Pollution inventory reporting – incineration activities guidance note

Environmental Permitting (England and Wales) Regulations 2016 Regulation 61(1)

Published February 2020
We are the Environment Agency. We protect and improve the environment. We help people and wildlife adapt to climate change and reduce its impacts, including flooding, drought, sea level rise and coastal erosion.

We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people’s lives and contributes to economic growth.

We can’t do this alone. We work as part of the Defra group (Department for Environment, Food & Rural Affairs), with the rest of government, local councils, businesses, civil society groups and local communities to create a better place for people and wildlife.

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Environment Agency
Horizon House, Deanery Road,
Bristol BS1 5AH
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

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Contents

Pollution inventory reporting – incineration activities guidance note ...................................................... 1
Environmental Permitting (England and Wales) Regulations 2016 Regulation 61(1) .................................... 1

Contents .......................................................................................................................................................... 3
1. Introduction ................................................................................................................................................ 4
2. Emissions to air ................................................................................................................................CSR  5
   2.1 Relevant pollutants .................................................................................................................................. 5
   2.2 Emission sources .................................................................................................................................... 7
3. Emissions to water ........................................................................................................................................ 10
   3.1 Relevant pollutants and emission sources .............................................................................................. 10
4. Off-site waste transfers .................................................................................................................................. 11
   4.1 Relevant wastes ....................................................................................................................................... 11
5. Appendix A Normalisation of emission concentrations ........................................................................... 12
   1. Appendix B Incineration source factors ................................................................................................ 14
      6.1 Releases to air .......................................................................................................................................... 14
      6.2 Releases to controlled waters and transfers in wastewater ...................................................................... 18
2. Appendix C: Dioxins and furans ............................................................................................................... 20
1. Introduction

If we regulate your activity as an A1 installation under the Environmental Permitting (England and Wales) Regulations 2016 (EPR) you will need to submit data to the Pollution Inventory.

You need to report each year. The system opens for reporting on 1 January and the deadline for submitting is 28 February.

Our general guidance sets out how to report and provides information applicable to all business and industries.

In this guidance you will find helpful information specific to the incineration sector. The term incineration includes hazardous waste, clinical waste, municipal, animal byproducts and sewage sludge incineration.

You should report annual mass releases of specified substances to air, water and land, as well as off-site transfers of waste. The reporting of ‘releases to land’ applies only to pollutants in waste which is disposed of by ‘land treatment’ or ‘deep injection’. If waste is treated in this way, substance specific releases must be reported by the operator of the installation producing the waste, regardless of the disposal location. Accidental releases of pollutants onto the soil on the site of a facility (for example spillages) do not have to be reported. This guidance note applies to air, water and off-site waste transfer only.

Pollution Inventory guidance: https://www.gov.uk/government/publications/pollution-inventory-reporting-guidance-notes

Release estimation techniques (RETs) are described in our general guidance.

This is a summary of our preferred RETs for incineration activities:

First preference – use continuous emissions monitoring systems (CEMS) data. Calculate the release based on daily CEMS average and daily average flow, integrated over year. (Note: based on raw/as measured data without subtraction of confidence intervals).

Second preference – use periodic monitoring data. Calculate release based on average of periodic samples and annual flow.

Third preference – use mass balance or emissions factors. Calculate release based on mass balance or emission factors.

Fourth preference – use agreed alternative technique. If you deviate from the above arrangements you need to agree an appropriate technique with us.
2. Emissions to air

Incineration installations subject to Chapter IV of the Industrial Emissions Directive (IED), which supersedes the Waste Incineration Directive, are normally required to be monitored continuously for NOx, total particulate matter, CO, TOC, HCl, HF and SO2. Under certain circumstances, continuous monitoring of HF, HCl and SO2 may not be required and periodic monitoring can be substituted. The specific requirements for continuous or periodic monitoring are laid down in the EPR permit. The permit also specifies frequencies for periodic monitoring for heavy metals, dioxins and furans, dioxin-like PCBs and PAHs. The frequencies required by Chapter IV of the IED are the minimum frequencies for such periodic measurements, but the permit may specify higher frequencies. Additionally, the EPR permit may set additional site specific monitoring requirements depending upon the local circumstances, which may include, where SNCR is in operation, N2O and/or NH3 releases depending on the reductant used.

