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SEVERN POWER STATION ENVIRONMENTAL RISK ASSESSMENT

RAMBOLL

SEVERN POWER STATION
ENVIRONMENTAL RISK ASSESSMENT

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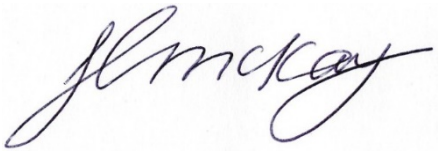

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CONTENTS

APPENDICES

1. INTRODUCTION

Ramboll UK Limited (Ramboll) was commissioned by Severn Power Limited (Severn Power or the 'Client') to prepare an environmental risk assessment for Severn Power Station, West Nash Road, Nash, Newport, Gwent, NP18 2BZ (the 'facility' or the 'site').

1.1 Environmental Permit Obligations

Severn Power Station has operated under a Part A(1) Environmental Permit (EP) since April 2010 (EP reference EPE/HP3737UE/V009). Section 3.1.3 of the EP stipulates the following requirement:

Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

Natural Resources Wales (NRW) Environmental Permitting Regulations H1 Guidance states the following with regards to monitoring requirements:

If you believe we should not require periodic monitoring of groundwater and soil as a condition in your permit you should justify this as part of your environmental risk assessment in terms of a systematic appraisal of the risk of contamination[6]. We will expect you to review this justification during the life of the permit.

The reference (6) is to Article 16(2) IED. This states that: *if the operator can demonstrate that in practice the risk of contamination is negligible, then the Competent Authority (CA) can decide that such monitoring is not required or that it can be carried out less frequently.*

1.2 Background

Severn Power Station is a gas-powered Combined Cycle Power Plant (CCPP) which was constructed in 2009 and has always operated under an EP. The facility includes two identical gas turbines and two steam turbines each operating on a single shaft. Both turbines drive a common generator to produce electricity for direct delivery via the National Transmission System.

The facility was operated by Calon Energy with Siemens being responsible for all plant under an operations and maintenance (O&M) contract. Calon Energy went into administration in 2020 and the facility has ceased production since August 2020. Activities at the facility are currently limited to routine maintenance and operational activities only.

An Application Site Condition Report (SCR) was produced for Severn Power Station in March 2009[1]. The SCR details the baseline ground conditions prior to construction of the facility. The EP application documents produced by RSK Group included a raw materials risk assessment within Table 2.3 of Section 2 of the application. A copy of the SCR and Section 2 of the EP application have been provided to Ramboll and relevant details are referenced in this report.

1.3 Objectives and Scope

The objective of this risk assessment is to establish the potential for soil or groundwater contamination as a result of operations at the facility since the Part A(1) Environmental Permit (EP) was issued in April 2010.

This environmental risk assessment is structured as follows:

[1] Severn Power Station – Site Condition Report; RSK Group, dated March 2009, ref: 44/0021/4/Rev02

- Section 2: Description of the site operations including storage and handling of hazardous materials and a summary of the site's environmental setting.
- Section 3: Identification and consideration of potential sources and pathways of contamination and screening of environmental risks.
- Section 4: Description of the risk assessment methodology.
- Section 5: Assessment of the risks including description of measures in place to control identified risks.
- Section 6: Provides the conclusions of the environmental risk assessment.

2. SITE DESCRIPTION

2.1 Site Setting

The Severn Power Station facility is located at National Grid Reference 332460, 183680 and covers an area of approximately six hectares. The facility is located within part of the wider Uskmouth Power Station site which was a former coal fired power station and is currently not operational. The facility was constructed within the site of the former 'Uskmouth A' power station which was demolished and later replaced by 'Uskmouth B' power station which is located immediately east of the facility.

The facility and wider power station infrastructure are located on the south side of the confluence of the River Usk and the Severn Estuary on reclaimed land within low lying salt marsh levels (forming part of the Caldicot Levels). Site locations plans are provided within the SCR.

