

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

Site	Connah's Quay Power Station	Permit Ref	NP3037AF		
Operator/Permit holder	Uniper UK Limited				
Regime	Installations				
Date of assessment	15/11/2018	Time in	N/A	Out	N/A
Assessment type	Report/Data Review				
Parts of the permit assessed	Routine Emissions Monitoring and Reporting				
Lead officer's name	Ross, Stuart				
Accompanied by					
Recipient's name/position	Andy Black/ Environmental Advisor	Date issued	15/11/2018		

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
C2 - General Management - Management system and operating procedures	C3	1.1.1
E1 - Emissions - Air	C4	3.1.2
E3 - Emissions - Surface water	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	2	Total compliance score (see section 5 for scoring scheme)	4.1
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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

Thank you for submitting your routine quarterly emissions monitoring returns for the periods April - June and July - September 2018.

a) Emissions to Air

Emission points A1 - A4, all emissions were compliant with the permitted limits throughout the monitoring periods. Invalidation logs received.

Emission point A11 (Gas Treatment Plant Thermal Oxidiser) - 22/06/18, Carbon Monoxide Emission Limit exceedance 14.5 mg/m³ (ELV 10 mg/m³) over one hour.

Part A and B notifications submitted to NRW as required.

The Part B states that;

'Uniper have completed an internal investigation into this incident and identified additional information regarding the incident. The CO limit was exceeded for the hourly average between 18:00 hours and 19:00 hours that evening.

Operation of two units that day required complex operation of the AGI gas flow control valves, necessitating several reverse gas flow events which caused the Gas Treatment Plant (GTP) feed gas nitrogen content to lower, which in turn caused instability in the plant and an increase in the nitrogen off-gas temperature and methane content.

These effects led to a change in combustion temperature and subsequent increased emission of Carbon Monoxide from emission point A11.

High level alarms indicating increasing CO content within A11 emissions were triggered five times between 17:41 hrs and 18:15 hrs before a CO 60 Minute Average High Level Alarm sounded at 18:28 hours.

These alarms were all silenced by the day shift GTP operator but not acted upon. Subsequently, due to a lack of evasive action an exceedance of the CO level occurred reaching a peak of 14.5 mg/m³ between 18:00 hrs and 19:00 hrs on 22nd June 2018.

Immediate measures applied were applied as follows :

- 1, Full investigation
- 2, Analysis of alarm errors
- 3, Shift handover review
- 4, Revisionary site training
- 5, Completion of installation of new burner to ensure complete combustion at times of low gas flow through the Thermal Oxidiser. '

The marginal emission limit exceedance is a breach of permit condition 3.1.2 with potential for negligible environmental impact (CCS 4).

The failure to act upon the system alarms is in itself a breach of permit condition 1.1.1 and its subsections attracting a CCS score of 3.

NRW is satisfied that Uniper have taken appropriate remedial action to prevent a recurrence of this incident.

b) Emissions to Water

All parameters within permitted limits.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034037**

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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.

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			
C2	C3	Operator has taken appropriate action - no further action required.	16/11/2018
E1	C4	Operator has taken appropriate action - no further action required.	16/11/2018

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.