1.1 Relevant pollutants

The following list details the main air emissions from waste incineration activities and their main sources. Use this list as a guide only and check that there are no other pollutants emitted from your installation. See Appendix B for a summary of currently used RETs.

List 1 – main air emissions from waste incineration activities and their sources

- **Cd** - Flue gas in MSW incinerators from batteries, accumulators, paints and plastics. Hazardous wastes including effluent treatment sludges and drummed waste from metal plating works.

- **CO** - Flue gas as a result of incomplete combustion of waste. For example, if spontaneously evaporating or rapid-burning substances are present, or when combustion gas mixing with the supplied oxygen is poor.

- **CO2** - Flue gas as a result of complete combustion of organic material. Between 0.7 and 1.7 tonnes of CO2 is generated per tonne of MSW combusted.

- **Dioxins and furans** - Flue gas as a result of re-combination reaction of carbon, oxygen and chlorine. Also found in boiler ash, bottom ash, fly ash and sorbents. Dioxin and furan releases should be reported as I-TEQ and WHO-TEQ equivalents as calculated to fulfil the requirements of your EPR permit.

- **HCl** - Flue gas from wastes containing chlorinated organic compounds or chlorides.

- **HF** - Flue gas from fluorinated plastic or fluorinated textiles in MSW and a variety of fluorinated compounds in HWI.

- **Hg** - Flue gas from MSW containing batteries, thermometers, dental amalgam, fluorescent tubes or mercury switches. In HWI from coking plant tars, waste from chlorine alkaline electrolysis, caustic oil sludge from refineries and other chemicals containing mercury. Also found in bottom ash, fly ash and sorbents. In SSI, Hg from sewage (especially dental amalgam).

- **Metals** (Heavy metals and compounds other than Hg and Cd) As, Pb, Cr, Cu, Ni and Sn - Flue gas as particulate matter usually as metal oxides and chlorides. Also found in bottom
ash, fly ash and sorbent.

NH$_3$ - Flue gas where SNCR is used and NH$_3$ is used as a reducing agent.

NO$_x$ - Flue gas as both thermal and fuel NO$_x$. In MSW incinerators the proportion of thermal NO$_x$ is very relevant with each type of grate having an inherent background NO$_x$ level. It is often more significant than fuel NO$_x$.

N$_2$O - Principally from SNCR. Modern MSW incinerators have low combustion-originated N$_2$O but, depending on reagent, significant emissions resulting from SNCR.

PAHs - Flue gas as products of incomplete combustion. Also found in bottom ash, fly ash and sorbents.

Dioxin-like PCBs - Flue gas from most municipal waste streams and some industrial wastes. Higher concentrations in some hazardous waste streams. Also found in bottom ash and APC residues.

Particulate matter (including PM$_{10}$ and PM$_{2.5}$) - Flue gas as fine ash from the incineration process entrained in the gas flow. Also fugitive releases of dust from waste storage areas. Note that emissions of PM$_{10}$ and PM$_{2.5}$ from the stack must be estimated using the method specified in Appendix B and reported accordingly (i.e. the estimated figure or below reporting threshold (brt) as appropriate).

SO$_2$ - Flue gas where sulphur is present in the waste stream. Common sources of sulphur in some waste streams are: waste paper; plaster board (calcium sulphate), and sewage sludges.

VOCs (Total Organic Carbon) - Flue gas from incineration of organic waste. Also fugitive releases from waste storage areas.
1.2 Emission sources

1.2.1 Point source emissions

These emissions are exhausted via a stack or vent, that is, a single point source into the atmosphere. Abatement equipment, for example scrubbing units, fabric filters (bag house) can be incorporated into the exhaust system prior to discharge to atmosphere. Point source (main stack) emissions are usually the most significant emission source (in terms of annual mass releases) for combustion activities taking place within a variety of furnace types at incineration facilities.

