

**From:** Vincent, Richard (ERG-ALE)  
**Sent:** 08 May 2012 15:34  
**To:**  
**Cc:** David Demain; Obe, Nicholas (AQIP)  
**Subject:** RE: TNP Question

The key to this is to be found in Article 32(3) of the Directive which says (with my emphasis:)

‘For each of the pollutants it covers, the transitional national plan shall set a ceiling defining the maximum total annual emissions for all of the plants covered by the plan **on the basis of each plant’s total rated thermal input on 31 December 2010**, its actual annual operating hours and its fuel use, averaged over the last 10 years of operation up to and including 2010.’

So where there are several boilers discharging through the common stack which defines the plant, the key question is: which of those boilers were in operation on 31 December 2010? That does not mean actually operating on that precise date, but forming part of the normal operation of the plant.

From what you describe, boiler 3 wasn’t “part of the operation” at the end of 2010, but it appears boiler 1 was. So in that case, fuel use for boilers 1 and 2 should be averaged, and the ELVs to be used in the calculation are those appropriate to the combined rated thermal input of the two boilers.

Clearly, the calculation can only take into account the fuel use when the boilers were in operation, but the averaging will be over the full ten years unless the plant as a whole (that is to say, all three boilers) was out of service for refurbishment for any part of the period, in which case the averaging period would be reduced commensurately.

Richard

**From:**

**Sent:** 02 May 2012 16:39

**To:** Vincent, Richard (ERG-ALE)

**Subject:** TNP Question

Dear Richard,

As discussed after the IED workshop, I have a specific TNP question on which I would be grateful for your advice please.

What I am looking for is how to average the operating data between 2001 and 2010 to calculate the 2016 and 2019 ceilings for a particular installation. They have three stationary technical units (Boilers 1, 2 and 3) defined in the installation EPR/ IPPC permit going up a single stack. Boiler 1 has not operated for the last year nor boiler 3 for the last 5 years. They only plan to operating boiler 2 from now on.

If only boiler 6 is going to be in the fleet going forward, please could you advise whether the operating data for that boiler should be averaged over the past 10 year period or should the operating data for all three units be averaged over the 10 years? Logic perhaps says no to the latter, but the TNP states that the ceiling will not be recalculated if plants are shutdown between 2016 and 2019.

Also, for the avoidance of doubt, please can you confirm that we should only use the operating data for the period when the units were on line rather than using the average over the whole 10 years?

Your thoughts would be appreciated. Please contact me if you require any further information.

Kind regards

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