

21 January 2020

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Our ref: WYA/25.65/705

Dear Ms Frost

ENVIRONMENTAL PERMITTING (ENGLAND & WALES) REGULATIONS 2010, COMBUSTION PLANT PROCESSES – WYLFA POWER STATION – EMISSIONS REPORTING 2019

Please find enclosed the following for the period 1st January 2019 to 31st December 2019:-

1. Report: WYA/REP/10299 Issue 1 – Combustion Plant Environmental Performance Report – 2019. This report does not include completed Forms Air 1 and Performance 1 for 2019 as specified in Permit No. QP3035LY, following agreement to reduce reporting of these parameters as outlined in CAR_NRW0035954.

I trust the report is to your satisfaction. Should you have any queries please contact my Environmental Co-ordinator, Ms N Hughes or my Head of Radiological Protection & Environment, Mr M Elsworth.

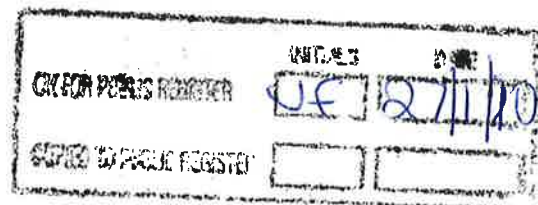
Yours sincerely

D.S. Law

Stuart Law
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Wylfa Report 10299

Combustion Plant Environmental Performance Report – 2019



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2. Introduction

As a requirement of our Environmental Permitting Regulations (EPR) 2010 (formerly Pollution Prevention and Control (PPC)) Permit (Permit Number QP3035LY) [9.1] and permit variations [9.2 & 9.3], for the site's combustion plant, we are required to produce a report including the following;

- (a) A review of the results of the monitoring and assessment carried out in accordance with this permit against the relevant assumptions, parameters and results in the assessment of the impact of the emissions submitted with the application.
- (b) A report detailing the stations performance against the environmental management system targets related to the combustion plant for the previous year.
- (c) The performance parameters set out in schedule 5 table S5.2 of EPR Permit QP3035LY [9.1] using the forms specified in table S5.3 of that schedule, as amended [9.2].
- (d) Details of any contamination or decontamination of the site which has occurred.
- (e) A report summarising the results of the previous year's programme of infrastructure monitoring under the site protection and monitoring programme.

This document has been produced to meet these requirements and record where agreements to reduce reporting have been established with Natural Resources Wales (NRW).

3. Emissions Testing Results and Assessment

Further to correspondence from NRW [9.6] confirming that the monitoring and reporting requirements specified in permit condition 3.6.1 of our EPR Permit QP3035LY [9.1] are no longer required, we have not completed form Air 1 (Schedule 5 table S5.3) for 2019. Emission points A1 – A6 have been permanently removed from service and no emissions have been made from this plant for the reporting period.

The assumptions made as the basis of the Atmospheric Dispersion Modelling [9.4] which was carried out for our PPC permit application [9.5] were confirmed to be valid. The plant operation configurations/running times resulted in far lower emissions than those considered as the basis of the models as the only operational Combustion Plant during 2019 was the small 'emergency back-up generator' (Emission point A17) and 'emergency diesel fire-water pump engine' (Emission point A18) and therefore emissions during 2019 for the site were extremely low.

The conclusion of the atmospheric dispersion modelling that the air emissions of the Combustion Plant at Wylfa have no significant environmental impact remains true.

4. Progress Against Environmental Management System (EMS) Targets

Wylfa has a formal EMS that is independently certificated to the International Standard ISO 14001. The system covers all activities carried out at the site. This includes, but is not limited to, activities associated with the fixed combustion plant as covered by the above permit.

The EMS encompasses annual improvement targets. As the Permitted Installation covers only a small area of the site activities, it should be noted that these targets will generally not be set specifically for the Installation, but for the site as a whole.

As part of the EMS environmental objectives, targets and performance are set/monitored for the financial year (April to March) i.e. the latest data available is to March 2019. Consequently, it will be reported on a similar basis in this report.

The EMS Objectives and Targets that were set for the site are shown in Table 1 of section 8.

Although the permitted installation only represents a small proportion of the whole site correct operation and management of the combustion plant can contribute to the achievement of many of the targets in Table 1. A summary of the performance of the whole site against these targets is provided in Table 2 of section 8.

5. Performance Parameter Reporting

Further to correspondence from NRW [9.6] confirming that the performance parameter data requirements specified in permit condition 4.2.1 of our EPR Permit QP3035LY [9.1] are no longer required, we have not completed form Performance 1 (Schedule 5 table S5.3) for 2019. Emission points A1 – A16 have been permanently removed from service and no emissions have been made from this plant for the reporting period.

The remaining operational combustion plant includes an 'emergency back-up generator' (Emission point A17) and 'emergency diesel fire-water pump engine' (Emission point A18) which resulted in a total of 9 hours running time and 358 litres of fuel oil being consumed in 2019.

6. Details Of Any Contamination Or Decontamination Of The Site Which Has Occurred

No known leakages or spillages have occurred at the site during the calendar year 2019 resulting in the contamination of any land.

No decontamination of the site has taken place during the calendar year 2019 (none has been identified as being necessary during this period).

7. Summary Of The Results Of Infrastructure Monitoring Under The Site Protection And Monitoring Programme.

The maintenance and inspection activities associated with the combustion plant are included in the site environmental maintenance schedule. These have been completed in a timely manner.

The Gas Turbines (1, 2, 4 & 5) (Emission points A1, A2, A4 & A5) were stood down on 20th January 2018, Gas Turbine 3 (Emission point A3) was stood down previously - fuel oil and lubricating oils have been drained.

