

Notice of request for more information
Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: **Mrs Christina Matthews**
RWE Generation UK Plc
Trigonos
Windmill Hill Business Park
Whitehill Way
Swindon
SN5 6PB

Application number: **PAN-027129 (addition of green hydrogen production facility)**

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, duly made on **25/07/2025**. The information requested should be sent to the following address by **21/11/2025**.

Information should be sent to:

Douglas Cowie
Permitting Service
Natural Resources Wales
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

Name	Date
Douglas Cowie	17/10/2025

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 3221
Ebost/Email Douglas.Cowie@cyfoethnaturiolcymru.gov.uk
Douglas.Cowie@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ
Permitting Service, Natural Resources Wales, Crown Buildings, Cathays Park, Cardiff, CF10 3NQ

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Schedule

- 1. Provide air emissions screening results for the proposed hydrogen flare stack, specifically focusing on nitrogen emissions and considering potential impact on nearby ecological receptors by use of the critical level for vegetation.** The source term for air emissions screening should be defined to establish a reasonable worst-case process contribution for oxides of nitrogen (NO_x) from this emission point. As a minimum, the following parameters should be profiled:

- Flare stack location (using UK National Grid co-ordinates)
- Flare stack height (metres)
- Flare stack exit diameter (millimetres)
- Flare stack exit temperature (°C)
- Flare stack exit velocity (metres/second)
- NO_x emission rates (grams/second or kilograms/day)
- Projected operating hours

***Explanation:** It is acknowledged that emissions profiling for electrolysers with hydrogen flares is an emerging field, and the availability of information in a suitable format for emissions screening may be constrained. We require an engineering upper estimate of the source term to inform emissions screening, to determine whether NO_x emissions from the flare stack may be significant. This is necessary to complete our technical assessment of your permit variation application.*

The H1 screening methodology outlined in the published guidance [Air emissions risk assessment for your environmental permit](#) may be followed, or another suitable method, taking into account the intermittent nature and anticipated short duration of hydrogen flaring.

- 2. Provide air emissions screening results for the proposed emergency generator, following published guidance and screening methodology for new Medium Combustion Plants (MCPs) between 1 – 20 MW thermal input capacity.** Screening shall use the [SCAIL Combustion](#) tool and follow NRW's [published user guide](#) for MCPs between 1 – 20MW thermal input.

If the MCP 'screens out' using SCAIL Combustion, the [SCAIL results template](#) must be completed and submitted to us.

If your MCP 'screens in' using SCAIL Combustion, site-specific air quality modelling assessment will be necessary. In this case, you must contact your permitting officer as soon as possible and before the notice expiry date to agree next steps.

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Explanation: This is a standard requirement for permit applications which include new MCPs. Use of the SCAIL Combustion screening tool requires specialist knowledge of air quality assessment and dispersion modelling. Screening distances for protected habitats sites are confirmed within NRW's user guide for new MCPs between 1 – 20 MW thermal input.

MCP air emissions screening results are necessary to complete our technical assessment of your permit variation application.

- 3. Clarify hydrogen storage provision at the proposed green hydrogen production facility.** The application originally describes hydrogen storage in buffer vessels or tanks. Modifications are noted in Drawing 5 (Revision C), but it is unclear how much hydrogen storage provision remains.

Explanation: Please clarify the purpose of any hydrogen storage vessels at your proposed facility and the storage conditions [quantity (kg or m³), pressure (gauge pressure / barg), temperature (°C)], where applicable.

If Hazardous Substances Consent (HSC) has been sought from your Local Authority for storage of hydrogen at or above 2 tonnes, please confirm the reference number associated with any HSC consent application.

- 4. Provide an accurate installation boundary plan showing all the permitted emission points to air and water (please show all existing points listed in permit EPR/DP3333TA, and any new emission points associated with the green hydrogen production facility).** Drawing 2 (installation boundary plan) should be revised, updated and resubmitted as Revision C in support of permit variation application PAN-027129.

Explanation: Drawing 2 (Revision B) conflicts with the site plan shown in Schedule 7 of permit EPR/DP3333TA/V005. Air emission points A16 – A20 marked on the site plan are associated with the Emergency Backup Generating Plant (EBGP) added to the installation permit in V005. These emission points do not appear on Drawing 2 (Revision B). Four new emission points added to Drawing 2 (for the green hydrogen production facility) duplicate the reference numbers for some EBGP emission points.

Please reconcile your new emission points with an accurate installation boundary plan, clearly showing all the existing emission points to air, and submit this as Drawing 2 (Revision C) in support of your application.

End of Schedule.

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