

Richard

Thank you for your prompt reply and explanation.

Regards

Environmental Technician

Energy Power Resources Limited

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**From:** Vincent, Richard (ERG-ALE) [Richard.Vincent@defra.gsi.gov.uk]

**Sent:** 23 February 2012 08:00

**To:** Demain, David (ERG-ALE); Obe, Nicholas (ERG-ALE);

**Cc:** Henderson, John

**Subject:** RE: IED TNP applications

The ELVs to be used for the purposes of calculating the TNP “allowance” for each plant in 2016 are those tabulated in the large combustion plants Directive – 600, as you say below. For 2019, the ELV is that tabulated in Annex V of the industrial emissions Directive. The allowances for 2017 and 2018 have to be calculated on a linear basis from those for 2016 and 2019. The method of compliance assessment is irrelevant for the purposes of calculation.

Article 6(1) of the now-finalised Rules (attached) in effect leaves it to the competent authority to determine the arrangements for monitoring compliance with the TNP allowances. Those arrangements will be finalised as the TNP is developed, but will probably be very similar to those applying to plants participating in the current National Emissions Reduction Plan.

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**From:**

**Sent:** 21 February 2012 16:39

**To:** Demain, David (ERG-ALE)

**Subject:** IED TNP applications

Hello David

During December's LCP stakeholder group meeting it was requested that operators complete the emission ceiling calculations for any submissions for inclusion in TNP. I have been looking at those calculations and have encountered some apparently contradictory information as detailed below.

### **ELV to be used in TNP calculations**

Included with the Defra letter dated 28 December 2011 – Industrial Emissions Directive – Large Combustion Plants - is guidance on the application for plants to be included in the transitional national plan (TNP).

In Appendix C to the letter is Table C.1 that lists the ELVs to be used when calculating the emission ceilings in 2016; for installations matching our EPR Ely site (solid fuel, 114 MWth) the NO<sub>x</sub> ELV is shown as 600 mg/Nm<sup>3</sup>. This matches EPR Ely's current permit emission limit when the reference period is 95% of all validated hourly averages over a calendar year. The other NO<sub>x</sub> limit in Ely's permit is a validated daily average of 300 mg/Nm<sup>3</sup>. IED Article 32, 2 states that ELVs in permits applicable on 31 December 2015 shall at least be maintained (presumably throughout the TNP period).

In Appendix D to the letter is Table D.1 that lists the ELVs to be used when calculating the emission ceilings in 2019; for plants matching our EPR Ely site (biomass) the NO<sub>x</sub> ELV is

shown as 250 mg/Nm<sup>3</sup> which matches the ELV in IED Annex V, Part 1, 4 referred to in Article 32, 3. In Annex V, Part 4, 1 (a) compliance with that ELV is assessed as a validated monthly average. If the ELV is judged against Part 4, 1 (d), 95% of all validated hourly averages over the year to retain common conditions to the 2016 figure, the limit would be 500 mg/Nm<sup>3</sup>.

Is it possible for guidance to be given for the following points to enable me to complete the calculations?

- Which of the above NOx ELVs should be used in the TNP ceiling calculations for 2016 and 2019? (I assume it should be 600 mg/ Nm<sup>3</sup> for 2016 and 250 mg/ Nm<sup>3</sup> for 2019 despite the changes in reference periods and the lower daily limit in the current permit.)
- If it is intended that the conditions for routine assessment of emissions against ELVs over the course of TNP is to change from 95% of all validated hourly averages in a year and a validated daily average (both applied in the current permit) to the new conditions stated in Annex V, Part 4, 1, how should the transition process be managed between 2016 and 2019? (Is 2019 the first year that the new conditions apply?)

Thank you for your attention to the above.

Best regards

Environmental Technician

Energy Power Resources Limited

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