



ANNEX F

INVESTIGATION REPORT

Investigation Report of CEMS Exceedances

Date	1 – 31 March 2025
Time	Continuous Monitoring throughout March 2025
Monitoring Location	Continuous Environmental Monitoring Systems (CEMS)
Parameter	Various emission parameters of the Centralised Air Pollution Control Unit (CAPCS), Cogeneration Units (CHPs), Ammonia Stripping Plant (ASP) and the Standby Gas Flaring Unit.
Exceedance Description	<p>Continuous monitoring was carried out at the CAPCS, CHPs, ASP and the Standby Gas Flaring Unit throughout the reporting period using the CEMS. According to the EM&A Manual, an exceedance is considered if the emission concentration of the concerned pollutants is higher than the emission limits stated in Tables 2.2, 2.3, 2.4, and 2.5 of the EM&A Manual (Version F) for the CAPCS, CHPs, Standby Flare, and ASP respectively. The concentrations of the concerned air pollutants were monitored on-line by the CEMS. Exceedances of various emission parameters were recorded on the CEMS including:</p> <ul style="list-style-type: none"> • NO_x from CHP1; • NO_x from CHP3; • NO_x, SO₂, NH₃, and HCl from the ASP; and • HF from the Standby Gas Flaring Unit. <p>The Contractor has investigated the cause of the exceedances and identified that:</p> <ul style="list-style-type: none"> • The exceedances of NO_x from CHP1 were caused by system instability, the Contractor has identified that the exceedances may be attributed to the frequent stopping/ starting of the system. • The exceedances of NO_x from CHP3 were caused by system instability, the Contractor has identified that the exceedances may be attributed to the frequent stopping/ starting of the system. • Regarding the SO₂ exceedances from the CHPs in previous monthly EM&A reports, SO₂ sampling and testing was completed by a third-party laboratory that showed lower SO₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. After review by MT and IEC, the correction factor was implemented on 17 May 2024. • The various exceedances from the ASP can be attributed to the frequent starting and stopping of the system which has been causing unstable process conditions during operation.

Investigation Report of CEMS Exceedances

	<ul style="list-style-type: none">The exceedances of HF from the Standby Gas Flaring Unit were caused by Normal Equipment Start-up Process / stopping Process (1-3hr)	
Action Taken / Action to be Taken	The Contractor investigated the reason for the exceedances and arranged Remedial Works and Follow-up Actions (see below).	
Remedial Works and Follow-up Actions	The Remedial Works and Follow-up Actions to be implemented by the Contractor to address the above exceedances (as well as updates on any exceedances from recent months) are detailed in the following table below.	
Monitoring Location	Measures/ Actions to Address any Exceedances	Implementation Timeline & Status
Centralised Air Pollution Unit (CAPCS)	<ul style="list-style-type: none">To address the exceedances for Total Odour (ou/Nm³) recorded in January 2024 and February 2025, the Contractor ordered a new H₂S / ORP sensor to replace the faulty one which was installed on 23 May 2024.The cleaning of the ventilation pumps was conducted in April 2024.The Contractor further identified that the ongoing exceedances for Dust, Total Odour, and VOCs from August 2024 – January 2025 were caused by chemical pipeline leakage, sensor issues, and the inefficiency of the chemical scrubber.Fine-tuning measures and adjustment in the operation of the system were implemented in October 2024.An enclosure has been set up to protect the VOC and H₂S sensors, and an ozone deodorization unit has been installed as of November 2024. An air sample was also taken to compare the sensor data.	<ul style="list-style-type: none">The Contractor has confined the leakage in the chemical pipeline and cleaned the chemical scrubber no.1. The chemical pipeline is back to service and there was no leakage now.
Cogeneration Unit 1 (CHP 1)	<ul style="list-style-type: none">To address the ongoing NO_x exceedances recorded from October 2023 – March 2025, the Contractor ordered 3 new cylinder heads from the supplier to replace the old ones and improve performance which were installed in May 2024.To address the SO₂ exceedances recorded from October 2023 – June 2024, August 2024, and November – December 2024, SO₂ sampling and testing was completed by a third-party laboratory that showed lower SO₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. After review by MT and IEC, the correction factor was implemented in May 2024.The Contractor received additional training for operation of the CHPs during December 2024.	<ul style="list-style-type: none">Contractor ordered spare parts for the CHPs which arrived in December 2024 and now received both spare parts and the tools. But installation schedule is pending from the Contractor.The Contractor was scheduled to complete the cleaning of silicon deposits on the cylinder heads and the exhaust heat exchanger replacement works by Q1 2025; the cleaning of CHP has been completed now.

