

sent by email only

Dear Tony,

ABERTHAW POWER STATION MAIN SITE PERMIT (EPR/RP3133LD), CONFIRMATION OF MONITORING REQUIREMENTS

I write in relation to on-going environmental monitoring requirements at Aberthaw Power Station and to confirm the proposed approach following transfer of the Main Site permit (ERP/RP3133LD) from the previous site owner and occupier, RWE, to the new owners CCR Energy Limited (CCR Energy).

Main Site Permit (EPR/RP3133LD)

It is intended that CCR Energy will continue environmental monitoring in line with the scope previously undertaken by RWE and as reported in Annual Performance Reports, 'Groundwater1' forms and 'Water1' forms. It is understood that the list of determinands and analytes collected and recorded by RWE were established with due regard to the current permit variation (RP3133LDV014) and with consideration to the non-operational nature of Aberthaw Power Station (with amendments drafted in RP3133LD-V0151). It is likely that the monitoring requirements were discussed with NRW at the time and as detailed within Compliance Assessment Reports (CARs).

CCR Energy subsequently seeks to confirm monitoring requirements for the following items and, where deemed necessary, propose alterations based on the non-operational nature of the facility and recent change in land ownership boundaries.

✦ Table S3.1 Point source emissions to air (Stack / Flue Monitoring)

Current requirement: The current permit details ambient air monitoring on all flues (A1, A2, A5, A7, A10, A11, A12, A16) with analytes including: particulate matter and entrained droplets, oxides, dust, carbon monoxide, temperature, pressure, flow, total mercury and ammonia. It is understood that RWE ceased air monitoring on flues when the station ceased operation. It is unknown whether annual extractive ammonia testing has been undertaken.

Proposed alteration: It is proposed to remove ambient air monitoring requirements for the stack / flues on-site which is in line with RWE monitoring since the station has become non-operational.

Reason for proposed alteration: Due to the non-operation nature of the facility (including non-operational stacks and flues) monitoring and reporting (either on-going, annual or biannual) is not considered to be required which is in line with that undertaken by RWE. During proposed decommissioning and demolition activities the Contractor will conduct appropriate ambient air monitoring for the task being undertaken as required by the Construction Environmental Management Plan (CEMP) and Demolition Environmental Management Plan (DEMP) being submitted under the permitted development application.

¹ Permit variation drafted by RWE and provided to CCR for information. If this document was not provided to NRW, CCR Energy will be able to provide a copy as part of finalising the proposed permit variation.

★ Table S3.6 Dust / Particulate Matter Monitoring

Current requirement and existing monitoring: The permit stipulates continuous deposited particulate matter measurements to be collected using a directional dust deposit gauge (contents of deposit gauge to be measured monthly). It is noted there are no existing dust deposit gauge sample locations within the Main Site Permit Boundary, however RWE have previously operated five sample points beyond the Main Site Permit Boundary. These comprise two sample points within the CCR Energy ownership boundary ('Aberthaw Sidings', east of the ash mound, and 'Rail Loop', north of the ash mound) and three beyond the CCR Energy ownership boundary (Quarry South, Quarry North and Font-y-Gary). It is noted ambient air monitoring is not stipulated in the Ash Mound permit (DP3432SW).

Proposed alteration: It is proposed that CCR Energy will continue monitoring at Aberthaw Sidings and Rail Loop dust deposit gauge sample locations only, which are within the ownership boundary. As a replacement of the Font-y-Gary monitoring point CCR Energy propose a location east of the nature reserve and within the CCR Energy ownership boundary. It is understood that RWE are continuing dust monitoring at Quarry North and Quarry South off-site to the northeast although this likely won't be reported to NRW due to not being one of RWE's permit requirements.

Reason for proposed alteration: CCR Energy propose to continue dust monitoring at locations within their ownership boundary only due to access rights restrictions and noting that both the Main Site and Ash Mound are non-operational. A review of 2021 and 2022 gauge deposit data suggests that deposition is predominantly mineral and plant matter with very few cenospheres and coal particles observed, indicating limited contribution from PFA and residue coal movements during decommissioning undertaken by RWE. The continued monitoring within CCR Energy's ownership boundary will provide a baseline prior to demolition works commencing on-site noting that baseline and active dust monitoring (following commencement of construction work) around active demolition areas will also be a requirement of the DEMP.

Permit Variation

Further to the Compliance Assessment Report (CAR_NRW0040861) issued by NRW in January 2023, CCR Energy notes the requirement to apply for a permit variation to transition the site from the current decommissioning phase into a demolition phase. Due to the non-operational nature of the facility, it is intended to request an amendment to the permit to remove the active combustion elements (as previously drafted by RWE in RP3133LD-V015).

We hope the above information is clear although please do not hesitate to contact the undersigned should you require further information or wish to discuss.

Yours faithfully

Christian Cadwallader
CCR Energy Limited
Aberthaw Power Station