1.2.2 Fugitive emissions

Fugitive emissions are those that are not released from a point source such as a stack. Fugitive dust and VOC emissions will be minimised where combustion, flue gas treatment processes and plant in general (including storage areas) operate at negative pressure. Some examples are:

- the loading and unloading of transport containers
- storage areas (for example, bays, stockpiles, and so forth)
- transferring material between vessels (for example, silos, volatile liquids such as SLF)
- conveyor systems
- pipework and ductwork systems (for example, pumps, valves, flanges)
- abatement equipment by-pass
- accidental loss of containment from failed plant and equipment
- oil and ammonia storage tanks
- poor building containment and extraction
- use of poorly sealed waste charging systems

You only need to report fugitive emissions that leave the installation to the PI. You do not need to report contained spills but do need to report vapour emissions that may have dispersed.

1.2.3 Emission factors

General

Provided that unit operations remain consistent, representative monitoring data can be used to generate site specific emission factors. The emission factor will be the ratio of the measured or calculated pollutant emission to the process activity (for example, waste feedstock flow rate). Site-specific emission factors should be periodically verified to ensure their continued validity, especially where waste feedstock quality varies throughout the year. Where different waste feedstocks are used, the emission when using each waste feedstock separately should be determined, and the results added together.

Emission factors are usually expressed as the mass of a substance emitted per unit of activity multiplied by the unit mass, volume, distance, or duration of the activity emitting the substance. In some cases, and particularly in the case of SO₂, the emission factor is
based on waste feedstock analysis data.
In the case of new or modified processes, you can obtain initial emission factors from manufacturers’ data and carry out sampling during commissioning to confirm the assumed values.

**Carbon dioxide factors**

Incinerators are currently exempt from EU ETS reporting requirements. You can use the methodology shown in our general guidance to estimate carbon dioxide emissions from incinerators.

**Waste feedstock analysis and process stream data**

The use of waste feedstock analysis and process stream data to determine emissions is similar to the use of emission factors.

For MSW incineration, analysis of fuel is not used for calculation of emissions. Either analysis is not carried out, is too variable, is too unreliable or cannot be related to emissions.

The basic equation used in waste feedstock analysis emission calculations is:

\[
E = Q_f \times \text{[Op hours]} \times \left[ \frac{PC_f}{100} \right] \times \left( \frac{MM_p}{EM_f} \right) 
\]  
(Equation 1)

Where:

- \(E\) = emission of pollutant, kg/yr
- \(Q_f\) = waste feedstock, kg/hr
- \(PC_f\) = pollutant concentration in the waste feedstock (%)
- \(\text{Op hrs}\) = operating hours per year, hr/yr
- \(MM_p\) = molar mass of pollutant as emitted after combustion
- \(EM_f\) = relative atomic mass of polluting element as present in waste feedstock.

Equation 1 is the method usually used for calculating \(SO_2\) emissions where it is normally assumed that all of the sulphur in the waste feedstock is converted to \(SO_2\).

Where the pollutant concentration in the waste feedstock is consistent over the averaging period (that is, one year), Equation 1 can be written as:

\[
E = M \times \left[ \frac{PC_f}{100} \right] \times \left( \frac{MM_p}{EM_f} \right) 
\]  
(Equation 2)

Where:

- \(E\) = emission rate of pollutant in kg/yr
- \(M\) = mass of waste feedstock burnt in one year (kg/yr)
- \(PC_f\) = pollutant concentration in the waste feedstock (%)
- \(MM_p\) = molar mass of pollutant as emitted after combustion
- \(EM_f\) = relative atomic mass of polluting element as present in waste feedstock.

You can use Equation 1 for volatile elements such as fluorine and chlorine as well as trace metallic pollutants, although some of these species are retained in the plant, either in the ash or in abatement equipment. You should apply appropriate retention factors.
When using Equation 1 or Equation 2, you should be aware that the amounts of pollutants present in the waste feedstock can vary significantly.

**Fugitive emissions**

See Appendix C for methodologies and factors used to determine fugitive emissions.

### 1.2.4 Normalisation

Take care in all calculations to ensure that the emission concentration and flow rate are compatible. For example, normalised emission concentrations should be multiplied by normalised volumetric flow rates or actual, measured emission concentrations multiplied by actual, measured volumetric flow rates. Normalised emission rates are quoted in terms of a standard oxygen concentration, and are usually dry gas, at a temperature of 273K and a pressure of 101.3 kPa. See Appendix A for formulae for conversion between normalised and actual emission concentrations.
3. Emissions to water

Emissions of substances to water can be either direct to controlled waters or indirect, following transfer to off-site effluent treatment plant.