	<ul style="list-style-type: none"> • The fine-tuning measures were implemented during May 2024, and a further tuning was carried out on 12 August 2024. • To address the HCl exceedances recorded from October 2023 – April 2024, July 2024, September – October 2024, and January 2025 and March 2025, the Contractor implemented in May 2024 fine tuning measures such as reviewing the ignition temperature curve, spark plug condition check and adjusting the intake & exhaust valves on the cylinder to reduce the fluctuations in HCl emissions and keep within the permissible limit. • A CHP expert from Europe visited the ORRC1 facility in August 2024 to review the performance of the CHPs and recommended various spare parts be replaced. • The Contractor will receive additional advanced training from the manufacturer for the operation and maintenance of the equipment. • The Contractor identified that a buildup of silicon deposits on the cylinder heads of the CHPs is preventing the engines from reaching full loading and will require cleaning to resolve. 	
Cogeneration Unit 2 (CHP 2)	<ul style="list-style-type: none"> • To address the ongoing NO_x exceedances recorded from October 2023 – October 2024 and January – February 2025, fine tuning of CHP 2 such as reviewing the ignition temperature curve, spark plug condition check and adjusting the intake & exhaust valves on the cylinder was conducted in May 2024 to reduce the fluctuations in NO_x emissions and to keep within the permissible limit. • To address the SO₂ exceedances recorded from October 2023 – April 2024, SO₂ sampling and testing was completed by a third-party laboratory that showed lower SO₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. After review by MT and IEC, the correction factor was implemented in May 2024. • To address the HCl exceedances recorded from November 2023 and April 2024, the Contractor implemented fine tuning measures such as reviewing the ignition temperature curve, spark plug condition check and adjusting the intake & exhaust valves on the cylinder to reduce the fluctuations in HCl emissions and keep within the permissible limit. • A CHP expert from Europe visited the ORRC1 facility in August 2024 to review the performance of the CHPs and recommended various spare parts be replaced. • A further tuning was carried out for the CHP on 12 August 2024. 	<ul style="list-style-type: none"> • Contractor ordered spare parts for the CHPs which arrived in December 2024 and now received both spare parts and the tools. But installation schedule is pending from the Contractor. • The Contractor was scheduled to complete the cleaning of silicon deposits on the cylinder heads and the exhaust heat exchanger replacement works by Q1 2025; ; the cleaning of CHP has been completed now.

	<ul style="list-style-type: none"> • The Contractor will receive additional advanced training from the manufacturer for the operation and maintenance of the equipment. • The Contractor identified that a buildup of silicon deposits on the cylinder heads of the CHPs is preventing the engines from reaching full loading and will require cleaning to resolve. • The Contractor received additional training for operation of the CHPs during December 2024. 	
Cogeneration Unit 3 (CHP 3)	<ul style="list-style-type: none"> • To address the ongoing NO_x exceedances from October 2023 – March 2025, fine tuning measures of CHP 3 were implemented in May 2024 such as reviewing the ignition temperature curve, spark plug condition check and adjusting the intake & exhaust valves on the cylinder to reduce the fluctuations in NO_x emissions and to keep within the permissible limit. • To address the SO₂ exceedances recorded from October 2023 – April 2024, SO₂ sampling and testing was completed by a third-party laboratory that showed lower SO₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. After review by MT and IEC, the correction factor was implemented in May 2024. • A further tuning was carried out on 12 August 2024. • A CHP expert from Europe visited the ORRC1 facility in August 2024 to review the performance of the CHPs and recommended various spare parts be replaced. • The Contractor will receive additional advanced training from the manufacturer for the operation and maintenance of the equipment. • The Contractor identified that a buildup of silicon deposits on the cylinder heads of the CHPs is preventing the engines from reaching full loading and will require cleaning to resolve. • The Contractor received additional training for operation of the CHPs during December 2024. 	<ul style="list-style-type: none"> • Contractor ordered spare parts for the CHPs which arrived in December 2024 and now received both spare parts and the tools. But installation schedule is pending from the Contractor. • The Contractor was scheduled to complete the cleaning of silicon deposits on the cylinder heads and the exhaust heat exchanger replacement works by Q1 2025; ; the cleaning of CHP has been completed now.
Ammonia Stripping Plant (ASP)	<ul style="list-style-type: none"> • To address the Carbon Monoxide exceedances recorded in February 2025, the Contractor arranged for a visit by the supplier to improve the reliability and performance of the system. • To address the ongoing NO_x exceedances recorded from October 2023 – March 2025, the Contractor conducted an overhaul of the ASP and arranged for a visit by the supplier to improve the reliability and performance of the system. The overhaul was completed 6 May 2024. • To address the ongoing SO₂ exceedances recorded from October 2023 – March 2025, 	<ul style="list-style-type: none"> • A visit from the supplier to inspect the ASP has been conducted. • The Contractor has implemented further fine-tuning measures for the ASP since December 2024; the stability of the ASP has been increased. However, it is found that the recently installed louver has resulted in some new

SO₂ sampling and testing was completed by a third-party laboratory that showed lower SO₂ values than those reported by the CEMS. The lower values measured by the laboratory was attributed to methane gas interference. Based on this study, it was proposed to implement a correction factor in the CEMS to adjust for the methane gas interference. After review by MT and IEC, the correction factor was implemented in May 2024.

- To address the ongoing NH₃ exceedances recorded from October 2023 – March 2025, the Contractor conducted an overhaul of the ASP and arranged for a visit by the supplier.
- To address the HCl exceedances recorded from October 2023 – May 2024 and August 2024 – November 2024, and February 2025 – March 2025, the Contractor conducted an overhaul of the ASP and arranged for a visit by the supplier.
- The automatic situation of the TCU louvres has been resolved as of October 2024.

issues which are currently under modification.

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