

Scottish Hydro Electric Power Distribution

Lerwick Power Station

Permit Variation

PPC/A/1008891 VAR02

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1 Non-Technical Summary of Determination

Provide a non-technical summary of the process and determination

SSE's Lerwick Power Station currently provides the majority of the Shetland Islands electricity generation using a number of diesel engines. The island's electricity system is in a period of change with the loss of generating capacity at Sullom Voe Terminal Power Station (SVT PS) and the impending connection of the island's distribution to the UK Mainland by subsea interconnector cable. To compensate for the removal of SVT PS contribution, SSE are installing three new low oxides of nitrogen (NOx) abated engines in Station A to make up for the initial shortfall in capacity and to provide future generating resilience should there be any issues with the distribution system. The addition of these new engines will shift the overall generating capacity at the station from high NOx emitting unabated engines to more efficient, lower emission ones. When compared to the historic emissions profile for the station, this will be a significant reduction in overall NOx emissions. However, when viewed against the current transitional mix of engine use where an abated Station A engine is supplemented by the unabated Station B engines (which emit through a much taller chimney), there could be some increase in potential ambient NOx concentrations at certain nearby receptors. The air quality impact assessment has shown that despite the lower stack height for the Station A engines and emission temperature, the relevant NOx air quality standards will not be compromised for the scenarios that the station is anticipated to operate in the near and foreseeable future.

Station A's air emission limits have been updated to reflect the addition of the new engines and to add the 1,500 operating hours per year restriction required by the Energy Efficiency Directive (EED) for standby electricity generating installations. The air emission sampling requirements, that verify compliance for the various combustion plant at the station, have been updated to reflect current and future operations.

The addition of the new engines will result in a significant reduction in noise impact from the station on the surrounding properties by using modern silencers for the engine intakes and chimneys. Station A's ventilation system is also being replaced with a modern system which will be fitted with acoustic absorbing panels to reduce noise escape from the engine hall. Several other escape points are being removed or improved to reduce the station's noise impact from its current "significant adverse effect" level to an acceptable degree.

The application also contains proposals to change the site's off-site ambient air monitoring provision and its current water emissions sampling. The ambient air monitoring has been reduced to focus solely on NOx as the emissions of SO2 and particulate have reduced significantly over the years due to changes in fuel standards and the use of new modern abated engines. The water sampling requirements and associated emissions limit values have also been revised to reflect current practice in the regulation of sewage discharges, sampling methods and upgrade of surface water discharge monitoring systems.

Glossary of Terms

AQS – Air Quality Standard
AQIA – Air Quality Impact Assessment
BAT - Best Available Techniques
BAT-C – Best Available Technique Conclusions
BOD - Biological Oxygen Demand
BREF – Best Available Techniques Reference Document
CO – Coordinating Officer
ELV – Emission Limit Value
EED – Energy Efficiency Directive
LPS – Lerwick Power Station
MCPD – Medium Combustion Plant Directive
MWth - Rated thermal input in Megawatts

SCR – Selective Catalytic Reduction
SVT PS - Sullom Voe Terminal Power Station
SIS - Small Isolated System
SSE – Scottish and Southern Energy

2 External Consultation and SEPA's response

Is Public Consultation Required?

(if no delete rows below)

Yes

Advertisement Check:

Date

Compliance with advertising requirements

Edinburgh Gazette

26Aug25

Compliant

Shetland Times

21Aug25

Compliant

No of responses received

None received

Summary of responses and how they were taken into account during the determination:

Not applicable

Summary of responses withheld from the public register on request and how they were taken into account during the determination:

Not applicable

Is PPC Statutory Consultation Required?

(if no delete rows below)

Yes

Food Standards Agency:

No response received

Health Board:

No response received

Local Authority

No response received

Scottish Water

Not applicable

Health and Safety Executive

No response received

NatureScot

No concerns raised as proposals will have negligible impact on water emissions and notes "net improvement compared to current position in emissions to air. Appropriate Assessment is therefore not required.

Discretionary Consultation required?

(if yes provide justification and details below, otherwise delete row)

No

Enhanced SEPA Consultation required?

(if yes provide justification and details below, otherwise delete row)

No

"Off site" consultation required

(if yes provide justification and details below, otherwise delete row)

No

Transboundary Consultation required?

