

Compliance Assessment Report CAR_NRW0045787

Permit being assessed: RP3232LD.

For: Felindre, Gas Compressor Station, **held by:** National Grid Gas PLC

At: Gas compressor station Heol Llangyfelach , Felindre, Swansea, SA5 7LX, West Glamorgan, SA5 7LX.

Type of assessment: Audit,

Reason: Routine.

On: 20/11/2024 between 10:00 and 13:10.

Parts of permit assessed: Multiple Permit Conditions .

NRW Lead Officer: Elliot Jones.

Report sent to: Neil Billingham, Senior Environmental Engineer, on 11/12/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR1C - Installations - Management - Energy Efficiency	Action only (X)	
IR1D - Installations - Management - Efficient use of raw materials	Action only (X)	
IR1E - Installations - Management - Avoidance, recovery and disposal of wastes produced by the activities	Action only (X)	
IR2E - Installations - Operations - Improvement programme	Action only (X)	
IR3B - Installations - Emissions and monitoring - Emissions of substances not controlled by emission limits	Action only (X)	
IR4A - Installations - Information - Records	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?

Criteria	Action needed	Complete by
IR1C	Provide evidence of the updated procedures with a 4 year review requirements.	Already completed
IR1D	Provide evidence of the updated procedures with a 4 year review requirements.	Already completed
IR1E	Provide evidence of the updated procedures with a 4 year review requirements	Already completed
IR2E	Submit documentation for Improvement Conditions in Environmental Permit.	Already completed
IR3B	Provide evidence of daily maintenance check performed on site, inspection of bunds, discharge point.	Already completed

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

Attendees

Elliot Jones – Natural Resources Wales (NRW) Regulation Officer

Neil Billingham - National Gas Senior Environmental Engineer

Matt Secomb – National Gas Environmental Engineer

Mark Morris – National Gas Site Controller

Introduction

A site visit of the National Gas Compressor Station Felindre was arranged for the 20th November 2024. Introducing Elliot Jones (NRW) to the site operator following a change of the sites regulatory officer. The operator provided an introduction outlining the National Grids operating model. The role of individuals was described i.e. Engineering and Asset Management, Senior Operations Engineer, and Environmental Compliance.

Process Overview

The Operator began the meeting by displaying the National Transmission Network for the UK and specifically outlining the role of the Felindre site in distributing Natural Gas from the terminals at Milford Haven to the consumer.

Currently the site has two Solar Titan DLE (Dry Low Emission) compressors along with a

Variable Speed Drive (VSD) unit. The main process emissions from the facility are oxides of nitrogen (NO_x) and Carbon Monoxide (CO) to air. The Installation is permitted to discharge surface water to a nearby watercourse via an interceptor.

Site Inspection

A Site-specific induction was undertaken prior to the site inspection. Site Controller led the site inspection explaining the site process and operations on site. During the visit none of the turbines were operating due to demand and site maintenance.

The site is clean and tidy with large areas covered with stone chippings and has a fully kerbed roadway. Site inspection included observation of the Sites backup generator and diesel bund, emergency gas release stacks, Turbine C stack emission point and Pipeline Inspection Gadget (PIG) access pipework.

Due to the site being non-operational access to Turbine C was possible. The Solar Titan turbine sits within its own fully contained, self-exhausting and soundproofed cab.

The cab is situated on the turbines oil lubricating tank. The Oil tank is fully contained and sits within a contained bunded concrete pit. Additionally, the turbine housing has a sealed drainage system, any contamination is drained to a holding pit before being removed from site via a tanker.

Turbine housing has its own fire extinguishing system. System includes a series of Nitrogen and fire extinguishing cannisters that automatically engage, dousing any fire once detected.

The sites generator is used when the site experiences an unexpected power outage. Generator engages automatically and has a 1-week supply of diesel fuel, stored on site alongside the generator building. Diesels is stored in its own contained unit with an additional secondary contained bund.

Discussion

The site infrequently receives noise complaints from nearby receptors. Mainly two receptors at differing distances from the site.

The source of the noise is believed to be the VSD, operator acknowledges that the VSD is loud when operational. Operator has undertaken a series of noise assessment. Following review of the noise assessments operator has installed attenuation measure to reduce the noise created by the VSD.

Since the attenuation measures have been installed, due to demand the VSD has not been operational and therefore the effectiveness of the control measures is not yet known. VSD has not been operational for a extended period of time.

Operator has consulted the nearby receptors notifying them of onsite developments with the VSD. Operator now notifies receptor when a planned occurrence on site is likely to cause significant noise levels, i.e. gas releases, alarm testing.

Fugitive Emissions Permit Condition 3.3.2

Containment bunds and water discharge points are inspected as part of the daily maintenance check performed on site. Findings are recorded on the maintenance log and appropriate measure taken if needed. During the inspection, all containment bunds were empty.

Action: Provide evidence of daily maintenance check performed on site.

Whilst compiling this report, operator provided the requested maintenance log records. Log contains record of inspection of bunds and of the sites water discharge point.

Environmental Conditions with Four Year Review

Previous site inspector identified a series of procedures in the Environmental Permit due for their 4-year review. Following discussions during the site visit, operator believed the required procedure had been reviewed.

Action: Provide evidence of the updated procedures with 4-year review requirements.

Whilst compiling this report, operator provided evidence of the most recent procedures.

- 1.2 - Accident management plan. *Updated May 2024*
- 1.3 - Energy efficiency. *Updated December 2022*
- 1.4 - Efficient use of raw materials. *Updated November 2022*
- 1.5 - Avoidance, recovery, and disposal of wastes. *Updated September 2022*
- 2.8 - Site protection and monitoring programme. *Updated September 2022*

Procedures have been reviewed by the operator and amended within the last 4 years. Majority of procedures due to be reviewed in 2026.

In order to remain compliant with environmental permit the above procedures must be updated regularly in line with advised timescale.

Site Security Permit Condition 1.6

During the inspection, it was evident site is extremely secure. Secure electric charged fencing extends around the perimeter of the site. Entrance to site is via a series double gate.

Improvement Conditions (ICs)

A number of improvement conditions are listed in the environmental permit. When preparing for the site visit, officer was unable to locate any official documents / Compliance assessment reports indicating completions of ICs.

Discussions on site revealed a lack of clarity on whether the improvement conditions have officially been completed.

Action: Provide update on improvement conditions and evidence of previous discussions with NRW.

Whilst compiling this report, operator provided documentation and procedures for Improvement conditions. Documentation to be reviewed by NRW and provide operator with comment.

Improvement conditions to be discussed with operator over the coming months.

Climate Adaptation Survey

Prior to the site visit operator requested an extension of the deadline to complete the climate adaptation survey. Extension was granted till the 30th of November 2024. Operator was undertaking further work to complete the survey more accurately. Survey was returned to NRW, prior to the newly set deadline, 15th November 2024.

Conclusion

This was the first site visit since the recent change of regulatory site officer, primary purpose of the visit was to familiarise the officer with site operations and establish links with the site management. During the visit, a number of requirements of the environmental permit were discussed (see above) operator provided the requested information to satisfy NRW officer.

Over coming months clarity is required with regards to the Improvement conditions. The information forwarded by the operator is to be reviewed to achieve a clear understanding which improvement condition have been completed and which remain outstanding.

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.