2.2 Facility Operations

The following information was derived from a site visit undertaken on 29th September 2021 by Jo McKay of Ramboll and from discussions and documentation provided by Craig Scott (Interim Plant Manager for the facility).

Figures showing the location of the site, site boundary and layout are provided in the SCR. Photographs taken during the site visit are presented in Appendix 1.

2.2.1 Storage of Chemicals and Hazardous Substances

The main raw materials used and stored at the facility include diesel, transformer oils (PCB free), lubricating and hydraulic oils, glycols, ammonia and other chemicals primarily for water treatment and cleaning.

Underground Storage

No underground bulk storage of raw materials takes place at the facility. The following underground infrastructure is in place:

- 250m^3 neutralisation pit which accepts effluent from the water treatment plant and condensate polishing plant (refer to Section 1.2.4);
- 2 x 30m^3 underground bulk effluent storage tanks which store ammoniated effluent from the MAJ vacuum pump system. The effluent is treated prior to disposal off-site via tanker. The underground tanks are double skinned and have a leak detection system and level monitor which was integrated into the Distributed Control System (DCS) for the plant;
- oil collection pits which are concrete lined and used for oil separation from roads, transformers, gas and steam turbine building floors. The collection pits were designed so that in the event of a spillage, contaminated liquids (including oils, fire fighting water or polluted surface water run-off) will collect in the pits without discharge to the drainage system; and
- glycol collection pits which are concrete lined. Any glycol which is captured in the pits is contained and would be removed via tanker for off-site disposal.

Above Ground Storage Tanks (ASTs)

ASTs present at the facility are summarised in Table 2.1 below.

Table 2.1: Summary of Above Ground Storage Tanks

Tank Name/No.	Contents & Capacity	Location	Construction and Containment
1 and 2	Ammoniated effluent 50m^3 each	External	Used to collect effluent which is not suitable to be discharged to surface water via the neutralisation pit. The effluent is collected by tanker for off-site disposal. The tanks are equipped with level guages and are located inside a bund.
3 and 4	Lubrication oil 40m^3 each	Inside buildings	Provides oil for the steam turbine system. Located internally and within a bund.
5	Suphuric acid 10m^3	Inside building	Located internally and within bunds. The tanks form part of the water treatment plant system. The tanks have level transmitters and overfill alarms. The fill points are provided with secondary containment and positioned over hardstanding.
6	Caustic Soda 10m^3		
7 and 8	Diesel 2,800 litres each	Within containers	Provide fuel for the emergency generators. Equipped with level control and low level alarms and located inside the generator containers.
9	Diesel 1,500 litres	Inside building	Provides fuel for the emergency fire water pump. Double skineed construction.
10	Diesel 2,000 litres	External	Used for refuelling vehicles. Steel and double skinned construction.
11 and 12	Hydraulic Oil 800 litres each	Inside building	Located internally and inside a dedicated metal container. Provided with leak detection and located above a spill tray inside the container.
13 and 14	Hydraulic Oil MBX 400 litres each	Inside building	Located internally and inside a dedicated metal container. Provided with leak detection and located above a spill tray inside the container.
15 and 16	Hydraulic Oil LBF 250 litres each	Inside building	Located internally and inside a dedicated metal container. Provided with leak detection and located above a spill tray inside the container.
17	Demin Plant Effluent (non-ammoniated) 300m^3	External building	Located in above ground concrete tank. Automatically monitored, neutralised and discharged.

In addition to the above listed tanks, there are also water holding tanks present at the facility which hold mains fed water and demineralised water.

All of the tanks and process lines have above ground pipework and the tanks are equipped with level gauges which are monitored via the DCS. Regular visual inspections of the tanks and bunds takes place as part of routine operational procedures. During the site visit there was no evidence of

staining on the hardsurfaced ground where bulk storage tanks are positioned and no leak or spillage incidents which have resulted in a discharge to ground were reported to have occurred.

Spill kits stations are located around the facility where bulk storage takes place.

