

7<sup>th</sup> December 2012

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

Ref:

Dear Mr Vincent

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

I refer to your e-mail, dated 1st December 2012, to our [REDACTED] on the subject of the INEOS Infrastructure (Grangemouth) Limited chp plant being part of the UK Transitional National Plan ("TNP").

Having written to you on 7<sup>th</sup> May 2012 with our reasons for the above it is somewhat surprising and disturbing to receive an e-mail on Saturday 1<sup>st</sup> December informing us that we were not part of the TNP and if we wished to pursue inclusion that we needed to provide you with further detailed data "as soon as possible and certainly before 7<sup>th</sup> December". Indeed we only received this response following our follow up with you by telephone in November. To receive 5 working days notice for this level of data is unacceptable following 6 months inactivity on your part. I ask that you work with us and we will provide this data as soon as possible, hopefully before the Christmas break.

Your e-mail states that in your opinion "it appears that they (the combustion plant within IIGL) are an integral part of the refinery's operation even though they serve other installations" and you mention "combustion plants running on refinery residues". I can only repeat that whilst IIGL's combustion plant burns some refinery off-gases, along with non-refinery off-gases the predominant fuel is natural gas and therefore this plant is not an integral part of the refinery's operation nor is it running on refinery residue.

Further you reference Article 32 (1) (b) and say that were it not for the words "within refineries" it is clear that the plant could not be placed in the TNP. I do not accept that interpretation as it also states "for its own consumption". Article 32 (1) (b) clearly refers to combustion plant within refineries that use the refinery off-gases as fuel for energy used in their own process operations.

Yours sincerely

[REDACTED]

[REDACTED]