Frequently Asked Questions

Environment Agency Permit Review of Medium Combustion Plant operated at regulated Installations (MCP Permit Review)

Version 3.0 (last updated 04/06/2024)

# Introduction

Schedule 25A of the Environmental Permitting Regulations places a duty on the Environment Agency (EA) to apply the requirements of the Medium Combustion Plant Directive (MCPD) (EU) 2015/2193. Where medium combustion plant is at a permitted installation and is existing, the EA intends to do this by carrying out an Agency led permit review. The purpose is to improve air quality across England with an outcome of improved health outcomes.

This FAQ document is intended to support operators of installation permitted facilities who have or are about to receive a regulation 61 notice asking them about medium combustion plant at their regulated facility.

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# Scope of the MCP Permit Review

Regulated facilities in England with an Installation (Industrial Emissions Directive (IED)) permit which have existing combustion activities between 1-50 MWth rated thermal input operated as the primary activity or as a Directly Associated Activity (DAA) are within the scope of this permit review as whilst the plant is referenced as forming part of their permit they may not have had the requirements (i.e. monitoring requirements and emission limit values) of the MCPD applied to all their existing MCP plant.

In some cases, we may have carried out a review previously, but we are missing some key details about your combustion plant, so we are using the regulation 61 notice to obtain this information, but it won’t necessarily mean we need to vary your permit as a result.

If operators have existing or new medium combustion plant on site which is not identified in the installation permit either as an activity (e.g., DAA or 1.1.A) or as a point source discharge point to air in schedule 3 of the permit then the operator will need to apply for a variation to add it to the permit as soon as possible, this includes where the plant was previously permitted and was removed. It is not appropriate for us to add combustion plant whose impacts have not been previously assessed as part of this permit review.

Medium combustion plant and/or specified generators which are considered standalone and not forming part of the installation (eg for office heating) should obtain a [separate permit](https://www.gov.uk/guidance/medium-combustion-plant-apply-for-an-environmental-permit) for these activities before the deadlines given in the legislation or where this has passed, as soon as possible, and are not in scope of this review.

# Permit review process

## Q: How will the permit review process work?

A: The Environment Agency will be contacting specific operators we believe to be in scope of this review with a [regulation 61 notice](https://www.legislation.gov.uk/uksi/2016/1154/regulation/61/made#:~:text=%E2%80%94(1)%20For%20the%20purposes,is%20specified%20in%20the%20notice.) requiring them to provide information about any qualifying existing medium combustion plant (MCP) (e.g. boiler, engine, turbine) with a net rated thermal input between 1 and less than 50MWth included within their permitted installation.

The regulation 61 notices are planned to be sent out on a sector basis between May and June 2024 as follows:

20 May – 24 May 2024:

* Cement, Lime, and Minerals
* Combustion (not data centres)
* Slaughterhouses and Animal By-product (SA)
* Nuclear
* Oil and Gas
* Paper and Pulp
* Refineries
* Textiles
* Metals

10 June – 14 June 2024:

* Combustion (data centres)
* Chemicals
* Landfill

We do not intend on contacting Agricultural operators (intensive farming installations) until a later date which is yet to be decided.

The notice will be sent via email to the operators nominated contact from our records. This will have been provided by the operator as part of a permit application or subsequently to an EA Compliance Officer. If you are concerned if we might have the correct contact details, then you should contact your local compliance officer with an update.

The notice will ask for information about:

* Any existing medium combustion plant 1-50MWth. Details such as those show in this [[spreadsheet](https://consult.environment-agency.gov.uk/psc/mcp-and-sg-regulations/supporting_documents/MCP%20list%20installations%20permit%20review%20v5.0.ods)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1183767/MCP-generator-list-v3.ods) will be required for each plant.
* Confirmation where applicable that you have no in scope MCP(s) or you believe they are excluded under MCPD Article 2.
* For combustion plant 5-50MWth demonstration that you already meet or have plans to meet the MCPD emission limit values by the regulatory deadline of 1st January 2025.

Operators will be given 2 months to return this information via a specially created response tool (using Smart Survey), a link will be provided to the tool in the Regulation 61 notice.

Once received the Environment Agency (EA) will review the information provided checking it against the local regulatory officer`s knowledge of the facility.

If necessary, we will then carry out an Environment Agency led variation to the permit to ensure that it includes, as a minimum, the requirements in the MCPD. The timing of any variation to your permit will depend on the various risk factors for example the size of the plant at your facility, The EA will start this process from September 2024 onwards.

