

Regulation 60(1) Notice of request for information

Environmental Permitting (England and Wales) Regulations 2010 (as amended)

Notice requiring information

To: The Company Secretary
Dragon LNG Ltd
Main Road,
Waterston,
Milford Haven,
SA73 1DR

Permit Reference: EPR/AP3136UA


Regulated Facility: Milford Haven Energy
Dragon LNG Ltd
Waterston,
Milford Haven,
SA73 1DR

The Natural Resources Body for Wales (“Natural Resources Wales”), in exercise of its powers under Regulation 60 (1) of the above Regulations, requires you to provide the information detailed in schedule 1. The information is required in order to review your permit. The information requested shall be sent to the following address by **31st March 2015**.

Information must be sent to:

Anna Lewis (Principal Permitting Officer)
NRW Permitting Service (Cardiff)
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff, CF24 0TP

Or by email to anna.lewis@naturalresourceswales.gov.uk

Name	Date
	14/11/2014

Eirian Macdonald. Principal Permitting Team Leader
Authorised on behalf of Natural Resources Wales

Ffôn/Tel 03000 654 358
Ffacs/Fax 029 2046 8874
Ebost/Email Anna.Lewis@cyfoethnaturiolcymru.gov.uk
Anna.Lewis@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

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Notes:

1. For the purposes of discharging its functions under the Environmental Permitting (England and Wales) Regulations 2010 (as amended), Natural Resources Wales may (under Regulation 60(1) of those Regulations), require any person to provide the information within the period it specifies in this Notice.
2. Failure to comply with this Notice without reasonable excuse is an offence under Regulation 38(4)(a) of the Environmental Permitting (England and Wales) Regulations 2010 (as amended), and may lead to legal action being taken against you.
3. Making any statement in response to this Notice that you know to be false or misleading in a material particular, or recklessly making any statement which is false or misleading in a material particular is an offence under Regulation 38(4)(b) of the Environmental Permitting (England and Wales) Regulations 2010 (as amended), and may lead to legal action being taken against you.
4. There is no right to appeal against this notice.
5. You may wish to seek independent legal advice.

Environmental Permitting (England and Wales) Regulations 2010 (as amended)
Regulation 60(1)

SCHEDULE 1
INFORMATION REQUIRED

Natural Resources Wales is reviewing your permit having regard to Chapter III of and Annex V to the Industrial Emissions Directive 2010. We are principally concerned with emission limit values (ELVs) and associated monitoring requirements.

In submitting your response and supporting evidence, please make reference to your current EPR permit, application (as amended) and any other information you may have submitted to us in the past.

This information request relates to this proposed review. Please refer to the cover letter for further details.

Description of information

Please provide in writing a response to the following:

1. The name (DEFRA LCP identifier) of each Large Combustion Plant (LCP) and its date of operational commencement. Please use the link below to obtain the DEFRA LCP identifier:-

http://cdr.eionet.europa.eu/gb/eu/lcpes/envusnpzq/UK_LCP_Inventories_2010_2012.zip/manage_document

2. For each LCP, state which compliance route you have selected.

If you have not yet made a final choice between two (or more) compliance routes for an LCP, then all compliance routes under consideration shall be identified here for each relevant LCP.

- i. Article 30(2) Annex V Part 1 – ELV
- ii. Article 30(2) Annex V Part 3(2)(a) – 10,000 hour operational plant.
- iii. Article 30(2) Annex V Part 1 – 1,500 Limited Hours Derogation (LHD).
Note: this can apply to the whole or part of a LCP.
- iv. Article 30(2) Annex V Part 1 – 500 hour emergency operation.
- v. Article 30(2) Annex V Part 2 – ELV
- vi. Article 30(2) Annex V Part 2 – 500 hour emergency operation.

Description of information

vii. Article 32 – Transitional National Plan (TNP).

viii. Article 33 – Limited Lifetime Derogation (LLD).

ix. De-rating to less than 50 MW net rated thermal input.