2.2.2 Other Bulk Storage

Other bulk storage which takes place at the facility primarily includes the following:

- ammonia stored in 1,000 litre IBCs or 200 litre drums. These are stored in dedicated hardsurfaced areas and are provided with secondary containment;
- glycols stored in 1,000 litre IBCs; and
- 200 litre drum storage of oils, acids and alkalines.

During the site visit, bulk storage was observed to primarily take place outside of the water treatment plant building or within a dedicated covered area. Due to current scaled back operations only a limited amount of bulk storage currently takes place. Approximately 12 drums and six IBCs were observed to be stored at external areas of the site, all located on drip trays and on hardsurfacing. No significant staining was observed on the concrete hardstanding at these areas.

2.2.3 Waste Storage and Disposal

Limited amounts of waste are reportedly generated by the site and all solid waste is sorted and recycled where possible. No issues with waste management were identified during the site visit and housekeeping appeared to be good. No visual evidence of staining or leaching from waste storage areas onto unsurfaced ground was noted.

2.2.4 Water, Wastewater and Drainage

The drainage infrastructure was installed when the power station was constructed in approximately 2008. The drainage system includes the following closed systems:

1. Surface water drainage – run-off is discharged to a 2,500m^3 capacity holding pond via an oil interceptor. The collected water is released to the River Usk as a permitted discharge at high tide.
2. Oily water / wastewater drainage – run-off from transformers, water collected in sumps in the buildings and auxiliary boiler blow-down passes through an oil interceptor into two 150m^3 wastewater holding ponds. The water is then released to the River Usk as a permitted discharge.
3. Chemical drainage – drainage from the water treatment plant and condensate polishing plant is directed to the neutralisation pit for monitoring and treatment (pH and ammonia) prior to discharge to the River Usk as a permitted discharge.
4. Foul sewerage drainage – sanitary effluent (toilets and shower facilities) is directed to a below ground sanitary treatment plant. The treated foul drainage is ultimately released to the River Usk as a permitted discharge.

A CCTV survey of the entire drainage system has not been carried out at the facility. The system was installed in approximately 2008 and is less than 15 years old, and accordingly, the integrity is expected to be good. No significant repairs have been required since operations began and according to facility personnel, there have been no ruptures or leaks to the drainage system which may have resulted in a loss to ground.

There are no direct discharges to ground other than rainwater run-off at gravel surfaced areas of the site, which are located away from the operational areas.

No leaks or spillages to ground were reported to have occurred since operations began and the UK Pollutant Release and Transfer Register (PRTR)[2] does not hold any records of pollutant releases to soil or water for the facility since the records began in 2010.

2.3 Environmental Setting

2.3.1 Geology and Hydrogeology

According to the BGS online Geology of Britain Viewer, the geology beneath the site is understood comprise:

- superficial Tidal Flat deposits (clay and silt) – classified as unproductive strata; underlain by
- bedrock geology of Mercia Mudstone – classified as a Secondary B Aquifer.

Previous investigations carried out prior to construction of the facility (as described in the SCR) recorded made ground including pulverised fuel ash (PVA), demolition rubble and cohesive and granular material up to 11.3m depth beneath the site.

The underlying natural geology was described as cohesive alluvium comprising clay and silt underlain by granular alluvium comprising silty sand, which was further underlain by sandy gravel (interpreted as river terrace deposits).

Groundwater was recorded as being present in the made ground at variable depths from 1.45m to 8.9m, within the underlying superficial deposits and within the bedrock mudstone. Groundwater within the superficial deposits was reported to be tidally influenced.

The SCR reported that there were no licensed groundwater abstractions within a 1km radius of the site. The site is not situated within an NRW designated groundwater Source Protection Zone.

2.3.2 Hydrology

The facility is located at the confluence of the River Usk and the River Severn. Surface water run-off and treated process wastewater is discharged to the River Usk, which is allowed under the conditions of the EP. Surface water and treated wastewater is discharged via above ground pipework during high tide times.

