

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

Site	Severn Power Station EA/EPR/HP3737UE/V003		Permit Ref	HP3737UE		
Operator/ Permit holder	Siemens plc					
Date	06/05/2015		Time in	09:30	Out	13:15
What parts of the permit were assessed	As below - EMS					
Assessment	Audit	EPR Activity:	Installation	X	Waste Op	Water Discharge
Recipient's name/position	Huw Edwards					
Officer's name	Toby Griffiths		Date issued	07/05/2015		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). 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

Condition(s) breached

Permit Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	A	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	N	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, 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 Total No Breaches is greater than zero, then please see Section 3 for details of 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 (e.g. 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 suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Visit of 6th May 2015

1. Business update, outages

An outage for unit 20 starts next week, which will take around a month to complete. A similar outage for Unit 10 is scheduled for the autumn. The outages may affect the timing of stack monitoring, though it is hoped that this can be managed.

No significant issues were reported since the last visit. The station is now capable of operating for shorter run periods to meet market demands, which should add flexibility to the operating regime.

Staff have been practising their emergency procedures which is commended.

2. Actions from last visit

There were no outstanding actions following the last visit.

3. Monitoring (pH)

Siemens have now fitted additional pH monitoring within the effluent system. This improves control of the effluent treatment process, and gives more accurate data to ensure permit compliance. There are two main pH probes now fitted, one at the outlet from the effluent main holding tank, the other from the rainwater collection sump. NRW queried the current control levels of pH 4 and pH 10. The permit limits are pH6 and pH9, therefore Siemens need to ensure that the effluent meets these limits at the discharge point.

ACTION 1: Please confirm that the new pH monitoring system can achieve compliance with the permit limits.

The pH monitoring system also has automatic data logging, allowing for trending and better control. This is commended by NRW.

4. IED Reg 60

The responses to the Regulation 60 notices (information on station performance etc) has been received by NRW and will be processed in due course. The permit will be varied as part of this process to implement the requirements of the Industrial Emissions Directive (IED).

5. IC7 – progress discussion

Progress with IC7 is continuing, though discussions over tankering of effluent to Nash STW has stalled due to permitting requirements. There are another of other options being explored which Severn Power hope to feed back in due course.

In addition, monitoring of the effluent quality is ongoing to characterise the range of contaminants and pH range. This information will help to decide which disposal or treatment options are the most suitable.

6. EMS Review

Siemens currently operate a corporate EMS accredited to ISO14001. This is not usually given the same weighting in the OPRA profile as a site specific EMS. As a result the OPRA score is slightly higher. In the past, Siemens have concluded that the costs to implement a local ISO14001 system would far outweigh the savings in the annual subsistence fee due to an OPRA score reduction.

Currently, the corporate EMS requires each site to have procedures in place to meet the standard, though it is not clear that these procedures are effectively audited at a corporate level.

However, it is still important that local procedures are fit for purpose and manage all the environmental risks. In view of this, NRW conducted a short audit of the local management system.

Aspects Register

The aspects register ref: HSER06.001 is held on the Siemens integrated EHS system. Each aspect is given a risk rating. The register is reviewed annually, though little changes on site with regard to environmental impact. The main aspects appeared to be listed. The procedure for maintaining the register requires a 6-monthly review, which is at odds with the current arrangement.

ACTION 2: Please update procedures to ensure the aspects register is reviewed at the appropriate intervals.

Legal register

An on line resource called "Simplifi" is used to as the legal register. Siemens have their own site specific account, which allows for UK legislation (including those specific to Wales) to be listed. The register can be printed, and listed by aspect e.g. Air emissions. A risk rating is assigned to each legal compliance item. The register was reviewed in March 2015.

Management Review

There are 6 monthly management review meetings, and permit compliance is a standing item. An example was seen.

Internal / external audit type and frequency

There are regular internal audits, with less frequent corporate level audits which occur around every 2 years; the last being September 2014. The main focus is on Health and Safety systems, though a local internal audit of 20th September 2013 focussed on the calibration and measurement of equipment. An audit schedule was seen which gives confidence that audits are planned and carried out.

The corporate level audits have not focussed on the environment significantly, which indicates that the corporate level EMS (ISO14001) does not focus fully on local site issues.

Recommendation:

NRW recommends that local audits are given an environmental focus at an appropriate frequency. This could include focus on particular permit conditions.

7. Site Tour.

A short tour of the site was undertaken. No significant issues were seen. Activity was increasing in preparedness for the outage. There was evidence of good segregation of chemicals in the external storage area.

Waste storage and segregation also appeared to be good. The site was tidy, and well organised. Anti tamper tags on spill kits were intact.

CEMS for the unit running (Unit 20) showed results of:

- 14% O₂
- 1mg/m³ CO
- 33mg/m³ NO_x (24.8 as NO)
- Current output of 396 MW(e)
- Stable export of 217 MW(e)

Emissions were compliant with permit conditions.

Please respond to the actions by **5th June 2015**.

END

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Operator/ Permit	Siemens plc	Date	06/05/2015

Section 3- Enforcement Response

Only one of the boxes below should be ticked

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.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			

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 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 which 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 fulfill 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 (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 and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information 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 twenty 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 the officer's line managers. 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.