Variations to Installation permits with only existing MCP 1-5MWTh are not likely to start until 2028 but the data collected through this Notice will support our business planning.

Before we vary your permit, you will be contacted by a permitting officer to let you know that the determination has begun and to check if there have been any changes since submitting your regulation 61 response.

## Q: I didn’t receive a notice during the time frames give above and I think we should have as we operate combustion plant on our installation. What shall we do?

A: please contact [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk) and let us know. Please include permit number, operator name, and facility address.

## Q: If my permit needs to be varied what will change and what will, and won’t you be assessing as part of this variation?

A: The main purpose of the permit review EA led variation will be to add the minimum emission limit values (ELV’s), stack monitoring and reporting requirements from the MCPD to your already permitted MCP(s).

This review will not lead to any backsliding from current permit conditions e.g. existing emission limits will continue to be applied where they are tighter than the ELVs given in the MCPD. Nor can the permit review be used to amend these previous set ELV’s due to changes to operations, this would require an operator led variation.

EU Best Available Technique reference documents (BREF’s) normally exclude from their scope any plant covered by MCPD. If by exception a BREF does cover an MCP the BAT-AELs would only be applied as appropriate if more stringent than MCPD ELV’s.

As the assessment of the environmental impacts from air emissions was performed at the time the combustion activity was first permitted, there will be no reassessment of the impacts to air quality or habitats as part of the review.

Where MCP review is the only purpose of the variation there will be no modernisation (consolidation) carried out on the permit.

Stack monitoring and reporting frequencies requirements will be required to follow the MCPD as a minimum. If the current permit requires more frequent monitoring, there will be no change required.

The monitoring method to be used will be [MCERTS](https://www.gov.uk/government/collections/monitoring-emissions-to-air-land-and-water-mcerts) other than in the situations given in table 1 below when the [‘monitoring stack emissions; low risk MCPs and specified generators](https://www.gov.uk/government/publications/monitoring-stack-emissions-low-risk-mcps-and-specified-generators/monitoring-stack-emissions-low-risk-mcps-and-specified-generators)’ (formerly called TGN M5) can be used instead:

Table 1

|  |
| --- |
| Individual MCPs with a rated thermal input of ≤20MW, that aggregate to less than 50MWth, which use natural gas or gas oil (light fuel oil), providing you MCP is not located in an AQMA. |
| MCPs operating for <500 hours per year, without a specified ELV |
| Diesel back-up generator MCPs that are operated for <50 hours per year, without a specified ELV |

There will be no exemptions for monitoring requirements for less than 500 hour per year plant or emergency back-up plant with a test limit of 50 hours per year.

## Q: How much will the permit review variation cost?

A: The underlying principle is that our charges reflect the amount of technical assessment and permitting effort required to complete the review.

The standard fee for the permit review variation is a normal variation charge, this will vary according to the sector your primary activity falls into. You should refer to the [charging scheme](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1098117/Environment_Agency_EPR_and_Abstraction_Licensing_Charging_Scheme_2022.pdf) for more information. If once the EA has carried out the permit variation, we think that a minor variation charge is more appropriate and proportionate given the time spent carrying out the variation determination they will apply this charge instead.

You will receive an invoice after the variation has been determined and issued.  Failure to pay will lead to debt recovery process being followed.

If there are no changes to permit conditions required, then there will be no EA led variation and no charge.

Where a variation forms part of a wider BREF review or operator led variation application which means we do not need to do an MCPD specific variation it will be included in that variation charge (i.e., there is no additional charge on top of that).

## Q: I don’t have any medium combustion plant at my facility, do I still need to complete the response tool?

A: Yes, we’d like you to use the response tool to confirm that this is the case. It will only take you a few minutes. Please do not email us unless you cannot use the response tool for accessibility reasons. Our local regulatory officers will review your response to ensure that it matches their understanding of your facility.

## Q: My combustion plant is exempt from the requirements of the MCPD under Article 2, do I still need to complete the response tool?

A: Yes, we’d like you to use the response tool to confirm that this is case and give us details of why you think your plant is exempt. It will only take you a few minutes. Our local regulatory officers will review your response to ensure that it matches their understanding of your facility.

## Q: My permitted site will soon be sold to another company and a permit transfer will be required.  How will this affect timescales for the permit review?