According to NRW flood maps, the facility is not located in an area at risk from flooding. Areas at the boundary of the facility (i.e. non-operational areas) are designated as being of low to medium risk of flooding from the sea (between 1 in 1000 and 1 in 200 chance of flooding and between 1 in 200 and 1 in 30 chance of flooding).

2.3.3 Ecology

The facility is not located within a statutory designated ecologically sensitive site. A review of the MAGIC database identifies the following statutory sensitive sites located in close proximity of the facility:

- River Usk – a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC);
- Severn Estuary – a Ramsar site, SSSI, SAC and Special Protection Area (SPA);

[2] https://www.gov.uk/guidance/uk-pollutant-release-and-transfer-register-prtr-data-sets

- Gwent Levels (a SSSI); and
- Newport Wetlands – a National Nature Reserve and SSSI.

3. IDENTIFICATION OF ENVIRONMENTAL RISKS

3.1 Source-Pathway-Receptor Concept

In order for pollution to have an impact on the environment, a pollution linkage must be present which relies on the Source-Pathway-Receptor concept.

A "pollution linkage" requires the following:

i) A "source" is a substance which is in, on or under the land and which has the potential to cause significant harm to a relevant receptor, or to cause significant pollution of controlled waters;

ii) A "receptor" is something that could be adversely affected by a contaminant, for example a person, an organism, an ecosystem, property, or controlled waters; and,

iii) A "pathway" is a route by which a receptor is or might be affected by a contaminant.

Identification of the source, pathway and receptor enables management interventions to be made to manage the environmental risks and avoid pollution reaching the receptor.

In this section the potential sources (environmental risks) of pollution to soil or groundwater at the facility are identified and screened for their significance, and the potential pathways and receptors are identified.

3.2 Environmental Risks

The operator is required to identify the environmental risks (sources of potential contamination) which could occur during the operation of the facility, including any risks which may arise from accidents.

A raw material risk assessment was carried out for the facility as part of the EP application which assessed that the risk from all storage areas was low.

Using Environment Agency online guidance[3] the following potential risks have been considered as part of this assessment to soil and groundwater:

- any discharge (e.g. sewage or trade effluent to surface water or groundwater);
- accidents; and
- uncontrolled and unintended ('fugitive') emissions.

Based on the guidance summarised above the potential environmental risks to soil or groundwater have been identified and have been determined either applicable or not applicable based on the potential environmental impact arising from the risk. A summary of these risks is presented in the table below which also provides justifications where risks are considered to be insignificant and therefore not considered further in the risk assessment. The risks which have been identified as significant have been included in the risk assessment in Section 4 of this report.

Table 3.1: Screening of Environmental Risks to Soil and Groundwater

[3] https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site

Environmental Risk	Applicability	Justification
Controlled discharges to surface waters	Not Applicable	Controlled discharges of surface water run-off, treated process wastewater and foul sewerage takes place at the facility. The discharges to the River Usk are allowed under the conditions of the EP. The controlled discharges are directed to the River Usk via the drainage network and concrete lined holding ponds and do not include discharges to ground. This risk has not been considered for further assessment.
Controlled discharges to groundwater	Not Applicable	There are no controlled discharges to groundwater at the facility. This risk has not been considered for further assessment.
Accidents	Applicable	Plant or equipment failure: the failure of plant or equipment may result in an incident occurring which could potentially impact on the environment. Material handling and storage: raw materials are stored on-site in bulk. There is the potential for accidents (e.g. spills, leaks etc.) to occur during the filling of bulk storage vessels and the movement of materials, which may result in contaminated run-off. Vandalism: damage / theft of externally located equipment and raw products.
Fugitive emissions	Applicable	Potential for the drainage system to become blocked or damaged resulting in an uncontrolled release of process wastewater to ground. A number of collections pits, sumps and holding ponds are also in use at the site, which if damaged could result in a release to ground.

