

## Compliance Assessment Report CAR\_NRW0043820

**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:** Report/Data Review,

**Reason:** Routine.

**On:** 20/05/2024.

**Parts of permit assessed:** Routine Emissions Monitoring & Reporting.

**NRW Lead Officer:** Stuart Ross.

**Report sent to:** Environmental Advisor, Environmental Advisor, on 20/05/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1A - Installations - Management - General Management	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR3E - Installations - Emissions and monitoring - Monitoring	Assessed (A)	
IR4B - Installations - Information - Reporting	Assessed (A)	

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?

No action required.

### 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 review of routine quarterly emissions monitoring returns for the period 01/01/24 – 31/03/24. It also covers a review of the information supplied by Uniper in response to Actions raised in the previous Compliance Assessment Report reference CAR\_NRW0043492.

#### **a) Previous Actions**

**Action 1 - Review and resubmit.**

*a) form AR1 for emissions released in 2022.*

*b) the 2022 annual mass emission result for CO and NOx for the PRTR (plus any other impacted data)*

*Please do so by 01/04/24.*

**Operator Response** – The required information was provided as required and the 2022 PRTR has been updated by NRW. Action 1 is now complete.

**Action 2 - Provide NRW with a copy of Uniper Technologies' DAHS verification report findings and the revised Local Management Instructions for the DAHS. Please do so by 01/04/24.**

**Operator Response** – The required information was provided as required, including Uniper procedure 'CQ LMI 2003 Environmental Monitoring & Reporting' that now includes a section on management of change for the Data Acquisition and Handling Software (DAHS).

Uniper Technologies report titled 'Connahs Quay DAHS and Emissions Data Review 2023' was received as requested. The report includes a technical review of the DAHS against the permit requirements and relevant standards, concluding that the DAHS is performing as expected.

The report states that.

*'A review of Connah's Quay emissions data has been carried out by Uniper Technologies using data from 2023 in order to verify the Envirosoft reporting package used on site. Raw one-minute average emissions data extracted from Envirosoft has been used to calculate the emissions statistics used for compliance and Pollution Inventory reporting, and these results have been compared with compliance reports generated by Envirosoft.*

*In general the results show excellent agreement, with a difference of typically less than 1%*

*between the Envirosoft report data and UTG's results. The comparison of long-term average concentrations for compliance reporting did not highlight any significant discrepancies and there is very good confidence in the validity of the Envirosoft reports. Similarly, the mass emissions reports generated by Envirosoft, excluding start-up and shut-down for compliance reporting, and including start-up and shut-down for Pollution Inventory reporting, showed very good agreement with results of the verification work. Any noted discrepancies are considered insignificant and are likely to be caused by rounding in the calculations. This is overall a very good result and has verified the robustness of the Envirosoft reporting software and confirms alignment with the requirements of EN 17255 for data acquisition and handling systems (DAHS).*

*Emissions data from the Plant Information (PI) database was also compared to Envirosoft data, which confirmed that the PI data corresponds to normalised Envirosoft data before subtraction of confidence intervals. Some differences are noted due to the way that PI compresses and retains data, however this is to be expected and is not a concern. The additional comparison to PI data gives further confidence in the Envirosoft software'.*

Following a review of the report we are satisfied with the response have no further comment. Action 2 is now complete.

## **b) Emissions to Air**

### **Units 1- 4**

Emission points A1 - A4. All emissions were compliant with the permitted ELVs throughout the monitoring period.

### **Auxiliary Boilers**

Emission points A10A - A10E, annual extractive NO<sub>x</sub> and CO monitoring was completed 19 – 30 June 2023 – emissions typical in comparison to previous monitoring data.

## **c) Emissions to Water**

Emission points W1, W2 & W3 - all parameters within permitted limits.

At W1, Total Residual Oxidant (TRO) was recorded at the ELV.

Advice & Guidance - Review TRO trends and the cause of the elevated emission. Take necessary steps to prevent an ELV exceedance.

## **d) Other Reports**

CEMs invalidation logs were provided for the period and record zero invalid hours for all units.

## **e) Noise Monitoring**

Permit condition 3.4.3 requires that –

*'The operator shall carry out a noise monitoring and assessment exercise from the site (over a calendar year period) at the nearest sensitive receptors during day time and night*

*time hours as per BS4142:2014 at least every 4 years..'*

A BS4142 report was received 12/04/24. NRW will review the report and provide comment in a separate Compliance Assessment Report.

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](mailto: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](mailto: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.