3. Provide evidence of any notification you may have already made in relation to the TNP and LLD.

4. The configuration of each LCP:-

i. Identify the types(s) of combustion unit within the LCP:-

- Boiler
- Open Cycle Gas Turbine (OCGT)
- Combined Cycle Gas Turbine (CCGT)
- Engine
- Any other.

ii. For CCGTs, provide mode of operation details:-

- Is the GT run on its own? If so, identify the windshield through which the combustion gases vent.
- Is the waste heat recovery boiler fired in auxiliary mode? If so, identify the windshield through which the combustion gases vent.

iii. Identify the fuel options available for each combustion unit within the LCP.

iv. Identify how each combustion unit vents its waste gases:-

- Single unit venting into its own dedicated windsheild.
- Multiple flues within a common windsheild.
- Multiple units venting into a common 'chimney' stack.
- Any other combination.

5. The net rated thermal input of the LCP and the method by which it was derived, including evidence of any de-rating or proposals for de-rating including a time scale for implementation.

6. Define the “minimum start up load” and “minimum shut-down load”, for each unit within the LCP as required by the Implementing Decision 2012/249/EU¹ in terms of:

Description of information

- i. The output load (i.e. electricity, heat or power generated) (MW); and
- ii. This output load as a percentage of the rated thermal output of the combustion plant (%).

And / Or

- iii. At least three criteria (operational parameters and / or discrete processes as detailed in the Annex) or equivalent operational parameters that suit the technical characteristics of the plant, which can be met at the end of start-up or start of shut-down as detailed in Article (9) 2012/249/EU.

7. With reference to the IED BAT Non-ESI Review paper 28 October 2014:-

- i. Provide your proposed ELVs and describe how they accord with the principles outlined in that paper.

Note: You do not need to provide proposed ELVs for Article 30(2) Annex V Part 2 – 500 hour GT emergency operation plant.

- ii. If an LCP uses multi-fuel firing provide proposals for implementation (derivation, compliance and reporting) of ELVs in accordance with Article 40(1).
- iii. For open cycle gas turbines (OCGTs), combined cycle gas turbines (CCGTs) and combined heat and power (CHP), with reference to Annex V Part 1(6) and Part 2(6) of the IED, if you wish to apply for the higher oxides of nitrogen ELVs, provide the efficiency of each unit within the LCP, the LCP as a whole and with the method by which it was derived.
- iv. For gas turbines (GTs), including CCGTs, with reference to (6) above and your review of emissions data, propose ELVs for each unit and the LCP for operation between Minimum Start-up Load (MSUL) / Minimum Shutdown Load (MSDL) and 70% load. Supply the method by which they were derived.

8. For gas fired plant only. With reference to Article 30(6), if you wish to apply for the derogation to not undertake monitoring when on standby fuels, where such fuels are used less than 240 hours/year, provide a justification.

9. Monitoring Requirements. With reference to the IED:-

- a. Sulphur Dioxide, Oxides of Nitrogen, dust and Carbon Monoxide.

- i. Annex V Part 3(1) - LCP which are less than 100MWth input, or

Description of information

- ii. Annex V Part 3(2)(a) – 10,000 hour operational plant.

If you currently use CEMs and you want to apply for six-monthly monitoring (Annex V Part 3(3)), provide a justification.

- b. Sulphur Dioxide and dust

- i. Annex V Part 3(2)(b) – combustion plant fired on natural gas.

If you currently use CEMs and you want to apply for six-monthly monitoring (Annex V Part 3(3)), provide a justification.

- c. Sulphur Dioxide.

- i. Annex V Part 3(2)(c) and (d) – combustion plant fired on oil with known sulphur content and combustion plant fired on biomass respectively

If you currently use CEMs and you want to apply for six-monthly monitoring (Annex V Part 3(3)), provide a justification.

- d. Sulphur Dioxide and Oxides of Nitrogen.

- i. If you currently undertake six-monthly monitoring and you want to apply for the Annex V Part 3(5) monitoring derogation, provide a justification and a copy of your procedures.

1. The determination of start-up and shut-down periods for the purposes of Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (2012/249/EU)