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Richard Vincent  
Head of Industrial Pollution Control  
Department for Environment Food and Rural Affairs  
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Ergon House  
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8<sup>th</sup> May 2012

Dear Richard

#### **INDUSTRIAL EMISSIONS DIRECTIVE – LARGE COMBUSTION PLANTS**

Further to my letter dated 3<sup>rd</sup> May 2012, I am writing to inform you that British Sugar wishes to participate in the proposed UK Transitional National Plan (TNP) for two additional Large Combustion Plants at the following sites:

Bury St Edmunds Sugar Factory  
Wissington Sugar Factory

Both of these plants are gas turbine CHP plants and do not operate within the current National Emissions Reduction Plan (NERP)

I enclose printouts of the calculated emissions ceilings for each of these sites.

It is our current intention that at the end of the period of operation of the TNP both plants will fully comply with the relevant emission limit values applicable at that time.

Please accept my apologies for the late submission of this information.

Yours sincerely

Company Environmental Manager

Wissington Factory

SELECT PLANT TYPE IN TABLE A.1 BELOW TO TRANSFER CORRECT SUMMARY VALUES

Input

Calculation

Table A.1 — Template for the list of combustion plants to be included in the transitional national plan

A Number	B Plant name	C Plant location (address)	D Date on which the application for the first permit for the plant has been submitted and date on which the plant has been put into operation for the first time	D OR Date on which the first permit for the plant has been granted	E Any extension by at least 50 MW of the total rated thermal input of the combustion plant, which took place between 27 November 2002 and 31 December 2010 (total extension in MW)	F Total rated thermal input on 31/12/2010 (MW)	G Annual number of operating hours (average 2001-2010)	H Pollutant(s) (SO <sub>2</sub> , NO <sub>x</sub> , dust) for which the plant concerned is NOT covered by the transitional national plan	I Indicate if the plant is a gas turbine or gas engine	J Annual amount of fuel used (average 2001-2010) (TJ/year)						K Average annual waste gas flow rate (average 2001-2010) (Nm <sup>3</sup> /y)	L Annual quantity of S in indigenous solid fuels used which was introduced into the combustion plant (average 2001-2010) tpa	M Conversion factor(s) used in case the waste gas flow rate was calculated from the fuel input (per fuel type) (Nm <sup>3</sup> /GJ)
										hard coal	lignite	biomass	other solid fuels	liquid fuels	gaseous fuels			
NA	British Sugar Plc Wissington Sugar Factory	Wissington Sugar Factory Wissington, Norfolk		01-Jun-98	Not Applicable				Gas Turbine	-	-	-	-	19	4928	4165485874		Fuel specific

Table B.1 — Template for calculating the 2016 emission ceilings

A Number	B name	C reference oxygen content (%)	D relevant ELV for SO <sub>2</sub> (mg/Nm <sup>3</sup> )	E relevant desulphurisation rate (where applicable)	F plant's contribution to the 2016 SO <sub>2</sub> ceiling (tpa)	G relevant ELV for NO <sub>x</sub> (mg/Nm <sup>3</sup> )	H plant's contribution to the 2016 NO <sub>x</sub> ceiling (tpa)	I relevant ELV for dust (mg/Nm <sup>3</sup> )	J plant's contribution to the 2016 dust ceiling (tpa)	K Comments
(individual plant data)										
SUM	Wissington Factory	See Baseline period	See Baseline period			See Baseline period	313	See Baseline period		

Table B.2 — Template for calculating the 2019 emission ceilings

A Number	B name	C reference oxygen content (%)	D relevant ELV for SO <sub>2</sub> (mg/Nm <sup>3</sup> )	E relevant desulphurisation rate (where applicable)	F plant's contribution to the 2019 SO <sub>2</sub> ceiling (tpa)	G relevant ELV for NO <sub>x</sub> (mg/Nm <sup>3</sup> )	H plant's contribution to the 2019 NO <sub>x</sub> ceiling (tpa)	I relevant ELV for dust (mg/Nm <sup>3</sup> )	J plant's contribution to the 2019 dust ceiling (tpa)	K Comments
(individual plant data)										
SUM		See Baseline period	See Baseline period			See Baseline period	313	See Baseline period		

