

From: Vincent, Richard (Defra)
Sent: 02 May 2013 17:30
To: -
Cc: Henderson, John
Subject: RE: T&L Sugars - TNP Query

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The lack of data for the full ten year period will make your TNP submission very questionable. If you wish to pursue it, I suggest you get as much verifiable data together as you can and set out for consideration.

Richard Vincent

Head of Industrial Pollution Control
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<http://www.defra.gov.uk/industrial-emissions/>

From: -]
Sent: 02 May 2013 16:18
To: Vincent, Richard (Defra)
Subject: RE: T&L Sugars - TNP Query
Importance: High

Hi Richard,

Thanks for getting back to me. I discussed the matter with John Henderson yesterday, and it appears that the ELV for the GT/WHB will be 100mg/m3 at best, but the lower GT limit may actually bring this down a bit. I thought that this would be the answer, but still do not really understand why we had a higher limit for this plant in our PPC permit than the boiler plant! I'm still not convinced that a fired WHB should be treated as an ordinary boiler, but there would appear to be no flexibility in IED for this.

It means that the TNP remains a sensible mechanism for us to pursue, however, having had the first trawl for data, we have come up against some pretty significant shortfalls against the requirements. The Thames Refinery was acquired by American Sugar Refining (ASR) from Tate and Lyle Plc in Autumn 2010, and with this change a significant amount of records held on the Plc network over 5 years old were either deleted or removed and are not available to us. As such, we could probably go back 5 years or so and get some useful data together, but will struggle going beyond this for things like running hours. CCL and EU ETS returns will give us some data, although I will need to get the

baseline submissions from the scheme administrators. Without being part of the NERP to get us into the swing of this data collection, or having the type of discipline that the power generators have applied to this issue, we are in a bit of a fix.

Is there any work around for a site that has incomplete data?

Thanks,

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From: Vincent, Richard (Defra) [<mailto:Richard.Vincent@defra.gsi.gov.uk>]

Sent: 30 April 2013 21:02

To: -

Subject: RE: T&L Sugars - TNP Query

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I am sorry to have been so long in replying.

You will need to continue to press the Environment Agency on the matter of ELVs for the plant from 1 January 2016. You will also need to calculate what the annual emissions allowance would be if the plant were placed in the TNP. That needs to be done in accordance with what is set out in the Commission Implementing Decision which I attach. The also-attached spreadsheet may also assist.

Richard Vincent

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From: -- [--

Sent: 09 April 2013 08:19

To: Vincent, Richard (Defra)

Subject: RE: T&L Sugars - TNP Query

Importance: High

Hi Richard,

Further to our discussion yesterday, I would like to make you aware of a key issue that we are finding pivotal in whether entry into the TNP would be correct for us.

The plant that presents our greatest challenge is a 22MW thermal input GT that exhausts through a fired waste heat boiler ((WHB) 43MW nrti on supplemental firing with GT on, or 57MW nrti on Aux firing with GT off). We have been unable to get IED ELVs for this plant configuration, and we understand from the EA that BAT is still being determined for this. Current ELVs for this plant are higher than for our conventional boiler plant (2x 55MW Aalborg boilers) yet all we have been able to find or have been given for 01/01/2016 are the GT NOx limits of 50mg/m3 (or 75 for efficient CHP). I anticipate that the WHB alone (Aux firing) would be treated as a conventional boiler plant with IED ELVs of 100/100/35 for NOx, CO, and SOx, but quite what happens with the GT and WHB being fired at the same time is not clear.

As we have low NOx burners, we feel that the IED ELVs would be challenging but manageable for our Aalborg boilers, and it is therefore the GT/WHB that causes us the concern. National Grid infrastructure is insufficient to provide adequate electrical supply for our process, and as such the GT and our CHP are critical to our operation.

I apologise for raising this issue rather late in the day, but clarification of an IED ELV for this plant is critical in our decision making processes.

Best regards,

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Environmental Compliance Manager

Tate & Lyle Sugars



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From:

Sent: 08 April 2013 16:04

To: Richard Vincent (richard.vincent@defra.gsi.gov.uk)

Subject: T&L Sugars - TNP Query

Importance: High

Hi Richard,

Thanks for the time to talk this afternoon.

As discussed, we managed to miss the May 2012 data submission for inclusion in the TNP for our Thames Refinery, Silvertown, London. We would welcome any opportunity to get our plant included in the TNP, and will generate data returns quickly to facilitate this.

I have your letter from the 28/12/2011, but not the spreadsheet for data return, so I would be grateful if you could send this through to me.

Thanks for your help with this matter.

Best regards,