(if yes provide justification and details below, otherwise delete row)

No

Is Public Participation Consultation Required?

(if yes provide justification and details below, otherwise delete rows below)

Yes

STATEMENT ON THE PUBLIC PARTICIPATION PROCESS

The Pollution Prevention and Control (Public participation) (Scotland) Regulations 2005 requires that SEPA's draft determination of this application be placed on SEPA's website and public register and be subject to 28 days' public consultation. The dates between which this consultation took place, the number of representations received and SEPA's response to these are outlined below.

Date SEPA notified applicant of draft determination

Date draft determination placed on SEPA's Website

Details of any other 'appropriate means' used to advertise the draft. Seek advice from the communication department	
Date public consultation on draft permit opened	
Date public consultation on draft permit consultation closed	
Number of representations received to the consultation	
Date final determination placed on the SEPA's Website	
Summary of responses and how they were taken into account during the determination:	
Summary of responses withheld from the public register on request and how they were taken into account during the determination:	
REMOVE THIS BOX FROM ANY VERSION OF THIS DOCUMENT TO BE PLACED ON THE WEBSITE OR PUBLIC REGISTER. RETAIN IN THE VERSION FOR THE WORKING FILE.	
Officer:	

3 Administrative determinations
Determination of the Schedule 1 Activity
No change
Determination of the Stationary Technical Unit to be permitted
Addition of three 13.6 MW engines to "A Station"
Determination of Directly Associated Activities
Addition of new abatement for the above engines
Determination of Site Boundary
None

4 Introduction and Background
4.1 Historical Background to the activity and variation
The SSE Lerwick Power Station (LPS) provides electricity generation for the Shetland Isles. The islands distribution grid is undergoing a period of substantial change with connection to the UK mainland by subsea cable, increased renewable generation and the cessation of electricity production at Sullom Voe Terminal Power Station (SVT PS). The latter is resulting in an increased need for additional generation at LPS to cover the loss of the SVT PS contribution to the islands electricity needs. Consequently, SSE are adding three new, Medium Combustion Plant Directive (MCPD) scale (between 1 to 50 MWth), diesel engines to LPS in Station A.

It should be noted that Station B is operated a Large Combustion Plant and is largely not affected by this determination, with the exception of its contribution in operating to the Energy Efficiency Directive operating hours restriction.

4.2 Description of activity

Generation of electricity using diesel engines

4.3 Outline details of the Variation applied for

- Addition of three 13.6MWth diesel engines
- Restriction of installation combustion plant operation once the station is operating as standby
- Changes to air emission monitoring to reflect current and future operations
- Revision of water emission limit values and associated monitoring
- Changes to ambient air monitoring

4.4 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.

None

4.5 Identification of important and sensitive receptors

The residential properties that could be affected by emissions from LPS are located to the south-west of the site. The closest receptor is 80m south of the site boundary.

The following ecological receptors are of note regarding the emissions from LPS:

- South Whiteness SSSI
- Catfirth SSSI
- Sandwater SSSI
- Aith Meadows and Burn of Aith SSSI

Other ecological designated areas have been screened out from air quality impact assessment due to their characteristics.

Officer:



5 Key Environmental Issues

5.1 Summary of significant environmental impacts

The key environmental impacts associated with this determination are:

- Air quality
- Noise

Other impacts are considered and are noted in this decision document, but these are the most significant.

5.2 Emissions to Air

Point Source emission to air:

5.2.1 Proposed change

The Shetland electrical distribution grid is under a period of significant change with the disconnection of Sullom Voe Terminal Power Station (SVT PS) from the islands grid and the connection of the island to the UK mainland by a sub-sea interconnector ("HVDC"). The closure of SVT power station results in a 20% loss of generation capacity to the grid itself but also a need to provide alternative security of supply to the Terminal. SSE undertook an assessment of the islands supply needs and concluded that additional generation capacity was necessary at LPS to cover the islands current needs and in the future should there be a subsea cable fault.

