

Dear Mr Vincent

I am writing to inform you that, as the operator of the Olefins Boiler plant, we wish to participate in the Transitional National Plan from 2016.

I would like to draw your attention to some difficulties we have encountered in calculating the emission ceilings, and which we would like to discuss with you:

1. The Olefins Boiler plant has undergone significant changes during the period 2001 – 2010; during the early years of this period, typically 3 individual boilers were operating at low operating rates (all discharging through a common stack). Latterly, only one boiler has been operating, but at typically higher rates. This change has been driven by a focus on efficiency of operations and changes to third party steam supply contracts. Hence it has been difficult to provide consistent data throughout this period.
2. Attached is a preliminary assessment of our emission ceilings. We would very much appreciate the opportunity to discuss in detail the basis on which the emission ceilings for the Olefins Boiler should be calculated, which would allow us to provide a more accurate ceiling calculation.

#### **No 1 Aromatics Plant, North Tees**

The No 1 Aromatics plant is participating in the NERP scheme; however the plant has undergone significant changes during the period 2001 – 2010 which we believe changes its status as qualifying as Large Combustion Plant.

The plant consists of 4 separate items of fired equipment, connected to a common flue.

Current net thermal capacities of the individual items of equipment are as follows:

Boiler 7	43MW
Boiler 9	10MW
Boiler 10	10MW
340B (Platfiner)	9.9MW

(Note these are the thermal capacities in the current EPR permit for the Installation)

Under the IED, Article 29. paragraph 3 states “For the purpose of calculating the total rated thermal input of a combination of combustion plants referred to in paragraphs 1 and 2, individual combustion plants with a rated thermal input below 15 MW shall not be considered”.

Taking this into account indicates that the combustion equipment at No 1 Aromatics should no longer be considered as Large Combustion Plant, as the total capacity is less than 50MW. Therefore No 1 Aromatics will not participate in the Transitional National Plan.

I would appreciate your written confirmation of this conclusion as soon as possible.

If for any reason you disagree with this conclusion, and the No 1 Aromatics plant continues to fall under the Large Combustion Plant requirements of the IED, we would wish to reconsider whether No 1 Aromatics will participate in the Transitional National Plan.

Regards

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## Olefins Boiler Preliminary Data for TNP Submission

	Plant Name	Plant Location	Date on which the plant was first permitted	Extension of capacity	Thermal capacity as of 31/12/2010	Annual number of operating hours (2001/2010)	Pollutants not covered by the TNP	Gas Turbine or gas engine?	Fuel used
	Olefins Boilers	Wilton, Redcar	1978 (plant commissioned)	0	66MW	8760	none	Plant is a steam raising boiler	Mixture of natural gas and own generated off gas
Comments			Initially permitted under IPC, circa 1995	Note the thermal capacity has significantly decreased during this period		It is not possible to provide a meaningful number for this due to the changes that have taken place during the time period required. The plant essentially operates continuously unless taken off for maintenance work			

2016						
Average flue gas flow rate (Nm3/s)	ELV for SO2 (mg/Nm3)	plants contribution to SO2 ceiling (tpa)	ELV for Nox (mg/Nm3)	plants contribution to NOx ceiling (tpa)	ELV for particulates (mg/Nm3)	plants contribution to particulates ceiling (tpa)
22.3	35	24.6	300	211.0	5	3.5

2019						
Average flue gas flow rate (Nm3/s)	ELV for SO2	plants contribution to SO2 ceiling	ELV for Nox	plants contribution to NOx ceiling	ELV for particulates	plants contribution to particulates ceiling
22.3	35	24.6	100	70.3	5	3.5

