

Mr. Neil Richardson  
RWE Generation  
Trigonos  
Windmill Hill Business Park  
Whitehill Way  
Swindon  
SN5 6PB

**Our ref: PAN-010169**

**Date: 14<sup>th</sup> July 2020**

Dear Mr. Neil Richardson

**We need more information about your application**

**Application reference: PAN-010169**  
**Operator: RWE Generation UK PLC**  
**Facility: Pembroke Power Station**

Thank you for your application received on 30/04/2020.

We need to ask you for some more information before we can do any more work on it.  
Please would you provide the following information.

- You have indicated that engines are tested once every 2 years but please confirm the number of testing hours for each engine.
- Confirm how you test the backup engines as well as how long for (do you have a testing and maintenance plan you could send me a copy of which details some examples below):
  - When you test backup engines you should:
  - stagger the tests if you have multiple backup engines
  - keep testing times and frequency to the minimum – just enough to demonstrate reliability at the appropriate load
  - only test when you expect low ambient nitrogen oxides (NOx) background, such as not during peak traffic periods
  - use the electricity generated from the test on your site
  - install backup generators away from sensitive receptors (not below windows or venting onto car parks) and terminate the exhaust flues vertically, making sure there are no obstructions.
- The Noise Impact Assessment provided states that “In the event of an emergency involving loss of Grid supplies, the EBGPs would operate for up to 7 days continuously (the capability to do this is a standard NGESO requirement). During this period the

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

gas engines would run continuously.” I’m not clear if this scenario is demonstrated in the Air Quality (AQ) assessment (as this is based on back up engines running simultaneously at full load for 500 hours/year and the 3 engines running for 7 days would equate to 504 hours). Please clarify. I assume this would overlap with the operation of the main CCGT engine too when it is up and running. Can you also provide further clarity on if there will be overlap with the start up of the main CCGT engines with the EBGp and how long for. We would expect the impacts for noise and air quality for the site to be considered as a whole.

- Confirm if battery storage is relative to engines is optimised. Could you have a larger battery storage and less engines? This may be detailed in the Project Description document submitted which I have not had chance to review in significant detail yet, if so please direct me to the appropriate section.
- Confirm how many gas-fired boilers for the pressure reduction facility containing. Is it 1 or 2? Be specific.
- The application form C3 table 1a does not match the tables 1.1 and 1.2 of the supporting document (Application for Variation of Permit ref. EPR/DP3333TA to cover operation of Emergency Back-up Generating Plant Supporting Document) in terms of activities to be listed in the permit. Please update the C3 form to correctly list all activities and DAA’s to be added.
- Form C3 table 2 – there will be emissions to air from the gas-fired boilers for heating. These should be listed in table 2 also on the C3 form.
- Please can you include Carbon Monoxide (CO) in the H1 screening tool so its clear it screens out and doesn’t need to be considered further.
- Confirm you are not applying for any commercial confidentiality.
- Please provide a copy of the WYG reports ‘WYG RWE Pembroke Power Station Ground Conditions Desk Top Study October 2018 and WYG RWE Pembroke Power Station Ground Investigation Report May 2019’ to support the Site Condition Report provided.
- There are Ancient Woodlands within screening distance that have not been considered in the Air Quality assessment. Please provide details on the impacts the proposed activity will have on these sites/ update the Air Quality assessment as necessary.
- The Gweunydd Somerton Meadows SSSI appears to be within 2km of the proposed activity but hasn’t been assessed in the Air Quality assessment. Please provide details on the impacts the proposed activity will have on this site.
- There are several sites such as Pembrokeshire Bat Sites and Bosherton Lakes SAC that are not assessed within the Air Quality assessment. There is reference to them being screened out in the document ‘Response to Queries about Potential Effects on Special Areas of Conservation’ but could not see **detailed** information on why some sites have not been looked at further. Please provide further information.
- “The final treatment or disposal method and location of treatment/disposal of waste arising from the EBGp will be in line with the current arrangements at Pembroke Power Station. The management of operational waste from the EBGp will be undertaken by staff at Pembroke Power Station. The details above are estimated based on similar plant at other RWE power stations.” Clarify what these arrangements are.
- The back-up engines are cogeneration engines. Please can you confirm that this a Combined Heat and Power engine type.
- Please provide a copy of the noise and vibration management plan.
- Please elaborate on the main unit supply restoration (SR) operating mode in terms of what will change: details of changes in steam system and GT operation, potential for increased noise due to safety valve lifts or higher steam by-pass flows, load profile details, associated emissions profiles for NOx and CO and any implications for part-load ELVs and updated air quality assessments if necessary.
- Confirm if you have applied for a Greenhouse Gas Permit for the activity. You can contact [GHGHelp@cyfoethnaturiolcymru.gov.uk](mailto:GHGHelp@cyfoethnaturiolcymru.gov.uk) for more help.

If you need advice about how to complete the form, or work out what your fee is, please contact your local area office. Call 0300 065 3000 and ask to speak to your local area office

or your site officer.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee.

If you email or write to us please quote the application reference PAN-010169 on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions email [Kirsty.Thomas@naturalresourceswales.gov.uk](mailto:Kirsty.Thomas@naturalresourceswales.gov.uk).

Yours sincerely

A handwritten signature in dark ink, appearing to read 'K. Thomas', with a stylized flourish at the end.

**Kirsty Thomas**  
**Senior Permitting Officer**