The addition of three new abated diesel engines to LPS Station A should result in a net improvement in air quality as these will be utilised instead of the current unabated engines. However, this will not be a

proportionate reduction in pollutant concentration as the Station A stacks are lower than the Station B stack (21m versus 70m). The use of abated engines offers around a ten times reduction in NO_x emissions for the Station A plant when old engines are compared to modern abated ones (1,850 mg/m³ versus 190 mg/m³ NO_x) which is achieved by the use of Selective Catalytic Reduction (SCR). The use of SCR also results in a reduction in particulate emissions due to the need to have cleaner gases to prevent fouling of the catalyst bed. The new engines operate to the emissions limits specified in the MCPD and relates to the BAT-AEL ranges for similar, but larger, plant in the Large Combustion Plant (LCP) BAT Conclusions. Alternative technologies (gas turbines, different speed engines and battery storage) have been considered and suitably discounted as being BAT.

5.2.2 Human health impact

The air quality impact assessment was undertaken using several different scenarios that reflect the transition that the station is currently undergoing. These have been adjusted to account for seasonal and daily changes in generation at the station and the units that are expected to operate. The following is a general outline of the station's merit order for certain situations and further detail can be found in the Appendix A of the AQIA:

- Historic operations – Station B Units 24 and/or Units 22/23 (all unabated) with Station A engines 3, 10 or 11 (unabated).
- Current operations – Unit 9 (abated), Station B Units 24 and/or Units 22/23 (all unabated) with Station A engines 10 or 11 (unabated)
- No contribution from SVT to grid and no HVDC connection (existing plant) – Unit 9 (abated), Station B Units 24 and/or Units 22/23 (all unabated) with Station A engines 10 or 11 (unabated) ("Case 1" – Increased duty for whole station due to loss of SVT)
- No contribution from SVT to grid and no HVDC connection (new plant) - Unit 9 and new Unit 2 (abated), Station B Units 24 and/or Units 22/23 (all unabated) with Station A engines 10 or 11 (unabated) ("Case 2" - Increased duty for whole station due to loss of SVT with change in operation due to addition of first new engine (Unit 2))
- Planned interconnector maintenance – All abated engines (2, 6, 7, 9) in summer ("Case 3").
- Prolonged interconnector failure – Unit 9, three new units (2, 6, 7) and part of full load from Unit 24 then Units 23/24 ("Case 3a").

Note: Abated refers to the new engines in Station A fitted with SCR abatement (Units 2, 6, 7 and 9). Unabated refers to older engines in either Station A or Station B.

Apart from the planned interconnector maintenance scenario, the annual and short-term Air Quality Standard (AQS) impact are of interest. In the event of a planned subsea cable outage, only the short-term AQS impact needs considered as the station will only be operating for a maximum of 4 weeks. The Air Quality Impact Assessment (AQIA) has shown that as expected the pollution profile has resulted in a net reduction in impact across most of the receptors for the scenarios compared to current operations. However, there are several receptor locations where the ambient air quality has for reduced for NO₂ but are still within the relevant air quality standards. These receptors are located closer to Station A and relates to the lower stack height and exhaust gas temperature that is caused by use of the SCR abatement. To prevent the reduction of ambient air quality at these specific locations either the stack heights would need to be raised, additional heat would need to be generated to boost the thermal buoyancy of the emissions or the rate of urea dosing for the SCR abatement would need to be significantly raised. Neither of these options are considered BAT for emissions that are going to meet the relevant AQS due to the additional associated cost or emissions. It should be noted that the air quality impact modelling is generally conservative in its findings. This has been supported by the site's ambient air sampling which is undertaken at a number of off-site locations. This data indicates that there has been no occurrence when the current emissions from the plant have impacted to compromise the NO₂ AQS, which prior modelling has indicated could be possible. Also of note, is that the modelling represents the worst-case scenario using the maximum permitted NO_x ELV (190 mg/m³) and the emissions testing during normal operation of the existing abated engine (Unit 9) is about 50% of that ELV.

This increase in localised NO₂, but still within the NO₂ AQS, should be set in context that compared to the historic station operating configuration modelling there has been a significant net improvement in air quality for all locations and that none of the scenarios are predicted to result in ambient air quality being compromised.

This change in emissions profile impacts on the current permit conditions for off-site ambient air monitoring. To confirm whether the change in emissions is valid, SSE have requested that the conditions covering the off-site monitoring are amended to reflect the change in station emissions profile. Refer to Section 5.9 of this decision document for further details.

The emission of other pollutants (particulate, SO₂ and VOCs) associated with the station's operations have been screened out as being insignificant from an air quality perspective.

