

Compliance Assessment Report CAR_NRW0043670

Permit number	HP3737UE	Operator name	Severn Power Limited
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Site name	Severn Power Limited
Site address	Severn Power Station, West Nash Road, Newport, Gwent, NP18 2BZ
Assessment type	Report/Data Review

Date of assessment	28 February 2024	Time in	N/A	Time out	N/A
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Parts of permit assessed	Monitoring and reporting requirements
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NRW Lead officer	Guy Baskerville	Accompanied by	N/A
Report sent to – Name and position	Craig Scott Asset Manager	Date	29 February 2024

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
IR4B - Information - Reporting	Assessed or assessed in part (A)	4.2.2 4.2.3

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

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

2. What action is required?

Criteria	Action needed	Complete by
N/A	N/A	N/A

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 prosecutions and/or suspension or revocation of your permit.

4. Details of our assessment

The purpose of this Compliance Assessment Report (CAR) is to record Natural Resources Wales' (hereafter 'NRW') assessment against Severn Power Limited's (hereafter 'Severn Power') **quarterly** [Q4 2023], **6-monthly** [July-December 2023] and **annual** [2023] monitoring and reporting requirements. NRW's assessment of Severn Power's monitoring returns data is outside the scope of this CAR and any non-compliance arising from an exceedance of a permitted emission limit will be recorded in a separate CAR.

N.B. The power station remained in preservation mode and non-operational until 5 December 2023. Nil returns were submitted against reporting periods Q1 2023, Q2 2023, Q3 2023 and 6-monthly [January-June 2023] inside the respective reporting windows.

Condition 4.2.3 of the environmental permit states:

Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;*
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and*
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.*

Table S4.1 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Oxides of nitrogen	A1, A2	Every 3 Months for continuous monitoring	1 January, 1 April, 1 July, 1 October
Carbon monoxide	A1, A2	Every 3 Months for continuous monitoring	1 January, 1 April, 1 July, 1 October
Sulphur dioxide	A1, A2	Every 6 Months for periodic monitoring	1 January, 1 July
Dust	A1, A2	Every 6 Months for periodic monitoring	1 January, 1 July
Oil and grease	W1	Every 12 months	1 January
pH	W1	Every 12 months	1 January

Table S4.4 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Form
Air	Appropriate form as detailed in the ESI IED Protocol Protocol (as referenced in Schedule 6) or other form as agreed by NRW.	Form IED CON 2 – continuous monitoring
Air	Appropriate form as detailed in the ESI IED Protocol Protocol (as referenced in Schedule 6) or other form as agreed by NRW.	Form IED PM1 – discontinuous monitoring and load

Water	N/A	Form W1 or other form as agreed in writing by Natural Resources Wales
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Monitoring report(s) for emissions were submitted via email on 19 January 2024.

The monitoring report(s) submission was made inside the reporting window which represents compliance with the environmental permit.

The monitoring report(s) submitted include reporting of monitoring carried out in respect of the parameters and emission points specified in schedule 4(a) table S4.1 which represents compliance with the environmental permit.

The monitoring report(s) submitted are for the reporting periods specified in schedule 4 table S4.1 which represents compliance with the environmental permit.

The monitoring report(s) have been submitted using the forms specified in schedule 4 table 4.4 which represents compliance with the environmental permit.

The monitoring report(s) submitted include results and assessments as required by the forms specified in schedule 4 table 4.4 which represents compliance with the environmental permit.

Condition 4.2.2 of the environmental permit states:

A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;*
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and*
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.*

Table S4.2 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.2 Annual production/treatment	
Parameter	Units
Power generated	GWh

Table S4.3 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.3 Chapter III Performance parameters for reporting to DEFRA		
Parameter	Frequency of Assessment	Units
Thermal Input Capacity for each LCP	Annually	MW
Annual Fuel Usage for each LCP	Annually	TJ
Total Emissions to Air of NO _x for each LCP	Annually	t
Total Emissions to Air of SO ₂ for each LCP	Annually	t
Total Emissions to Air of particulate matter (dust) for each LCP	Annually	t
Operating Hours for each LCP (Load Factor)	Annually	h

Table S4.4 of Schedule 4 to the environmental permit is partially reproduced below.

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Form
Air & Energy	Appropriate form as detailed in the ESI IED Protocol Protocol (as referenced in Schedule 6) or other form as agreed by NRW.	Form IED AR1 – SO ₂ , NO _x and dust mass emission and energy
LCP	Appropriate form as detailed in the ESI IED Protocol Protocol (as referenced in Schedule 6) or other form as agreed by NRW.	Form IED HR1 – operating hours
CEMS	Appropriate form as detailed in the ESI IED Protocol Protocol (as referenced in Schedule 6) or other form as agreed by NRW.	Form IED CEM – invalidation log

Performance report(s) for were submitted via email on 29 January 2024 and 31 January 2024

The performance report(s) submission was made inside the reporting window which represents compliance with the environmental permit.

The performance report(s) submitted includes a partial a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data which represents compliance with the environmental permit.

The performance report(s) submitted include the annual production/treatment data set out in schedule 4 table S4.2 which represents compliance with the environmental permit.

The performance report(s) submitted include the performance parameters set out in schedule 4 table S4.3 which represents compliance with the environmental permit.

The performance report(s) have been submitted using the forms specified in schedule 4 table 4.4 which represents compliance with the environmental permit.

[END]

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

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

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 – 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.