Guidance on what constitutes an emission or a transfer is contained in the general PI guidance document.

2.1 Relevant pollutants and emission sources

Water discharges from incineration processes arise from the air abatement equipment (for example, wet scrubbers), storm water, cooling water, boiler blow-down, incoming waste handling areas, ash and other residue handling areas, accidental emissions of raw materials, products or waste materials, firefighting and from on-site effluent treatment. Table 3 illustrates the main pollutants emitted to water and their main sources. Suspended solids are not a PI reportable substance. Check that there are no other substances emitted from the process, including in association with suspended particulate. See Appendix B for methodologies used to determine emissions to water.

This following list details the main water pollutants generated by incineration activities and their main sources.

List 2 - main water emissions from waste incineration activities and their sources

Dioxins and furans - Scrubber liquor, releases from ash quenching
Ethylene dichloride - Scrubber liquor, releases from ash quenching
Metals - Waste storage, scrubber liquor, releases from ash quenching
PAHs - Scrubber liquor, releases from ash quenching
Suspended solids - Raw material preparation, storage and handling, scrubber liquor, releases from ash quenching
TOC - Waste storage, scrubber liquor, releases from ash quenching

Note: At some installations waste water will pass through an on-site effluent treatment plant prior to discharge into controlled waters.

The resulting discharges of the above substances depend on the ‘in process’ preventative measures (good housekeeping, re-use) and the presence and technical standards of waste water treatment facilities.

You should consider all emission sources to water and characterise the flows and emission concentrations from each source.

4. Off-site waste transfers
Wastes must be classified by the List of Wastes Regulations 6-digit code(s) and by the relevant Waste Framework Directive disposal or recovery code(s) (D&R).

There is no reporting threshold for hazardous wastes, which are indicated by an asterisk in the List. For all other List/D&R code combinations, a reporting threshold of 5 tonnes applies.

Any transfer of waste off-site to a third party is covered by the Duty of Care provisions of the Environmental Protection Act 1990. This includes the requirement to describe the waste and record the quantity. Use the data you generate to comply with Duty of Care requirements to complete your PI return.

3.1 Relevant wastes

In general the waste streams from incineration facilities comprise:

- **Bottom ash** (approx. 25% by weight and 10% by volume of input for a modern Municipal Waste Incinerator MWI), (19 01 11 – where bottom ash contains hazardous substances and 19 01 12 where it does not)
- **Fly ash** (19 01 13 where fly ash contains hazardous substances and 19 01 14 where it does not) (where fly ash is combined with APC residues, include it in the mass of APC residue.)
- **Air pollution control (APC) residues** (commonly combined with fly ash and then approx. 2.5% by weight of waste input for a modern MWI) (19 01 07)
- **Rejected feedstock wastes** (chemical or physical incompatibility, for example large objects)
- **Recovered waste fractions**, for example steel and aluminium extracted from ash. (19 01 02 ferrous materials removed from bottom ash)
5. Appendix A Normalisation of emission concentrations

In many cases, pollutant emission concentrations to air are reported as normalised concentrations, the actual measured emission concentration having been adjusted to a normalised temperature (273K), oxygen, pressure and/or water vapour concentration. In calculating mass emissions to air, it is important that either the actual release concentration is multiplied by the actual volumetric flow rate, or the normalised concentration is multiplied by the normalised volumetric flow rate.

The following equations can be used to correct measured concentrations and flow rates for temperature, oxygen, pressure and water vapour content.

**Concentrations**

**To correct for moisture concentration to dry (0% oxygen)**

\[ C_d = C_m \times \frac{100}{(100 - \%H_2O)} \]

Where:  
- \( C_d \) is the dry concentration  
- \( C_m \) is the measured concentration  
- \( \% H_2O \) is the measured water vapour percentage

**To correct the % oxygen to dry basis (if required – may already be measured dry)**

\[ O_2(\text{dry}) = O_2m \times \frac{100}{(100 - \%H_2O)} \]

Where:  
- \( O_2(\text{dry}) \) is the dry oxygen percentage  
- \( O_2m \) is the measured oxygen percentage