A: If you have an application for a transfer already submitted to the EA and it is likely to be determined within the regulation 61 response period then you do not need to complete the response tool, instead please contact us at PSC@environment-agency.gov.uk to let us know and we will then contact the new operator with the regulation 61 notice once the permit has been transferred instead. If you don’t yet have an application for a transfer submitted or it won’t be determined before the end of the regulation 61 response period, then the current operator is still responsible with complying with the regulation 61 notice and should complete the response tool. Please include the permit number, transfer application number and facility address in any correspondence.

## Q: My permit has already been transferred to another operator, what should I do?

You do not need to complete the response tool. Contact us at [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk) and let us know and we will send the regulation 61 notice to the new operator instead. Please include the permit number and facility address.

## Q: my permit has been surrendered or is in the process of being surrendered, what shall I do?

You do not need to complete the response tool. Contact us at [PSC@environment-agency.gov.uk](mailto:PSC@environment-agency.gov.uk) and let us know. Please include the permit number and facility address.

## Q: We are currently making changes to our installation which will require an operator led permit variation application. Can this be combined with the permit review of MCPs?

A: Where you are preparing a variation application or have recently submitted one for other planned changes to the permit or to add MCPs not currently permitted, then you should continue to prepare, submit and pay for that application and ask for us to include a review of the medium combustion plant at the same time.  We will do our best to align the variations where possible to keep the number of variations and therefore the charges to a minimum. You should continue to submit a response to this regulation 61 notice as this will provide all the necessary information on file for our permitting staff to use in any review of your permit against the MCPD as part of the operator led variation and alert them that you are soon to submit your own variation application.

## Q: I would like to make some minor changes to my permit can this be done as part of the permit review?

A: This will depend on the extent of the proposed changes.

We are happy to include administrative changes in the permit review variation, use the open text boxes provided in the response tool to let us know what admin changes you’d like us to make.

We cannot include in this permit review variation anything that would require additional technical assessment such as adding new or existing medium combustion plant not already included in your permit, in these cases you need to make an operator led variation application instead.

We also won’t include in the review any changes such as amendments to operational hours in the permit or changes to previously set ELV’s and monitoring requirements which are tighter than MCPD perhaps due to changes in use or mode of the plant.

## Q: How will the EA review permit’s which are part of a multi operator installations?

A: A multi operator installation is one where there are two or more separately permitted operators. For example, a third party may operate, and be issued with a permit for the operation of the combustion plant separate to the primary listed activity.  In all instances the operator of the medium combustion plant should complete the response to the regulation 61 notice as they are responsible for the plant.

## Q:Will you vary my permit to include MCP 1-5MWth when rules do not apply until 2030?

Where there are MCP 5-50MWth we will also include MCP 1-5MWth at the same facility unless requested not to do so by the operator due to planned closure before 2030 or because they are likely to be replaced or changed before 2030. ELVs will be post-dated to the compliance deadline depending on the thermal input of the MCP. There are questions in the response tool which allow you to tell us what you want.

If there are only MCP 1-5MWth at the facility, we will be programming in the review of these once we have completed all the permit reviews for larger 5-50MWth MCPs, but before the 1st January 2029. We will contact you before we start this work to check that the information supplied is still correct or if there have been changes to your medium combustion plant operations since you responded to this regulation 61 notice.

Where possible we will try and link this to other sector-based reviews or operator led variations being carried out to prevent multiple variations to those permits and minimise the charges we make to operators.

# Completing the regulation 61 response tool

The following series of question should provide guidance on how to answer each of the questions in the response tool.

## Q: Which sector does my installation fall under (Q4 of the response tool)?

A: You should choose the sector from the pick list which most closely matches the primary purpose of your installation. We are asking this question to aide our analysis and QA of your response using staff with the correct knowledge and skills.

## Q: What is the difference between existing and new medium combustion plant (Q11 of the response tool)?

A: guidance on whether medium combustion plant is new or existing can be found [here.](https://www.gov.uk/guidance/medium-combustion-plant-when-you-need-a-permit#:~:text=MCPs%20are%20new.-,When%20a%20MCP%20is%20classed%20as%20new%20or%20existing,-The%20date%20you)

In summary an MCP is:

new – if it’s put into operation on or after 20 December 2018.

existing – if it was put into operation before 20 December 2018.

## Q: how do I know what the net rated thermal input of my combustion plant is?

A: You can calculate the net thermal rated input capacity of your MCP by [following the guidance](https://www.gov.uk/guidance/medium-combustion-plant-when-you-need-a-permit#:~:text=the%20heat%20generated.-,Capacity,-MCPD%20controls%20apply).

