Compliance Assessment Report

Report ID: CAR_NRW0000043

This form will report compliance with your permit as determined by an NRW officer					
Site	Uskmouth Power Plant EPR/LP3131SW	Permit Ref	LP3131SW		
Operator/Permit holder	Uskmouth Power Co Ltd				
Regime	Installations				
Date of assessment	22/03/2016	Time in	14:00	Out	15:20
Assessment type	Audit				
Parts of the permit assessed	General compliance				
Lead officer's name	Richards, Gareth (Rivers House)				
Accompanied by					
Recipient's name/position	Mike James/ Environment Manager	Date issued	30/03/2016		

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**

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X**= Action only

Number of breaches recorded	**0**	**Total compliance score** (see section 5 for scoring scheme)	0

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

An update on plant operations was provided by Mike James

SNCR Trial update

The trial programme had been suspended while issues related to the impact of the current operational pattern and the tuning of the process were resolved. There was no predicted recommencement date at present. It was unlikely that enough information had been gained from the trial programme to date to enable a decision to be made on a full installation for U14.

It was confirmed that all the ash generated during the trials was being stored in a separate silo and none had been transferred to the temporary ash storage area. Analysis results had indicated that this ash contained raised ammonia levels. Uskmouth were requested to include in the suite of routine analysis of the W1b water discharge, ammonia. **Action (1).** It is also recommended that long term storage of SNCR ash in the silo may not be suitable due to the potential for the lime content to lead to difficulties in eventual removal. **Recommendation (1).**

IC12 requires a SNCR trial report to be provided to NRW by 1/07/2016. In view of the trial suspension it may not be possible to meet this date. NRW is prepared to accept an alternative deadline such as one month after formal completion of the trial programme. If this is necessary Uskmouth should submit a request. **Action (2).**

General

It was confirmed that there are performance issues with U13 bags. A bag change is scheduled for June/July. Following this a repeat QAL2 for dust will need to be completed as soon as practicable. **Action (3**).

It was confirmed that a significant issue affecting the overall station performance was wet coal (20%+ moisture). This necessitated increased air flow through the coal mills to effect drying and a consequence of this was that the boiler pf feed was not meeting specification (typically 70% <75µm). The resultant increased proportion of larger size coal particles were contributing to poor burnout (probably compounded by the less than optimum boiler air supply).

It had previously been agreed that the necessary QAL2 on U14 could be delayed until completion of SNCR installation. If there is doubt whether SNCR installation will now happen, or, there is a significant delay, then the QAL2 must be completed as soon as practicable. It is not acceptable that there is a significant delay purely as a result of an unconfirmed modification schedule. **Action (4).**

It had been noted by the monitoring contractor while undertaking the U13 QAL2 assessment that the dust monitors may not be in the most appropriate location. Further investigation had suggested that the sampling points may have at least partially been influenced by the instrumentation cable lengths. Further investigation/consultation will be carried out prior to any decision being taken to move the monitoring

locations. **Action (5).**

Actions 4, 5 and 8 on the previous CAR form (CAR_NRW0000049) need a response to NRW by 31st March.

Reporting Forms

Clarification is provided:

- Form IED PM1 only needs to be used for the reporting of the discontinuous monitoring result for Hg
- TNP mass emission reporting must be done on a basis that excludes start up/shut down. However, energy data reporting must include start up and shut down fuel use.

Coal transfer from Liberty

Further progress with coal transfer has been made however it has not been prioritised by Cuddy's. It is not clear whether it will be completed by end of March.

Biomass firing

Biomass firing options are being considered again. The permit currently allows "a small percentage of biomass" to be used as a supplementary fuel in addition to coal. There is no explicit current guidance available on biomass firing, however, if coal substitution is proposed to reach a level whereby it could be interpreted as co-firing, it would then be necessary to consider changes to the existing emission limits (as co-firing limits should be calculated taking in to the relevant emission limits for the respective fuel types).

If at any stage it is proposed to increase biomass firing above the levels that were previously achieved (~5% thermal) I advise that NRW should be consulted at an early stage so any consequences of this upon the permit and emission limits can be assessed. **Action (6).**

- QAL 2 Reports

The QAL2 reports recently provided by Uskmouth will be audited by NRW. **Action (7): NRW**

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0000043**

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Operator/Permit holder	Uskmouth Power Co Ltd	Date	22/03/2016

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.

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.