5.2.3 Ecological impact

The AQIA has shown that the potential impact from nitrogen dioxide and nutrient nitrogen deposition has an insignificant effect on the natural receptors of note.

Fugitive emissions to air:

None – Emissions are only being emitted through stacks

Odour:

None – Good combustion should prevent the potential for odour release

5.3 Emissions to Water

Point Source Emissions to Surface Water and Sewer:

The application provides a review of the permit's water monitoring requirements as it has become apparent that the specified methods for sampling have been updated. The site's sampling data has also indicated that the suspended solid limit has been periodically breached. SSE investigations have found that the cause of these non-compliances has been due to an off-site source from Grimista Burn that discharges close to one of the site's discharge points. The application contains a revised sampling plan that reviews the potential sources of emissions from the power station and updates the sampling methods. Based on this submission the following changes have been made to the permit's water monitoring requirements:

Biological Oxygen Demand (BOD) – The ELVs and associated monitoring have been removed as the discharges from the site's septic tanks fall under the scope of a CAR Registration activity as there is less than 50 population equivalent (21 p.e.). The ELV for BOD have been removed and the equivalent CAR registration requirements have been added in their place to ensure an appropriate level of environmental protection (Condition 3.6.9).

The sampling location for the effluent treatment system has been moved to a location where the potential interference of seawater is minimised. This ensures that accurate data that reflects the operation of the effluent treatment is gathered.

Emission Point "W" which is the Station A surface water discharge point has been removed as the interceptor now has eco-sentry continuous monitoring that triggers an alarm should oil be accidentally realised into the drainage system. This system is also in place for Emission Point "Z" but point Z will be retained as it includes the discharge from the effluent treatment plant. Condition 3.6.9 applies to Emission Point "W" as a continuing limit on emissions.

Point Source Emissions to Groundwater:

None – No discharge to groundwater

Fugitive Emissions to Water:

None – Existing site infrastructure sufficient for the addition of these new engines

5.4 Noise

The three new engines will be installed with modern abated silencers serving the stacks and the air intakes. This will offer a significant reduction in noise emissions compared to the situation where the older existing engines have largely no abatement on the air silencers and the stack silencers are of an older design. Station A will also be fitted with a new mechanical ventilation that will extract heat from the engines. A number of fugitive noise emission points (louvres and windows) are being phased out and remaining ones having new acoustic silenced vents or triple glazed windows installed. The older engines will also be very unlikely to be used due to the use of the four modern new abated engines, combined with Station B being next in operating merit order, further reducing overall noise emissions.

The effect on the surrounding community will be that the current situation where the noise emissions from the station could have a “significant adverse effect” at some receptors (using the BS4142 assessment methodology) will be reduced a low adverse effect. The applicant’s proposals therefore represent BAT.

No changes to the station’s noise permit conditions are being made as the ongoing maintenance of this noise attenuation equipment will be managed through the site’s noise and vibration management plan requirement. This plan will be reviewed to comply with current Condition 3.1.3 as part of the new engine project.

5.5 Resource Utilisation

Water use

No change – New engines will be integrated into current seawater cooling system which is considered BAT.

Energy use and generation

As the installation has a thermal input greater than 20MW thermal and the addition of the three new engines represents a substantial change, the Cost Benefit Assessment (CBA) requirements of the Energy Efficiency Directive (EED) could apply. The CBA requires operators to assess whether it is feasible to utilise surplus heat. The Directive has an exclusion from this requirement if the installation is to be operating as a peak load or back-up electricity generating installation. SEPA has accepted SSE’s case that as the station is moving to standby duty, when the Shetland Islands distribution system is connected to the HVDC interconnector, that the cost of installing heat recovery is not viable both during the short period remaining when the station is still the islands main power supply and when in standby mode.

Installations which operate in standby mode are required by Article 14(6) of the EED to have their operation restricted to 1,500 operating hours per year, as averaged over a five-year period. Condition 3.5.21 places this requirement upon the Shetland Islands distribution system losing its Small Isolated System (SIS) status when connected to the HVDC cable. This condition is suspended during interconnector failure (Condition 3.5.21). Condition 3.12.5 requires SSE to report the cumulative concurrent station operating hours annually to SEPA.

Raw Materials Selection and Use

No change – No additional or increased volume of raw materials being held at the site

5.6 Waste Management and Handling

Waste Minimisation

No change – Current resource utilisation conditions are driving improvement

Waste Handling

No change – Current waste handling arrangements remain unchanged

Waste Recovery or Disposal

No change – Current waste management routes remain in place.