Auxiliary Boiler 4 (Emission points A6) was permanently shut down on the 14th March 2018 and has been placed under configuration control - bulk fuel oil and dosing chemicals have been drained.

Auxiliary Boilers 1, 2 & 3 (Emission points A7–A9) were permanently shut down in 2016 and have been placed under configuration control – fuel oil, lubricating oils and dosing chemicals have been drained.

The diesel generators (Emission points A10-A12), were stood down on 6th December 2018 - fuel oil, lubricating oils and coolant have been drained.

The Back-up Feed Pumps (BUFs), Tertiary feed pumps and REIC generator (Emission points A13-A16) were also stood down on 6th December 2018 - fuel oil has been drained.

A total of 538,260Kg of fuel oil from the redundant combustion plant was removed off site (sold) in January 2019.

During 2020 it is expected that the site will continue with its Post Operational Clean Out (POCO) programme which includes work to remove residual oils from the combustion plant systems. A current priority for the site is the Gas Turbine Fuel Oil ring main lines due to recently establishing uncertainty over the integrity of the associated secondary containment.

The SPMP arrangements have been revised for the plant that is no longer operational and are considered to be appropriate.

8. Tables

Table 1 - Environmental Objectives and Targets (for the whole Wylfa Site) 2018/19

E, H, S & Q Policy	Objective	Target
We will maintain an Integrated Management System that describes all aspects of our activities	Maintain a robust and compliant integrated management system	Maintain accreditation to ISO 14001 / 9001 OHSAS 18001
We aim to prevent pollution, minimise waste and the use of resources and maximise Recycling	Prevent pollution	Ensure that emissions of air pollutants are minimised and in accordance with regulatory requirements
		Zero breaches of water discharge EPR permits
	Minimise waste and maximise recycling	75% of all landfill waste to be recycled.
	Minimise resource consumption	Minimise site electricity usage
		Maintain water consumption at below 6m ³ /hr
		Minimise fuel oil consumption
We ensure that our activities, products and services comply with all applicable legislation, and meet the requirements of applicable standards and best practice	Full compliance	Zero prosecutions/ statutory notices from regulator
We will inform, instruct, train and develop the people who work for us	Staff at all levels having adequate understanding of environmental issues at Wylfa	Staff appropriately trained to ensure protection of the environment
We will prevent incidents and property damage, and maintain effective emergency arrangements	Effective emergency arrangements maintained	Staff trained adequately to deal with environmental emergencies

Note:

Not all directly applicable to combustion plant.

**Table 2 – Performance Against Environmental Objectives and Targets
Relevant to Combustion Plant 2018/19**

E, H, S & Q Policy	Objective	Target	Outcome
We will maintain an Integrated Management System that describes all aspects of our activities.	Maintain a robust and compliant integrated management system.	Maintain accreditation to ISO 14001 / 9001 OHSAS 18001	Achieved.
We aim to prevent pollution, minimise waste and the use of resources and maximise recycling.	Prevent pollution.	Ensure that emissions of air pollutants are minimised and in accordance with regulatory requirements.	Achieved.
		Zero breaches of water discharge EPR permits	Achieved
	Minimise waste and maximise recycling.	75% of all landfill waste to be recycled.	Achieved. Recycling rate of 50%. Excluding non-recyclable waste (asbestos etc.) improves this figure – 88%.
	Minimise resource consumption.	Maintain water consumption at below 6 m ³ /hour.	Achieved. Site overall use 5% below target for 18/19.
		Minimise fuel oil consumption.	Achieved – fuel oil consumption for ‘back-up plant’ test run only.
We ensure that our activities, products and services comply with all applicable legislation, and meet the requirements of applicable standards and best practice.	Full compliance.	Zero prosecutions/ statutory notices from regulator.	Achieved.
We will inform, instruct, train and develop the people who work for us.	Staff at all levels having adequate understanding of environmental issues at Wylfa.	Staff appropriately trained to ensure protection of the environment.	Achieved (demonstrated by ISO 14001 certification)
We will prevent incidents and property damage, and maintain effective emergency arrangements.	Effective emergency arrangements maintained.	Staff trained adequately to deal with environmental emergencies.	Emergency arrangements remained in place for 18/19 financial year and site successfully transferred to contingency arrangements in October 19.

Although the permitted installation only represents a small proportion of the whole site, correct operation and management of the combustion plant can contribute to the achievement of many of the targets in Table 1. The above is a summary of the performance of the whole site against these targets.

9. References

- 9.1) Environment Agency, QP3035LY, *Wylfa Combustion Plant, Permit with Introductory Note Pollution Prevention and Control Regulations 2000*, 05 April 2007.
- 9.2) Environment Agency, EPR/QP3035LY/V002, *Wylfa Combustion Plant, Notice of variation with introductory note, Environmental Permitting (England & Wales) Regulations 2010*, 13 December 2013
- 9.3) Environment Agency, EPR/QP3035LY/V003, *Wylfa Combustion Plant, Notice of variation with introductory note, Environmental Permitting (England & Wales) Regulations 2010*, 21 October 2015
- 9.4) Jacobs Babbie, 0016099/R02/ Issue 3, *Wylfa Power Station, Combustion Activities, PPC Application, Atmospheric Dispersion Modelling Assessment*, September 2005.
- 9.5) Jacobs Babbie, 0016099/R05/ Issue 2, *Wylfa Power Station, Combustion Activities, PPC Application*, 31 January 2006.
- 9.6) Compliance Assessment Report, Report ID: CAR_NRW0035954, 19th November 2019.

