

To the LCP Stakeholder Group

Dear Colleagues,

Richard Vincent has asked me to copy you into the email exchange below which may be of interest to you.

Kind regards

David

David Demain
Industrial Pollution Control
Defra Atmosphere and Local Environment
Area 5F Ergon House
17 Smith Square
London
SW1P 3JR
Tel 020 7238 1687
Fax 020 7238 4859

From: Vincent, Richard (ERG-ALE)
Sent: 18 April 2012 20:17
To: -
Cc: Demain, David (ERG-ALE); Obe, Nicholas (ERG-ALE)
Subject: RE: TNP AND THE 500 HOURS DEROGATION IN IED

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The 500 hour derogations given in paragraphs 5 and 6 of Part 1 of Annex V are available at any time to a plant which demonstrably operates for emergency use for less than 500 hours.

So if a plant which had been placed in the TNP because it did not meet those criteria were subsequently to meet them to the regulator's satisfaction, the derogation would apply.

I don't propose at this relatively late stage to amend the 28 December letter, but by copy of this I am asking **David** to copy this E-mail exchange to the LCP Stakeholders' Group.

Best wishes for your new organisation!

Richard

From: -

Sent: 17 April 2012 11:14

To: Vincent, Richard (ERG-ALE)

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

Subject: TNP AND THE 500 HOURS DEROGATION IN IED

Dear Richard,

Further to your letter to operators dated 28 December 2011 on TNP matters, the operators within Energy UK (our new name since the start of April – please see footnote) have one further enquiry that has not been discussed so far.

The question we have is whether the Annex V 500 hours derogations for gas turbines and gas engines could be available on exit from the TNP?

This question has arisen for at least one operational UK plant.

We can see no reason why not (subject to the plant technology and fuel falling within the scope of the derogation), as this is essentially the same situation as the Annex V 1500 hours derogation.

The plant would, of course, need to comply with the requirements of the TNP prior to exit.

If DEFRA agrees with this understanding, perhaps the following points could be added to the “APPENDIX 1 – other points to note” list in the 28 December 2011 letter:-

A11. A plant can leave the TNP at any time between 1 January 2016 and 30 June 2020 to be subject to Annex V 500 hour derogation.

A12. A plant can take the Annex V 1,500 hours derogation upon completion of the TNP on 30 June 2020.

Our understanding is that an operator, intending that a plant should take this compliance route on completion of the TNP, should state this in the TNP declaration letter as the credible “measures foreseen” for this case. The 500 hours option has the same status as the other compliance options that are available on exit from the TNP.

Kind regards, --



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Charles House

5-11 Regent Street

London SW1Y 4LR

United Kingdom

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