**To correct to normalised oxygen concentration**

\[ C_{corr} = C_d \times \frac{20.9 - O_{2\text{norm}}}{20.9 - O_2(\text{dry})} \]

Where:  
- \( C_{corr} \) is the corrected concentration for oxygen concentration  
- \( O_{2\text{norm}} \) is the stated normalised oxygen percentage

**To correct for temperature**

\[ C_{\text{norm}T} = C_{corr} \times \frac{(273 + T_m)}{273} \]

Where:  
- \( C_{\text{norm}T} \) is the normalised concentration for temperature  
- \( T_m \) is the measured temperature in degrees centigrade

**To correct for pressure**

\[ C_{\text{norm}} = C_{\text{norm}T} \times \frac{101.3}{P_m} \]

Where:  
- \( C_{\text{norm}} \) is the normalised concentration  
- \( P_m \) is the measured pressure in kPa
**Volumetric flow rates**

**To correct for moisture concentration to dry (0% oxygen)**

\[ Q_d = Q_m \times \left(\frac{100 - \%H_2O}{100}\right) \]

Where:
- \(Q_d\) is the dry volumetric flow rate
- \(Q_m\) is the measured volumetric flow rate
- \(\%H_2O\) is the measured water vapour percentage

**To correct the % oxygen to dry basis (if required – may already be measured dry)**

\[ O_2(\text{dry}) = O_{2m} \times \left(\frac{100}{100 - \%H_2O}\right) \]

Where:
- \(O_2(\text{dry})\) is the dry oxygen percentage
- \(O_{2m}\) is the measured oxygen percentage

**To correct to normalised oxygen concentration**

\[ Q_{\text{corr}} = Q_d \times \left(\frac{20.9 - O_2(\text{dry})}{20.9 - O_{2\text{norm}}}\right) \]

Where:
- \(Q_{\text{corr}}\) is the corrected volumetric flow rate for oxygen concentration
- \(O_{2\text{norm}}\) is the stated normalised oxygen percentage

**To correct for temperature**

\[ Q_{\text{normT}} = Q_{\text{corr}} \times \left(\frac{273}{273 + T_m}\right) \]

Where:
- \(Q_{\text{normT}}\) is the normalised volumetric flow rate for temperature
- \(T_m\) is the measured temperature in degrees centigrade

**To correct for pressure**

\[ C_{\text{norm}} = C_{\text{normT}} \times \left(\frac{P_m}{101.3}\right) \]

Where:
- \(C_{\text{norm}}\) is the normalised volumetric flow rate
- \(P_m\) is the measured pressure in kP
1. Appendix B Incineration source factors

