

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Mr J A Keene
Company Secretary
RWE Generation UK plc
Windmill Hill Business Park
Whitehill Way
Swindon
SN5 6PB

Application number: EPR/RP3133LD/V014

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a substantial variation to your environmental permit, duly made on 31st March 2017. The information requested should be sent to the following address by **13th June 2017**.

Information should be sent to:

Anna Lewis
Permitting Service
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
<i>A. M. Lewis</i>	16/05/2017

Anna Lewis, Principal Permitting Officer
Authorised on behalf of Natural Resources Wales

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Trwyddedu Gwasanaeth, Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Permitting Service, Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
www.naturalresourceswales.gov.uk Correspondence welcomed in Welsh and English

Schedule

1. OPRA Profile

Please provide an updated electronic copy of the OPRA spreadsheet for the installation. The updated spreadsheet must include the revised emissions profile for the site following the issue of variation notice EPR/RP3133LD/V013.

Our current OPRA spreadsheet template entitled “OPRA Installations 2016” can be found at the following link on the Natural Resources Wales website: <https://naturalresources.wales/about-us/what-we-do/how-we-regulate-you/our-charges/?lang=en> A link to the relevant Environment Agency guidance on how to complete an OPRA spreadsheet, which we are continuing to follow, can also be found as link on the same webpage.

2. Variation application supporting document – Higher volatile matter coal use

- A) Page 4 of the application supporting document (ASD), explains that additional dust suppression systems have been identified as necessary at potentially high dust generation areas. Please provide a written list and description of these areas. Please also describe what specific measures are being implemented to suppress dust in these high dust generation areas.
- B) Page 4 of the ASD states that the existing vacuum cleaning plant is to be extended to enable cleaning of more of the fuel route. Please confirm that there are no release points associated with the vacuum cleaning plant or increases in proposed emissions to air.
- C) Page 4 of the ASD proposes out of service mill drum rotation activated by carbon monoxide (CO) detection to prevent coal self-heating in mill. Please confirm and justify whether routine out of service mill drum rotation has been considered as a more robust fire prevention measure, as an alternative to out of service mill drum rotation activated by CO detection.
- D) Page 4 of the ASD explains that dynamic classifier speeds will be lowered in order to maintain the required throughput and achieve the required Pulverised Fuel (PF) fineness for combustion of High Volatile Matter Coal (HVMC). This will increase the particle size distribution. In view of this, please confirm whether the PF particle size distribution changes will impact on the Continuous Emissions Monitor (CEM) set up for dust and therefore require recalibration of the CEM.
- E) Page 5 of the ASD states that:

“the proportion of NO:NO₂ is expected to remain similar”.

Please explain whether the NO:NO₂ ratio will be reconfirmed by measurement during commissioning of each upgrade unit?

- F) Figure 1 on Page 6 of the ASD shows that the projected oxides of nitrogen (NO and NO₂, expressed as NO₂) (NO_x) emission levels from converted units 7 and 8 are higher than the sector Best Available Techniques (BAT) monthly average Emission Limit Value (ELV) of 450 mg/m³, although it is noted that the station stack emissions with Unit 9 in operation will achieve the sector BAT ELV during the Transitional National Plan (TNP). Please explain what measures are proposed for implementation during the TNP to enable emissions below the sector BAT ELV to be achieved without Unit 9 in operation?
- G) Page 7 of the ASD states that no significant change in carbon monoxide emissions is expected from the change to HVMCs. Please provide data from current operation and the HVMC firing trials to demonstrate that CO emissions will remain comparable to current levels.
- H) Table 1, on page 7 of the ASD provides an example of the trace element analysis in typical HVMC compared to that found in typical welsh coal. Please provide trace element composition data for proposed HVMC delivered to the installation consistent with data currently required by the environmental permit, i.e. All List I and List II elements liable to be present plus selenium, (including iron, aluminium, molybdenum, uranium, beryllium, tin, cobalt, titanium and thallium).
- I) Table 1, on page 7 of the ASD provides an example of the trace element analysis in typical HVMC compared to that found in typical welsh coal. Please provide evidence to demonstrate that the typical Welsh coal trace element data presented in the table are consistent with the levels used to assess seawater discharge impacts in the original permit application.
- J) Please provide ash quality data demonstrating that trace element data currently monitored by the quarry landfill permit are consistent with current ash levels, i.e. mercury, cadmium, lead, arsenic, chromium, molybdenum, boron, selenium. Table 2 on page 8 of the ASD does not include data about these parameters. In addition, please refer to the ash quality data on these additional parameters to justify whether or not a review of the hydrogeological risk assessment is required.
- K) Section 2.13 “Noise”, on page 9 of the ASD, states that:
- “There are no expected changes in noise as a result of the plant modifications to allow burning of HVMCs”.
- Please provide details of proposed controls and any necessary communications with residents in relation to potential increases in steam safety valve venting during commissioning of the upgraded plant.

L) Section 2.14 “Monitoring”, on page 9 of the ASD states that:

“Once the plant has been fully commissioned a review will be required to determine if a new QAL test will be required due to the reduction in NO_x emissions from the stack”

Please confirm whether dust and SO₂ as well as NO_x CEM re-testing will be undertaken if necessary due to changes in emission levels associated with the conversion to HVMC firing.

M) Section 4 of the ASD provides a justification of the option choice for the installation in terms of plant modifications. Please provide a sensitivity analysis of the options appraisal outcome to key parameter assumptions, providing justifications where necessary, including the LNBo NO_x levels achieved <400 mg/m³, Opex, HVMC, air staging plates and load factor.

End of Schedule.