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 Natural Resources Wales
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Date: 13th February 2020

Subject: Solutia UK Ltd – EPR Permit Number: BR9715IB
 IC36 – Boiler 16, and Condensing Economizer emissions

IC36: 'The Operator shall carry out additional monitoring on emission points A4 and A31 associated with Boiler 16 and the new condensing economizer to ensure that the 2 separate emissions when combined do not exceed the NOx ELV of 135mg/NM3 and the CO ELV of 75mg/Nm3. The report shall be submitted to NRW for approval'

We believe there to be a slight error in the wording of this Improvement item, in that the emission limits for both Boiler 16 [A4] and the Condensing Economizer [A31] are: (referenced to 15% oxygen) 75mg/Nm3 for NOx, and 100mg/Nm3 for CO. It is worth noting also that these benchmark emission limits apply to operation of the facility in CHP mode i.e. with the Gas Turbine unit running, and the waste heat being directed through the boiler – this being the normal operation

The configuration of the plant was outlined in the IC37 response (dated 31/05/19) i.e. it described that the flue gas composition at the two release points would always be the same, but simply spilt via the two discharge points in a proportion determined by the heat recovery requirement at any particular time - This may be different to the understanding of how the installation would operate when the associated Permit Variation application was originally submitted (hence this Improvement Item), which was some time before the Condensing Economizer unit actually went through the detailed design stage. In any event, since the commencement of operation of the Condensing Economizer in Q3/2019, emissions monitoring has been conducted on both; Boiler 16, and the Economizer by an MCertified emissions monitoring company, with the results as follows:

CE [12/09/19] A31		Blr 16 [13/12/19] A4	
NOx	53.3	NOx	43.6
CO	79.2	CO	89.5

This should hopefully demonstrate that the units are within compliance Vs the emission limit requirements, with ongoing emissions compliance testing to continue to be conducted on a (now) quarterly basis



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