The net rated thermal input of the combustion plant, or a unit comprising part of a combustion plant, is the Net Thermal Input, i.e., the thermal input based upon the Net Calorific Value of the fuel, also known as the Lower or Inferior Heating Value. The Gross Thermal Input is based on the Gross Calorific Value of the fuel, also known as the Upper or Superior Heating Value. If the Gross Thermal Input is provided then multiply by 0.90 to obtain the Net Thermal Input, for natural gas fired plants, or by 0.94 for fuel oil fired plants (diesel, gas oil or generic fuel oil).

For boilers, the ‘nameplate’ Thermal Input should be used, i.e., the badged value from the physical nameplate. If the nameplate is missing or illegible, the manufacturer’s data sheet may be used instead. Only when this information cannot be obtained directly, then the Thermal Input can be estimated from the steam or hot water duty as described by the [Combustion Engineering Association guidance.](https://cea.org.uk/boiler-calculations-for-mcpd/)

For engines, the Net or Gross Thermal Input may be available on the manufacturer’s data sheet rather than on the nameplate. If this is not available then the Net Thermal Input can be estimated from the engine design data as described by the [Association of Manufacturers and Suppliers of Power generating Systems (AMPS).](https://www.amps.org.uk/wp-content/uploads/2023/06/AMPS-Guidance-for-determination-of-thermal-input-power-of-generators-.pdf)

For gas turbines, use the ‘as built’ value of net thermal input, unless the plant has been modified significantly, resulting in an improvement that increases the rated thermal Input (which typically requires a performance test to demonstrate that guaranteed improvements have been realised). Evidence to support the rated thermal input value, in order of preference, shall be in the form of: a) Performance test results during contractual guarantee testing or at commissioning; b) Performance test results after a significant plant modification; c) Manufacturer’s contractual guarantee value; d) Published reference data, e.g., Gas Turbine World Performance Specifications (published annually); e) Design data; f) Operational efficiency data as verified and used for heat accountancy purposes; g) Data provided as part of Due Diligence during the acquisition of a company.

## Q: should I answer Q11 of the response tool if my plant is exempt under article 2 of MCPD?

A: yes, we will ask you about your exemptions to MCPD in later questions in the response tool.

## Q: Question 12 ask if the MCP are included in the current permit, what do the different options mean?

A:

Installations are defined in [Regulatory Guidance Note No. 2 Understanding the meaning of regulated facility (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/media/603669608fa8f54807540920/LIT_6528.pdf)

The medium combustion plant at your facility maybe included in the installation permit in one of 3 ways:

1. It could be a **primary activity** which is listed in part 2 of schedule 1 of the Environmental Permitting Regulations (EPR) for example a section 1.1 Part A (1) activity ordinarily given in table 1.1 of the permit.
2. A **directly associated activity**, meaning there is a technical connection to the MCP with the primary activities which could have an effect on pollution. Core guidance ‘limb (ii) tests’ can be used to identify the DAA’s. It should be clear in your permit if your MCP(s) are DAA’s, if you are unsure, you should contact your local regulatory officer to establish this. There is also more guidance given in RGN 2 which may help you to determine if the MCP(s) is or should be a DAA to the installation permit.

It should be noted that the connection to the national electricity or domestic gas supply system would always break the technical connection and would not be included within an Installation permit. For example, where a power station is connected through the national gas supply grid or to a producer of natural gas the technical connection is broken by the grid. Where connections are also made to natural gas which are owned and operated by the same operator as the installation that the technical connection is also broken where this is outside the permitted area. MCP’s related to this plant should apply for a stand-alone permit at the appropriate time given in the regulations and do not need to be included in your Reg 61 response.

3. A **point source emission** will be referenced in the permit as listed emission point. If the MCP uses this emission point even if it has not been otherwise referenced in the permit, we will take this as being ‘permitted’ as it is clear that it will have been included in any previous air emissions assessment.

Where a permit refers to a separate Part A installation permit which covers the MCP relating to your installation then a separate regulation 61 notice will have been sent to the operator of the other part A permit application and they will complete the response tool providing the information about the MCP. If you have not other MCP’s relating to the installation, then you can complete the response tool to let us know that you do not have any permitted MCP’s.

