

From: [REDACTED]
To: [REDACTED]
Subject: Sizewell C Combustion Activity - Permit Application EPR-MP3731AC-A001 - Request for further information
Date: 01 March 2022 15:16:00
Attachments: [image001.png](#)

Dear [REDACTED]

Further to our conversation earlier today. We require the following additional information in support of the above application. Please respond by 9th March 2022. If you require more time, please call me to discuss.

1. Provide further information about the actual operating hours of the generators during the commissioning phase. Explain in more detail what will be done to minimise the hours of operation at the site during the commissioning. Also, explain in more detail why the generators are required to be operated within the proposed hours during the commissioning. Is there a link between the commissioning of the generators and the commissioning of the SZC EPRs?

Reason: Under the Medium Combustion Plant Directive (MCPD) new medium combustion plants that do not operate more than 500 operating hours a year, as a rolling average over a period of three years, may be exempt from compliance with the emission limit values set out in Part 2 of Annex II. This will apply to SZC Combustion Activity during the operational phase of the plant.

However, SZC Combustion Activity will operate for 4 892 hours during the commissioning in the first 2 years. Table 4.1 of the Schedule 5 Response - Air Quality Assessment confirms that each of the 4 Unit 1 EDGs will be run for 242.5 hours during commissioning. Each of the 2 UDGs will be run for 738 hours. This is an aggregated total of 2,446 hours operation for the 12 months of commissioning. On the second year of the commissioning each of the 4 Unit 2 EDGs will be run for 242.5 hours during commissioning. Each of the 2 UDGs will be run for 738 hours. This is an aggregated total of 2,446 hours operation for the 12 months of commissioning. This is more than 500 operating hours a year and therefore the plant should be compliant with the emission limit values set in Part 2 of Annex II of the MCPD during the commissioning phase.

Application Document ref. 100207658 states that some of the 738 hours needed for commissioning the UDGs will involve tests that can be carried out before the engines are brought to site. The commissioning hours presented therefore represent a conservative estimate of the time for which plant will be run during this phase. It also states that commissioning operations were not considered in the GDA as this is a site-specific activity dependant on manufacturer's recommendations. Table 4.1 Schedule 5 Response – Air Quality Assessment also states that actual commissioning hours and sequencing is still to be confirmed.

2. Confirm whether the proposed generators can be run on ultra-low sulphur gas oil (sulphur content max 0.001%). And if not, justify this.

Reason: Application Document ref. 100207658 states that fuel to be used in diesel generator engines must contain less than 0.1% sulphur (in line with the SCOLF Regulations). However, ultra-low sulphur gas oil (sulphur content max 0.001%) should be available and therefore this is considered BAT for the installation.

Kind regards

[REDACTED]