### IED & Large Combustion Plant

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Introduction

- How IED affect new & existing LCPs
- What EA is doing to minimise uncertainties
- I will cover:
  - LCP BRef & BAT conclusions
  - IED requirements – some new issues
  - IED Interpretational Issues & communications
  - Timing and reviewing permits
IED & BAT Conclusions

- Chapter III – LCP requirements are minimum
- BAT Conclusions shall be reference in setting permit conditions
- BRef derives BAT Conclusions – TWG
- Art.13 Forum – MS, NGOs, Industry etc.
- Conclusions are adopted by Art.75 Committee
- Permit ELVs shall not exceed BAT AELs
  - Derogations?
UK LCP BRef Process

- UK submitted ‘wish list’ to Commission in May
- Common UK position – agencies & industry
- Key issues
  - New & existing plant – all fuels
  - Cost & benefit
  - UK transition to low C generation
  - Primary abatement measures preferred
  - Load factors & projected plant life
  - CCS, CHP and being ready
  - Biomass
- BAT AELs and 19 supporting documents - evidence
Europe LCP Bref Process

- Starts October
- Richard Chase & industry reps for UK
- UK TWG feed back to LCP Stakeholders group
- BRef concludes 2013 or later
- BAT Conclusions adopted 2014 or 2015? – 4 years to comply

- For now UK LCP BAT as submitted to BRef
IED LCP requirements

- ELVs – new 30(3) & existing 30(2)
  - Common stack aggregation (not <15MW)
  - Fuel interrupt derogations
  - Not for diesel engines
- BAT review for non-commercial fuels by Dec.2013 – different ELVs ?
- CO ELVs for GTs

NB: Current 4(4) opt out may only be new plant
IED LCP requirements

- Transitional National Plan Art.32
  - Existing plant operating before Nov. 2003
  - Plan for SO2, NOx & PMs – note still CO ELV for GTs
  - Not for refineries non-commercial fuel
  - Art. 41 – TNP rules – calculation of annual emission – 2016 to 2020 June, then 30(2) ELVs
  - 2015 permit ELVs minimum to be maintained
  - UK to confirm TNP plant before end 2012
IED LCP requirements

- Limited Life Derogation Art. 33
- Existing plant operating before Nov. 2003
- 17,500 hours 2016 to end 2023
- 2015 permit ELVs minimum to be maintained
- Operators to confirm LLD plant before end 2013
IED LCP requirements

- Annex V ELV derogations
  - Existing plant operating before Nov. 2003
  - Less than 1,500 hrs / year as a 5 year rolling average
  - Can be for part of a plant / common stack
- GT for emergency use < 500 hrs a year
- No IED ELVs
IED LCP Consistency in the UK

- LCP Stakeholders Group
  - Defra Chair, periodic meetings
  - Trade bodies, agencies, DAs, operators & NGOs

- Interpretational Issues for IED Implementation
  - Replaces JEP Framework & will be for some 350 UK LCPs
  - More than just JEP & AEP
  - Definitions & protocols e.g. Mixed Techniques, Start up & Shut down, Break down, Monitoring.
Timescales


January 2013
- transposition by Member States (via EPR)
- applies to new installations

Jan. 2013 - applies to existing installations (except LCPs)

June 2015 - applies to new Annex 1 activities

1 January 2016 - applies to existing LCPs
Derogation Timescales

- **TNP** – notified to EC by 01/01/2013
- **LLD** – Notify CA by 01/01/2014

Permitting Time Scales

- **BAT Conclusions adopted > 2015, IED permit review** in 2015 for 1/1/2016 including ELVs for ex NERP plant opting for TNP or LLD and a BAT review asap to allow 4 years to comply