

This form will report compliance with your permit as determined by an NRW officer

Site	Severn Power Station	Permit Ref	HP3737UE		
Operator/Permit holder	Siemens plc				
Regime	Installations				
Date of assessment	11/02/2020	Time in	10:00	Out	13:30
Assessment type	Audit				
Parts of the permit assessed	As detailed				
Lead officer's name	Griffiths, Toby				
Accompanied by	Richards, Gareth (Rivers House)				
Recipient's name/position	Nikki Burge/ EHS Manager	Date issued	30/06/2020		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	X	
	X	
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E1 - Emissions - Air	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
	X	
	X	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
H2 - Resource Efficiency - Energy efficiency	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Nikki Burge (EHS Manager), Dan England (Station Manager), Ian King (Severn Power Ltd), John McLaren (Maintenance Manager)

Visit of 11th February 2020

1. Business update, outages etc. Handover.

The station operating mode is primarily 2-shifting (peaking). Nikki Burge has replaced Huw Edwards as EHS Manager. Dan England remains as station manager. Ian King represents Severn Power Ltd on site. Siemens reported routine minor outages on Unit 10 last year and a larger overhaul of Unit 20 is due next year. The outage will include efficiency improvements to the gas turbine.

NRW explained the change in working arrangements to the place-based model. Siemens now lies within the "South East" administrative area, hence the site handover to Gareth Richards who is within the South East Industry Regulation team.

Permit variation (transfer)

Siemens notified NRW of a change in legal entity by April 2020, meaning the permit will need to be changed. There will be no changes to local management or arrangements as personnel and procedures will remain the same. NRW advised that an application should be submitted as soon as possible. The relevant fees have been communicated via email.

Potential permit variation

Siemens discussed potential options to change generation capacity on site. This would require a permit variation in advance of any change. The charge for this would likely be based on the OPRA score multiplier for a normal variation. Links to forms and other guidance will be sent via email.

QAL 2 query

Siemens queried the requirement for a repeat QAL 2, following changes to the plant. Technical Guidance Note M20 states that a QAL 2 is required to be repeated (within 6 months) if the change is significant, such as change of fuel or upgrade affecting CEM calibration. Any changes that do not affect the calibration of the CEM will not require a repeat of the QAL2 procedure. The planned plant efficiency upgrades are unlikely to fall into the category of significant change, but Siemens should confirm this.

Action 1: Please confirm whether the planned plant changes would have the potential to significantly affect emissions profiles.

2. Monitoring

In line with the 4-yearly cycle, an Operator Monitoring assessment (OMA) is due this year. Siemens performed well in the last assessment in 2016 with a score of 86%. NRW will arrange to complete the audit in due course.

NOx converter update – above 95%

Siemens continue to replace the NOx converters every 6 months to ensure they remain within the specified efficiency. In the longer term, it is hoped that their efficiency can be tested more effectively to reduce the frequency at which they are changed.

Monitoring acquisition software

Envirosoft is still used as the CEMS monitoring data collection and processing system. Siemens are asked to confirm that it meets the PREN17255 standard for data acquisition and handling systems.

Action 2: Please assess whether the current arrangements meet the requirements of PREN17255.

Last Annual Surveillance Test (AST)

An AST was carried out in June 2019 with no reported issues. A query was raised regarding the method used by the contractor to calculate stack volume flow during the AST/QAL2.

Action 3: Please confirm whether oxygen and moisture were included in the last QAL2.

3. Recent monitoring reports. The below reports were received by NRW.

All reports up to date with no exceedances:

Quarterly: CON2 forms, received:	12/04/19 (Jan – March)
	25/07/19 (April – June)
	14/10/19 (July – September)

6 monthly PM1, received:	25/07/19 (Jan – June)
	14/10/19 (July – Sept)
	13/01/20 (Oct – Dec)

Noted outage on Unit 10 during September.
Annual reports received HR1, AR1, water1.
Performance report

4. BREF Review

NRW advised that there were no significant issues at this stage of the determination. A draft permit should be sent out for review by early March

5. Environmental Management Systems (EMS)

Siemens operate an asset management system (ISO55001) and an EMS (ISO14001) at a corporate level. An integrated management system is being considered, which would combine the elements of each. Site based ISO14001 audits happen on a rolling program, and the Newport site is scheduled for 2021. Internal audits are also carried out on key areas such as energy efficiency and maintenance. Siemens reported that following one project, an improvement to gas pressure has led to efficiency savings on site. This is a good example of continuous improvement on site. As the corporate EMS remains in place, the OPRA profile does not give maximum points, unless site specific elements are included.

6. IC7 – progress discussion

Various options have been explored in recent years, and Siemens are now hopeful that a solution

has been found. There have been successful trials treating ammoniated effluent at Nash Wastewater Treatment works, via tanker transfer. Welsh Water have recently varied their Environmental Permit to allow commercial wastes to be accepted. Siemens reported that the quantity of effluent varies depending on operation and load, which equates to circa 1 or 2 tankers (25,000l) per week. Once final arrangements are complete, Siemens will be able to provide a completed report to NRW to complete IC7. We recommended that the cost/benefit of the scheme and environmental benefits should be included e.g. tonnes of CO2 saved, and other appropriate metrics. To enable us to track progress, we request an update, either an interim or final report.

Action 4: Please provide an update for IC7 as either an interim or final report by 30th September 2020.

7. Site tour

A site tour of the main plant areas included: control room (including a check of CEMS data) chemical storage area, both turbine halls, external waste storage areas and beneath the ACC. No significant issues were found, and there was evidence of good practice including spill kits and bunding of polluting liquids. Only one of the two units was operating.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036372**

This form will report compliance with your permit as determined by an NRW officer

Site	Severn Power Station	Permit Ref	HP3737UE
Operator/Permit holder	Siemens plc	Date	11/02/2020

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
A1	X	Action 4: Please provide an update for IC7 as either an interim or final report by 30th September 2020.	31/03/2020
G1	X	Action 3: Please confirm whether oxygen and moisture were included in the last QAL2	31/03/2020
G1	X	Action 2: Please assess whether the current arrangements meet the requirements of PREN17255.	31/03/2020
A1	X	Action 1: Please confirm whether the planned plant changes would have the potential to significantly affect emissions profiles.	31/03/2020

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.