



Compliance Assessment Report

Report ID:
CAR_NRW0026613

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	21/10/2016	Time in	10:00
Assessment type	Audit	Out	14:00
Parts of the permit assessed	Monitoring (OMA)		
Lead officer's name	Griffiths, Toby		
Accompanied by	Andy Collins		
Recipient's name/position	Huw Edwards/ EHS Manager	Date issued	14/11/2016

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
E1 - Emissions - Air	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G3 - Monitoring and Records, Maintenance and Reporting - Maintenance records	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	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

Site Visit of 21st October 2016

David Rowlands (CEMS engineer)
Huw Edwards (EHS Manager)
Ian King (Calon Energy)
Sean Grundy (Station Manager)
Andy Collins (NRW)

1. Business update

A new station manager, Sean Grundy was introduced. Siemens are planning to install the Envirosoft monitoring software to replace the current Emidate system. The new software is MCERTS compliant and will make producing reports required by the permit more straightforward.

2. Improvement Condition IC7 update

Emissions from the proposed effluent treatment technique are likely to have an insignificant impact, based on the initial screening. The ammonia treatment unit will reduce the loading of ammonia into single figures (milligrams per litre) before it mixes with the main process water system. This means that by the time it reaches the discharge point, the ammonia concentration will be very low. Siemens now plan to submit an application for a permit variation to allow the discharge to be formally assessed. The variation may include a new limit value for ammonia (the permit already requires monitoring on a monthly spot sample basis). As part of the variation, NRW will correct an error in Table S3.1 where only emission point A1 is listed in some places, whereas A1 and A2 should both be listed. Please make a note of this in your application.

3. Last audit actions

All actions from the last visit were completed. No corporate audits have been carried out recently.

4. OMA audit

A good overall score of 86% was achieved. It was noted that since the previous OMA, the standard expected have been tightened. This means that the scores given may be lower, even if the standards on site have remained the same. A full OMA report will be sent separately. A summary of the audit is as follows:

OMA 1: Overall, a high standard of management was demonstrated for the monitoring arrangements.

OMA 1A: The internal document management system procedure needs to be updated to incorporate new ELV's for CO (100 mg/m³). This ELV also needs to be updated in the test contractor's (ESG) SSP.

OMA 1C: Siemens needs to update its current maintenance schedule to take into account periodic monitoring requirements, even if it is arranged on an ad-hoc basis (and dependant on plant usage). This will ensure in the future all relevant staff involved in monitoring can have access to an overarching document which covers all monitoring requirements (periodic as well as the CEMs).

OMA 1E: Some additional monitoring training would be beneficial for operator staff involved in monitoring management, even if they have done it previously, as standards & guidance are constantly evolving. The Source Testing Association (<http://www.s-t-a.org/training/>) holds relevant one day training courses for operators including:

- Regulatory Monitoring Requirements for Process Operators
- BS EN14181 quality assurance of an AMS

It is recommended for staff involved in monitoring to attend either one or both of these courses before the next OMA.

OMA 2: All aspects of Periodic Monitoring have shown to be at the highest level by ESG.

OMA 2C: Measurement Methods and Standards:

- NOX monitored instrumentally using chemiluminiscence (standard reference method) to standard BS EN 14792.
- Carbon Monoxide monitored instrumentally using NDIR (non dispersive infra-red analyser - standard reference method) to standard BS EN 15058.
- Oxygen monitored instrumentally using the Zirconium Cell method (standard reference method) to standard BS EN 14789.

OMA 3: Overall, a good level of competence evident from personnel involved in CEMS maintenance and calibration.

OMA 3C: It is not currently not possible to apply relevant calibration factors derived from QAL2 testing to the CEM itself, as the current linked CEM data collection software (EMIDATE) does not have the facility to do this. Once the operator upgrades its CEM data collection data system/software to Envirosoft, this will be remedied. In the meantime CEM results will be qualitative, rather than quantitative (with an effective calibration factor of $y=x$).

OMA 4: A good level of Quality Assurance shown by operator and contractor ECL for some of the elements within this section.

OMA 4 D & E: There are two elements (4D and 4E) where the operator needs to make improvements, as the scores for auditing of monitoring and auditing compliance are below the acceptable element score of "3". The Operator should ensure that they carry out regular audits of monitoring activities (following written linked internal procedures) that covers monitoring reports as well as on-site audits of contractors. Any corrective actions highlighted by these audits should then be completed.

Action 1: Please provide a response to the comments made above in relation to OMA audit, particularly where recommendations are suggested.

Action 2: Please provide a document, preferably graphical, showing how the MSUL and MSDL points are defined, and how these trigger compliance with the relevant emission limit values, including at 70% and base loads.

Please provide the response to the actions by **22nd December 2016**.

END

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**Cyfoeth
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EPR Compliance Assessment Report

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Operator/Permit holder	Siemens plc	Date	21/10/2016

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			

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 reports 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 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.