3.2 Releases to air

The following table shows the pollutants potentially emitted from typical incineration processes. In the Method column, M = measurement, C = calculation and E = estimation (engineering judgement). For pollutants not contained within this table a return of not applicable (n/a) is in most cases to be expected, to indicate that this pollutant is not knowingly discharged by the site.
Table 1 Emissions to Air
<table>
<thead>
<tr>
<th>Determinand</th>
<th>Method</th>
<th>Emission source</th>
<th>Literature reference</th>
<th>Factors and guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>C</td>
<td>Waste combustion</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Benzo(a)pyrene</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS ISO 11338</td>
<td>BS ISO 11338 for extractive monitoring</td>
</tr>
<tr>
<td>Butadiene</td>
<td>C</td>
<td>Waste combustion</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>CO</td>
<td>M</td>
<td>Waste combustion</td>
<td>CEN/ISO/MCERTS</td>
<td>Continuous and periodic monitoring carried out for all incinerators covered by Chapter IV IED. BS EN14181 for CEMs.</td>
</tr>
<tr>
<td>CO₂</td>
<td>C</td>
<td>Waste combustion</td>
<td>EU ETS M&amp;R Methodology (2004/156/EC)</td>
<td>Although incinerators are not subject to the EU ETS requirements the EU ETS methodology is considered best practice.</td>
</tr>
<tr>
<td>CH₄ (see note 1)</td>
<td>C</td>
<td>MSW combustion</td>
<td>Environment Agency (1997)</td>
<td>0.0008 kg/t of MSW combusted</td>
</tr>
<tr>
<td></td>
<td>C</td>
<td>SSW combustion</td>
<td>USEPA 1995</td>
<td>0.39 kg/t of SSW combusted in multiple hearth (controlled)</td>
</tr>
<tr>
<td></td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN1948</td>
<td>Periodic monitoring required for Chapter IV IED incinerators.</td>
</tr>
<tr>
<td>Dioxins &amp; Furans</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN1948</td>
<td></td>
</tr>
<tr>
<td>HCl</td>
<td>M</td>
<td>Waste combustion</td>
<td>MCERTS/BS EN</td>
<td>BS EN14181 for CEMs and BS EN1911 (or demonstrated equivalent) for periodic monitoring carried out for all incinerators covered by Chapter IV IED</td>
</tr>
<tr>
<td></td>
<td>C</td>
<td>MSW combustion</td>
<td>USEPA 1995</td>
<td>3.2 Kg/t of MSW combusted</td>
</tr>
<tr>
<td></td>
<td>C</td>
<td>SSW combustion</td>
<td>USEPA 1995</td>
<td>0.05 Kg/t of SSW combusted on fluidised bed (controlled)</td>
</tr>
<tr>
<td></td>
<td>C</td>
<td>CW combustion</td>
<td>USEPA 1995</td>
<td>16.8 Kg/t of CW combusted</td>
</tr>
<tr>
<td>Fluorine and inorganic</td>
<td>M</td>
<td>Waste combustion</td>
<td>ISO/USEPA</td>
<td>BS EN14181 for CEMs and USEPA Method 26A for periodic monitoring. Not all Chapter IV IED incinerators are required to monitor HF continuously.</td>
</tr>
<tr>
<td>compounds</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NH₃</td>
<td>M</td>
<td>SNCR nitrogen oxide</td>
<td>MCERTS certified equipment</td>
<td>Continuous or periodic monitoring may be required depending upon BAT assessment. US EPA Method 26</td>
</tr>
<tr>
<td>NMVOCs</td>
<td>M</td>
<td>Waste combustion</td>
<td>MCERTS/BS EN 12619</td>
<td>CEM and extractive monitoring required</td>
</tr>
<tr>
<td>waste type</td>
<td>combustion</td>
<td>source</td>
<td>emissions</td>
<td>notes</td>
</tr>
<tr>
<td>------------</td>
<td>------------</td>
<td>--------</td>
<td>-----------</td>
<td>-------</td>
</tr>
<tr>
<td>MSW</td>
<td></td>
<td>Environment Agency (2000)</td>
<td>0.0308 kg/t of MSW combusted</td>
<td></td>
</tr>
<tr>
<td>SSW</td>
<td></td>
<td>USEPA 1995</td>
<td>0.84 kg/t of SSW combusted in multiple hearth (uncontrolled)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fugitive VOC releases</td>
<td>None</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td>N\textsubscript{2}O (see note 2)</td>
<td>Waste combustion</td>
<td>None</td>
<td>Extractive monitoring required for Chapter IV IED. (ASTM D634803, ISO 10849, VDI2469-1)</td>
</tr>
<tr>
<td></td>
<td>PAHs (see note 3)</td>
<td>Waste combustion</td>
<td>BS ISO</td>
<td>BS ISO11338 for extractive monitoring</td>
</tr>
<tr>
<td></td>
<td>PCBs</td>
<td>Waste combustion</td>
<td>CEN/BS EN</td>
<td>BS EN1948 for dioxin like PCBs extractive monitoring</td>
</tr>
<tr>
<td>Total Particulate Matter</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS ISO/BS EN</td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>---</td>
<td>------------------</td>
<td>-------------</td>
<td></td>
</tr>
</tbody>
</table>