5.7 Management of the site

Environmental Management System

No change – One of the new engine types (Unit 9) is already in operation and so site has appropriate systems in place.		
Accidents and their Consequences		
No change – No additional raw material or waste handling facilities being added.		
Closure		
No change – Current conditions will ensure that the site decommissioning plan is appropriately updated.		
5.8 Site Condition report		
No change – No new substances being introduced and no change in inventory location.		
5.9 Monitoring		
Air		
5.9.1 Emissions monitoring		
<p>Emissions performance of the new engines will be monitored using the existing requirements as for Unit 9. The only change for all the abated plant is the addition of indicative NO_x monitoring to ensure that the urea dosing for the SCR abatement is operating correctly to achieve compliance with the NO_x and ammonia ELVs.</p> <p>Station A's monitoring requirements have been changed to reflect the decreased use of unabated engines and to account for significantly reduced operations once the island's distribution system is connected to the UK mainland. The current monitoring frequency requirements for the equivalent plant at Lerwick's sister station at Stornoway Battery Point have been applied to the unabated engines from issue of this variation notice (Condition 3.5.19). It will then apply to all abated engines when the system connection occurs (Condition 3.5.20). This prevents the need for testing to be undertaken unnecessarily and reflects the standby status of the operation of these engines in a proportionate manner. Table 4.2 has been replaced with two Tables (4.2A and 4.2B), the first covering current operations and the second outlining requirements during standby operation.</p>		
5.9.2 Off-site ambient air monitoring		
<p>The ambient air monitoring, which has been undertaken at a number of locations since the issue of the PPC permit, has not been reviewed to take account of the change in station operations. There have been a number of operational changes that have affected the emissions profile of the site:</p> <ul style="list-style-type: none"> • Introduction of the Sulphur in Fuels Regulations, which lowered the sulphur content of the gas oil and heavy fuel oil utilised. • The cessation of Medium Fuel Oil use in Station A, which lowered particulate and sulphur emissions. • Station B will cease utilising Heavy Fuel Oil when LPS moves to standby operation, which should lower particulate, sulphur dioxide and NO_x emissions • The use of the new abated engines in Station A will result in a significant reduction in NO_x and particulate emissions through the use of the SCR abatement. <p>SEPA has accepted SSE proposals to reduce the off-site monitoring requirements to focus solely on NO_x as the other pollutants being measured are no longer significant for the reasons highlighted above. Consequently, the measurement of smoke and SO₂ in the permit has been removed. The current conditions relating to off-site monitoring have been deleted and replaced with SEPA's standard conditions outlining the requirements and reporting frequency for NO₂ measurement (Conditions 3.4.1-3.4.5).</p>		
Water		
<p>The application also reviews the permit's water monitoring requirements as it has become apparent that the specified methods for sampling have been revised. The site's sampling data has also indicated that the suspended solid limit has been periodically breached. SSE investigations have found that the cause of these non-compliances has been due to an off-site source from Grimista Burn that discharges close to</p>		
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one of the site's discharge points. The application contains a revised sampling plan that reviews the potential sources of emissions from the power station and updates the sampling methods. Based on this submission the following changes have been made to the permit's water monitoring requirements:

Biological Oxygen Demand (BOD) – The ELVs and associated monitoring have been removed as the discharges from the site's septic tanks fall under the scope of a CAR Registration activity as there is less than 50 population equivalent (21 p.e.). This level of Authorisation does not require monitoring or ELVs for BOD and so has been removed from the permit. The visible discharge quality check required to verify compliance with Condition 3.6.9 is used to replace this.

pH, Oil in water, Suspended Solids, Total Residual Oxidant – Sampling methods have been updated.

The sampling requirements will also be changed when the site enters standby and a proportionate reduction in sample frequency has been placed. Table 4.6A covers the period until SIS cessation and Table 6.4B takes effect from that connection date. The frequencies have been set to correspond to that already in place for the sister station at Stornoway Battery Point (PPC/A/100889).

As noted in Section 5.3 above, monitoring relating to Emission Point number "W" has been removed due to the upgrade of the discharge monitoring system, which meets GPP3 "Use and design of oil separators in surface water drainage systems" standards.