## Q: Do we need to include MCP’s which are leased from a hire company?

A: If the MCPs are to be on site longer than 6 months they would assumed to be the responsibility of the installations facility operator (not the lease company) and would either need to form part of the installation permit (if directly associated or a primary activity) or a stand alone permit depending on the purpose (e.g. office heating).

## Q: What is the Article 2 (3) MCPD exclusions referred to in the response tool at question 15?

A:

Where exclusions apply to your combustion plant via Article 2, Paragraph 3 of the MCPD the operator will be asked to confirm this in their response to the information request. You can read about the exclusions in our [guidance](https://www.gov.uk/guidance/medium-combustion-plant-when-you-need-a-permit#:~:text=new%20or%20existing-,Excluded%20MCP,-MCPD%20controls%20do) or directly in the [directive](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L2193#:~:text=carbon%20monoxide%20(CO).-,Article%C2%A02,-Scope).

If any exclusions do apply you will be asked supply evidence which supports this. The evidence should take the form of a statement of how the plant functions and include details about which of the exclusion to the MCPD apply.

## Q: What are back-up generators, as per question 18 of the response tool?

A: A back-up generator is the common term used for a generator operated only in an emergency and for less than 50 hours per year for testing only. There is more guidance [here.](https://www.gov.uk/guidance/medium-combustion-plant-mcp-comply-with-emission-limit-values#:~:text=Less%20than%20500%20operating%20hours%20per%20year%20exemption) The question is intended to help us plan our work in relation to low risk activities such as these.

## Q: How will I know if my combustion plant is compliant with Annex II emission limit values given in part 1 of the medium combustion plant directive (MCPD) in response to Q20 of the response tool?

A: you will need to look at the tables in the [MCPD, Annex 2, part 1](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L2193#d1e32-15-1) and identify which table best matches your plant(s), you then look at the fuel you are using and can read the emission limits which will be applicable as a minimum. If you have tested the emissions from your plant previously you should then be able to confirm if you can meet the limit or not. If you have not tested and do not know if your plant can meet this limit you should select ‘don’t know’, If there is multiple plant with different situation for each select the worst case. I.e. if there is one or more plant where you don’t know or know that you cannot meet the ELV’s make this selection even if other plant will be able to comply.

## Q: What will the appropriate method for monitoring of stack emissions be for my plant?

A: use this [guidance](https://www.gov.uk/guidance/medium-combustion-plant-mcp-comply-with-emission-limit-values#monitoring:~:text=In%20England%20there%20are%202%20monitoring%20standards%20available%20for%20MCP%3A) to determine the most appropriate method to test your stack emissions. We will add an appropriate method to your permit unless there is already a requirement which is more robust in which case we will apply the no back sliding principle and the existing requirement will remain.

Q: When am I required to demonstrate compliance with MCPD emission limit values with monitoring returns?

If existing plant can’t meet the MCPD emission limit values, there is no derogation process. Establishing if plant can meet the ELV’s as soon as possible is recommended to give time to take action to ensure compliance by the 1st January 2025.

For existing MCPs Annex 3, para 4 of the MCPD states that “the first monitoring measurements needs to be carried out within 4 months of the grant of a permit to, or registration of, the plant, or the date of start of the operation, whichever is latest” in this case the plant is already permitted so we will instead give the compliance deadline of either 1st Jan 2025 or 2030 depending on the size of the plant, in other words first monitoring measurements demonstrating compliance should be provided to the regulator before that date. We will accept first monitoring that has been carried out within the last 2 years before the relevant compliance deadline i.e., after 01/01/2023 for 5-50MWth MCP’s and 01/01/2028 for 1-5MWth MCP’s.

You can provide the monitoring information in the response tool or defer it until the relevant compliance date. Ensure you use an appropriate monitoring method relevant to the plant otherwise it may not be accepted (see above), monitoring provisions will be specified in the monitoring conditions as part of the permit review variation.

If you don’t send your monitoring data as proof of compliance as part of the regualtion 61 response tool you should instead send them directly to your local compliance officer before the 1st January 2025 (form 5-50MWth) or 1st January 2030 (1-5MWth).

## Q: What file size can you accept as part of the Regulation 61 response?

A: When providing your submission via the response tool, ensure you only include and upload when prompted supporting information that we need to see to carry out the permit review. There is a file size limit of 50MB for each upload. You should avoid having to password protect access on the files.

## Q: can I save my response at the end?

Yes, at the end of the form you will be given the option to ‘print’ this will create a document in the format that you can save your response for your own future reference.