3.3 Identification of Potential Pathways

The potential pollution pathways between the sources identified in Section 1 (excluding those which have been screened out) and the receptors are summarised in Table 3.2 below.

Table 3.2: Potential Pollution Pathways

Source	Potential Pathway	Receptor
Accidents: including plant or equipment failure; materials handling; vandalism; operator error; fire and flooding.	• Over site surfaces • Via the site drainage systems	• Soil • Groundwater • Surface water (River Usk) via groundwater migration pathways
Fugitive Emissions: including surface water run-off and releases via the drainage.		

4. RISK ASSESSMENT METHODOLOGY

The risk assessment provides a simple representation of the hypothesised relationships between contaminants, pathways and receptors. This allows the identification of potential contamination linkages and, therefore, an interpretation of the potential for pollution to occur at the facility or within the vicinity of the site as a result of the activities at the facility.

The potential for pollution to occur at the site is determined by assessing the likelihood of an identified receptor being exposed to pollution emanating from a source at the facility and the resultant consequences of any such exposure. In determining the likelihood and the consequence of a pollution exposure the risk management techniques which are used at the facility, and the effect on any such exposure are considered. Where the risk management techniques are considered to have a mitigating impact the resultant overall likelihood of the pollution exposure occurring and its consequences on a receptor are lowered.

4.1 Assessing Likelihood and Consequence

Within the risk assessment each hypothesised relationships between contaminants, pathways and receptors is assessed to determine the likelihood of the receptor being exposed to pollution and the consequences of exposure using the rankings listed in the tables below.

Table 4.1: Likelihood Rankings

Very Low	Low	Medium	High
Exposure to pollution is considered to be *highly unlikely*.	Exposure is considered to be *unlikely*.	Exposure is considered to be *likely*.	Exposure is considered to be *highly likely* to occur.

Table 4.2: Consequence Rankings

Very Low	Low	Medium	High
No impact or imperceptible impact on the receptor.	Low level impact easily and quickly mitigated or may not require any intervention to rectify any impact.	Moderate impact which will not be rectified without some mitigation / intervention.	High impact requiring significant intervention / mitigation and may have caused irreparable damage to the receptor.

4.2 Assessment of Risk

Following the determination of the likelihood and consequence rankings for the hypothesised relationships developed using the source-pathway-receptor concept the matrix in the table below is used to determine the overall risk of the pollution exposure occurring.

Table 4.3 Risk Matrix

		Likelihood			
		Very Low	**Low**	**Medium**	**High**
Consequence	**High**	Low	Medium	High	High
	Medium	Low	Medium	Medium	High
	Low	Low	Low	Medium	Medium
	Very Low	Very Low	Low	Low	Low

5. RISK ASSESSMENT

Table 5.1 below present the potential sources of pollution, receptors and potential pollutant linkages to soil and groundwater to assess the risks.

