

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

Site	Aberthaw Power Station	Permit Ref	RP3133LD	
Operator/Permit holder	RWE Generation UK plc			
Regime	Installations			
Date of assessment	29/06/2018	Time in	10:00	Out 15:00
Assessment type	Report/Data Review			
Parts of the permit assessed	Emissions, noise, abatement			
Lead officer's name	Leakey, Antony			
Accompanied by				
Recipient's name/position	Richard Powell/ Station Chemist	Date issued	27/07/2018	

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - General Management - Management system and operating procedures	A	
	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
E1 - Emissions - Air	A	
E3 - Emissions - Surface water	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	C3	3.5.1

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	1	Total compliance score (see section 5 for scoring scheme)	4
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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

Aberthaw Power Station site visit and report review Q1 2018

Site Visit - 29 June 2018

Oil interceptor inspection and cleaning

A review of documents covering the oil interceptor and skimmer maintenance regime was undertaken. The daily check of the interceptor for contamination does not have criteria set.

The oil mop system is covered by a preventative maintenance routine, although the efficacy of the current inspection, cleaning and maintenance regimes may not provide sufficient protection and improvements or changes to frequency may be necessary.

ACTION: RWE to review the need for oil interceptor daily check criteria and review the periodic maintenance requirements of the interceptor and oil mop system by 30 September 2018.

Coal diet trials

Operation during January-March 2018 has continued with a 50/50 blend of bituminous coal and residual semi-anthracite stock. Some cold weather operation was undertaken as well as continuing commissioning and optimisation runs.

Monthly mean NO_x emissions during February and early March again approached the ELV even when allowing for the measurement uncertainty. The relatively low number of run hours during the period will have increased the monthly average during days of high emissions. Examination of the plant data indicate that high emissions hours were associated with high load operation during cold weather periods using the most reliable fuel blend to ensure security of supply and some commissioning runs at low load when mill problems were experienced. Unit 9 was also in operation when required to bring average station NO_x emissions down. This indicates that there was little that could be done to reduce emissions further while bituminous coal firing continues to be optimised.

The high monthly mean NO_x emissions are not a breach of the ELV and future optimisation of the station using bituminous coal will ensure that such approaches to limit are minimised and avoided where possible.

Opportunities to optimise NO_x emissions reduction will be unlikely until autumn 2018, when limited runs are planned to meet contract obligations

Dust deposition

Higher than normal dust deposition results were reported for the two quarry monitoring locations during February 2018. The composition analysis and optical microscope assessment of these results suggests that most material was derived from natural vegetation, although some ash was present in the quarry south sample, indicating that the limited operations during the winter can still

give rise to fugitive dust emissions.

A trial using a polymer to seal coal stock surfaces on the high volatile coal group was not taken forward.

Boiler House Panel Replacement

The noise attenuation assessment supporting the replacement of the wired glazing panels has been reviewed. The assessment outcome is dependent upon the STC (sound transmission class) of the old wired glass panels and the actual noise levels inside the boiler house.

An STC of 27 dB(A) is taken for glass panels, but justification for adopting this value is not provided. What glass thickness is currently present and does the STC value adopted take into account the wired construction? For example, 6 mm wired glass will achieve around 32 dB(A).

The actual noise level inside the boiler house will also have a bearing on whether the noise level will be discernible at the nearest sensitive receptor. Discernibility at the sensitive receptor is potentially an issue at higher internal noise levels and the potential difference between the current wired glass performance and single skin steel is up to 8 dB, which is clearly distinguishable.

Depending upon the actual internal noise levels in the station building the receptor levels could be over 50 dB, which may be distinguishable above ambient background.

NRW considers that the current proposals present a potential risk of increased noise impact off site, particularly in the context of intermittent station operation, which may emphasise any change in noise levels. A more rigorous assessment to confirm that off-site noise levels will be acceptable is considered to be necessary.

ACTION: RWE to undertake a more detailed assessment to show that replacement boiler house panels will not increase off site noise levels unacceptably.

LCP Bref

Compilation of responses to the Regulation 61 notice requiring information on compliance with the BAT conclusions is progressing.

Clarification is needed of whether certain operational problems resulting in FGD bypass should be considered "other than normal operating conditions". These aspects will need to be agreed with all the UK regulators. However, NRW is currently of the view that if abatement is possible then OTNOC is not appropriate.

It is accepted that seawater intake concentrations are likely to be of significance for all FGD discharge parameters and may need to be subtracted from discharge emissions when checking compliance with the BAT AELs. However, this will have implications for dealing with measurement uncertainties.

Improvement Condition IC41 & IC42

The interim commissioning report submitted in response to IC41 following the fuel switch to bituminous coal is noted. The details of the plant issues affecting unit 7 should be included in the final report along with pre-conversion noise levels for comparison. NRW acknowledges that a final version of the report will only be possible if sufficient run time is viable during October 18 to April 2019.

The revised accident management plan submitted in response to IC42 following the fuel switch to bituminous coal is noted and this condition is considered completed. A public register summary of the changes made to the plan as a result of the fuel conversion is required.

ACTION: RWE to submit public register summary of the changes made to the accident

management plan.

Consideration should be given to waste disposal implications arising from actions to deal with inventories of mills or silos that are on fire if the coal cannot be reused.

Emissions review

The station has continued to operate intermittently until the end of March 2018 and has now entered a summer cold period when operation will only occur in response to system stress events.

It is noted that visual checks used for suspended solids and hydrocarbon oil parameters for releases from W1 during February were not followed up by laboratory analysis of the samples. This was an operational oversight due to the intermittent nature of discharges from this release point. Steps have been taken to ensure that samples are analysed in future.

This is a minor impact category 3 breach of permit point source monitoring condition 3.5.1 due to the limited scope for significant hydrocarbon or solids discharges from this location following visual samples checks.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033691**

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Operator/Permit holder	RWE Generation UK plc	Date	29/06/2018

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			
G1	C3	Review training refresher needs relating to occasional sampling and analysis.	31/10/2018

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.