

Our ref: JP3632ZH/2

Your ref:

The Company Secretary
Cofely Industrial Energy Services Limited
C/O Michael Booth, Stuart House
Coronation Road,
Cressex Business Park,
High Wycombe,
Buckinghamshire,
HP123TA

Rivers House
St Mellons Business Park
Fortran Road
St Mellons
Cardiff
CF3 0EY

Ebost/Email: www.naturalresourceswales.gov.uk

Ffôn/Phone: Customer services line: 0300 065 3000

June 2015

Dear Sir/Madam,

Request for further information on compliance with IED Chapter III ELVs for Large Combustion Plant

Permit Reference: EPR / JP3632ZH

Operator: Cofely Industrial Energy Services Limited

Facility: Barry Silicon Based Manufacturing Installation

Cofely Industrial Energy Services Limited,
Winbourne Road - Dock 2,
Barry,
Vale of Glamorgan,
CF63 3DH

Thank you for providing your response, dated 30 March 2015, to the regulation 60(1) notice of the Environmental Permitting (England and Wales) Regulations 2010 (the EPR) (as amended) that we sent to you on 14 November 2014 letter reference JP3632ZH.

Unfortunately your response did not contain sufficient information for Natural Resources Wales to undertake the required review of your environmental permit.

Therefore, you are required to provide additional information in support of your original response to that notice as soon as possible but no later than 30 June 2015.

The questions below relate directly to the questions in your notice. In order to provide your answer, please refer to that notice and '*IED BAT ESI Review paper 28 October 2014*' enclosed with it.

Cyfoeth Naturiol Cymru

Plas-yr-Afon, Parc Busnes Llanelirwg, Llanelirwg, Caerdydd,
CF3 0EY
Llinell gwasanaethau cwsmeriaid: 0300 065 3000
Ebost: www.cyfoethnaturiolcymru.gov.uk

Natural Resources Wales

Rivers House, St Mellons Business Park, St Mellons, Cardiff,
CF3 0EY
Customer services line: 0300 065 3000
Email: www.naturalresourceswales.gov.uk

You are advised to contact your local Regulatory Officer, Toby Griffiths, for guidance on 03000 653061 or email toby.griffiths@cyfoethnaturiolcymru.gov.uk.

Please send your response by email to anna.lewis@cyfoethnaturiolcymru.gov.uk and copy to me and your local Regulatory Officer.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'A Leakey', with a long, sweeping underline.

TONY LEAKEY

Pollution Prevention & Control Technical Specialist

Ffôn/Tel 03000 653087

Ffacs/Fax 029 20369810

Ebost/Email antony.leakey@naturalresourceswales.gov.uk

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

Additional Information Required in support of Regulation 60(1) Notice response

Please provide in writing a response to the following:-

1. Q5 of the notice:-

- Provide the method by which you derived the net rated thermal input figure.

Note: - we will accept the guarantee performance test figure from when the LCP was first commissioned or if undertaken after plant upgrade. Confirm when this was undertaken, by whom and to which standard / code.

2. Q6 in the notice:-

- Provide details of three start-up/shut down criteria (for the gas turbines) and the Minimum Start-Up Load and Minimum Shutdown Loads (for GTs and boilers). Details of how these have been derived are also required. This must be made with reference to the Implementing Decision 2012/249/EU:-

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012D0249&qid=1430229220585&from=EN>

You should have based MSUL / MSDL for the GTs on three criteria as defined in Article 9 of the Implementing Decision document.

Note: - Load or fuel input flow is normally used as the third, fail safe, criteria since they can vary with ambient conditions. The first two criteria may be, for example, triggers such as switch from lean pre-mix to diffusion mode and GT outlet temperature. Provide a justification, supported by site-specific data, (spreadsheet / graphical format) for all of the criteria options identified in the Implementing Decision Document, and a demonstration why the criteria you have chosen adequately demonstrate when the LCP is out of start-up / into shutdown.

3. Q7 in the notice:-

- For the TNP compliance route you have chosen, propose ELVs based upon current performance using the principles set out in the IED BAT Non-ESI Review paper dated 28 October 2014 and provide justification for the ELVs you have requested. This must be supported by a summary of emissions data.
- You have not proposed GT ELVs for operation between Minimum Start-up Load (MSUL) / Minimum Shutdown Load (MSDL) and 70% load. Either confirm that full load GT ELVs can be applied at all loads or propose part load ELVs consistent with the approach described in the ESI – IED Compliance Protocol for Utility Boilers and Gas Turbines, Rev. 1, February 2015 (available on the Energy UK website at <http://www.energy-uk.org.uk/publication/272-governmentdocuments.html>).

Please provide part load ELVs derived as described in the Protocol along with justification for the ELVs you have proposed. This must be supported by a summary of emissions data.

- Where part load CO ELVs greater than 110 mg/m³ are proposed you must also provide an environmental impact assessment for partial combustion products.

END