions Monitoring

Uniper intend to install dual redundancy for all continuous water emissions monitoring equipment.

As agreed, and further to correspondence arising from the previous OMA (Water), Uniper are to review the options for oil in water analysis for emission point W1 and consider either applying for a variation to change the monitoring requirement (e.g. monitoring location, method, period, frequency) or install a continuous analyser.

Action 2 - Please provide NRW with a report setting out your intended course of action to monitor oil in water on emission point W1. Please do so by 29/12/23.

PR-TR Reporting Issues

The 2022 annual carbon monoxide mass emission value was significantly less than that reported in 2021. Uniper, working with Envirosoft, have investigated the issue and have reportedly identified an error with calculations performed within the MCERTs software. This error appears to coincide the commissioning of new CEMS and software in 2022.

Uniper do not believe that the issue has impacted on the validity of any other emissions reporting, including reporting against Emission Limit Values.

Action 3 - Uniper to submit a revised 2022 carbon monoxide mass emission values to NRW by 30/11/23.

Action 4 - Uniper shall complete root cause analysis as to the cause of incorrect mass emissions reporting (CO) and report its findings and corrective actions to NRW. The report shall also determine whether the issue has impacted on other emissions monitoring data reporting, and whether all such data submitted to NRW since the software was commissioned remains valid. Please do so by 30/11/23.

Ambient Air Injection

The ambient air injection system has been installed on Unit 4. Owing to current market conditions there is presently no intention of commissioning the system or submitting a response to the associated pre-operational condition. The situation will be kept under review.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.