

Richard

That has really helped and indicates that the regulator may have some scope for post 2015 ELVs to be set at achievable limits until 2019. I had misunderstood that the least stringent the regulator could be was to set the ELVs as shown in Annex V.

Many thanks for your prompt reply.

Kind regards

From: Vincent, Richard (ERG-ALE) [mailto:Richard.Vincent@defra.gsi.gov.uk]
Sent: 24 February 2012 11:05
To:
Cc: David Demain; Obe, Nicholas (AQIP)
Subject: RE: To all operators of plants which are in the current UK national emission reduction plan

Mr

What the paragraph says is that, whatever the ELVs you have in your permit on 31 December 2015, you will have to continue to meet them if you participate in the TNP from 1 January 2016. They will have been set by the regulator according to what IPPC requires.

So, unless the regulator has cause in the meantime to amend them, your current ELVs ('150/200 mg/m³ respectively') will continue to apply if the plant is placed in the TNP. Those limits are in terms of concentration. If you participate in the TNP, you would not have to meet the concentration limits set in Annex V. Rather, you would also have to keep annual mass emissions to within either the allowance you receive or within that allowance plus any other allowance that you acquire from other participants.

As I hope is clear, the allowance you receive for 2016 will be calculated using not the Annex V limits but the relevant limits under the current large combustion plants Directive (LCPD).

The Annex V limits are used to calculate the allowance for 2019, and the allowances for 2017 and 2018 have to be worked on a “straight line” change between those for 2016 and 2019. Where (as may be so in your case), the LCPD limits are the same as Annex V, there will of course be no difference between 2016 and 2019.

Richard Vincent
Head of Industrial Pollution Control

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17 Smith Square
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Phone: 020 7238 1678

From:
Sent: 24 February 2012 10:03
To: Vincent, Richard (ERG-ALE)
Subject: RE: To all operators of plants which are in the current UK national emission reduction plan

Hi Richard

We are considering joining the TNP however I am seeking further clarification of the extract from your letter (para 5 Below).

For our equipment the Annex V requirements for Nox will be 50 or 75 mg/m³ for our gas turbines and 100mg/m³ for our conventional boilers. Our current limits are 150/200 mg/m³ respectively.

My understanding from the paragraph below is that if we join the TNP from 7th Jan 2014 we will still have to meet the Annex V requirements. If this is the case I don't understand how joining the TNP helps.

I would welcome some clarification on this matter.

Kind regards

Humber Energy

Para 5 extract:

‘Please note also that all plants in the TNP will continue to be subject to ELVs which are at least as stringent as those in place in permits on 31 December 2015. Those ELVs will have been set by the environmental regulator as appropriate to meet the requirements of the IPPC Directive and, from 7 January 2014, the requirements of Chapter II of the industrial emissions Directive. Furthermore, plants placed in the TNP will remain subject to the requirements of Chapter II of the industrial emissions Directive and so the environmental regulator may need to set more stringent ELVs based on BAT and taking account of particular environmental circumstances, irrespective of the annual emissions ceilings applying to TNP plant or the ELVs prescribed in Annex V of the Directive.’

From: Demain, David (ERG-ALE) [mailto:david.demain@DEFRA.GSI.GOV.UK]

Sent: 28 December 2011 11:31

Cc: Vincent, Richard (ERG-ALE); Obe, Nicholas (ERG-ALE)

Subject: To all operators of plants which are in the current UK national emission reduction plan

To all operators of plants which are in the current UK national emission reduction plan

Dear Colleagues,

Please find attached a self-explanatory letter which has also been sent to members of Defra's LCP Stakeholder Group

<<TNP - letter to operators FINAL.doc>>

Kind regards

David

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Thank You

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Thank You

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