

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Flexible Generation Limited

**Pentref y Groes
Croespenmaen
Crumlin
Newport
Wales
NP11 3BT**

Permit number

EPR/DB3499FD

Pentref y Groes

Permit number EPR/DB3499FD

Introductory note

This introductory note does not form a part of the permit

This permit will allow the operator to operate:

- One or more compression ignition combustion (each less than <20MWth) that aggregate to a EP Regulations Schedule 1, Part 2, Chapter 1, Section 1.1, Part B.
- The plant is also a Specified Generator and the requirements of Schedule 25B of the EP Regulations apply as it generates electricity in a Combined Heat and Power Plant.

This permit allows Flexible Generation Limited to operate fourteen 3.5 MWth diesel fuelled compression ignition engines (one 49 MWth Specified Generator). These engines are operated via a balancing services contract on a short-term basis meeting peak demand or short falls in generation within the electrical distribution network. The engines class as an existing medium combustion plant (MCP) on the basis that it was operational before 20 December 2018. It has been permitted as a Tranche B Specified Generator as the site was commissioned during 2017. The activity also falls under Schedule 1, Part 2, Section 1.1; Part B regulations solely because of aggregation of two or appliances less than 20 MWth but is only subject to paragraphs 1(2) and 4(a) of schedule 8 and is exempt from Part B conditions.

There is one Designated European Habitats site (Aberbargoed Grasslands SAC) located within 3.6 km, there are no sites of special scientific interest (SSSI) within 2.0 km of the site. An assessment of the impact on nearby designated ecological sites has been completed and concluded the impact of airborne NOx concentrations, nitrogen deposition and acid deposition to be insignificant. The air quality modelling and impact assessments have concluded that exceedances of any air quality objectives are unlikely at the local receptors identified to protect human health.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application PAN-005837 received	10/07/2019	Bespoke application for Tranche B Specified Generator permit
Permit determined PAN-005837/A001	22/11/2019	Permit issued to Flexible Generation Limited.

Status log of the permit		
Description	Date	Comments
NRW Initiated variation EPR/DB3499FD/V002	12/05/2025	NRW initiated variation to 1) remove the Part B conditions and; 2) change permit number from PAN- 005837 to EPR/DB3499FD
Variation issued EPR/DB3499FD	27/08/2025	Variation Notice and consolidated issued to Flexible Generation Limited

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/DB3499FD (Formally PAN-005837)

This is the consolidated permit referred to in the variation and consolidation notice for EPR/DB3499FD/V002 authorising,

Flexible Generation Limited (“the operator”),

whose registered office is

27/28 Eastcastle Street

London

W1W 8DH

company registration number **08918033**

to operate one or more Part B Combustion Plant and Specified Generators at

Flexible Generation Limited

Pentref y Groes

Croespenmaen

Crumlin

Newport

NP11 3BT

to the extent authorised by and subject to the conditions of this permit.

Signed	Date
Holly Noble	27/08/2025

Authorised on behalf of Natural Resources Wales

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, so far as is reasonably practicable, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1, table S1.1 (the “activities”).

2.2 The site

- 2.2.1 The activities shall only be carried out at the address in this permit where the plant is located.

2.3 Operating techniques

- 2.3.1 The activities shall be operated using the techniques and, in the manner, described in schedule 1, table S1.2B.

2.4 Pre-operational conditions

- 2.4.1 The activities shall not be brought into operation until 22/12/2019 and until the measures specified in schedule 1 table S1.4A have been completed

3 Emissions and monitoring

3.1 Emissions to air

- 3.1.1 There shall be no point source emissions to air except from the sources and emission points listed in schedule 3, tables S3.1,
- 3.1.2 The limits given in schedule 3 shall not be exceeded.

3.2 Monitoring

- 3.2.1 The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit, or at a greater frequency if notified to the operator in writing by Natural Resources Wales:
- (a) point source emissions specified in tables S3.1
- 3.2.2 Monitoring shall not take place during periods of start up or shut down.
- 3.2.3 The operator shall maintain records of all monitoring including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, test and surveys and any assessment or evaluation made on the basis of such data.
- 3.2.4 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme specified in condition 3.2.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made.
- 4.1.2 The operator shall maintain convenient access, in either electronic or hard copy, to the records, plans and management system required to be maintained by this permit.
- 4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual hours of operation for each MCP and/or Specified Generator.
- 4.1.4 The operator shall maintain a record of any events of non-compliance and the measures taken to ensure compliance is restored in the shortest possible time

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.
- 4.2.2 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 S4.2; and
 - (c) giving the information from such results as required by the forms specified in those tables.