Table 5.1: Source-Pathway-Receptor Risk Assessment

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	**Receptors**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Accident (Plant and Equipment): • Failure in containment of above ground storage tanks and associated plant and equipment (valves, pipes etc.). • Overfilling of tanks or other spillage / operator error during material handing such as filling or decanting from tanks or other bulk storage (i.e. drums and IBCs).	*Ground* *Groundwater* *Surface Water (River Usk)*	Over site surfaces Via the drainage systems	• Tanks are provided with secondary containment and the majority of tanks are additionally located inside of buildings or containers. Sumps are located inside the buildings to capture spillages in the event of an accident. • In the event of an oil spillage, contaminated liquids such as oil from transformers or polluted rain water would be collected in the oil collection pits. • The two external effluent tanks are located within a concrete bund which would capture spillages in the event of an accident. • Tanks are equipped with level gauges which are constantly monitored via the DCS. • Facility personnel maintain an asset list of every plant item and a schedule of their regular inspections and maintenance through their electronic WebBFS Plant Management system. Regular visual inspections of the tanks and bunds takes place as part of routine operational procedures. • Spill kit stations are located around the facility where bulk storage takes place. • All tanks and process lines have above ground pipework. • The facility has a Site Emergency Plan in place (ref. HSEP-02.001, dated 15th February 2018) which provides procedures to manage emergency situations. • There have been no incidents reported during the lifetime of the EP that has resulted in a release to ground.	Low	Low	Low
Accidents (Vandalism): • Damage / theft of externally located equipment / raw products.	*Ground* *Groundwater* *Surface Water (River Usk)*	Over site surfaces Via the drainage systems	• All visitors and contractors enter the facility via the shared security entrance to Uskmouth Power Station. • CCTV covers the site. • The size of the facility and low staff numbers means that any person trespassing on the premises would be easily identified and escorted off-site.	Low	Low	Low
Accidents (Fire and Flooding): • Fire and arson attacks / flood events.	*Ground* *Groundwater* *Surface Water (River Usk)*	Over site surfaces Via the drainage systems	• The facility has a Site Emergency Plan in place (ref. HSEP-02.001, dated 15th February 2018) which provides procedures to manage emergency situations. these situations include fire, explosion, major chemical spillage, bomb threat, flood events and suspected gas leaks. • The operational areas of the facility are located in an area at low risk of flooding from the sea. There have been no flood events since operations began. • A fire water storage tank is present at the site and a sprinkler system installed. • In the event of a fire, contaminated fire fighting water would be collected in the oil collection pits. • Firefighting equipment is available on site for handling small fires. • A review of the fire safety arrangements is routinely carried out by South Wales Fire and Rescue Service.	Low	Low	Low
Fugitive Emissions (Surface Water Run-Off): • Surface water run-off from external areas including bulk storage areas.	*Ground* *Groundwater* *Surface Water (River Usk)*	Over site surfaces	• Surface water run-off from external areas is directed to a closed system which passes through an oil interceptor prior to discharging into the concrete lined holding pond, prior to controlled and permitted releases to the River Usk. The interceptor is regularly inspected and maintained in accordance with routine operational procedures. • Bulk storage areas are located on concrete hardstanding and fugitive emissions would be directed to the collection pits which are equipped with shut-off valves.	Low	Low	Low

			• Rainwater run-off can enter gravel surfaced areas of the site. These are located away from the operational areas. No leaks or spillages to ground were reported to have occurred since operations began.			
Fugitive Emissions (Below Ground Infrastructure): • Releases to ground via below ground structures and underground drainage.	*Ground* *Groundwater* *Surface Water (River Usk)*	Via the drainage systems	• The drainage system was installed in approximately 2008, is less than 15 years old and the integrity is expected to be good. No significant repairs have been required to take place since operations began and it was reported that there have been no ruptures or leaks to the drainage system which may have resulted in a loss to ground. • The collection pits and sumps are concrete lined and routinely inspected. • The two underground ammoniated effluent tanks are double skinned and have a leak detection system and level monitor which was integrated into the DCS.	Low	Low	Low

6. CONCLUSION

Potential risks to the environment from permitted operations have been identified as including:

- Hazardous raw materials stored at the site primarily includes oils, diesel, acids and alkalines, ammonia and glycol. These are stored in either above ground storage tanks or within drums and IBCs.
- Waste process water is produced at the site which includes ammoniated effluent stored in above ground tanks and process water (including surface water run-off, drainage from the water treatment plant and condensate polishing plant and foul sewerage drainage) which is treated, stored and ultimately discharged to the River Usk as a permitted discharge in agreement with NRW.

The potential risks to soil and groundwater have been assessed in this Environmental Risk Assessment, including theoretical risks from accidents at the facility (including from plant and equipment failure, material handling, vandalism, operator error or from a fire or flood incident) or from fugitive emissions via the surface water run-off or from releases to the underground drainage system.

