

7<sup>th</sup> May 2012

Mr Richard Vincent  
Head of Industrial Pollution Control  
Defra  
Area 5F, Ergon House  
17 Smith Square  
London, SW1P 3JR

En

Dear Mr Vincent,

## Industrial Emissions Directive – Large Combustion Plants

In response to your email of the 28<sup>th</sup> December 2011, it is our view that the INEOS Infrastructure (Grangemouth) Ltd ("IIGL") CHP plant should be included in the UK Transitional National Plan, TNP.

Prior to 1st April 2011 the INEOS refining, petrochemical and utilities assets at Grangemouth were owned by INEOS Manufacturing Scotland Ltd and permitted under PPC/A/1013141. On 1<sup>st</sup> April 2011 INEOS sold a part share of its refining business to Petrochina and as such had to re-organise the site assets accordingly.

IIGL became a separate legal entity on the 1<sup>st</sup> of April 2011, owning the CHP plant. As such IIGL received its own PPC permit PPC/A/1090147 at this time.

Our CHP plant consists of the following large combustion plant ;

- Boiler 8 commissioned in 2000,
- Boilers 9-13 commissioned in 1965-67 and
- Boiler 14 & 15 commissioned in 1975-76.

Under Article 32 of the IED, combustion plants operational before the 27 November 2002 may be considered part of the UK TNP.

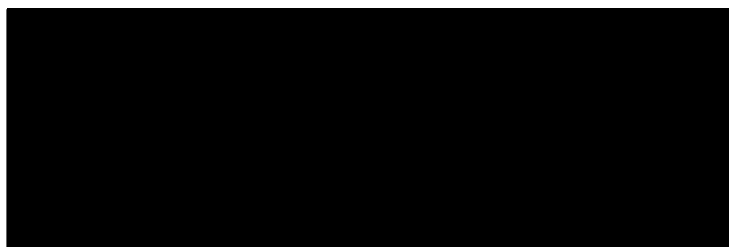
We have provided the information requested under Appendix A Table A.1 but at this time are unable to complete Appendix B as our boilers use a combination of natural gas and other indigenous site gases. We cannot therefore determine the emission ceilings as no emissions limit values have yet been set for combustion plants firing gases other than natural gas as referred to in Article 30 9(c).

For the avoidance of doubt

- (a) We do not qualify to be excluded under Article 32 (1)(b) for the consumption of refinery residue gases as our boilers consume a mixture of natural gas, refinery residue gases, chemicals residue gases and residue gases from the crude oil stabilization plant owned by BP Exploration Operating Company.

- (b) Our CHP plant is not located within the refinery and has never been so, serving the refining, petrochemical and crude stabilization manufacturing plants across Grangemouth.
- (c) From the further clarification provided in the second paragraph of section (1) of the Annex to your letter, we can confirm that our boilers are not located within the refinery and are not operated by a refinery operator. The IIGL CHP plant is located on land owned by BP which is leased directly to IIGL till 2104 and operated by IIGL employees..

We would therefore like to be considered for inclusion under the UK TNP and have attached as much information as we can provide at this time for your information.



Commercial Director