## Q: can I partially complete the response tool and save it to finish on another day?

Yes, there is an option to save your response and complete it later, when you select this option, you will be sent an email with a link which will allow you to resume your submission.

# Completing the combustion plant list as part of the response tool

Within the response tool, if you have in scope MCP(s) you will be asked to download and complete an excel spreadsheet to provide information about each of the MCP(s). There is guidance given within the sheet but here some other commonly asked questions when completing this [sheet](https://consult.environment-agency.gov.uk/psc/mcp-and-sg-regulations/supporting_documents/MCP%20list%20installations%20permit%20review%20v5.0.ods)

## Q: What should I use as a ‘plant name’?

A: You can use any name you like to identify your plant. It may be helpful however if you refer to the same plant names which are already included in the permit so we can match them up.

## Q: The plant is so old that I don't know the manufacturers name model number for the plant, what shall I do?

A: You can leave these fields blank if you don’t know this information.

## Q: Do I have to complete all the options given for the emission point location?

A: No, you can do either National Grid reference, Easting and Northing or Latitude and Longitude

## Q: I don’t know the exact date the operation started, what shall I do?

A: Try and make a best guess of the year and put for example 01/01/1950

## Q: Why are the technology or type of plant limited to specific options?

A: you must select from the drop down provided, these of the technology types as provided for in the medium combustion plant directive.

## Q: The fuel we use isn’t listed in the drop-down options, what should we do?

A: certain fuels such as Hydrogenated Vegetable Oil (HVO), Industrial Heating Oil (IHO) and Hydrogen were not provided for in the medium combustion plant directive so are not listed. You should select gas oil and give more details in the open text box on question 31 for the response tool.

## Q: What is Article 6 (3) of the MCPD with reference to limited operating hours plant?

A: [Article 6 (3) of the MCPD](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L2193#:~:text=of%20Annex%20II.-,3.,-Member%C2%A0States%20may) states that MCP which operate less than 500 operating hours per year, as a rolling average over a period of five years are exempt from compliance with the emission limit values set out in tables 1,2 and 3 of part 1 of Annex II. We want to know if your combustion plant will fall into this exemption. We have provided guidance [here.](https://www.gov.uk/guidance/medium-combustion-plant-mcp-comply-with-emission-limit-values#monitoring:~:text=Less%20than%20500%20operating%20hours%20per%20year%20exemption) There is also guidance on how to calculate operating hours [here.](https://www.gov.uk/guidance/medium-combustion-plant-mcp-comply-with-emission-limit-values#:~:text=How%20to%20calculate%20operating%20hours)

## Q: how do I calculate my annual operating hours?

A: Refer to the section on How to calculate your operating hours at the following link:

[https://www.gov.uk/guidance/medium-combustion-plant-mcp-comply-with-emission-limit-values](https://www.gov.uk/guidance/medium-combustion-plant-mcp-comply-with-emission-limit-values )

We are asking for the anticipated or expected operating/running hours which should be your best guess. This figure will not be used in your permit variation to set requirements to operate in accordance with the hours you put forward, unless:

* There are already limits to operating hours for this specific plant within the permit (these will remain in the permit and the figures put forward should therefore be within that restriction)
* You have confirmed the plant is a limited operating hours plant (hours must be less than 500 hours per year – see above for more details)

## Q: What is an annual load factor?

A: average load that the combustion plant is intended to be utilised at over a 12-month period.

## Q: I haven’t got any secondary abatement fitted to my plant, is this a problem?

A: No, you don’t necessarily need abatement fitted to meet the emission limit values, but some plant will. Other operators may have fitted abatement anyway to reduce emission for other reasons. We are interested in this data to understand how existing plant is performing and methods being deployed to keep emissions low.

## Q: What additional documents might I need to upload for you to consider as part of this permit review?

A: If you are wondering what to upload it probably means you don’t have anything relevant! This option is provided because you may feel it necessary to send us Manufacturers specifications, details of monitoring that has been booked or any other information you may wish to provide if you combustion plant is excluded under article 2.

# If you have any further questions

Please read the guidance [here](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)

If you have any questions about specific permit applications, you can access pre-application support [here](https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit), selecting the ‘installations activities’ form. You can also contact your local area officer for site specific questions.

You can join our MCP and SG mailing list [here](https://www.smartsurvey.co.uk/s/VTAPQA/)

All other enquiries can be made to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk) or call us on 03708 506 506