

Compliance Assessment Report CAR_NRW0037833

Permit being assessed: RP3232LD.

For: Felindre, Gas Compressor Station, held by National Grid Gas PLC

At: Gas compressor station Heol Llangyfelach, Felindre, Swansea, SA5 7LX, West Glamorgan, SA5 7LX.

Type of assessment carried out: Audit, Reason: Routine.

On 08/12/2020.

Parts of permit assessed: Please see comments

NRW Lead Officer: Ieuan Davies.

Report sent to: Neil Billingham, Senior Environmental Engineer on 06/04/2021.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E3 - Emissions - Surface water	Assessed (A)	
E1 - Emissions - Air	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

No action required.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Attendees

Neil Billingham, Bruce Morgan, Matthew Williams, Mike Aldridge – National Grid Gas Plc.

Ieuan Davies – Natural Resources Wales

Agenda

Introductions

Process Overview

Improvements/Developments inc. update on commissioning of VSD

Overview of Returns

AOB

Introductions

A meeting was arranged for the 8th of December 2020 to introduce Ieuan Davies (Natural Resources Wales) to the site operator following the departure of the former inspector, Nick Jenkins, to another role within NRW. The operator provided an introduction stating National Grid's operating model i.e. Asset Owner, Asset Manager and Asset Steward. The role of individuals/teams was described i.e. Engineering and Asset Management, Senior Operations Engineer and Assurance/Compliance. The Operator continued with a site/process overview, details of their environment performance for the previous 12 months and to highlight their developments regarding completion of the Alltwn pipeline loop and subsequently commissioning of the Variable Speed Drive (Unit A) at Felindre.

Process Overview

The Operator began by displaying the National Transmission Network for the UK, specifically to detail Felindre's role and contribution in distributing Natural Gas from reception terminals at Milford Haven to consumers.

Aerial view of the site was used to define processes including key elements of the permitted activity within the site boundary. Currently two Solar Titan DLE (Dry Low Emission) compressors are utilised. The main process emissions from the facility are oxides of nitrogen (NO_x) and Carbon Monoxide (CO) to air. The Installation is also permitted to discharge surface water to a nearby watercourse via an interceptor.

Improvements/Developments inc. update on commissioning of VSD

In a previous CAR form dated 16th of May 2019, two projects were stated as the reinstatement and completion of commissioning of the electric VSD and the completion of the recycle loop for the improved operation at the offsite cross connection (Alltwn).

National Grid stated that they are not in control of the quantity of gas received at the compressor station as the amount is directly linked to supply and demand. The completion of the Alltwn recycle loop would assist in the commissioning of the electric VSD unit which in turn means the installation is not reliant on flows from Milford Haven.

Commissioning runs of the Alltwn recycle loop will begin in January 2020 with operational handover envisaged for March 2020.

Work is concurrently undertaken on the commissioning of the electric VSD and is expected to be completed in a similar timeframe by end March / beginning April 2020.

This work will see the VSD become the primary unit at the facility and the two existing Solar Titan Units providing backup.

Overview of Returns

National Grid PLC are required to submit quarterly air monitoring results to comply with their environmental permit. The Inspector queried the following Process Monitoring Requirement within National Grids permit

Table S4.4 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Turbine unit B & C	Operating hours at less than 70% MCR	Continuous	Not applicable	Shall be reported annually
Turbine unit B & C	Operating hours	Continuous	Not applicable	Shall be reported annually

The requirement for both gas powered turbines (Unit B & C) is to report its hourly operating times, additionally its operating hours below 70% of its Maximum Continuous Rate (MCR). This particular reporting requirement is an useful indicator in demonstrating the turbines are managed and operated in an efficient manner and thus reducing their environmental impact. Within National Grid's returns the MCR rate has been stated as 55% rather than the 70% stated in their environmental permit. The Inspector asked the Operator to review the percentage (55) stated in their returns and to amend any future reports submitted to Natural Resources Wales to demonstrate an accurate representation of the turbines efficiency.

Subsequent to the meeting on the 8th of December 2020 Neil Billingham provided the following response:

On the quarterly reporting - the reports states hours run below 55% but the data is for below 70% - data reported is correct. We will amend the Q4 report heading to reflect the data.

AOB

Four yearly series of environmental conditions

There are a series of conditions within National Grids permit requesting assessment/review of certain parameters/criteria as follows:

1.2 Accident management plan

1.3 Energy efficiency

1.4 Efficient use of raw materials

1.5 Avoidance, recovery and disposal of wastes produced by the activities

2.8 Site protection and monitoring programme

These conditions do not require National Grid to submit the reviewed reports, however, to maintain compliance with their environmental permit Natural Resources Wales need to be aware of the expected timeframe for reviewal and implementation of activities.

Subsequent to the meeting held on the 8th of December 2020, Neil Billingham has

submitted copies of the requested reports with the following table produced to outline the timeframe for future reviews.

- 1.2 Accident management plan – Expected 2021*
- 1.3 Energy efficiency – Expected 2022*
- 1.4 Efficient use of raw materials -Expected 2022*
- 1.5 Avoidance, recovery and disposal of wastes produced by the activities – Expected 2022*
- 2.8 Site protection and monitoring programme – Expected 2022*

Conclusion

This was the first meeting since change of inspector, its purpose to familiarise the officer with site operations and establish links with the site management.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.