| Continuous monitoring carried out for all incinerators covered by Chapter IV IED. BS EN13284-2 for CEMs and BS EN13284-1 for SRM. For plants that use their particulate continuous emissions monitoring systems (CEMS) as indicative monitors as per the Environment Agency’s M20 guidance, a conservative estimate of the annual total particulate emissions shall be made on the basis of the normalised annual flow (for each line in the case of a multi-line plant) multiplied by the highest single result obtained from periodic monitoring (for each line if applicable) over the last 3 years (or since the start of regular operation if less than 3 years data are available), excluding commissioning. A shorter period of time than 3 years may be agreed with the Environment Agency if the plant has undergone maintenance within the last 3 years which will have reduced particulate emissions (e.g. replacement of the bag filters). Periodic monitoring will include all tests for calibration and validation of the CEMS (QAL2) and annual surveillance tests (ASTs) carried out under BS EN 14181, as well as any further periodic monitoring specified in the permit or agreed in writing with the Environment Agency. Periodic monitoring in this instance can be an attempted QAL2 or AST, in which case a single result means the average of the samples obtained over the test period under normal operating conditions (normally 15 results for a QAL2 or 5 for an AST). Otherwise if no QAL2 or AST has been attempted, a single result will be a single sample or the average of triplicate (or more) samples taken as part of any other single test campaign.
under normal operating conditions. Alternatively, as per the M20 guidance, operators may instead assume that the plant operates constantly at 30% of the daily ELV (i.e. the maximum allowable uncertainty) and multiply this figure by the normalised annual flow.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Type</th>
<th>Source</th>
<th>Method</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$<em>{10}$ and PM$</em>{2.5}$</td>
<td>E</td>
<td>Waste Combustion</td>
<td>None</td>
<td>In order to provide a conservative estimate, the same annual mass emission as that calculated for total particulate matter (TPM) should be used for both pollutants i.e. assume that TPM = PM$<em>{10}$ = PM$</em>{2.5}$</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>M</td>
<td>Waste combustion</td>
<td>CEN/ISO/MCERTS</td>
<td>BS EN14181/BS 6069 (ISO 7935) for CEMs and BS EN14791 (SRM). BS ISO11632/BS ISO 6069 alternatives for extractive monitoring</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>C</td>
<td>MSW combustion</td>
<td>Environment Agency 2000</td>
<td>0.076 kg/t of MSW combusted</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>C</td>
<td>SSW combustion</td>
<td>USEPA 1995</td>
<td>2.3 kg/t of SSW combusted in multiple hearth (venturi scrubber)</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>C</td>
<td>SSW combustion</td>
<td>USEPA 1995</td>
<td>0.15 kg/t of SSW combusted in fluidised bed (uncontrolled)</td>
</tr>
<tr>
<td>SO$_x$</td>
<td>C</td>
<td>CW combustion</td>
<td>USEPA 1995</td>
<td>1.09 kg/t of CW combusted in controlled air (uncontrolled)</td>
</tr>
<tr>
<td>As</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Cd</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Cu</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Cr</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Hg</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Mn</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Ni</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Pb</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Sb</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>V</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring</td>
</tr>
<tr>
<td>Zn</td>
<td>M</td>
<td>Waste combustion</td>
<td>BS EN</td>
<td>BS EN14385 for extractive monitoring (see note 4)</td>
</tr>
</tbody>
</table>
Notes:
1. Option exists for methane emissions to be included in future phases of the EU ETS – estimation methodologies may warrant re-evaluation when EU monitoring and reporting decisions are published.
2. Option exists for N₂O emissions to be included in future phases of the EU ETS – estimation methodologies may warrant re-evaluation when EU monitoring and reporting decisions are published.
3. From 2006 the PI Schedule requires reporting of the annual emissions of listed individual PAH compounds (with individual reporting thresholds) rather than a PAH total.
4. Although not specifically validated for zinc, BS EN14385 will be applicable in most cases (see Environment Agency “Metals” Method Implementation Document)
3.3 Releases to controlled waters and transfers in wastewater

