

7th May 2012

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

Dear Mr Vincent,

Industrial Emissions Directive – Large Combustion Plants

In response to your email of the 28th December 2011, INEOS Chemicals (Grangemouth) Ltd ,ICGL, and specifically the KG and G4 ethylene crackers would like to be considered for inclusion in the UK Transitional National Plan, TNP, for the large combustion plants that we operate.

ICGL became a separate legal entity on the 1st of April 2011, and as such received its own PPC permit PPC/A/1088953 at this time. It had previously been permitted under INEOS Manufacturing Scotland Ltd PPC/A/1013141. Our KG ethylene cracker includes boilers F501A/B, and our G4 ethylene cracker includes boilers F4A/B and F5. These were all commissioned prior to the year 2000.

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 can not 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 clarification;

- a) We do not believe that we 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 and chemicals residue gases, with a facility to top up with refinery residue gases.
- b) Our ethylene crackers are not part of the refinery.
- 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 ICGL Ethylene crackers are located on ICGL owned land and operated by ICGL 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.

Yours sincerely,

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Olefins and Polymers HSE Manager