



# Sahaviriya Steel Teesside

Steel House, Redcar, TS10 5QW  
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09 August 2012

Mr R Vincent  
Area 5  
Ergon House  
17 Smith Square  
London  
SW1P 3JR

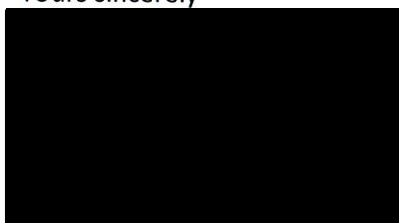
Dear Mr Vincent

**Ref: Industrial Emissions Directive – Large Combustion Plants**

Andrew Clark of the Environment Agency has stated that there is on record of our response regarding the above subject. However, we had believed that after my communications with you, we had responded with the attached letter, dated 03 May 2012.

I apologise for any inconvenience caused.

Yours sincerely



**Technical Development Director**  
Sahaviriya Steel Industries UK Limited

Enc Copy of letter dated 03 May 2012



# Sahaviriya Steel Teesside

Steel House, Redcar, Cleveland, TS10 5QW  
www.ssi-steel.co.uk

03 May 2012

Mr R Vincent  
Area 5  
Ergon House  
17 Smith Square  
London  
SW1P 3JR

Dear Mr Vincent

## **Ref: Industrial Emissions Directive – Large Combustion Plants**

In response to your letter dated 28 December 2011 I would like to register SSI UK's interest to participate in the Transitional National Plan (TNP) for emissions of sulphur dioxide, nitrogen oxide and dust for the existing large combustion plant (LCP 33) from 1 January 2016 to 30 June 2020.

Data and calculations to determine emission ceilings will be submitted shortly. I note that the calculations require operators to use historical data from the period 2001-2010. As you may be aware the iron and steel making facilities on Teesside were mothballed in February 2010 leaving only coking and energy facilities in operation on site. During normal operations the typical fuel used in the combustion plant boilers is a mixture of Blast Furnace Gas (BFG) and Coke Oven Gas (COG). However, BFG was not available following mothballing and the operational boiler moved to 100% COG. On this basis we would propose to use data from the period 2001-2009 to reflect current and future fuel use following the resumption of iron making in April 2012.

Sahaviriya Steel Industries UK Limited purchased Teesside Integrated Iron & Steel Works from Tata Steel UK Limited in March 2011 with the intention of increasing production beyond the historic levels of 2001-2010. Under the method of calculation of the TNP allowance, there appears to be no recognition of the unique circumstances of the works during the mothballed period.

The SSI business plan for the works has always involved far greater production levels than those in the benchmarking period 2001/10. Indeed, the operation is not sustainable at previous output levels and a ramp up plan is currently underway, involving major investments still to come on line. This is in addition to the vast sums spent on actual refurbishment within the mothballed plants

SSI understand that the calculation is an obligatory part of the TNP allowance. However, it is felt that further discussion is required to understand how the significant production output plans for the future are not adversely affected by implementation of a baseline using data from what may be considered as irrelevant to the works going forward. Is it possible to review the baseline as and when new equipment, designed to increase output, comes on stream ?

Please could you confirm your acceptance of this proposal.

Yours sincerely

**Sahaviriya Steel Industries UK Limited**