For any releases to water from once-through cooling, data should reflect the pollutant load taking into account incoming cooling water quality. Where this would result in a negative return (that is, removal of pollutants from incoming waters) make a n/a return, unless alternative local arrangements have been made with us.

The following list shows the main water pollutants that could be discharged from effluent treatment facilities and their analytical methods. In all cases it is expected that the release of these pollutants would be measured with by monthly flow proportional sampling or continuous monitoring (as specified in the permit). The list is not exhaustive, and other analytical methods may be appropriate

List 3 analytical methods for water pollutants

As - BS EN ISO 11969

Cd - BS EN ISO 17294


Chloroform - BS EN ISO 10301

Cr - BS EN ISO 11885 BS EN ISO

Cu - BS EN ISO 11885 BS EN ISO

Ethylene dichloride - BS EN ISO 10301

Hg - BS EN 13506

Naphthalene - BS ISO 17993 USEPA Method

Ni - BS EN ISO 11885 BS EN ISO

PAHs (The include * Benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, indeno(123-cd)pyrene) - BS ISO 17993 USEPA method 0610

Pb - BS EN ISO 11885 BS EN ISO
**PCBs** - USEPA methods 0680, 1668

**TOC** – no reference method currently listed or continuous monitoring

**Tributyl Tin** - BS ISO 18073:2004

**Zinc** - BS EN ISO 11885 BS EN ISO
2. Appendix C: Dioxins and furans

This family of compounds is known chemically as polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs). Each compound is made up of two benzene rings interconnected by oxygen atoms. Each individual PCDD or PCDF is termed a congener (there are 210 congeners in total). In reporting dioxin and furan releases, only the mass of PCDD and PCDF with chlorine atoms in the 2, 3, 7 and 8 positions (which are of particular environmental concern) should be included. The 17 relevant PCDD and PCDF congeners are listed in Tables 2 and 3.

Table 2 PCDD

<table>
<thead>
<tr>
<th>Congener</th>
<th>WHO-TEF</th>
<th>I-TEF</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,3,7,8-TCDD</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>1,2,3,7,8-PeCDD</td>
<td>1</td>
<td>0.5</td>
</tr>
<tr>
<td>1,2,3,4,7,8-HxCDD</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>1,2,3,7,8,9-HxCDD</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>1,2,3,6,7,8-HxCDD</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>1,2,3,4,6,7,8-HpCDD</td>
<td>0.01</td>
<td>0.1</td>
</tr>
<tr>
<td>OCDD</td>
<td>0.0003</td>
<td>0.001</td>
</tr>
</tbody>
</table>

Table 3 PCDF

<table>
<thead>
<tr>
<th>Congener</th>
<th>WHO-TEF</th>
<th>I-TEF</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,3,7,8-TCDF</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>2,3,4,7,8-PeCDF</td>
<td>0.3</td>
<td>0.5</td>
</tr>
<tr>
<td>1,2,3,7,8-PeCDF</td>
<td>0.03</td>
<td>0.05</td>
</tr>
<tr>
<td>1,2,3,4,7,8-HxCDF</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>1,2,3,7,8,9-HxCDF</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>1,2,3,6,7,8-HxCDF</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>2,3,4,6,7,8-HxCDF</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>1,2,3,4,6,7,8-HpCDF</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>1,2,3,4,7,8,9-HpCDF</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>OCDF</td>
<td>0.0003</td>
<td>0.001</td>
</tr>
</tbody>
</table>

The two ways we want you to report the toxicity of dioxin releases are International toxicity equivalents (I-TEQs) and World Health Organisation toxicity equivalents (WHO-TEQ). Each dioxin congener is assigned a toxic equivalency factor (I-TEF for the International scheme and WHO-TEF for the WHO scheme). The 2,3,7,8-TCDD isomer is the most toxic, and is assigned a TEF of 1.0. The remaining 2,3,7,8-positional congeners are then assigned lower relative TEFs.

The toxicity mass of a particular substance relative to 2,3,7,8-TCDD can then be expressed by multiplying the mass of those 2,3,7,8-positional congeners present in the mixture by their respective TEFs. The resulting toxic equivalents (TEQs) are expressed as masses in the same way that the individual congeners are expressed.

You must give the total quantity of dioxins and furans in terms of their I-TEQs and WHO-TEQs.

TEFs for each of the 17 relevant 2,3,7,8-positional congeners of PCDDs and PCDFs are presented in Tables 2 and 3. All other congeners that may be present in a sample are not
reported.

**Worked example - calculating Dioxin and furan releases**

If monitoring data representative of annual releases are available, you can get the TEQ of the mixture by summing the individual TEQs as follows:

**Step 1**: Calculate the TEQ for each congener released. Multiply the concentration (per m$^3$) of each released congener by its TEF and then by the total volume released in that year (in m$^3$) to provide the TEQ.

**Step 2**: Calculate the total TEQ released. Add together the TEQs of all the congeners released. Carry out Steps 1 and 2 for both sets of TEFs.
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