Soil and Groundwater

No change

Waste

No change

5.10 Consideration of BAT and compliance with BAT-Cs if appropriate

The applicant's proposals can be considered as being BAT and they satisfy the minimum requirements of the Medium Combustion Plant Directive. BATC does not apply to this determination as it does not involve the operation of the Station B Large Combustion Plant.

6 Other Legislation Considered

Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994

Is there any possibility that the proposal will have any impact on site designated under the above legislation?	Yes
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If yes, provide information on the action and justification below:

The AQIA assessment evaluated the potential additional impact that increased ammonia emissions from the use of SCR could have on the designated areas of natural interest. It showed that this would continue to be insignificant as per the current emissions situation. There is also a reduction in acid gas impact and nutrient nitrogen contribution due to the reduction in NOx emissions offered by expanded the use of modern abated engines. No further action with respect to habitats impact is required.

Screening distance(s) used	15km
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Is there any other legislation that was considered during determination of the permit (for example installations that may be impacted by the requirements of legislation involving Animal By Products, Food Standards, Waste, WEEE regulations etc).	No
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If yes, provide information on the legislation, action and justification below:

7 Environmental Impact Assessment and COMAH
How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account?
Not applicable – EIA not required for the change in operation
How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account?
Not applicable – Site is Lower Tier COMAH establishment

8 Details of the permit		
Do you propose placing any non standard conditions in the Permit?		Yes
Do you propose making changes to existing text, tables or diagrams within the permit?		Yes
Outline the changes required and provide justification below:		
Proposed Condition Number:	Proposed Change:	Justification:
1.1.4.1	Change to overall installation thermal input	Addition of three engines
1.1.5.1 (c) and 1.1.6.6	Adding three new engines to existing description in place for Unit 9.	As above
Table 2.1	Amending reporting period and condition reference for ambient air monitoring	Refer to Section 5.9 above
Table 2.1	Annual reporting for total operating hours for all combustion plant operated at the installation	Refer to Section 5.5 above
Tables 2.2 and 2.3	Tables deleted	Deleted as now longer referenced due to updated resource efficiency conditions being already in permit (2.5.1)
3.4.1-3.4.5 and Tables 4.11 and 4.12	Removal of existing ambient monitoring conditions and replacement with SEPA standard conditions	Refer to Section 5.9 above
3.5.2 and 3.5.4	Deletion of reference to Table 4.2 and replacement with Tables 4.2 A and 4.2B	Refer to Section 5.9 above
3.5.19 and 3.5.20	Revised monitoring requirements for Station A engines	Refer to Section 5.9 above
3.5.21 and 3.5.22	Installation operating hours restriction for EED and cessation of restriction in the event of an interconnector failure.	Refer to Section 5.5 above
3.6.9	Addition of CAR registration covering discharge of sewage from site septic tanks	Refer to Section 5.3 above
3.12.6	Reporting of concurrent combustion plant operating hours	Refer to Section 5.5 above
Table 4.1	Revision of emission points N, O and P requirements to reflect addition of new engines	Refer to Section 5.2 above
Table 4.2	Deletion of Table 4.2 and replacement with Table 4.2A and Table 4.2B	Refer to Section 5.9 above
Table 4.5	Deletion of row containing BOD ELV	Refer to Section 5.3 above
Table 4.5	Delete of column containing Emission number point "W".	Refer to Section 5.3 above

Table 4.6	Deletion of Table 4.6 and replacement with Table 4.6A and Table 4.6B	Refer to Section 5.9 above
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9 Emission Limit Values or Equivalent Technical Parameters/Measures	
Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters?	Yes
Outline the changes required and provide justification below:	
Water emissions:	
Removal of historic ELV for BOD – Refer to Section 5.3	

10 Peer Review	
Has the determination and draft permit been Peer Reviewed?	Yes
Comments made:	
Minor amendments and typos made to Notice and Decision Document	

11 Final Determination	
Issue of a Permit - Based on the information available at the time	
Issue a Permit – Based on the information available at the time of the determination SEPA is satisfied that <ul style="list-style-type: none"> • The applicant will be the person who will have control over the operation of the installation/mobile plant, • The applicant will ensure that the installation/mobile plant is operated so as to comply with the conditions of the Permit, • That the operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques. • That no significant pollution should be caused. 	