Table B.3 - Overview of emission ceilings

tonnes pa	2016	2017	2018	2019	2020 (1 Jan – 30 Jun)
SO <sub>2</sub>					
NO <sub>x</sub>	313.1	313.0	312.8	312.7	156.3
Dust					

**Bury Factory**                      **SELECT PLANT TYPE IN TABLE A.1 BELOW TO TRANSFER CORRECT SUMMARY VALUES**

Table A.1 — Template for the list of combustion plants to be included in the transitional national plan

A	B	C	D		E	F	G	H	I	J						K	L	M
Number	Plant name	Plant location (address)	Date on which the application for the first permit for the plant has been submitted and date on which the plant has been put into operation for the first time	OR Date on which the first permit for the plant has been granted	Any extension by at least 50 MW of the total rated thermal input of the combustion plant, which took place between 27 November 2002 and 31 December 2010 (total extension in MW)	Total rated thermal input on 31/12/2010 (MW)	Annual number of operating hours (average 2001-2010)	Pollutant(s) (SO <sub>2</sub> , NO <sub>x</sub> , dust) for which the plant concerned is NOT covered by the transitional national plan	Indicate if the plant is a gas turbine or gas engine	Annual amount of fuel used (average 2001-2010) (TJ/year)						Average annual waste gas flow rate (average 2001-2010) (Nm <sup>3</sup> /y)	Annual quantity of S in indigenous solid fuels used which was introduced into the combustion plant (average 2001-2010)	Conversion factor(s) used in case the waste gas flow rate was calculated from the fuel input (per fuel type) (Nm <sup>3</sup> /GJ)
										hard coal	lignite	biomass	other solid fuels	liquid fuels	gaseous fuels		tpa	
NA	British Sugar Plc Bury Sugar Factory	Bury Sugar Factory Bury St Edmunds, Suffolk		01-May-99	Not Applicable				Gas Turbine	-	-	-	-	16	3497	2958703345		Fuel specific

Table B.1 — Template for calculating the 2016 emission ceilings

A	B	C	D	E	F	G	H	I	J	K
Number	name	reference oxygen content (%)	relevant ELV for SO <sub>2</sub> (mg/Nm <sup>3</sup> )	relevant desulphurisation rate (where applicable)	plant's contribution to the 2016 SO <sub>2</sub> ceiling (tpa)	relevant ELV for NO <sub>x</sub> (mg/Nm <sup>3</sup> )	plant's contribution to the 2016 NO <sub>x</sub> ceiling (tpa)	relevant ELV for dust (mg/Nm <sup>3</sup> )	plant's contribution to the 2016 dust ceiling (tpa)	Comments
(individual plant data)										
SUM	Bury Factory	See Baseline period	See Baseline period			See Baseline period	223	See Baseline period		

**Table B.2 — Template for calculating the 2019 emission ceilings**

A	B	C	D	E	F	G	H	I	J	K
Number	name	reference oxygen content (%)	relevant ELV for SO <sub>2</sub> (mg/Nm <sup>3</sup> )	relevant desulphurisation rate (where applicable)	plant's contribution to the 2019 SO <sub>2</sub> ceiling (tpa)	relevant ELV for NO <sub>x</sub> (mg/Nm <sup>3</sup> )	plant's contribution to the 2019 NO <sub>x</sub> ceiling (tpa)	relevant ELV for dust (mg/Nm <sup>3</sup> )	plant's contribution to the 2019 dust ceiling (tpa)	Comments
(individual plant data)										
SUM		See Baseline period	See Baseline period			See Baseline period	222	See Baseline period		

Table B.3 - Overview of emission ceilings

tonnes pa	2016	2017	2018	2019	2020 (1 Jan – 30 Jun)
SO <sub>x</sub>					
NO <sub>x</sub>	222.5	222.4	222.3	222.1	111.1
Dust					