The risks to soil and groundwater with the current management controls in place have been assessed as low. The above and below ground infrastructure is less than 15 years old and was designed in a way that would minimise risks to the environment in the event of an accident or fugitive emission. Operational procedures include routine inspections of the infrastructure and a Site Emergency Plan is in place. Since operations began there has been no incidents which has resulted in a release of contamination to ground. There was no visual evidence of leaks or spillages during the site walkover and housekeeping was observed to be good.

Based on the outcome of this Environmental Risk Assessment and whilst current management controls remain in place, Ramboll does not consider there to be a requirement for periodic monitoring of groundwater or soil as a condition of the Environmental Permit. In the event that changes to operational procedures, bulk storage arrangements or below ground infrastructure significantly changes in the future, it is recommended that the Environmental Risk Assessment is reviewed accordingly.

APPENDIX 1
FIGURE

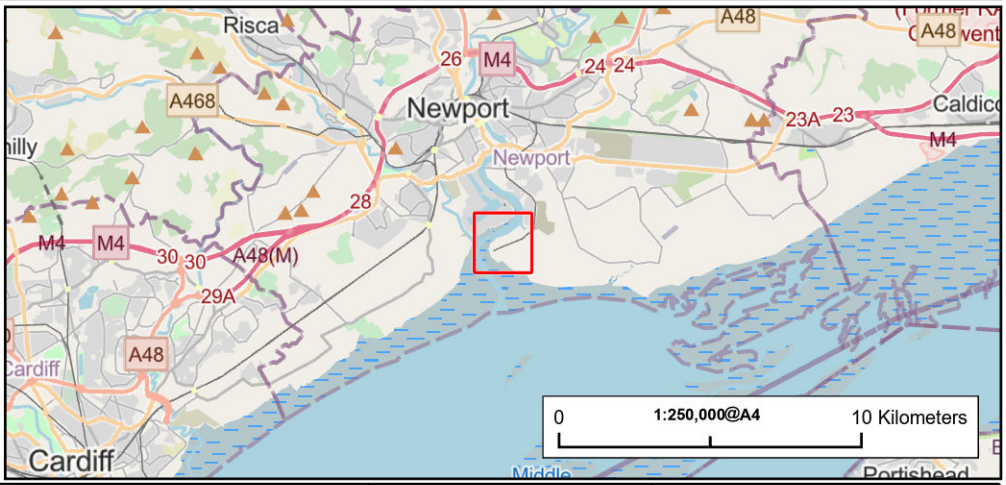

Figure Title: Figure 1: Site Location	Project Name: Severn Power Station, West Nash Road, Newport, NP18 2BZ	Date: October 2021	
		Scale: As shown	
Project Number: 1620012327	Client: Severn Power Limited	Issue: 1	Prepared By: BVK

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APPENDIX 2
PHOTOGRAPHIC LOG

Photo 1. Two ammoniated effluent storage tanks. Water holding tank in the background.

Photo 2. Fill points for the internal sulphuric acid and caustic soda tanks

Title:	Photographic Log	**Client:**	Severn Power Limited
Site:	Severn Power Station	**Date:**	September 2021

Photo 3. Example of floor sump inside of the water treatment plant

Photo 4. View of the neutralisation pit which accepts effluent from the water treatment plant

Title:	Photographic Log	**Client:**	Severn Power Limited
Site:	Severn Power Station	**Date:**	September 2021

Photo 5. Drum storage of oils, acids and alkalines

Photo 6. Example of spill kits in use at the site

Title:	Photographic Log	**Client:**	Severn Power Limited
Site:	Severn Power Station	**Date:**	September 2021

Photo 7. Lubrication oil tank located inside a bund which provides oil for the steam turbine system

Photo 8. Hydraulic oil tank location

Title:	Photographic Log	**Client:**	Severn Power Limited
Site:	Severn Power Station	**Date:**	September 2021

Photo 9. Surface water run-off holding pond

Photo 10. Double skinned diesel tank used for refuelling plant

Title:	Photographic Log	**Client:**	Severn Power Limited
Site:	Severn Power Station	**Date:**	September 2021