4.3 Notifications

- 4.3.1 In the event:
- (a) of a breach of any of the permit conditions the operator must immediately—

- (i) inform Natural Resources Wales, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (b) of a breach of any of the permit conditions which causes a significant degradation of local air quality, the operator must immediately suspend the operation of the activities or the relevant part of them until compliance with the conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (c) any change in the operator's name or address; and
 - (d) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (e) the death of any of the named operators (where the operator consists of more than one named individual);
 - (f) any change in the operator's name(s) or address(es); and
 - (g) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities

National Grid Reference and or activity reference/emission point	Activity listed in the EP Regulations	Description of Medium Combustion Plant and/or Specified Generator	Fuel	Operating hours limit per year
A1, A2, A3, A4, A5, A6, A7, A8, A9, A10, A11, A12, A13 and A14 are the individual stacks for each engine, comprising one Specified Generator National Grid Reference: ST19954 97865	Schedule 1 Part 2 Section 1.1 Part B (iv) combustion plant 20—50 MWth input through aggregation of two or more compression ignition engine <20MWth. and Schedule 25B – Specified Generator	14 x 3.5 MWth engines each fitted with SCR abatement comprising one 49 MWth Specified Generator	Gas Oil (sulphur content of fuel oil Less than 0.1% weight for weight.)	< 500 operating hours per specified generator per annum

Table S1.2B Operating techniques for Specified Generator

Description
Each generator must be operated in accordance with the manufacturer's instructions and records must be made and retained to demonstrate this
The operator must keep periods of start-up and shut-down of each generator as short as possible
There must be no persistent emission of 'dark smoke' as defined in section 3(1) of the Clean Air Act 1993
Where secondary abatement is required to ensure compliance with the NOx ELV it must be met within 10 minutes from when the generator commences operation or within 20 minutes when the generator was a Tranche A and is now a Tranche B.
The stack must be vertical and unimpeded by cowls or caps.
The operating regime of the generator must be in line with document reference 40131-WOD-XX-XX-TN-O-0002_A_C01 dated June 2019 and all referenced documents submitted as part of permit application PAN-005837

Table S1.4A Pre-operational measures

Reference	Pre-operational measures
PO1	Unless otherwise agreed in writing, the combustion plant must comply with the requirements of Environmental Permitting Technical Note 1/1(18), which will serve as statutory guidance under Regulation 65 of The Environmental Permitting Regulations 2016 once finalised.

Schedule 2 – Waste types, raw materials and fuels

This schedule is not used.

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.

Emission point reference & location	Source/technology	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method ^{Note 1}
A1, A2, A3, A4, A5, A6, A7, A8, A9, A10, A11, A12, A13 and A14	Specified generator and Schedule 1 Part 2 Section 1.1 Part B (iv) combustion plant made from 14 x 3.5 MWth Compression ignition engines (existing medium combustion plant)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic	After the maximum average annual operating hours have elapsed And no less frequent than every 5 years	MCERTS BS EN 14791
		Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1
		Carbon monoxide	No limit set	Periodic		MCERTS BS EN 15058 OR In line with web guide: Monitoring stack emissions: low risk MCPs and specified generators

Note 1: Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6 % for solid fuels, 15 % for engines and gas turbines and 3 % all other MCPs

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.2.1.	A1-A14	After the maximum average annual operating hours have elapsed and no less frequent than every 5 years	1 January

Table S4.2 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	27/08/2025

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution

To be notified within 24 hours of detection

Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit

To be notified within 24 hours of detection unless otherwise specified below

Emission point reference/ source	
Parameter(s)	
Limit	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by Natural Resources Wales under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“compliance date” means 01/01/2025 for existing MCPs and a tranche A specified generator with net rated thermal input of greater than 5MW or 01/01/2030 for existing MCPs and a tranche A specified generator with a net rated thermal input of less than or equal to 5MW.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“existing MCP” means an MCP first put into operation before 20/12/2018.

“first put into operation” means that the plant must have been fired with its design fuel up to its full load. This can be, but does not have to be, during commissioning.

“gas oil” includes diesel and is defined in Article 3(19) of the MCPD.

“limited operating hours MCP” means an MCP that meets the requirements of paragraph 7 (existing MCP) or paragraph 8 (new MCP) of Part 2 of Schedule 25A of the EP Regulations.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“medium combustion plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants.

“operating hours” means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“specified generator” has the meaning given in paragraph 2(1) of Schedule 25B of The EP Regulations.

“tranche A generator” has the meaning given in paragraph 3(3) of schedule 25B of The EP Regulations.

“tranche B generator” is any generator that is not a Tranche A generator.

“year” means calendar year ending 31 December.

END OF PERMIT

Permit Number: EPR/DB3499FD

Operator: Flexible Generation Ltd

Facility: Pentref y Groes

Form Number: Air1 /27/08/2025

Reporting of emissions to air for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^{[2][5]}	Sample Date and Times ^[3]	Uncertainty ^[4]
A1	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A2	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A3	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^{[2][5]}	Sample Date and Times ^[3]	Uncertainty ^[4]
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A4	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A5	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A6	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^{[2][5]}	Sample Date and Times ^[3]	Uncertainty ^[4]
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A7	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A8	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A9	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^{[2][5]}	Sample Date and Times ^[3]	Uncertainty ^[4]
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A10	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A11	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A12	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^{[2][5]}	Sample Date and Times ^[3]	Uncertainty ^[4]
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A13	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		
A14	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190 mg/Nm ³	Periodic		BS EN 14792		
	Dust	10 mg/Nm ³	Periodic		MCERTS BS EN 13284-1		
	Carbon monoxide	No limit set	Periodic		BS EN 15058		

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.

- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.
- [5] Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6 % for solid fuels, 15 % for engines and gas turbines and 3 % all other MCPs

Signed
(Authorised to sign as representative of Operator)

Date.....